



NORWICH City Council

Committee Name: Sustainable development panel

Committee Date: 16/11/2021

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

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

Report from: Head of planning and regulatory services

Wards: All Wards

OPEN PUBLIC ITEM

Purpose

To report and discuss the findings of the 2021 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor.

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

Recommendation:

To note:

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

Policy Framework

The Council has three corporate priorities, which are:

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

This report meets all three corporate priorities.

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

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

Report Details

1. This report presents the findings of the 2021 Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor.
2. The Norwich City Centre Shopping and Town Centre Floorspace Monitor & Local and District Centres Monitor is the council's monitoring report advising of vacancy rates and changes of shop type in the city. Regular monitoring ensures that the council can assess the implementation of its retail policies and gauge their effectiveness. Previously the main purpose of the reports has been to measure vacancy rates for retail (formerly Use Class A1) and to provide data on the total amount of retail floorspace within the city centre. However recently it has been identifying that there is a need for greater flexibility to allow our high streets to evolve in order for them to thrive and particularly due to changes to the Use Classes Order and to government policy which have been introduced in the past year and due to the policy approach set out in the emerging Greater Norwich Local Plan, now is felt the best time to extend the scope of the Monitor.
3. The Monitor is based on a survey of the city's retail offer carried out in July 2021. This report updates members from the last monitor produced in October 2019. The 2019 survey reported on how remarkably resilient Norwich city centre has been in adapting to the unprecedented challenges arising from wider societal changes in employment patterns, shopping habits and leisure activities. The October 2019 report was published before the start of the COVID-19 pandemic and no-one could have anticipated what Norwich, the country and the world would go through in the coming couple of years.
4. As has been the case nationally, it is clear that the COVID pandemic has had an impact upon our high street and the monitoring report seeks to start to understand what changes have occurred since the last survey in October 2019.
5. Since the 2019 report there have been changes to both the Use Classes Order and Permitted Development Order which are likely to have an effect on the health of our city centre and district and local centres. The creation of a new Class E (commercial, businesses and services) means that buildings used for any purpose within Class E can now change to any other use within Class E without the need for planning permission. The introduction of Class MA now allows for the change of use from Class E to residential without considering all material planning considerations. The government's intention is that these measures will help high streets to adapt and thrive; however the Council has concerns that allowing the change of use to residential without the Council being able to consider the impact that the loss of town centre uses will have upon the viability and vibrancy of our centres could be harmful.

Main findings of the 2021 Retail Monitor

6. The Norwich City Centre Shopping Floorspace Monitor and Local and District Centres Monitor (July 2021) is attached as Appendix 1. The main findings of the monitor are set out below:
 - (a) The vacant available retail *floorspace* in the city centre is 14.5% which is a significant increase from 2019's figure of 5.5%. Unsurprisingly this is the highest vacancy rate that we have seen in the plan period. Previously the highest figure in the plan period was 12.4% in 2010 which compares to the

lowest figure of 4.2% which was experienced in 2014. City centre retail vacancy rates 'as a proportion of all retail floorspace' have also increase from 10.0% in October 2019 to 15.2% in July 2021.

- (b) The percentage of vacant units has also increased from 10.1% to 14.1%. Whilst this is a significant increase of +4% it does still compare favourably to the average GB retail vacancy rate of 15.8% (Local Data Company, September 2021¹).
- (c) In terms of all town centre uses, vacant floorspace currently stands at 16.2% and vacant units at 15.2% which are both around 1% higher than retail only vacancies.
- (d) Overall the amount of retail floorspace in the city centre has decreased slightly since the last survey in October 2019. The amount of retail floorspace reduced by 1,534m² which is a 0.7% decrease. Whilst this is a relatively large decrease it is significantly less than in the previous monitoring period where between June 2018 and October 2019 the overall retail floorspace reduced by 6,231m² which was a 2.8% decrease, largely due to the change of use of a number of units within Castle Quarter to leisure use. Interestingly the total number of retail units has remained the same between October 2019 and July 2021 which would suggest that some smaller units have actually changed back to retail.
- (e) Since the last survey was carried out a large number of national chains have been lost from the city centre whereas independent shops, particularly within the secondary retail area and the Magdalen Street Large District centre, have been more resilient during the pandemic.
- (f) Within the Primary retail area vacant available floorspace currently stands at 14.5% which is a significant increase from before the pandemic when vacancy rates were at an extremely low rate of 4.1% in October 2019. Most of the primary area retail frontage zones are performing reasonably well in terms of their retail function with all of them being within their recommended minimum percentage rate of A1 retail. Levels of non-retail have crept up in five of the seven frontage zones; however in one zone retail levels have actually increased.
- (g) Retail vacancies have continued to increase in the secondary retail areas since 2018 and in terms of available floorspace are now 23.1%. This high vacancy rate is primarily due to the closure of Toys R Us in April 2018 and the closure of a further unit in the Cathedral Retail Park during this monitoring period. If these units are omitted from both the vacant floorspace and total floorspace, the vacancy rate in the secondary retail area would only be 6.7% which is well below the national average and one of the lowest in the city centre. This shows that this secondary retail area (excluding the Cathedral retail park) is still performing well in providing independent retail diversity and by adapting rapidly it appears that it has remained resilient during the pandemic.
- (h) In the Large District Centres, vacancy rates have increased from 3.3% in 2019 to 9.1%. This is a low figure for a shopping area which does not form a central part of the city's retail offer. The vacancy rate in Riverside is 13.7% for floorspace and 19.0% for units whereas the Magdalen Street, Anglia

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

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

- (i) In the rest of the city centre (streets outside the defined areas), vacant available floorspace has increased significantly from 5.9% in 2019 to 13.7% in 2021. Historically available vacancy rates have been fairly high in the rest of the city centre with for example in 2014 vacancies being 18.3%; however in October 2019 the rate was exceptionally low at only 5.9% which was a bit of an anomaly. The percentage of vacant retail units in the rest of the city centre has more than doubled from 22 units (9.2%) in October 2019 to 25 units (19.4%) in July 2021. Whilst this is a significant increase it is no higher than it was in June 2018.
 - (j) Vacancy rates in the ten existing district centres have increased marginally to 9.8% from 9.7% which is significantly lower than it was in 2018 where 11.6% of units stood vacant. Vacancy rates in the 28 local centres have increased to 12.7% from 7.1% in 2019. Vacancy rates vary considerably within each of the district and local centres but overall the centres have a lower average vacancy than the city centre. This would suggest that the local centres are continuing to be relatively robust and vibrant and to offer an appropriate range of local services and facilities, with food stores being most important to their success. This may suggest that during the pandemic more people shopped locally.
 - (k) Over the past decade there has been a significant growth in out of town retailing, particularly in South Norfolk and Broadland with new comparison goods shops opening as well as a significant growth in the number of supermarkets and fast food outlets. Furthermore there has been a significant change in the nature of several of Norwich's employment areas and not only have a lot of DIY trade counters for instance opened, another noticeable change is the number of leisure uses that are now on employment sites.
7. Retail vacancy rates have risen significantly since October 2019 and rates have increased in all city centre areas as well as within the District and Local Centres. This is unsurprising given the challenging circumstances faced by retailers and given that there have been three lockdowns when all shops and leisure facilities have been forced to close other than essential retail. Furthermore for much of the period footfall within the city centre has been extremely low partly due to the 'work at home' message and also due to people choosing to either shop locally or turning to online retailing.
8. Many shops have managed to reopen following lockdowns but despite there being business rate relief and other government support many shops have been unable to survive the impact of the pandemic. In particular, Norwich has lost a significantly high number of multiples over the monitoring period and a number of these such as Debenhams and Topshop previously occupied large and prominent locations. Notwithstanding this it would appear that many of Norwich's independent retailers have been performing well and this can be shown by the low vacancy rates within both the secondary retail area (when excluding the Cathedral Retail Park) and the Magdalen Street, Anglia Square &

St Augustine's LDC where vacancy rates are only 6.7% and 7.0% which is extremely low when compared to a national average retail vacancy rate of 15.8%. There has also been some new chains opening in Norwich which would suggest that Norwich is seen as a good place to invest.

9. In terms of the total amount of retail floorspace within the city centre, whilst it continues to decrease, the rate has slowed and during this monitoring period there has only been a reduction of 1,534m² (0.7%) which is considerably less than that which was lost in 2018/19 where retail floorspace decreased by 6,231 m² (2.7%). Given the changes to the Use Classes Order and the General Permitted Development Order and the future change in policy approach that is likely to be brought in through the GNLP it is anticipated that this trend will continue, but we do not yet know at what rate.
10. Although this runs counter to the aims of JCS policy 11 (to increase the amount of retailing in the city centre), it can be regarded as in support of the policy's aim to increase other uses such as the early evening economy, employment and cultural and visitor functions to enhance vitality and viability. It also conforms to paragraph 85 of the NPPF which allows for diversification in order to respond to changes in the retail and leisure industries and the Avison Young "Greater Norwich Town Centres & Retail Study Update" (December 2020) which sets out that there is an oversupply of comparison goods retail floorspace in Norwich which may mean that some units (possibly such as those with a large floorspace in secondary retail areas/the large district centres e.g. Cathedral Retail Park) need to be repurposed to other town centre uses or uses that are compatible in a town centre environment.
11. The retail sector both nationally and within Norwich has experienced a lot of challenges in recent years brought about by changing consumer behaviour driven by technology and prevailing economic conditions and the past 18 months have been even more challenging as a result of the COVID pandemic. These challenges are likely to have an ongoing impacts for the viability of some retail businesses.
12. It is however encouraging that footfall has significantly increased following the lifting of restrictions, particularly in terms of visitors to the city. With the majority of adults now having received their COVID vaccine it is hoped that confidence will continue to build and people will start to use the high street in a similar way than they did before the pandemic. Whilst a number of multiples have ceased trading within Norwich, there is clearly investment happening with new chains arriving. Furthermore with so many improvements taking place to the public realm, this should enhance the shopping and leisure experience and make it easier for people to get around.
13. It is however important to acknowledge that there are many changes that can now take place within retail centres without the requirement for planning consent from the council which include the change of use to other town centre uses but also the change of use to residential. The added flexibility within retail centres could reduce vacancy rates and provide a wider range of amenities and services but the Council have also identified a number of risks associated with this. Whilst we acknowledge that retailing and town centres are currently in a state of flux, this reinforces the need to protect and promote town centres to allow them to recover and evolve in a planned manner and we are concerned

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

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

Consultation

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

Implications

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

Financial and Resources

17. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2019-22 and Budget.
18. There are no proposals in this report that would reduce or increase resources. Staff time to carry out the monitor is met from existing budgets.

Legal

19. There are no legal implications.

Statutory Considerations

Consideration	Details of any implications and proposed measures to address:
Equality and Diversity	The report is not likely to affect people because of their protected characteristics.
Health, Social and Economic Impact	Whilst the report itself does not have any health, social and economic impacts, the findings of the retail monitor should be used to inform future planning decisions and the future direction of travel in terms of town centre and retailing policies. These could have quite significant social and economic impacts. These impacts will need to be assessed as part of the decision making process or when considering what changes will need to be made to our policies in the future.
Crime and Disorder	No likely implications
Children and Adults Safeguarding	No likely implications
Environmental Impact	No likely implications

Risk Management

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

Other Options Considered

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

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

Reasons for the decision/recommendation

22. The recommendation is to note the findings and to consider what implications they have both in terms of informing planning decisions and considering the future direction of our planning policies. Consideration also needs to be given to whether the council should increase the frequency of retail monitoring. It is not recommended to make changes to policies at this point in time due to resource implications; however it is useful to begin discussions.

Background papers: None

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

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



Survey at July 2021

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Introduction

1. Norwich city centre is the pre-eminent regional centre in the East of England, focused on a historic city centre with a wealth of heritage assets and an unrivalled historic and natural environment. It accommodates the majority of jobs, key services and economic, leisure and cultural facilities serving much of Norfolk and north Suffolk. It is within the top 15 retail destinations in the UK. The established approach to planning for Norwich city centre has been cited as an example of best practice by 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 October 2019 with surveys done of both the City Centre and the District and Local Centres. A report was written entitled Norwich City Centre Floorspace Monitor & Local & District Centres which reported how remarkably resilient Norwich city centre has been in adapting to the unprecedented challenges arising from wider societal changes in employment patterns, shopping habits and leisure activities. The October 2019 report was published before the start of the COVID-19 pandemic and no-one could have anticipated what Norwich, the country and the world would go through in the coming couple of years.
3. In order to gain some indication as to how our high street was coping in the middle of a pandemic, in October 2020 a survey was carried out of the city centre retail area. A decision was made that a full report would not be written at this time as it would be better to carry out an additional survey in early 2021 in order to give a better understanding of what impacts COVID-19 has had on our city. Furthermore, the decision was made in October 2020 not to survey the District and Local Centres due to the practicalities of doing this during the pandemic.
4. Restrictions were in place longer than anticipated and for this reason it was felt best to delay the 2021 survey until restrictions were lifted. The lifting of restrictions in England took place on 19th July 2021 so a decision was made to do the survey work at the end of July. This delay in completing the survey work also allowed for a period of adjustment for essential and non-essential retail as well as the hospitality industry as they had been allowed to open for several months which has provided time to see which business have been able to survive and which businesses unfortunately have had to close their doors permanently.
5. As has been the case nationally, it is clear that the COVID pandemic has had an impact upon our high street and this report seeks to start to understand what changes have occurred since the last survey in October 2019. Previously the main purpose of the reports has been to measure vacancy rates for retail (formerly Use Class A1) and to provide data on the total amount of retail floorspace within the city centre. However over recent years

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

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

6. Particularly given changes to the Use Classes Order it is now proposed that this report also includes some data on vacancy rates for a wider range of town centre uses (such as financial and professional services, restaurants and cafes, drinking establishments, hot food takeaways, offices, medical and health services, sport and leisure uses and betting shops) as it is important that we start to look at our high street holistically. With the amount of total retail floorspace reducing year on year we now need to look at what contribution other town centre uses are making to the long-term vitality and viability of Norwich City Centre and it is hoped that this revised scope provides an improved understanding of the 'health' of the city centre overall and the impacts of current relaxations both on the city centre and more widely. As this is the first year of reporting vacancies for all town centre uses, we are unable to look at trends, however in the future this should help assist with policy monitoring and help inform / support initiatives such as a city centre strategy. The report also provides some information on Norwich's out of town retail centres as this is an area where there has been some growth in recent years which may impact upon the City Centre.

Policy Context

Existing policy framework

7. The National Planning Policy Framework 2019 (NPPF 2019) was published in February 2019. It states in paragraph 85 that planning policies and decisions should "support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation". "Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters." The revised NPPF no longer has the requirement for definition of primary and secondary frontages and instead it promotes flexibility and diversification. It recognises the changing face of the high street and the need to take a different approach to retail planning policy in order to reinvigorate and adapt the offering focused in primary centres/core areas to successfully prepare for future; this includes suitable provision of leisure uses and housing within town centres.
8. The Joint Core Strategy (JCS) was adopted in March 2011, with amendments adopted in January 2014 by the three local planning authorities in the Greater

Norwich Development Partnership (GNDP)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 autumn 2022 following the Local Plan examination in early 2022.

9. Policy 11 of the JCS for Norwich city centre states that its regional centre role will be strengthened and that the retail, cultural and leisure facilities offered in the city will be expanded and enhanced through intensification of retail uses in the primary retail area and its expansion if necessary. The policy also promotes the strengthening of specialist shopping areas in secondary areas of the city centre.
10. Policy 19 of the JCS promotes the strengthening of the Large District Centres (LDCs) at Anglia Square, Magdalen Street & St Augustine's and at Riverside, which are at the second level of the retail hierarchy headed by the city centre. The essential role of District and Local Centres in meeting everyday shopping needs is also supported.
11. The adopted Development Management Policies Local Plan (the DM plan) provides the detail to enable the strategic policies above to be implemented and to protect the vitality and viability of centres. The existing DM policies seek to retain a certain threshold of retail units within defined centres; however given changes to the Use Classes Order, General Permitted Development Order and the NPPF we acknowledge that a more flexible approach is going to be needed both when implementing the policies and during any future review. Nonetheless it is important to still monitor our existing policies going forward.
12. In particular, policies DM20 and DM21 aim to protect retail function by managing the proportion of shops - as opposed to other services and facilities - in defined city centre shopping frontages (policy DM20) and suburban shopping areas (policy DM21). In both cases local policies seek to ensure that proposals for change of use will not result in the proportion of shops falling below a specified minimum level.
13. For the city centre retail frontages the applicable minimum thresholds for policy DM20 are set out in a separate supplementary planning document (the Main town centre uses and retail frontages SPD, adopted in December 2014). For District and Local Centres the thresholds are set out in policy DM21.

Recent government changes

14. Since the last monitoring report was published, changes have taken place to both the Use Classes Order and General Permitted Development Order which could have significant impacts upon Norwich's retail and town centre provision.
15. Firstly the Town and Country Planning (Use Classes) Order 1987 puts uses of land and buildings into various categories known as 'Use Classes'. On 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

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

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

16. The government's aim is to simplify the system and to allow greater flexibility to both landlords and tenants to adapt to changing needs and to reflects the diverse range of uses in town centres. The following uses have now been revoked and have been replaced by Class E

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

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

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

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

19. A further important change that has occurred is the introduction of Class MA which is a new permitted development right to allow for the change of use from Class E (commercial, business and service use) to residential (class C3). This did not come into force until 1st August 2021 so will not have affected this survey. There are some limitations and conditions but in effect it means that many commercial premises in our retail centres can now change to residential without considering all material planning considerations. The government's intention is that this will help high streets to adapt and thrive; however the Council has concerns that this will mean that the Council has no ability to consider the impact that the loss of town centre uses will have upon the viability and vibrancy of our centres. The piecemeal loss of retail and town centre units

could be a huge threat to the vitality and vibrancy of our high streets as once units are lost to residential they are unlikely to ever revert back to a town centre use.

Emerging policy

20. The Greater Norwich Local Plan is due to replace the Joint Core Strategy towards the end of 2022 (subject to a successful examination). The policies within the GNLP seek to provide flexibility and recognises the trend for changing uses and functions in city centres. The aim of the plan is to ensure the centre provides an attractive location in which people can experience a complementary range of different uses which support the retail function as well as promoting diversification of services and facilities to ensure that vitality and vibrancy can be maintained throughout the day and evening.
21. Policy 6 places the city centre retail area at the top of the retail hierarchy, with the Large District Centres of Riverside and Anglia Square, Magdalen Street and St. Augustines providing a complementary role and meeting more day to day needs. The extent of, and more detailed policies for, the city centre retail area, and the primary and secondary retail areas within it, along with the Large District Centres, will continue to be set out in the existing development management policies.
22. In light of the rapidly changing retail picture, and based on recent trends, no sites have been reserved for retail development and it is anticipated that any additional comparison retail floorspace will primarily be accommodated through the intensification of retail use on existing sites. The policy also prioritises vibrancy, activity and diversity of uses in defined retail areas outside of the defined primary retail area, permitting the use of redundant floorspace for other uses, including the re-use of upper floors. The policy encourages the development of new leisure and cultural facilities, hotels and other visitor accommodation to support the delivery of a broader range of activities in the city centre and strengthen Norwich City Centre's role as a visitor and cultural destination.
23. This flexible long-term approach seeks to continue to promote a vibrant city centre in the context of the decline of high street shopping and the growth of online retailing which has been further impacted by COVID-19 and its economic consequences.
24. The Norwich City Centre Future 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	14.5%	15.8%	11.3%

25. The Local Data Company provides regular analysis of town centres across Great Britain and they have recently published the retail and leisure market analysis for the first half of 2021 (Looking beyond Lockdown: GB Retail and Leisure Market Analysis H1 2021, published September 2021). This sets out how the past couple of years has been a critical period for the retail and leisure sector with lockdowns forcing a significant proportion of the market to close three times in the past 18 months. The key findings from their most recent publication are as follows:

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

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

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

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

Main Findings for Norwich

City Centre Overview

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

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

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

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

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

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

32. The percentage of vacant *units* has also increased from 10.1% to 14.1%. Whilst this is a significant increase of +4% it does still compare favourably to the average GB retail vacancy rate of 15.8% (Local Data Company, September 2021⁴). However, direct comparison with national rates is difficult due to methodological differences between surveys and due to the surveys covering different areas i.e. national figures include high streets, shopping centres, retail parks and standalones in local neighbourhood parades.

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

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

restaurants, bars and takeaways) as well as financial, professional and other services the percentage of vacant units and floorspace has increased. Whilst it is very difficult to compare with national figures due to the difference in surveys and methodology, the national picture is that leisure vacancy rates are lower than retail vacancy rates which does not necessarily seem to be the case in Norwich.

34. Overall the amount of retail floorspace in the city centre has decreased slightly since the last survey in October 2019. The amount of retail floorspace reduced by 1,534m² which is a 0.7% decrease. Whilst this is a relatively large decrease it is significantly less than in the previous monitoring period where between June 2018 and October 2019 the overall retail floorspace reduced by 6,231m² which was a 2.8% decrease. This loss in 2018/19 was largely attributed to the change of use of a number of units within Castle Quarter to leisure use. This would suggest that whilst some retail units are still being lost to other uses, the rate of loss is now occurring at a slower pace.
35. Interestingly the total number of retail units has remained the same between October 2019 and July 2021. This would suggest that it is the larger units that are changing away from retail whilst some of the smaller units are actually reverting back to retail use.
36. In terms of refurbishment, there has been a significant decrease in under construction/refurbishment floorspace since the last monitoring report. This is due to Primark on Haymarket/White Lion Street being completed in December 2019. At the time of the last survey New Look in Castle Quarter was also closed for refurbishment. Whilst this did reopen, unfortunately it has now permanently closed so the 1,088m² unit now falls within the vacant floorspace.
37. Recent years have seen an increased diversification of uses within the city centre with a particular increase in the number of cafes and restaurants on offer, along with other 'service' type uses such as tattoo studios and beauty salons. Between 2018 and 2019 there was also a significant growth in leisure uses with, for example, the opening of a bowling alley, soft play, gym and retro gaming centre within the Castle Quarter. Whilst these changes have been occurring at a slower pace than between 2018 and 2019 it is likely that this trend will continue especially with planning policies being more flexible and with the changes to the Use Classes Order which makes it much easier and quicker for landlords to offer their premises to a wider range of commercial businesses, especially as the city recovers from the pandemic.
38. Change away from retail is clearly a trend that has been experienced nationally. The GB Retail and Leisure Market Analysis H1 2021 (published September 2021 by the Local Data Company⁵) has set out that the leisure sector saw significant year-on-year improvements however over the past year this improvement has been driven by the café and fast food units alone, as other leisure categories, including entertainment, restaurants and bars, pubs and clubs have declined.

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

39. Since the last survey was carried out, some large national chains have been lost from the city centre including Debenhams, Topshop/Topman, Outfit, Game, West Cornwall Pasty Company, Jack Wills, The Edinburgh Woollen Mill, STA Travel, Peacocks, Hawkins Bazaar, Paperchase, Cath Kidson, Giraffe, Timberland, Bathstore, Fired Earth, Loch Fyne, Laura Ashley, Thorntons, Evans and Mothercare. There has also been further loss since the survey was completed with Disney Store closing down. Some of these brands have since moved into other stores such as Bathstore is now within Homebase on Hall Road Retail Park and Jack Wills have space within House of Fraser. There are also some shops such as Argos and New Look that have rationalised the number of stores that they have but they have kept a presence within the city. On a more positive note however there are a number of stores which nationally have rationalised but have retained their presence in central Norwich which include New Look, Marks and Spencer and House of Fraser. This is a positive sign for the health and attractiveness of Norwich City.
40. Furthermore there are a number of national chains that have recently opened in Norwich (some of which opened after the survey work was completed). This includes Montezuma's, Deichmann, Hamleys, H&M Home and The Real Greek. This is a positive sign and suggests that Norwich is seen as a good place for investment. The Royal Arcade was also recently up for sale and sold for £3.375m with the new director saying that the goal is to have the Arcade full and bustling as soon as possible.
41. There has been a 5.7% decrease in retail floorspace since 2008 and 0.7% of this was in the past monitoring period (with 2.8% being in the previous monitoring period). Although this runs counter to the aims of JCS policy 11 (to increase the amount of retailing in the city centre), it can be regarded as in support of the policy's aim to increase other uses such as the early evening economy, employment and cultural and visitor functions to enhance vitality and viability and has ultimately prevented a substantial increase in vacancy rates. It also conforms to paragraph 85 of the NPPF which allows for diversification in order to respond to changes in the retail and leisure industries and is in line with government thinking in terms of creating a single Use Class for most town centre uses. It has been shown in the past that an appropriate diversity of other town centre uses such as restaurants, cafes and leisure uses can help support the economic vitality and health of the city centre and as we move forward, this is likely to become ever more important.
42. The city centre has undergone some major public realm and traffic changes over the past few years with a number of streets being closed to general traffic, being made one-way or being pedestrianised. This increases the attractiveness of the city to shoppers. Public realm improvements that have recently been completed, are in progress or are in the pipeline include Tombland, London Street, Prince of Wales Road, King Street, Cleveland Road, Hay Hill and St Stephen's Street. Works are also ongoing to create a mobility hub at the train station and to increase the capacity of the bus station.
43. Over the past monitoring period there has also been a significant increase in outdoor seating and pedestrianisation with traffic being restricted in some of Norwich's street, so cafes can have outdoor seating and people can abide by social distancing rules. This has included St Benedict's Street and Exchange Street. Whilst these were initially done on a temporary basis, the County

Council are seeking to make these changes permanent as part of the Connecting the Norwich Lanes⁶ project. This project will also include a new riverside footbridge between Duke Street and St Georges Street, a new cycle track and crossing facilities on St Andrew's Street and creating a better environment for enjoying the St Giles Street area on foot.

44. Norwich is also embarking on a wayfinding project which will replace the existing city centre wayfinding system and hopefully make it easier for people to find their way around and in July 2020 Norwich City Council produced a city centre Public Spaces Plan⁷. The Plan shows the location of proposed projects and also explains the funding sources and implementation timescales. Funding sources include the Transforming Cities Fund, New Anglia Local Enterprise Partnership, Community Infrastructure Levy, Towns Fund, Section 106/278 and developers. A new bike sharing scheme (Beryl bikes) was also introduced in 2020 which makes the city centre more accessible.
45. Also of particular importance is the fact that Norwich City Council established a Town Deal Board in Autumn 2019 to bid for £25m of government investment. Eight full business cases to deliver skills, enterprise infrastructure and urban regeneration into Norwich were developed and submitted to government in January which includes the projects sets out in figure 1 below. Full business cases were submitted to government throughout 2021 and all of Norwich's Towns Deal Fund Business Plans were approved by MHCLG in August. The 2021/22 payment will see approximately £15.5M of government investment into Norwich's skills and enterprise infrastructure and urban regeneration. The notification of funding release means that delivery of the projects can now start which is an extremely exciting time for Norwich. This has put Norwich at the leading edge of the government's Towns Fund Programme, and among the first of the 101 towns to have 21/22 funding released.

⁶ [Connecting the Norwich Lanes - Norfolk County Council](#)

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









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

Figure 1: Towns Deal projects

46. The above is an incredible achievement and shows how committed Norwich City Council is to growing and supporting the city's economy. Of particular note are the public realm improvements and branding. Furthermore whilst a number of the other projects are not directly related to our retail and leisure provision, through supporting the office economy this also supports the balance and symbiosis that exists between the business, retail, hospitality, leisure and cultural sectors in the city centre. This city centre vitality is an essential part of the wider "Norwich offer" to residents, businesses, visitors, workers and students; driving investment and growth to support the city's future economic wellbeing.
47. In terms of future retail growth, the level of floorspace growth promoted by JCS policy 11 was based on assumptions in a 2007 study and the retail market has changed radically since then. An updated retail study to assess Norwich's current 'retail needs' to inform retail policy in the emerging Greater Norwich Local Plan (GNLP) was produced in December 2017 by GVA⁸ and a further update was produced in December 2020⁹ by Avison Young to take account of the impact of both the UK's exit from the European Union and the COVID-19 pandemic. The 2017 report advocates continued support and growth of the comparison goods retail offering, commercial, leisure and other 'main town centre uses' in Norwich City centre. The report recommends a need for an additional 11,000m² - 15,000m² comparison retail floor space to 2027. Further

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

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

to the above, the report also supports continued improvement to the public realm in Norwich, following recent success of completed improvements. The report considers this approach appropriate to support and enhance its role as a centre of regional-scale shopping and leisure significance. The 2020 report sets out that there has not been a significant change in the convenience goods floorspace forecasts and it remains the case that there is no quantitative requirement to plan for net additional convenience goods floorspace, although there may be qualitative reasons why a modest amount of convenience goods floorspace should be placed in new local centres to support the day to day needs of new communities.

48. Where there are great differences between the 2017 and 2020 reports is around comparison goods floorspace. The 2020 report now sets out that there has been a material change in the level of retail expenditure available to support 'bricks and mortar' comparison goods floorspace and it now shows an oversupply in the Norwich urban area of circa -20,00sq m net. These levels of 'negative capacity' or over supply confirm the strategy for retailing in the GNLP which is not to allocate sites/locations for net additional comparison goods floorspace. Instead this would suggest that we should be concentrating on improving the quality of existing retail provision and it may actually be necessary to allow some units to be redeveloped for other uses which are appropriate within town centre environments.
49. Finally it is important to look at the footfall figures from the Norwich Business Improvement District (BID). Within the October 2019 retail monitor it was reported that the city centre was experiencing a decline in footfall; down 2.1% on the previous year. Unsurprisingly and due to the impact of three lockdowns, footfall has changed considerably over this monitoring period. The Norwich Evening News¹⁰ reported that footfall in Norwich rose by 444% the week the high street reopened with nearly 50,000 people visiting the shops. A week prior to lockdown easing only 9,167 people were out and about in the city centre but on April 12 this figure was 49,956. Furthermore it is reported that the month on month picture is similarly positive, with Norwich performing above the national average at 52.4% increase compared to 24% across the UK and 28.8% increase for the East of England.
50. It is encouraging to see that people are returning to the shops, restaurants and leisure facilities and visitors are coming to Norwich; however not as many people have returned to the offices full time as expected and the Local Data Company reports that a hybrid working model is likely to be the short to medium term future. With less people working in the city centre on a daily basis, it is likely that our high street will take longer to recover and will continue to feel the impact of the pandemic.
51. **Summary:** The results of the survey for the city centre as a whole presents a mixed picture. Whilst there has been a significant increase in vacant floorspace and units, it has been an unprecedented 18 months due to the COVID-19 pandemic. Over this period there have been three lockdowns where only essential retail have been able to open and therefore it is no surprise that some

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

shops have struggle to survive, despite there being government support. Furthermore whilst the percentage of vacant *units* has increased from 10.1% to 14.1%, this does still compare favourably to the average GB retail vacancy rate of 15.8% (Local Data Company, September 2021¹¹).

52. Footfall levels are increasing again in the city and whilst the next year or so is extremely uncertain, there clearly is investment being made into Norwich and therefore it is hoped that there will be a slow down in decline and that our city centre will start to recover. The Norwich city centre retail offering does appear to be fairly robust, largely due to the strength of independents, but careful consideration does needs to be given to what the survey is telling us about the long-term health of retailing in Norwich in the context of the challenges facing the British High Street/Town Centre retail sector, particularly in light of changes to the Use Classes Order, the NPPF and in terms of how we implement our current and future policies.
53. Table 1, provides city centre overview data on retail floorspace, enabling comparison over the time period of the plan. Table 2 provides an overview of vacancy rates for all town centre uses and Table 3 compares this to retail uses only.

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

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

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
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
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>	
July 2021	15.2%	14.5%	14.1%	
October 2020	10.3%	10.0%	14.7%	
October 2019	10.0%	5.5%	10.1%	
June 2018	11.3%	7.3%	10.8%	
June 2016	7.0%	5.8%	11.4%	
Sept 2015	5.9%	4.9%	11.1%	
April 2014	4.9%	4.2%	11.3%	
August 2013	6.8%	5.3%	11.2%	
January 2011	10.3%	9.3%	10.1%	
July 2010	13.0%	12.4%	11.3%	
January 2010	9.7%	9.5%	11.7%	
July 2009	9.1%	9.0%	11.8%	

July 2008	6.2%	6.2%	10.0%
Overall retail floorspace change			
Since October 2019	Decreased by 1,534 sqm (0.7% decrease)		
Since July 2008	Decreased by 13,115 sqm (5.7% 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><i>Vacant+Refurbishment</i></u> <i>All</i>	<u><i>Vacant+Refurbishment</i></u> <i>All</i>
Norwich City Centre	16.2%	15.2%
Primary retail area	14.7%	15.5%
Secondary Retail area	20.6%	11.6%
Large District Centre	9.3%	11.6%
Rest of Centre	22.0%	18.1%

Table 3: Summary of retail only vacancy rates

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

The Primary Area: Retail Vacancy

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

54. The extent of the primary area, containing the shopping centres and main comparison goods stores, is shown on Map 1.
55. The vacant available *floorspace* rate is 14.5% in the primary retail area. This is a significant increase in percentage of vacant floorspace from before the pandemic when vacancy rates were at an extremely low rate of 4.1% in October 2019. In October 2020 vacancy rates were at 8.4% and the more recent significant increase in floorspace has been a result of some large shops closing down such as Debenhams and Topshop. Previously the peak vacancy rate within the primary retail area was in 2010 when it was 11.7%.
56. Primary Area retail vacancy rates 'as a proportion of all retail floorspace' has also increased to 14.9%. In 2019 there was a large disparity between vacant + refurbishment (10.5%) and vacant (4.1%) which was attributed to the large-scale redevelopment and extension to Primark which has a floor area of 7,735m² and the refurbishment of New Look within the Castle Quarter which has a floor area of 1,088 m². The new Primark store opened in December 2019. The temporary store on St Stephen's Street which is 3,145 m² has now been vacated by Primark and remains empty. New Look within Castle Quarter did reopen but has since permanently closed.
57. The percentage of vacant retail *units* in the Primary Area has increased to 15.2% in 2021, up from 11.1% in 2019. Previously the highest rate during the plan period was 14.1% in 2015. As in recent years, this figure being higher than the floorspace vacancy figure implies that smaller shops remain difficult to let in the primary area; however the vacancy rate has fallen slightly since October 2020 which may suggest that some shops that were closed temporarily during COVID have now reopened. The reason for higher vacancies in smaller shops may be an issue related to rental values or the viability of small businesses in general.
58. These vacancies rates are of concern particularly as they have increased so significantly over the monitoring period and are now very close to the national average retail vacancy rate of 15.8% (Looking beyond lockdown: GB Retail and Leisure Market Analysis H1 2021, Local Data Company, published September 2021¹²).

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

59. The overall amount of floorspace in A1 retail use has decreased by 1,831m², and reduced by 2 units in the Primary Area since 2019. Between 2014 and 2018 the amount of retail floorspace has remained relatively constant however there was a significant reduction in retail floor space (5,461 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.
60. The change of use of a number of units away from A1 did prevent a number of units in Castle Quarter sitting empty and helped decrease the vacancy rate in the centre from 26% to 18%. However a number of units closed during the pandemic and whilst some of these have reopened a number remain shut. Long term vacancies in Castle Quarter is still of concern and unfortunately largely as a result of the pandemic it is too soon to see how successful the leisure uses are that now occupy the Castle Quarter. It is however still hoped that diversification into the leisure sector will continue to prevent a number of particularly large retail units sitting empty and that although certain sectors are declining, they can be replaced with other success town centre business uses which will ultimately increase footfall. The use of the foodcourt as a vaccination centre for example, will have prevented vacancies but will also have significantly increased footfall within the centre.
61. Chantry Place (formerly Chapelfield) on the whole remains well occupied and at the time of the survey only 10 units were vacant out of a total of 93 (10.8%). This is a slight increase but is still below the average for the primary retail area and since the survey was completed some units have since been occupied include by H&M Homes and Hamleys Toy shop.
62. The last report set out how in 2019 the Royal Arcade has experienced a significant change with half of the units now being vacant (8 out of 16 units). Now only five units are vacant; however plans to amalgamate three empty units to create a new restaurant never materialised. The Arcade has recently been sold and it is hoped that the new owner will work with the Council and BID to help further decrease vacancies in this prominent location.
63. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 14.7% (compared to retail only of 14.9%) and the percentage of vacant units is 15.5% (compared to retail only of 15.2%).
64. Table 4, below, provides retail floorspace data for the primary area.

Table 4: Primary shopping area

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
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
July 2021	521	442	76	3
October 2020	524	442	79**	3
October 2019	523	465	50	8
June 2018	530	479	48	3
June 2016	562	484	72	7
Sept 2015	559	481	72	7
April 2014	579	499	74	6
August 2013	567	490	72	5
January 2011	574	524	45	5
July 2010	576	513	58	5
January 2010	578	524	53	1
July 2009	581	524	57	0
July 2008	584	537	46	1
Retail vacancy rate (use class A1)				
	As a proportion of all retail floorspace <i><u>Vacant+Refurbishment</u></i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i><u>Vacant</u></i> <i>All</i>	As a proportion of all retail units <i><u>Vacant+Refurbishment</u></i> <i>All</i>	
July 2021	14.9%	14.5%	15.2%	
October 2020	8.8%	8.4%	15.6%	
October 2019	10.5%	4.1%	11.1%	
June 2018	10.5%	5.3%	9.8%	
June 2016	7.4%	5.7%	14.0%	
Sept 2015	6.3%	5.0%	14.1%	
April 2014	4.4%	3.8%	13.8%	
August 2013	7.1%	6.2%	13.6%	
January 2011	9.2%	8.0%	7.8%	
July 2010	12.1%	11.7%	10.1%	
January 2010	8.0%	8.0%	9.2%	
July 2009	7.0%	7.0%	9.8%	
July 2008	3.7%	3.7%	7.9%	

The Primary Area: Retail Frontages

65. Policy DM20 divides the primary area into a number of smaller 'frontage zones' (as defined on the policies map and as identified in appendix 4 to the DM policies plan). The frontage zones are shown on Map 2. The retail threshold applicable in each of these areas is set within the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014).
66. Table 5 provides data on the percentage of retail uses in the primary area retail frontage zones in July 2021. None of the frontages have dropped below their minimum thresholds as set out in the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014) and overall, the retail frontages appear relatively healthy. There have not been any significant changes since 2019 although levels of non-retail has crept up in five of the seven zones (PC01: Gentleman's Walk/Haymarket/Brigg Street, PC02: Castle Mall, PC03: Chapelfield, PR01: Back of the Inns/Castle Street area and PR03: St Stephens Street/Westlegate). However in PR02: The Lanes east retail levels have continued to increase and in PR06: Timberhill/Red Lion Street there has been no change.
67. This would suggest that in the past couple of years there has been fewer changes away from retail to service and leisure uses overall than there was previously when there was a significant increase in non-retail frontage in PC03: Castle Quarter when non retail increase from 38.3m (4.4%) in June 2018 to 129.9m (14.8%) in October 2019.
68. Overall, whilst the percentage of A1 retail frontage within some primary retail area core frontage zones has declined, in other areas it has increased and overall retail frontages still remain at relatively comfortable levels above their minimum thresholds.

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

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

Key:

Green denotes no change or increase in A1 retail since 2019

Red denotes decrease in A1 retail since 2019.

Blue denotes frontage is within minimum A1 threshold.

Orange denotes minimum A1 frontage threshold has been breached.

¹³ There is no defined frontage in this zone

¹⁴ There is no defined frontage in this zone

The Secondary Area: Retail Vacancy

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

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

70. The vacant available *floorspace* rate experienced a significant increase between 2016 and 2018 when it rose from 2.8% to 17.2%. Between 2018 and 2019 vacancy rates remained high with a slight further increase to 18.3% and they have now increased further to 23.1%.

71. The percentage of vacant retail *units* in the Secondary Area also increased between 2016 and 2018 with a rise from 7.0% to 7.7%. Between 2018 and 2019 there was no change in the percentage of vacant retail units but this has now increased to 9.8%.

72. The overall amount of floorspace in A1 retail use has increased since the last survey in 2019 (by 248m²) and there has also been an increase in units in the Secondary Shopping area since the last survey in 2019 (from 181 to 183).

73. The high vacancy rate in the secondary retail area is of some concern as the figure is at the highest level in this area since monitoring commenced in 2008. However the high floorspace vacancy rate can be attributed to the closure and subsequent vacancy of Toys R Us in Cathedral Retail Park in April 2018 which has an individual floor area of 3,222m² and more recently 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 6.7% which is well below the national average and one of the lowest in the city centre. Furthermore vacancy rates '*as a proportion of all retail units*' are lower in the secondary area than any other area within the city and the only area where this is below 10%. This is very competitive when compared to the GB national average retail vacancy rate of 15.8%¹⁵.

74. Policy 11 of the Joint Core Strategy identifies that "other shopping areas within the centre will be strengthened to provide for retail diversity, with a particular focus on enhancing the character of specialist retailing areas and markets". The secondary retail area includes some streets which provide a specialist mix of shops and excluding the Cathedral Retail Park, is performing very well in providing independent retail diversity and by adapting rapidly it appears that it has remained resilient during the pandemic.

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

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

Table 6: Secondary area

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
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
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>$\frac{\text{Vacant} + \text{Refurbishment}}{\text{All}}$</i>	As a proportion of retail floorspace excluding space being built or refitted <i>$\frac{\text{Vacant}}{\text{All}}$</i>	As a proportion of all retail units <i>$\frac{\text{Vacant} + \text{Refurbishment}}{\text{All}}$</i>	

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

76. Policy DM20 divides the secondary area into a number of smaller 'frontage zones' (as defined on the policies map and as identified in appendix 4 to the DM policies plan). The frontage zones are shown on Map 3. The retail threshold applicable in each of these areas is set within the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014).
77. Table 7 provides data on the percentage of retail uses in the secondary area retail frontage zones in July 2021. Out of the three secondary areas that have frontage zones, one (SR03: St Benedicts) is below the minimum threshold as set out in the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014). However during the monitoring period the proportion of retail has actually increased and it would only take a few more units to change back to retail for the frontage zone to no longer be below the threshold. Notwithstanding this, overall the retail frontages appear relatively healthy and in all three frontage zones the percentage of retail has surprisingly increased.
78. This would suggest that in the past couple of years there has been fewer changes away from retail to service and leisure uses and overall retail frontages remain at relatively comfortable levels above their minimum thresholds.
79. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 20.6% (compared to retail only of 23.3%) and the percentage of vacant units is 11.6% (compared to retail only of 9.8%).

Table 7: Secondary area retail frontage zones

Frontage zone	Total frontage (m)	Total non-retail frontage July 2021	% A1 retail July 2021 (frontage)	% A1 retail Oct 2019 (frontage)	Minimum threshold (from 2014 SPD)
Secondary retail area core frontage zones					
SR01	404.1	96.5	76.1%	74.1%	70%
SR02	121.7	39.4	67.6%	65.4%	60%
SR03	638.0	259.1	59.4%	59.2%	60%
SR04	No defined frontage				
SR05	No defined frontage				
SR06	No defined frontage				

Large District Centres

Headline figures	Vacant floorspace	Vacant available floorspace (excluding refurb)	Vacant units	Retail floorspace change
Large District Centres (Retail only)	9.1%	9.1%	10.9%	0.7% increase

80. Map 4 shows the extent of the LDCs. Riverside was included in these statistics from August 2013 onwards, following the removal of it from the Primary Retail Area and its redesignation as part of the Large District Centre.
81. The vacant available floorspace in the LDCs is currently 9.1% which is a significant increase from 2019 when only 3.3% of available floorspace was vacant. Whilst this is the highest that it has been since Riverside has been included in the LDC, it is still significantly lower than both the city and national average and regarded as a low figure for a shopping area which does not form a central part of the city's retail offer.
82. The percentage of vacant retail *units* in the LDCs has increased marginally since 2019 (from 10.2% to 10.9%) but this is still lower than it was in June 2018 when 11.4% of units were empty. In 2019 the difference between vacant floorspace and vacant units would have suggested that the larger units were faring well but that the smaller units were harder to find and retain retailers. Vacant floorspace has now nearly caught up with vacant units which would suggest that some of the larger units became vacant during the monitoring period.
83. In 2019 it was reported that Riverside was fully let but the closure of Mothercare, Outfit and Carphone Warehouse has now left three units empty which at 593m², 1,530 m² and 196 m² respectively has had a significant impact on the vacancy figures for the Riverside Large District Centre with 13.7% of floorspace being vacant and 19.0% of units being vacant. Riverside has largely been a car based destination but it is hoped that the routes to be established within the emerging 'St Anne's Quarter' development will create a more attractive walking and cycling link between Riverside and the city centre.
84. The Magdalen Street, Anglia Square & St Augustine's LDC on the other hand has a relatively low floorspace vacancy rate of 7.0% (up from 6.7% in 2019 but still down from 11.6% in 2018) and 10.8% of units. This is very competitive when compared to the GB national average retail vacancy rate of 15.8%¹⁶. This centre has repositioned itself as a niche area of speciality/ethnic retailers and restaurants. The low vacancy rates in this area also correspond to the Local Data Companies findings that independents continued to be more resilient than multiples with growth in independents being driven by the convenience (convenience stores, grocers, butchers and bakers) and leisure sector (cafes

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

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

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

86. The overall amount of floorspace in A1 retail use has decreased by 445m² and there has been a decrease in 3 units in the LDCs since 2018.

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

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

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
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
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>	
July 2021	9.1%	9.1%	10.9%	
October 2020	6.4%	6.4%	13.0%	
October 2019	3.5%	3.3%	10.2%	
June 2018	6.7%	5.4%	11.4%	
June 2016	5.6%	5.4%	10.0%	
Sept 2015	3.4%	3.2%	7.2%	
April 2014	3.2%	2.4%	7.1%	
August 2013	4.1%	1.0%	13%	
January 2011	18.5%	18.1%	20.0%	
July 2010	18.0%	17.6%	17.9%	
January 2010	18.8%	18.4%	20.7%	
July 2009	17.7%	16.6%	16.2%	
July 2008	16.7%	16.8%	16.0%	

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

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

Rest of the City Centre

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

88. This area covers all shops within the city centre which are not included in the defined areas discussed above. There have been some boundary changes which were first reflected in the 2014 monitor. As such, the figures prior to 2014 are not directly comparable with current figures.
89. The vacant available *floorspace* in the rest of the city centre has increased significantly from 5.9% in 2019 to 13.7% and when including refurbishments the vacancy rate now stands at 19.2%. Historically available vacancy rates have been fairly high in the rest of the city centre with for example in 2014 vacancies being 18.3%; however in October 2019 the rate was exceptionally low at only 5.9% which was a bit of an anomaly. This may suggest that a number of new businesses have struggled to survive during the pandemic.
90. The percentage of vacant retail *units* in the rest of the city centre has more than doubled from 22 units (9.2%) in October 2019 to 25 units (19.4%) in July 2021. Whilst this is a significant increase it is no higher than it was in June 2018.
91. The overall amount of floorspace in A1 retail use has decreased by 167m² and reduced by one unit in the 'rest of the city centre' since 2019.
92. These figures suggest that there is a lot of change and turnover in the 'rest of the city centre' area and although a number of new businesses set up in 2018/19 these have either struggled to survive or other more established businesses have unfortunately closed. It may also be the case that some businesses have moved to premises within other retail areas. Overall however it would appear that some of the smaller units are still struggling to find and retain retailers in the lesser known shopping streets which lie outside of the defined areas.
93. If all town centre uses are taken into account the proportion of vacant floorspace (including refurbishments) is 22.0% (compared to retail only of 19.2%) and the percentage of vacant units is 18.1% (compared to retail only of 19.4%).

Table 9: Rest of city centre

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
July 2021	13,503	10,912	1,852	739
October 2020	13,503	11,080	2,423	0

October 2019	13,670	12,792	813	65
June 2018	13,834	11,769	1,658	407
June 2016	14,387	12,629	1,758	0
Sept 2015	14,475	12,711	1,676	88
April 2014	14,164	11,430	2,591	143
August 2013	17,084	14,738	920	1,426
January 2011	17,400	14,495	2,880	25
July 2010	17,500	13,524	3,559	417
January 2010	17,593	14,240	3,353	0
July 2009	17,702	13,655	4,047	0
July 2008	17,786	13,310	3,761	765
Retail units (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
July 2021	129	104	23	2
October 2020	129	104	25	0
October 2019	130	118	11	1
June 2018	135	110	23	2
June 2016	137	125	12	0
Sept 2015	138	125	12	1
April 2014	144	124	19	1
August 2013	157	137	12	8
January 2011	168	144	23	1
July 2010	192	167	23	2
January 2010	172	145	27	0
July 2009	173	146	27	0
July 2008	171	143	26	2
Retail vacancy rate (use class A1)				
	As a proportion of all retail floorspace <i><u>Vacant+Refurbishment</u></i> <i>All</i>	As a proportion of retail floorspace excluding space being built or refitted <i><u>Vacant</u></i> <i>All</i>	As a proportion of all retail units <i><u>Vacant+Refurbishment</u></i> <i>All</i>	
July 2021	19.2%	13.7%	19.4%	
October 2020	17.9%	17.9%	19.4%	
October 2019	6.4%	5.9%	9.2%	
June 2018	15%	12%	18.5%	
June 2016	12.2%	12.2%	8.8%	
Sept 2015	12.2%	11.6%	9.4%	
April 2014	19.3%	18.3%	13.9%	
August 2013	13.7%	5.4%	12.7%	
January 2011	16.7%	16.6%	13.7%	
July 2010	22.7%	20.3%	12.0%	
January 2010	19.1%	19.1%	15.7%	
July 2009	22.9%	22.9%	15.6%	
July 2008	21.1%	22%	15.2%	

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

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

District and Local Centres

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

District Centres

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

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

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

100. A number of these centres have non-retail percentages only just over 40%, so in many cases it would just take one or two units changing to retail to satisfy the policy ambition. However, applications locally and patterns nationally over recent years have shown that this is considered to be moving in the opposite direction with an increase in non-retail uses. This is also likely to be exacerbated with greater flexibility to change between any use within the new Class E and there may also be changes to residential as a result of new permitted development rights introduced this year. Whilst it is recognised that some non-retail units such as restaurants and cafes, along with community, service and leisure uses can add to the vitality and viability of a retail centre there is concern that the change of use to residential would have a significantly detrimental impact upon District Centres and their ability to meet local need. The next monitoring year may start to show any impacts from changes to the Use Classes Order and Permitted Development Order as well as showing longer term impacts of the pandemic.

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

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

103. In 2019 Drayton Road district centre DC02 had the highest vacancy rate with 20% of units being unoccupied but the number of vacant units has decreased from three to two which reduces the vacancy rate to 13.3%. This is still higher than the average vacancy rate for the District Centres. The non-retail percentage rate has not changed and is only 26.7% which is well clear of the 40% recommended maximum guideline.

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

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

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

106. DC05: Aylsham Road/Mile Cross has seen no changes in vacancy rates or total number of units although one unit has changed away from retail which increased the percentage of non retail to 47.6%. A new Lidl opened adjacent to the District Centre a couple of years ago which is just outside of the District Centre boundary (so not counted as a unit within this monitoring report). Currently this would appear to have had little impact upon the centre.
107. Earlham House district centre DC06 was previously recognised as one of the poorest performing district centres in terms of vacancy rates in 2016. However, since that time the centre has benefitted from some refurbishment. In 2018, 15 of the 17 units were occupied, in 2019 all units were full and despite one unit now being vacant, the vacancy rates is still low at only 6.7% and with only 20% of units being non retail this is one of the city's best performing retail centres.
108. There are two district centres which have all of their units occupied which are The Larkman (DC07) and Hall Road (DC09) centres. Hall Road district centre DC09 was regarded as poor performing in both 2016 and 2018. A community centre opened in 2019 and there are currently no vacant units within this centre. 57.1% of the units however are non-retail use.
109. DC08 Dereham Road/Distillery Square is the largest District Centre in terms of shop numbers and this has experienced quite a significant increase in vacancies with four units now being vacant which compares to one in 2019. During the monitoring period two units also change from retail to non retail which now means that the 40% non retail threshold has been exceeded.

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

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change	Non retail units	% non-retail
DC01	Bowthorpe	17	2	11.8%	8	47.1%
DC02	Drayton Road	15	2	13.3%	4	26.7%
DC03	Eaton Centre	17	3	17.6%	9	52.9%
DC04	Plumstead Road	32	3	9.4%	14	43.8%
DC05	Aylsham Road/ Mile Cross	21	3	14.3%	10	47.6%
DC06	Earlham House	15	1	6.7%	3	20.0%
DC07	The Larkman	14	0	0.0%	6	42.9%
DC08	Dereham Road/ Distillery Square	37	4	10.8%	15	40.5%
DC09	Hall Road	7	0	0.0%	4	57.1%
DC10	Sprowston Road/ Shipfield	19	1	5.3%	8	42.1%
TOTAL		194	19	9.8%	81	41.8%

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** 60% policy



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



Local centres

Headline figures	Vacant units	Retail floorspace change
Local Centres	12.7%	0.3% increase

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

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

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

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

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

- LC15: Sprowston Road/Silver Road
 - LC20: Colman Road, The Parade
 - LC26: UEA; and
 - LC29: Aylsham Road/Copenhagen Way.
114. The following local centres are recorded as having exactly 50% non-retail. Any changes of use of existing A1 units to non-retail uses will cause the DM21 policy threshold to be exceeded:
- LC11: Aylsham Road/Boundary Road
 - LC14: Magdalen Road
 - LC17: Bishop Bridge Road
 - LC28: Magdalen Road/Clarke Road

Table 11: Local Centres¹⁷ defined in the adopted Norwich Local Plan 2014

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change		Non retail units	% non-retail	
LC01	Hall Road/ Trafalgar St	7	3	42.9%		1	14.3%	
LC02	Hall Road/ Queens Road	28	8	28.6%		15	53.6%	
LC03	Hall Road/ Southwell Road	7	0	0.0%		3	42.9%	
LC04	Grove Road	14	1	7.1%		5	35.7%	
LC05	Suffolk Square	9	0	0.0%		4	44.4%	
LC06	Unthank Road	43	3	7.0%		23	53.5%	
LC07	St Augustine's Gate	8	1	12.5%		6	75.0%	
LC08	See footnote							
LC09	Aylsham Road/ Junction Road	8	1	12.5%		1	12.5%	
LC10	Aylsham Road/ Glenmore Gardens	13	1	7.7%		7	53.8%	
LC11	Aylsham Road/ Boundary Road	12	1	8.3%		6	50.0%	
LC12	Woodcock Road	7	0	0.0%		4	57.1%	
LC13	Catton Grove Road/Ring Road	12	2	16.7%		4	33.3%	
LC14	Magdalen Road	14	3	21.4%		7	50.0%	

¹⁷ Local centres at **Dereham Road/Distillery Square** (previously LC08) and **Sprowston Road/Shipfield** (previously LC16) were redesignated as district centres following the development of new anchor foodstores and renumbered as DC08 and DC10 respectively in the 2014 local plan. They are listed in table 7 above. The local centre at **St Stephens Road** newly designated in that plan (LC30) falls partly within and partly outside the city centre. The retail floorspace within that part of the local centre is included within the floorspace and unit totals in Table 6.

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

Key

Vacancy rate is **unchanged** since last survey

Vacancy rate is **up** since last survey

Vacancy rate is **down** since last survey



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

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

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



Retail Warehouse and Norwich's out of town retail

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

Conclusions

120. Retail vacancy rates have rising significantly since October 2019 and as shown in table 12 rates have increased in all city centre areas as well as within the District and Local Centres. This is unsurprising given the challenging circumstances faced by retailers and given that there have been three lockdowns when all shops and leisure facilities have been forced to close other than essential retail. Furthermore for much of the period footfall within the city centre has been extremely low partly due to the 'work at home' message and also due to people choosing to either shop locally or turning to online retailing.
121. Many shops have managed to reopen following lockdowns but despite there being business rate relief and other government support many shops have been unable to survive the impact of the pandemic. In particular Norwich has lost a significantly high number of multiples over the monitoring period and a number of these such as Debenhams and Topshop previously occupied large and prominent locations. Notwithstanding this it would appear that many of Norwich's independent retailers have been performing well and this can be shown by the low vacancy rates within both the secondary retail area (when excluding the Cathedral Retail Park) and the Magdalen Street, Anglia Square & St Augustine's LDC where vacancy rates are only 6.7% and 7.0% which is extremely low when compared to a national average retail vacancy rate of 15.8%. However one question often posed about the independent market is that of long-term sustainability. Many of these units have shorter average length of occupancy and a higher rate of churn across the market, due to a lack of infrastructure and financial backing so it will be interesting to see how these areas perform in the coming years.
122. For the first time, this report also looks at all town centre use vacancy rates as well as retail. Nationally leisure vacancy rates are lower than retail and whilst it is difficult to compare due to different methodologies of collecting and analysing data, the overall vacancy rate for the city centre does increase when other town centre uses are taken into account.
123. In terms of the total amount of retail floorspace within the city centre, whilst it continues to decrease, the rate has slowed and during this monitoring period there has only been a reduction of 1,534m² (0.7%) which is considerably less than that which was lost in 2018/19 where retail floorspace decreased by 6,231 m² (2.7%). Given the changes to the Use Classes Order and the General Permitted Development Order and the future change in policy approach that is likely to be brought in through the GNLP it is anticipated that this trend will continue, but we just do not yet know at what rate.
124. All of the retail frontages in the Primary area remain within the recommended minimum percentage of A1 use as set out in the 'Main Town Centre Uses and Retail Frontages' Supplementary Planning Document (2014). There have not been any significant changes since 2019 although levels of non-retail have crept up in five of the seven zones. However in PR02: The Lanes east retail levels have continued to increased and in PR06: Timberhill/Red Lion Street there has been no change. In terms of the secondary area retail frontage zones one out of three (SR03: St Benedicts) is below the minimum threshold;

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

125. Vacancy rates in District and Local Centres have increased overall from 8.1% in 2019 to 11.6% in 2021. This follows the trend of increasing vacancy rates within the city; however, 11.6% is significantly lower than the 14.1% shop vacancy rate in the city centre which would indicate that despite the challenging circumstances local and district centres are faring quite well. This may suggest that during the pandemic more people shopped locally.
126. The retail sector both nationally and within Norwich has experienced a lot of challenges in recent years brought about by changing consumer behaviour driven by technology and prevailing economic conditions and the past 18 months have been even more challenging as a result of the COVID pandemic. These challenges are likely to have an ongoing impacts for the viability of some retail businesses.
127. It is however encouraging that footfall has significantly increased following the lifting of restrictions. With the majority of people now having received their COVID vaccine it is hoped that confidence will continue to build and people will start to use the high street in a similar way than they did before the pandemic. Whilst a number of multiples have ceased trading within Norwich, there is clearly investment happening with new chains arriving. Furthermore with so many improvements taking place to the public realm, this should enhance the shopping and leisure experience and make it easier for people to get around.
128. It is however important to acknowledge that there are many changes that can now take place within retail centres without the direction of the council which include the change of use to other town centre uses but also the change of use to residential without the need for full planning permission. The added flexibility within retail centres could reduce vacancy rates and provide a wider range of amenities and services but the Council have also identified a number of risks associated with this. Whilst we acknowledge that retailing and town centres are currently in a state of flux, this reinforces the need to protect and promote town centres to allow them to recover and evolve in a planned manner and we are concerned that extending the use of permitted development rights to change to residential could be hugely detrimental to this. Without being able to consider the impact that the loss of town centres uses at ground floor level, we are concerned that there could be the piecemeal loss of town centre uses at ground floor level which will result in residential interspersed with town centre uses. This will not only affect the way that our high streets function but it could reduce rather than increase footfall. For this reason the Council has concern that the uncontrolled and piecemeal loss of town centre uses could be a threat to the vitality and vibrancy of our high street and it is going to be very important to monitor change over the coming few years.

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

given the potential challenges faced, including working closely with Norwich BID and other key stakeholders.

Table 12: 'At a Glance' The direction of travel of vacancy rates and retail floorspace in Norwich since October 2019

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

Key

↑ = increase

↓ = decrease

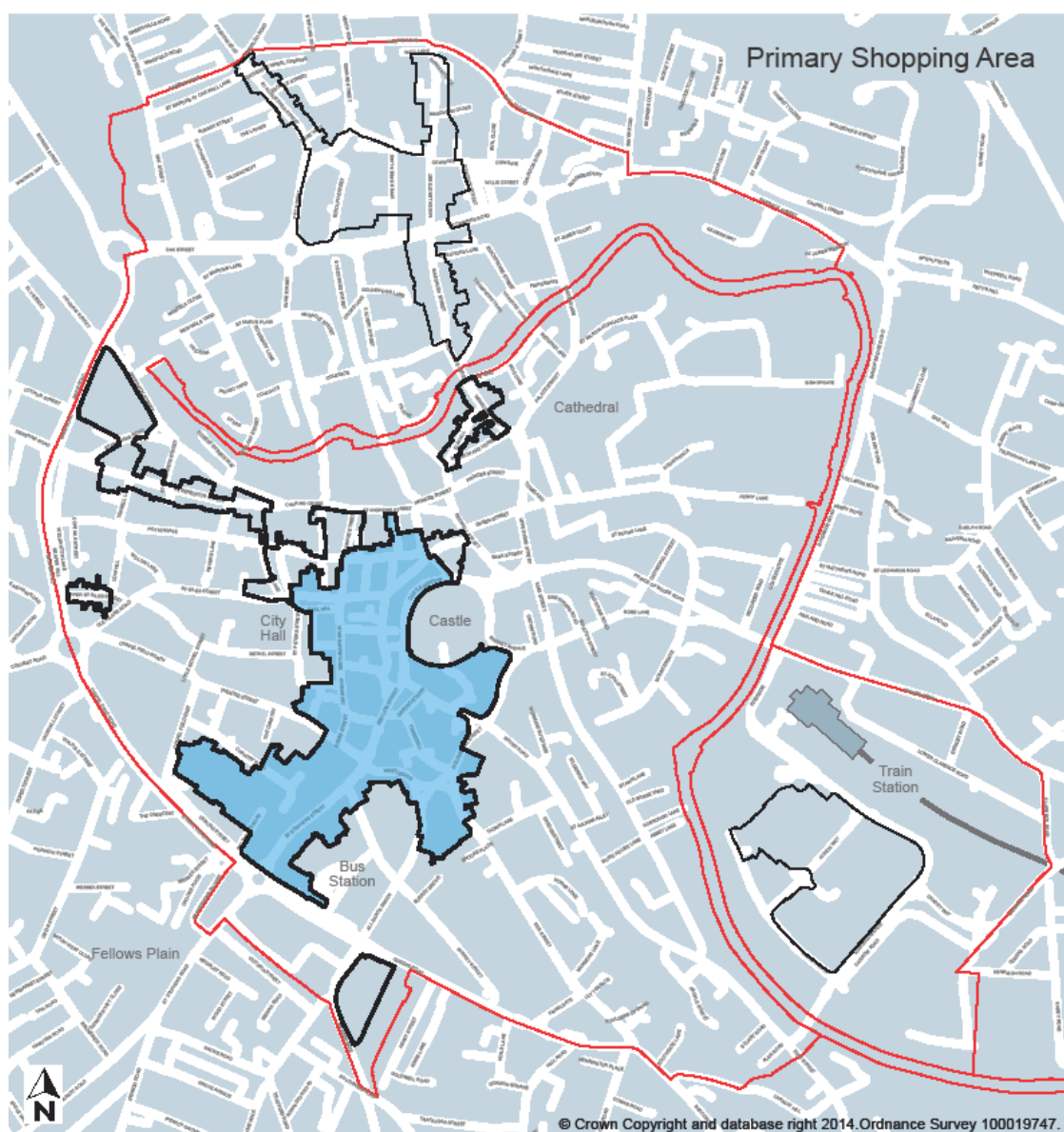
Red = Moving in a negative direction

Green = Moving in a positive direction

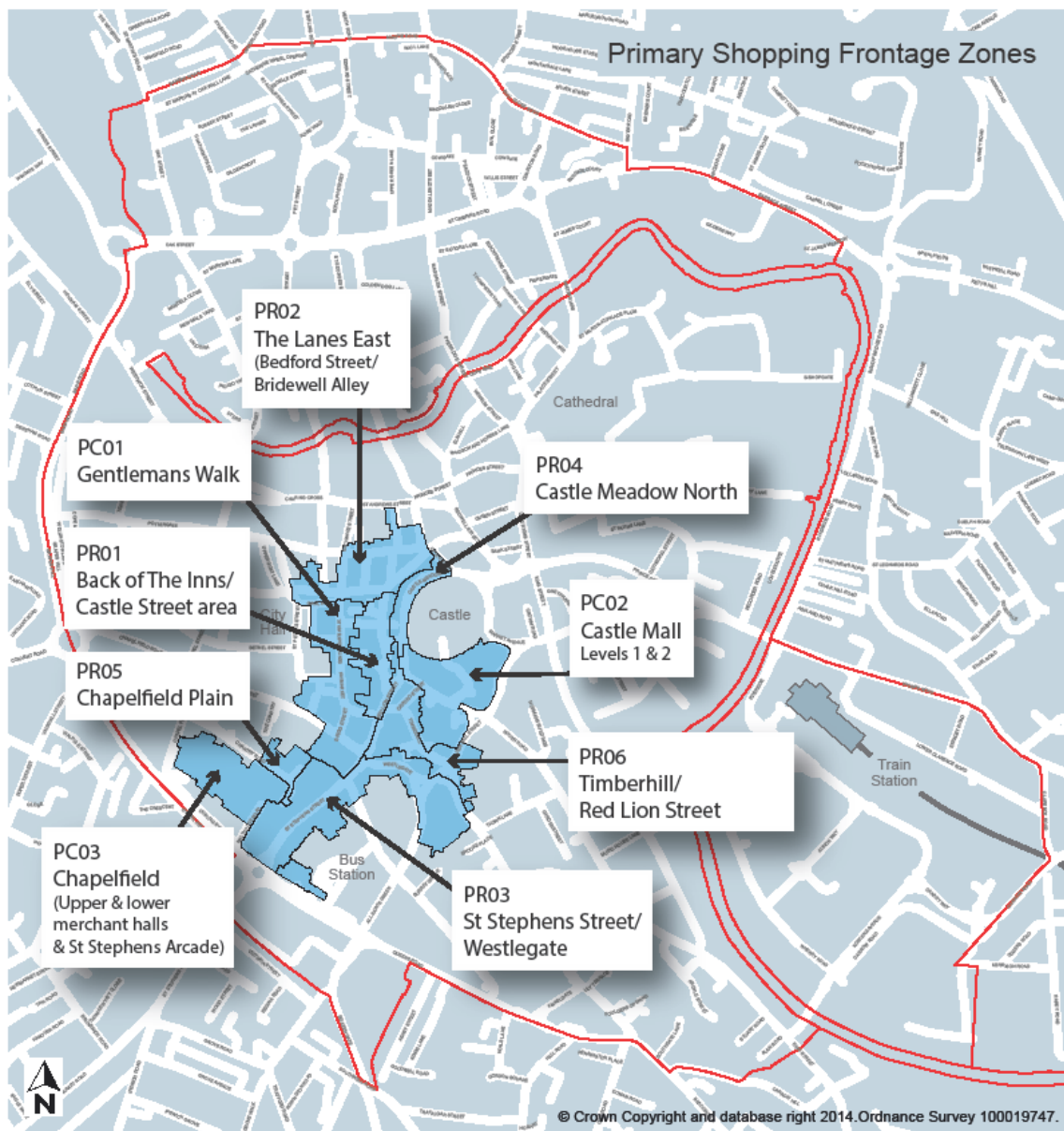
Grey = No change

Supporting Maps

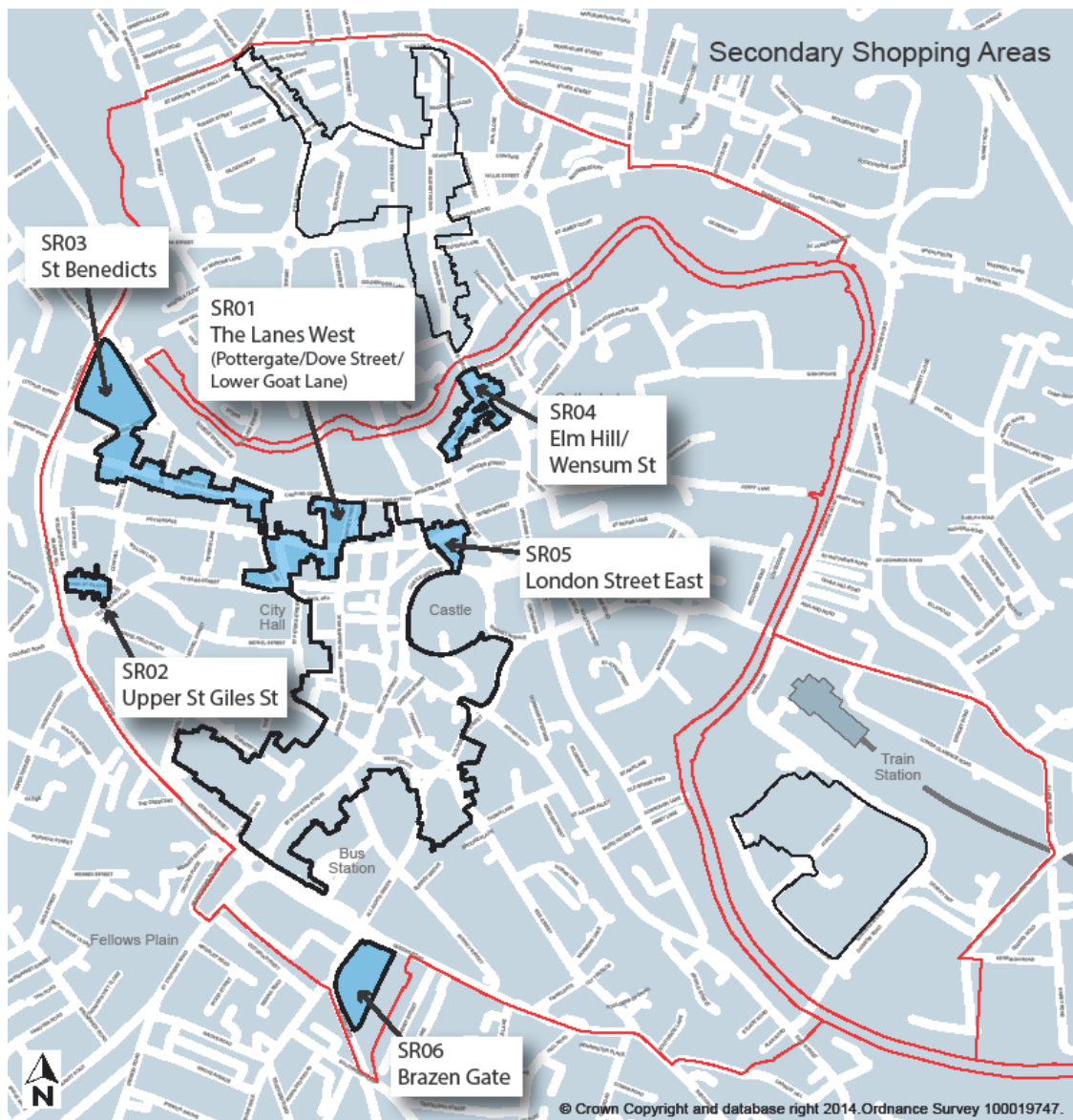
Map 1: Primary shopping area



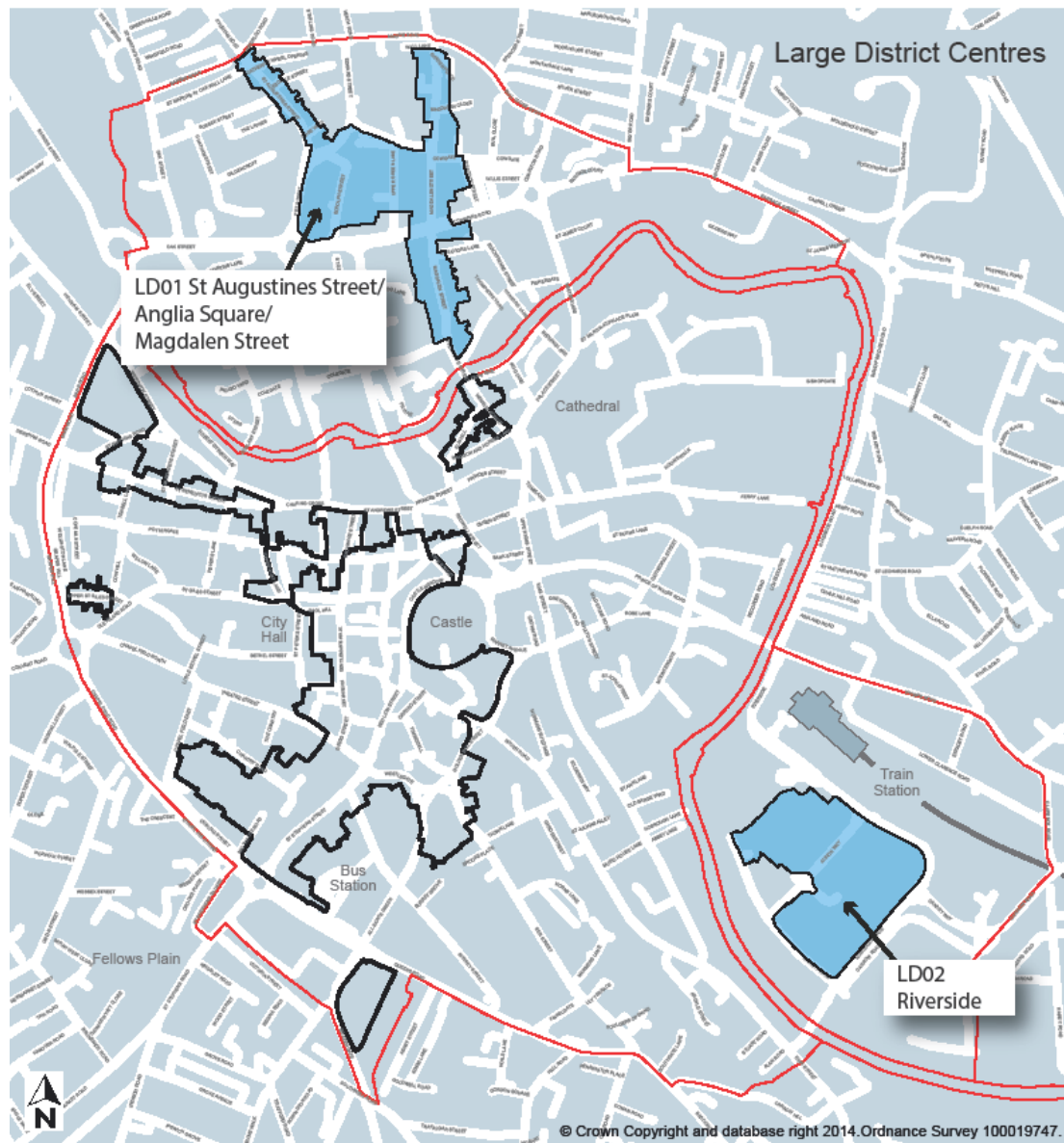
Map 2: Primary area frontage zones



Map 3: Secondary shopping areas



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



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