

#### Sustainable development panel

#### Date: Tuesday, 15 November 2022 Time: 16:00 Venue: Mancroft room, City Hall, St Peters Street, Norwich, NR2 1NH

#### **Committee members:**

#### **Councillors:**

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

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#### Agenda

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1	Apologies	
	To receive apologies for absence	
2	Declarations of interest	
	(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)	
3	Minutes	3 - 6
	To approve the accuracy of the minutes of the meeting held on 14 June 2022	
4	2020/21 Annual Monitoring Report	7 - 138
	<b>Purpose -</b> To present the 2020/21 Greater Norwich Development Partnership (GNDP) Annual Monitoring Report for Broadland, Norwich and South Norfolk.	
5	Article 4 Direction	139 - 164
	<b>Purpose -</b> To update members on the introduction of an article 4 direction to remove permitted development rights for the conversion of offices to residential within Norwich city centre and to feedback on the	

recent discussions with the Department for Levelling Up, Housing and Communities.

Date of publication: Monday, 07 November 2022



Item 3

MINUTES

#### Sustainable Development Panel

#### 16:00 to 16:45

14 June 2022

- Present: Councillors Stonard (chair, following appointment), Giles (vice chair, following appointment), Carlo, Grahame, Hampton, Lubbock, Oliver and Padda (from item 5, below)
- Apologies: Councillor Osborn

#### 1. Appointment of chair

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

#### 2. Appointment of the vice chair

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

#### 3. Declarations of interest

There were none.

#### 4. Minutes

**RESOLVED** to approve the accuracy of the minutes of the meetings held on 7 March 2022.

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

The planning policy team leader presented the report and summarised the reasons for the delay (as set out in paragraph 4). Officers would be meeting with the representatives of the Department of Levelling Up, Housing and Communities (DLUHC) on 21 June to discuss the best approach to progress the introduction of the Article 4 Direction. Any new approach would be brought back to the panel before consideration at cabinet. The delay in the introduction would impact on the emerging Greater Norwich Local Plan which would need to be updated if the area covered by the Article 4 Direction was amended.

Discussion members commented that the risk to the proposed Article 4 Direction being acceptable was not unexpected. Members noted that at this stage it was too late to learn from other local planning authorities' experience. It was positive that the DLUHC was engaging with the council and the solution might be Article 4 Directions for smaller areas in the city. The planning policy team leader said that there were examples of London Boroughs with large Article 4 Directions but there had been a subsequent change in policy, which required a more targeted approach. The head of planning and regulatory services said that the council would engage the original consultants to develop the new approach and proposals would be brought back to the panel as part of the consultation.

Discussion ensued in which members noted that office accommodation floor space had reduced by 30 per cent since 2008. There was no correlating data for the number of new dwellings converted from office accommodation. The head of planning and regulatory services said that the issue was the poor standard of the residential accommodation. Members noted that the conversion of offices to accommodation could be turned round quickly. The Article 4 Direction would not remove the ability to convert office buildings but would require the council to consider a planning application. Members were advised that the office conversions under permitted development rights required prior approval from the council as the local planning authority. These applications should appear on the weekly list of planning applications and other related applications that was circulated to members so that they could call them in to committee if the application met the criteria.

**RESOLVED** to note the delay to the introduction of the Article 4 Direction.

#### 6. March 2022 Norwich City Centre Shopping and Town Centre Floorspace Monitor

The planning policy team leader presented the report.

During discussion members considered that the increase in footfall and new investment coming into the city in the form of a new hotel in Guildhall, student accommodation in the former Debenhams and vacant retail units being taken up by Morrisons, Tesco's and Costa Coffee, were encouraging. Members' perspective of the increased footfall differed. A member said that she considered that the city was quieter than before and that she was concerned about the impact of on residents and shops from the road works in St Stephen's Street. The chair referred to the evidence that supported the increased footfall and referred to Town Deal funding for the St Stephens Street scheme, stating that it was necessary and the works justified.

A member suggested that the council owned retail units could be let at a peppercorn rent for alternative uses such as eco-hubs, workshops, hotdesking, food banks, hot desking and hybrid or blended meetings, adding to the vibrancy of the city. The head of planning and regulatory services said that she would forward this suggestion to the assets team, although commenting that the infrastructure for hybrid meetings was expensive.

Discussion ensued in which members were advised that there had been some preapplication discussions about proposals for the housing led development at the Cathedral Retail Park. Members noted that Castle Mall management company proposed to diversify its retail offer and increase focus on food and leisure. Members queried the authenticity of the "street food stalls" within an urban shopping mall and noted that market research had identified a target audience of young people. **RESOLVED** to note the findings of the March 2022 Norwich City Centre Shopping and Town Centre Floorspace Monitor.

CHAIR



#### Committee Name: Sustainable development panel Committee Date: 15/11/2022 Report Title: 2020/21 Annual Monitoring Report

- Portfolio:Councillor Stonard, Cabinet member for inclusive and<br/>sustainable growth
- **Report from:** Executive director of development and city services

Wards: All Wards

#### OPEN PUBLIC ITEM

#### Purpose

To present the 2020/21 Greater Norwich Development Partnership (GNDP) Annual Monitoring Report for Broadland, Norwich and South Norfolk.

#### Recommendation:

To note the contents of the 2020/21 GNDP Annual Monitoring Report

#### Policy Framework

The Council has five corporate priorities, which are:

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

This report meets the corporate priorities Norwich is a sustainable and healthy city, and Norwich has the infrastructure and housing it needs to be a successful city.

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

This report helps to meet the housing, regeneration and development objective of the COVID-19 Recovery Plan

#### **Report Details**

#### Introduction

- 1. The purpose of this report is to inform members of the publication of the Greater Norwich Development Partnership Annual Monitoring Report (AMR) for Broadland, Norwich and South Norfolk for the period 2020/21. This AMR is being published later than usual as staff resource has been focused on the preparation of and involvement in the Greater Norwich Local Plan (GNLP).
- 2. The development plan for Norwich includes the following documents:
  - Joint Core Strategy for Broadland, Norwich and South Norfolk (the JCS) adopted March 211, amended January 2014
  - Norwich Site Allocations and Site Specific Policies Local Plan (the site allocations plan) adopted December 2014
  - Norwich Development Management Policies Local Plan (the DM policies plan) adopted December 2014.
- 3. In addition to monitoring the objectives of the JCS, the AMR outlines the housing land supply position, details of CIL receipts, actions taken under the Duty to Cooperate, updates to the Sustainability Appraisal baselines and includes a section of the implementation of each local authority's local plan policies.
- 4. The full AMR report is of considerable size and is a detailed technical document. Therefore, only the main body of the AMR and the appendices concerning housing land supply and the local plan monitoring for Norwich are reproduced in Appendices 1-4 of this report. The full AMR is available at this link: <u>Annual Monitoring Report » Greater Norwich Growth Board</u>
- 5. This report contains an overview of the monitoring of the JCS and the policies in the DM policies plan. Monitoring of delivery of sites in the site allocations plan is incorporated in Appendix 2 as part of the assessment of the five-year housing land supply.
- 6. The Greater Norwich Local Plan (GNLP) has been submitted and is currently undergoing examination in public. Once adopted, the GNLP will replace the strategic policies in the JCS.
- 7. This AMR covers the period 1<sup>st</sup> April 2020 31<sup>st</sup> March 2021. The information contained within this report is accurate as of that period, however updated information has been provided for context where this is available. The City Council keeps up to date records of district monitoring information and it is hoped that future AMR's can be reported more promptly. This 2020-2021 monitoring period also covers several periods of national lockdown and other measures associated with the Covid-19 pandemic. The effects of the pandemic are referred to below where it is considered to have impacted upon the monitoring data.

#### Overview of the Joint Core Strategy AMR

- 8. The AMR's key findings are set out below and in the Executive Summary, which is attached in Appendix 1 of this report. The AMR demonstrates that progress is being made on a number of indicators, however overall a more mixed picture is represented.
- 9. The total CO2 emissions per capita and per sector have largely decreased across the board with only domestic emissions in Broadland and Norwich remaining stable at 2018/19 levels.
- 10. The percentage of household waste that is recycled and composted has increased in both South Norfolk and Broadland councils but has decreased in Norwich. Whilst the AMR itself gives Norwich a red RAG rating for this indicator, it does not explore these figures alongside total domestic waste. Although this is not monitored, it is possible that a reduction in the production of waste that can be recycled and composted in Norwich is responsible for the reduced percentages for the 2020/21 period.
- 11. In relation to the objectives to ensure sufficient housing and affordable housing completions against JCS requirements, the latest AMR reports a mixed picture. For overall housing delivery, there has been a decrease in housing delivery for Greater Norwich from 2,075 units pa in 2019/20 to 1,468 units pa in 2020/21. This does not meet the JCS target of delivering 2,046 units pa. Housing delivery for the Norwich Policy Area (NPA) also decreased from 1,624 units per annum in 2019/20 to 1,140 units per annum which does not meet the target for delivery within the NPA of 1,825 units pa. The decreased housing delivery is in part due to the impacts of the Covid-19 pandemic resulting in closure of construction sites, in addition to impacts of construction costs and labour shortages.
- 12. Of all the housing completions figures to be recorded against this monitoring indicator, the only ones to meet their identified targets are the delivery of housing within the Broadland Rural Policy Area (RPA) and the South Norfolk RPA. The issue of over delivery of housing within the RPA and under-delivery within the NPA is considered further in the Housing Land Supply Issues section below and in Appendix 3.
- 13. Housing delivery for Norwich (as reported against the JCS) in 2020/21 was 166 dwellings; a significant decrease on previous years' delivery. This figure does not include completions from C2 communal accommodation or purposebuilt student accommodation and therefore does not provide the full delivery picture for Norwich. The monitoring against the local plan (paragraphs 24 onwards in this report) which does account for these accommodation types reports 300 dwellings delivered in 2020/21. Of this figure, 55% (166 dwellings) were C3 residential units and 45% (134 dwellings) were C2 communal and student accommodation. (For reference, the housing completions figures for the 2021/22 period are contained within Appendix 5).
- 14. Affordable housing completions have also decreased across the Greater Norwich area from 658 dwellings in 2019/20 to 314 dwellings in 2020/21. In Norwich, the reduction is particularly noticeable from 184 completions in

2019/20 to 20 completions in 2020/21. This is the first time in the past three years that the annual affordable housing target for Greater Norwich of 525 dwellings per year has not been met. This reduction is related to the reduced total housing delivery associated with various factors, including both direct and indirect impacts of the Covid-19 pandemic. The provision of affordable housing continues to remain a challenge particularly given that certain types of development are not required to provide affordable housing (e.g. prior approval conversions of offices to residential) and that some applications seek to reduce the amount of affordable housing provision on viability grounds.

15. There has been a further loss of office floorspace in Norwich City Centre, although this is significantly less than the loss sustained in previous monitoring periods. The overall net reduction in office floorspace in Norwich city equates to a 30.3% loss in office stock from 2008/09-2020/21. Conversely there has been a continued increase in the amount of office floorspace being developed in the Broadland area. Norwich City Council are currently exploring the introduction of an Article 4 Direction within certain parts of the city centre, to help prevent the continued loss of office floorspace, which is the subject of another report to this Panel meeting.

#### Housing Land Supply Issues

- 16. Within the AMR reported to SD Panel in September 2019, changes to the methodology for calculating the five year land supply were outlined. These changes resulted in significant differences to the figures and there was concern that this could obscure changes on a year-by-year basis. As such, an additional five-year land supply calculation was provided using the same methodology as previous years to allow for more direct comparison. Similar calculations have been undertaken for the 2020/21 period and are included at Appendix 3 (These are not included within the AMR itself). This calculation concludes that there has been significant under-delivery of housing within the NPA and over-delivery in the RPA over the plan period. This results in a housing year land supply position for the NPA of 4.74 years.
- 17. However, all the AMR's subsequent to the 2017/18 reporting period, no longer use the JCS as the basis for the housing land supply calculation. In accordance with the NPPF, as the local plan is over 5 years old, the local housing need figure has been calculated using the standard methodology set out in national guidance. The methodology can only be used at the level of the whole district and therefore it is no longer possible to calculate the supply using the methodology across the NPA. Using the standard methodology, the AMR presented the housing land supply at April 2020 as 6.16 years across Greater Norwich and 4.35 years across the city. By comparison the housing land supply at April 2021 is calculated as 6.01 years across Greater Norwich and 4.37 years across the City (Appendix 2).
- 18. The changes to the five-year land supply are more balanced within this monitoring period. The supply is reduced slightly across Greater Norwich, but there has been a marginal increase in housing land supply in Norwich. It should be noted that the information provided for Norwich is a conservative estimate based on information available at the time. It should also be noted that the 2020-21 five-year land supply is not affected by nutrient neutrality, as

this position is from before Natural England's announcement that the Norfolk local authorities must ensure development can demonstrate it is nutrient neutral before granting consent. The five-year housing land supply position will also be updated as part of the GNLP examination process so that the most up to date information on housing delivery forecast is presented to the inspectors.

19. In summary, for the purposes of determining future planning applications, a five-year land supply has been demonstrated across the Greater Norwich area using the standard methodology. However, notwithstanding this, there is still significant under delivery of housing against the target set out in the policy JCS4 (as detailed in paragraph 16 and Appendix 3). Therefore, officers consider that the need for housing to meet local need is at least as great as it was previously, and great weight should continue to be given to this issue on relevant applications.

# Overview of the Development Management Policies Local Plan (Norwich Appendix of AMR)

- 20. The following is a summary of the information provided in Appendix F of the AMR and set out in appendix 4 of this report. This information pertains to the Norwich City Council local planning policies only.
- 21. In accordance with paragraph 33 of the National Planning Policy Framework (NPPF) and S10A of the Town and Country Planning (Local Planning) (England) Regulations 2017, Norwich City Council undertook a review of the DM policies plan and the Site Allocations plan, to review whether the plans are up to date and respond to changing local needs and circumstances. The review was carried out in October-November 2019 and endorsed by cabinet on 13 November 2019. It concluded that, in general, the local plan policies are fit for purpose at the current time, however it recommends that a full review of the Development Management Policies Local Plan should commence following the Regulation 19 consultation of the GNLP. The full conclusions of the Regulation 10A review can be found at the following link:

https://www.norwich.gov.uk/info/20199/adopted\_local\_plan/2494/regulation\_10 a\_review\_of\_the\_local\_plan

- 22. However, there have been numerous future policy changes presented by national government (such as those introduced in the Environment Act, and those proposed in the Levelling Up Bill) which could have a direct impact on local planning policy. It is therefore considered prudent to await more certainty on the potential national planning reforms and on the adoption process of the GNLP before this review commences, likely in early 2024.
- 23. The following is a summary of the main findings of the Norwich Appendix of the AMR 2020/21:
  - There has been a reduction at both the Lakenfields and Castle Meadow monitoring stations for air quality indicator Nitrogen Dioxide (NO<sub>2</sub>) and airborne particulates (PM<sup>10</sup>) compared with previous monitoring periods. The reduction in NO<sub>2</sub> levels at Castle Meadow has been particularly

noticeable this year. This is in part due to the impacts related to reduced travel in the Covid-19 pandemic and reduced bus services.

- In 2020/21, 335 new homes were granted consent compared with 746 new homes granted consent in 2019/20.
- The total housing commitment (the number of dwellings with outstanding planning permission (and unbuilt) and those allocated for development in the local plan) was 6,245. Although this is a reduction on the previous year's figure, it is still significantly greater than the figures recorded for the other monitoring periods since the adoption of the local plan
- Housing completions in 2020/21 were recorded at 300 dwellings (inclusive of student and C2 accommodation). This is a significant reduction on previous years' completions figures and does not meet the average annual target for Norwich set by the JCS of 477 dwellings per annum. It is likely that the reduced delivery of homes across the 2020/21 period is as a result of the Covid-19 pandemic. This is likely to be both a result of closed construction sites under government rules, and then ongoing material supply chain issues and shortages of labour (also associated with Brexit). This trend has been reflected across the country and is not unique to Norwich.
- There were no new consents granted in the 2020/21 period for student or C2 accommodation.
- In 2020/21, there was a continued loss of office space of -6,773.31 m2. Interestingly, this period also saw an increase in the number of permitted prior approval consents for office to residential conversions, and these applications were responsible for the largest overall losses of office floorspace. It is also interesting to note that this monitoring period saw the biggest increase in the amount of office floorspace permitted (note this indicator relates to permissions and not completions). This is largely as a result of 3,300m2 of office floorspace being approved at Hanger 5 Anson Road for the addition of mezzanine floorspace associated with an existing business.
- The city centre retail sector appeared to be performing well in the 2020/21 period with none of the primary or secondary retail centres falling below their required retail thresholds, despite the monitoring period covering several periods of national lockdown. However, there has been a net loss of retail floorspace across the city centre overall in this period. In terms of district and local centres, the picture is more balanced, with several centres having a reduced proportion of retail floorspace, but several centres also increasing their proportion of retail floorspace.
- The largest amount of community facilities floorspace was approved since the adoption of the local plan, at 11,012m2. In total, 12 applications were granted consent. Significant consents include the change of use of Moles Rest Fifers Lane to a place of worship and the change of use at Unit E Havers Road to a dance school.

- The largest amount of education and training floorspace was also approved since the adoption of the local plan, at 44,842m2. The majority of this floorspace results from the approval of the application for the Sky House building at UEA.
- The 2020/21 period saw the highest number of applications refused for non -provision or insufficient provision of car parking, servicing or cycle parking since the adoption of the local plan. For example, an application for 9 dwellings on Colman Road was refused in part for the over-provision of car parking at the expense of pedestrian access thereby encouraging the use of private car and discouraging sustainable modes of transport. The refusal of all of the applications refused on these grounds amounts to 24 dwellings that otherwise could have been granted consent.

#### Consultation

- 24. The AMR is prepared with input from Norwich City Council, Broadland District Council, South Norfolk District Council, Norfolk County Council and the Greater Norwich Local Plan Team.
- 25. In addition, the relevant portfolio holder was briefed on the contents and main conclusions of the AMR prior to this report being completed.

#### Implications

#### Financial and Resources

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 and Budget.

26. There are no proposals in this report that would reduce or increase resources.

#### Legal

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

#### Statutory Considerations

Consideration	Details of any implications and proposed measures to address:
Equality and Diversity	No implications arising from this report
Health, Social and Economic Impact	No implications arising from this report
Crime and Disorder	No implications arising from this report
Children and Adults Safeguarding	No implications arising from this report
Environmental Impact	No implications arising from this report.

#### Risk Management

Risk	Consequence	Controls Required
This is a report for information and there are no associated risks arising from this report.	N/A	N/A

#### **Other Options Considered**

28. The Annual Monitoring Report must be produced in line with both the Joint Core Strategy and Development Management Policies monitoring frameworks, therefore no other options have been considered.

#### Reasons for the decision/recommendation

29. To provide an annual report to the Council in line with the above planning monitoring frameworks and to note the contents.

#### Background papers:

None

#### Appendices:

Appendix 1 – Greater Norwich Annual Monitoring Report (main doc) 2020-21

Appendix 2 – Greater Norwich 5-year land supply statement 2020-21

Appendix 3 – Illustrative housing land supply for the Norwich Policy Area (NPA)

Appendix 4 - Norwich City Council Development Management Policies Monitoring appendix to AMR 2020-21

Appendix 5 - Norwich City Council Housing Completions Figures 2021/22

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# Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2020-21



Jobs, homes, prosperity for local people





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## 1. Executive Summary

- 1.1 This Annual Monitoring Report (AMR) assesses how the Greater Norwich area performed for 2020/21 against the objectives set out in the Joint Core Strategy (JCS).
- 1.2 There are many indicators that are currently being met or where clear improvements have been made, such as:
  - The percentage of household waste that is recycled or composted has generally increased;
  - The CO2 emissions per sector have mostly decreased;
  - The CO2 emissions per capita have decreased;
  - The percentage of the workforce employed in higher occupations has increased;
  - Norwich has maintained its 13th position in the national retail ranking;
  - No listed buildings have been lost or demolished.
- 1.3 However, there are several indicators where targets are not currently being met, some of which may have been adversely affected by the uncertain economic and political climate. Some indicators are perhaps less influenced by external factors and these are the areas where the overall focus of action should be placed:
  - Although housing delivery has improved in recent years, the number of completions remain below target for the whole plan period;
  - The continued loss of office space in Norwich City Centre, and the growth of office space in other areas is noteworthy, continuing previous years' trends.
- 1.4 The underperforming economic indicators reflect wider economic conditions. However, there is a strong argument that the ambitious JCS targets for office and retail developments reflect older business models and less efficient use of space.
- 1.5 A 5-year land supply can be demonstrated for this monitoring year. Greater Norwich Authorities can demonstrate 6.01 years of housing supply.
- 1.6 A range of activities are underway that will have a positive impact on stimulating growth and help deliver against targets over the coming years.
- 1.7 The local planning authorities (LPAs), working with Norfolk County Council and the Local Enterprise Partnership through the Greater Norwich Growth Board, progressed implementation of the Greater

Norwich City Deal which was agreed with Government in 2013. Working together, the partners support the private sector to deliver in numerous ways, including:

- making a Local Infrastructure Fund available to developers to unlock site constraints;
- delivering the Northern Distributor Road (A1270) and other transport measures, and working towards delivering the Long Stratton bypass and better public transport, including through the Transforming Cities Fund and
- engagement in skills initiatives to improve the match between labour supply and demand.
- 1.8 The LPAs are reviewing and rolling forward the JCS to produce the Greater Norwich Local Plan (GNLP), scheduled to be adopted in 2023. The AMR will inform and be informed by this process.

### 2. Introduction

Context

- 2.1. The JCS for Broadland District Council, Norwich City Council and South Norfolk Council (excluding the Broads Authority area) sets out the longterm vision and objectives for the area and was adopted on 24<sup>th</sup> March 2011.
- 2.2. Following a legal challenge, parts of the JCS concerning the North-East Growth Triangle (NEGT) were remitted for further consideration including the preparation of a new Sustainability Appraisal (SA). The additional work demonstrated that the original policy approach remained the preferred option and this was submitted and examined during 2013. With some modifications, including new policies (Policies 21 and 22) to ensure an adequate supply of land for housing, the amendments to the JCS were adopted on 10<sup>th</sup> January 2014.
- 2.3. For more information on the adoption of the Joint Core Strategy please see the <u>Greater Norwich Growth Board's website</u>.

Purpose

- 2.4. The AMR measures the implementation of the JCS policies and outlines the five-year land supply position (Appendix A).
- 2.5. It also updates the SA baseline (Appendix D) and includes a section on the implementation of each local authority's policies (Appendices E and F) from their respective local plans (not covered by the JCS).
- 2.6. The Localism Act (2011) requires this report to include action taken under the Duty to Cooperate. This can be found in Appendix C.
- 2.7. Community Infrastructure Levy (CIL) regulations require this report to include details of CIL receipts received over the monitoring period. These details can be found in Appendix B.

## 3. Joint Core Strategy Monitoring

- 3.1 The spatial planning objectives in the JCS provide the framework to monitor the success of the plan. They are derived from the districts' Sustainable Community Strategies, which are:
  - To minimise the contributors to climate change and address its impact;
  - To allocate enough land for housing, and affordable housing, in the most sustainable settlements;
  - To promote economic growth and diversity and provide a wide range of jobs;
  - To promote regeneration and reduce deprivation;
  - To allow people to develop to their full potential by providing educational facilities to support the needs of a growing population;
  - To make sure people have ready access to services;
  - To enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact;
  - To positively protect and enhance the individual character and culture of the area;
  - To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value;
  - To be a place where people feel safe in their communities;
  - To encourage the development of healthy and active lifestyles;
  - To involve as many people as possible in new planning policy.
- 3.2 The sections that follow show how each of the objectives and indicators highlighted in the monitoring framework of the JCS have progressed since the 2008 base date of the plan. The current iteration of this report shows data from the last 5 years. For data from the earlier years, please see previous iterations of the report.
- 3.3 In some instances, relevant data will be released after the publication of this report and as such, some indicators do not have complete time-series information. In addition, information from across the area is not always consistent. Where this is the case the reasons for these inconsistencies are stated.
- 3.4 Some data is collected from sample surveys, such as the Annual Population Survey. Given the nature of sample surveys there can

be some fluctuation in results. Indicators which use the Annual Population Survey are employment and unemployment rates, occupational structure and highest-level qualifications.

- 3.5 Since the JCS monitoring framework was drawn up various datasets have been withdrawn or altered. Again, where this is the case reasons for incomplete data will be given and where possible proxies are used instead.
- 3.6 To ensure the monitoring stays effective and relevant, a full review of the framework has been carried out. As a result, a number of indicators have been updated or revised from 2015/16 onwards.
- 3.7 Datasets for the indicators monitored are set out in detail in tables on the following pages.

This Annual Monitoring Report (AMR) is based upon the objectives and targets set out in the Joint Core Strategy (JCS) and covers the period between 1<sup>st</sup> April 2020 and 31<sup>st</sup> March 2021.

In addition to the objectives and targets in the JCS, Broadland, South Norfolk and Norwich have a number of indicators that they monitor locally. These can be found in the appendices.

Objective 1: To minimise the contributors to climate change and address its impact

The following table sets out indicators measured by the JCS monitoring framework.

Location	Target	2016/	2017/	2018/	2019/	RAG
		2017	2018	2019	2020	status
Broadland	Decrease	6.0	5.5	5.9	5.5	Green
Norwich	Decrease	3.9	3.7	3.5	3.2	Green
South Norfolk	Decrease	6.3	6.2	6.6	6.3	Green

Table 3.1 Total CO<sup>2</sup> emissions per capita

Source: DECC

3.8 CO<sup>2</sup> emissions per capita decreased in all three districts in 2019 and 2020, the latest year in which figures are available.

Location	Target	Sector	2016/	2017/	2018/	2019/	RAG status
			2017	2018	2019	2020	
Broadland	Decrease	Ind & Com	2.4	2.0	2.1	1.7	Green
Broadland	Decrease	Domestic	1.7	1.6	1.5	1.5	Amber
Broadland	Decrease	Transport	1.9	2.0	2.1	2.0	Green
Norwich	Decrease	Ind & Com	1.6	1.5	1.4	0.9	Green
Norwich	Decrease	Domestic	1.4	1.3	1.2	1.2	Amber
Norwich	Decrease	Transport	1.0	1.0	0.9	0.8	Green
South Norfolk	Decrease	Ind & Com	1.6	1.5	1.5	1.2	Green
South Norfolk	Decrease	Domestic	1.7	1.5	1.5	1.4	Green
South Norfolk	Decrease	Transport	3.1	3.3	3.2	2.9	Green

Table 3.2 Total CO<sup>2</sup> emissions per capita for each sector

Source: DECC

3.9 CO<sup>2</sup> emissions per capita across all sectors have decreased or remained level.

Location	Туре	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021
Broadland	TOTAL	8.67MW	0.78MW	OMW	0.2MW
Broadland	Wind	0 MW	OMW	OMW	OMW
Broadland	Solar PV	8.67 MW	0.64MW	OMW	omw
Broadland	Hydro	0 MW	omw	OMW	omw
Broadland	Biomass	0 MW	0.14MW	0MW	0.2MW
Norwich	Solar PV Only	No schemes submitted	No schemes submitted	13.8 kW	4000kWh*
South Norfolk	TOTAL	17MW	OMW	OMW	1MW
South Norfolk	Wind	omw	omw	OMW	OMW
South Norfolk	Solar PV	17MW	omw	OMW	1MW
South Norfolk	Sewerage	omw	omw	OMW	omw
South Norfolk	Biomass	omw	omw	OMW	omw
South Norfolk	Air	OMW	OMW	omw	OMW

Table 3.3 Sustainable and Renewable energy capacity permitted by type

Source: LPA

\*This data was provided as Kw hours for 2020/21 thus is not directly comparable.

- 3.10 In many cases micro-generation of renewable energy on existing buildings does not require planning permission, therefore, precise information on the amount of renewable energy capacity is not systematically recorded or available.
- 3.11 Solar energy capacity approvals have decreased since 2015/16, although results have fluctuated considerably over the plan period so far. Permitted development rights have been extended to allow a wide range of renewable energy schemes (especially solar panels) to be installed without requiring planning permission, therefore, this indicator can only now capture a sample of larger schemes. Results are thus made up of relatively few sites and therefore might be expected to fluctuate somewhat from one year to the next, making it difficult to assess this indicator with certainty.

Table 3.4 Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality

Location	Target	2017/	2018/	2019/	2020/	rag
		2018	2019	2020	2021	
Greater Norwich	Zero	0	0	0	0	Green
area						
Broadland	Zero	0	0	0	0	Green
Norwich	Zero	0	0	0	0	Green
South Norfolk	Zero	0	0	0	0	Green

Source: LPA

3.12 There were no planning permissions granted that were contrary to the advice of the Environment Agency on either flood defence grounds or water quality in 2020/21.

Water efficiency

- 3.13 All new housing is required to meet the optional higher Building Regulations water efficiency requirement of 110 litres per person per day and other development is required to maximise water efficiency.
- 3.14 All developments of 10+ dwellings have to show they will meet this standard. Therefore 100% compliance is assumed as permission will not be granted without this assurance.
- 3.15 The government's national housing standards review means the part of the adopted JCS policy 3 which encouraged a design-led approach to water efficiency on large scale sites can no longer be applied. This is because there is no equivalent new national standard as demanding as the requirement set in the JCS.
- 3.16 The remainder of the policy can and is still being applied. The optional water efficiency standard set out in Building Regulations is directly equivalent to the JCS policy 3 for housing developments of less than 500 dwellings. This level of water efficiency can be easily achieved at very little extra cost through water efficient fixtures and fittings.
- 3.17 Non-housing development is unaffected by these changes and must continue to show how it will maximise water efficiency. An advice note provides information to enable this standard to be implemented through JCS policy 3.

Location	Target	2017/ 2018	2018/ 2019	19/20	20/21	RAG
Broadland	No Reduction	a)23.60%	a)21.45%	a)21.97%	a)21.54%	Red
Broadland	No Reduction	b)26.34%	b)26.79%	b)27.61%	b)27.42%	Red
Norwich	No Reduction	a)24.86%	a)22.90%	a)22.60%	a) 22.9%	Green
Norwich	No Reduction	b)12.7%	b)16.10%	b)16%	b) 16.1%	Green
South Norfolk	No Reduction	a) 42.34%	a) 22.15%	a) 22.49%	a) 21.92%	Red
South Norfolk	No Reduction	b) 18.4%	b) 19.20%	b) 20.04%	b) 19.84%	Red

Table 3.5 Percentage of household waste that is a) recycled and b) composted

Source: LPA

- 3.18 The percentage of household waste that is recycled and composted has increased in Norwich but decreased slightly in Broadland and South Norfolk. While increasing recycling year on year is difficult to maintain, in contrast, the rate of composting has generally and consistently increased across all districts over the years.
- 3.19 Increasing recycling rates remains difficult as the amount of newspapers and magazines continues to decline with people switching to digital means and recyclable items being increasingly made using less material (the effect known as "light weighting"). The market also dictates a higher quality of recycling. This has resulted in the rejection rate of material increasing as lower quality material is not being sent for recycling. Norfolk County Council is working with all other Norfolk district councils to improve services and increase the amount of waste diverted from landfill.

# **Objective 2: to allocate enough land for housing, and affordable housing, in the most sustainable settlements**

Target	Location	2017/201 8	18/19	19/20	20/21	RAG status
NPA – 1,825 per annum	NPA	1,685	2,382	1,624	1,140	Red
Greater Norwich area – 2,046 pa	Greater Norwich area	2,034	2,779	2,075	1,468	Red
Broadland – 617 pa	Broadland - NPA	449	482	540	410	Red
Broadland RPA – 89 pa	Broadland - RPA	230	158	123	89	Green
Norwich–477 pa	Norwich	237	927	495	166	Red
South Norfolk NPA – 731	South Norfolk - NPA	999	973	589	564	Red
South Norfolk RPA – 132	South Norfolk - RPA	119	239	328	239	Green

Table 3.6 Net housing completions

Source: LPA

- 3.20 Housing delivery in 2020/21 has decreased from the previous year. This in part reflects that the housebuilding industry shut down for part of the monitoring year in response to the Covid pandemic restrictions. As such, there have been year on year decreases across all of the geographical areas considered in the monitoring report. It is notable that the rates of delivery in the rural areas of Broadland and South Norfolk remain either at or above the JCS target levels. It should also be noted that over the 4-year rolling period since 2018 (which is also the base date the emerging Greater Norwich Local Plan) Greater Norwich has exceeded its annual requirements in the JCS, although only on the basis that over-delivery in the RPA has made up for some, albeit modest, shortfalls in the NPA.
- 3.21 Despite these recent successes and the strength of delivery in the rural areas over the last 3 to 4 years, housing delivery overall has fallen 4,474 homes below the JCS target since the start of the plan period in 2008/9. This under delivery has been the result of housing shortfalls in the NPA, which total 6,961 homes since 2008/9. These shortfalls have been particularly acute in the Broadland part of the NPA. The net effect of these shortfalls is that the annual rate of delivery needed to meet the JCS NPA target by 2026 has grown

from 1,825 homes per year in 2008 to 3,217 homes per year as of 1 April 2021. At the Greater Norwich level, the impact of this increase is mitigated to some extent by the over-supply that is occurring in the rural areas. Nonetheless, it remains a significant challenge to achieve and sustain a level of delivery that would enable the JCS housing target to be met by 2026.

- 3.22 It is noteworthy that housing completions monitored under the JCS do not take account of student accommodation that has been delivered. Norwich City has recently enjoyed considerable growth in the delivery of student accommodation. 134 student bed spaces and institutional homes were delivered in 2020/21. This level of delivery reflects an increased market demand for this type of accommodation in the City Centre.
- 3.23 The housing delivery shortfall in the NPA is the result of a number of factors including: the JCS NPA target being significantly above the targets adopted in previous Local Plans; delays to the allocation of sites for development as a consequence of the JCS legal challenge; the prolonged downturn in the property market that occurred following the global financial crisis in 2008, which had a substantial impact on housing delivery in the early part of the plan period; and the impacts of Covid. The impact of these factors was intensified due to the JCS's dependence on a large, strategic scale, growth, in particular the Broadland Growth Triangle and the challenge presented by the redevelopment of complex brownfield sites in the urban area. However, rates of delivery in the NPA over the last 5 years are now 34% above the overall average since 2008 and lie only slightly below the JCS annualised requirement for the NPA. This is illustrative of the significant progress that has been made to address these substantial challenges.
- 3.24 Despite these challenges, the Greater Norwich Authorities have now delivered 21,794 homes since 2008 and maintain a commitment (the sum of planning permissions and site allocations) of 30,640. This is significantly (117%) higher than the commitment of only 14,090 that existed at the start of the JCS period in 2008. This substantial housing commitment sets the foundation for long-term sustained and sustainable growth across Greater Norwich. It remains critical that the development of planned sites is achieved if the authorities are to deliver high quality growth that is consistent with the Greater Norwich City Deal, and to help to ensure that the area fulfils its economic potential.
- 3.25 The Greater Norwich area Housing Land Supply Assessment 1 April 2020 sets out the 5 Year Housing Land Supply (5YR HLS) position for Greater Norwich. With the JCS becoming 5 years old on 10th

January 2019, the 5YR HLS calculation is now calculated using the outcomes of the Housing Delivery Test (HDT) and standard methodology for the calculation of Local Housing Need (LHN) as opposed to the Housing Requirement of the JCS. As the 5YR HLS at Appendix A demonstrates, the authorities are now able to demonstrate a housing land supply that is in excess of 5 years using this methodology.

Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
Affordable housing target of 525 per year¹	Greater Norwich	531	724	658	314	Red
Not applicable	Broadland	177	195	211	165	NA
Not applicable	Norwich	56	137	184	20	NA
Not applicable	South Norfolk	298	392	263	129	NA

Table 3.7 Affordable housing completions

<sup>1</sup> The Central Norfolk SHMA, 2017, identified a need of 11,030 affordable homes for the period 2015 to 2036

- 3.26 314 affordable homes were completed in 2020/21. This is below the target of 525 completions per year, which is based on the 2017 Strategic Housing Market Assessment (SHMA). However, this is the first time in last 3 years that the target has not been met. This fall is clearly related to a relatively lower number of overall housing delivery this year, which in turn connected to the closure of the housebuilding industry for part of the year.
- 3.27 It needs to be borne in mind that affordable housing completions are reported as gross rather than net figures. Gross delivery will need to exceed the target in order to ensure all needs identified within the SHMA are met. In general terms, meeting overall needs for affordable housing is likely to remain a challenge. This challenge has been made more difficult by government changes to the planning system which mean that affordable housing cannot be required in certain circumstances e.g. due to the vacant building credit or the prior approval of office conversions (measures which have a particularly significant impact in Norwich City).
- 3.28 Another challenge to the delivery of affordable housing is that it has proved necessary to reduce the level of affordable housing secured on some sites, to ensure that development is viable. The authorities continue to scrutinise viability assessments submitted by developers to ensure that development meets the affordable housing target as far as possible. In addition, a number of section 106 agreements that accompany development include a "claw back" provision which may

mean that additional affordable housing will be delivered at a later date, if viability improves.

3.29 There was no data collected for new house completions by bedroom number, based on proportions set out in the most recent Sub-Regional Housing Market Assessment.

Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
To meet CHANA (Option 1) targets:29 pitches in total (15 from 2017-22, further 14 to 2022-27)	Greater Norwich area	0	0	2	0	Red
To meet CHANA (Option 1) targets:29 pitches in total (15 from 2017-22, further 14 to 2022-27)	Broadland	0	0	0	0	Red
To meet CHANA (Option 1) targets: 29 pitches in total (15 from 2017-22, further 14 to 2022-27)	Norwich	0	0	0	0	Red
To meet CHANA (Option 1) targets:29 pitches in total (15 from 2017-22, further 14 to 2022-27)	South Norfolk	0	0	2	0	Red

 Table 3.8 Provision of Gypsy and Traveller pitches (completions)

- 3.30 Additional sites for Gypsy and Traveller pitches will be delivered through granting of further planning permissions or through the GNLP in emerging local plans, as appropriate. Broadland Housing Association has secured planning permission for the delivery of 13 pitches at Swanton Road. The project has been delayed due to a legal challenge over ownership of the land, but it is anticipated that work will commence to deliver this project within this financial year alongside a revised application to Homes England for funding.
- 3.31 Looking to the future, a Caravan and Houseboats Accommodation Needs Assessment was completed in 2017 for the period to 2036 (commissioned jointly by the Greater Norwich authorities with the Broads Authority; Great Yarmouth Borough Council; and North Norfolk District Council). The Needs Assessment categorised the need for residential caravans, Travelling Showpeople and residential boat dwellers.

- 3.32 The need for residential caravans was studied specifically for those of Gypsy and Traveler heritage. A distinction was also drawn between Gypsy and Traveller households who have not ceased to travel permanently (Option 1) and those who only travel for work purposes (Option 2).
- 3.33 The Needs Assessment was completed in October 2017. The study concluded the most appropriate geography for assessing the need for the three Greater Norwich authorities was across the whole of the three districts together (as a single figure).

Type of Pitches	2017-2022	2022-2027	2027-2032	2032-2036	Total
Gypsies and Travellers (Option 1)	15	14	15	16	60
Gypsies and Travellers (Option 2)	-2	11	11	11	31
Travelling Showpeople	25	6	7	8	46
Residential boat dwellers	0	0	0	0	0
Residential caravan dwellers	91	5	5	5	106

 Table 3.9 Required provision of Gypsy and Traveller pitches

3.34 There is ongoing work to keep evidence current, and an updated Needs Assessment is expected in 2022. In addition to a desktop study, evidence gathering will include engagement and interviews with families from travelling communities. The work is being done specifically for the Greater Norwich area.

Table 3.10 Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900)

Target	Location		2018/ 2019	2019/ 2020	2020/ 2021
No decrease	Greater Norwich area	67.3%	63.8%	No data	No data

3.35 No data was available this year as the methodology for measuring accessibility has changed.

Table 3.11 (Gross) new house completions by bedroom number, based on the proportions set out in the most recent Sub-Regional Housing Market Assessment

Location	Dwellings	2017/2018	2018/2019	2019/2020	2020/2021
Broadland <sup>1</sup>	1 bed	27	69	72	41
Broadland <sup>2</sup>	2 bed	205	187	197	147
Broadland <sup>2</sup>	3 bed	234	198	219	218
Broadland <sup>2</sup>	4 bed	228	195	193	119
Broadland <sup>2</sup>	Unknown	0	0	0	1
Norwich	No data collected				
South Norfolk	1 bed	121	98	81	30
South Norfolk	2 bed	230	266	167	121
South Norfolk	3 bed	396	483	317	184
South Norfolk	4 bed	335	310	238	171
South Norfolk	Unknown	36	71	114	294

3.36 Since we do not have data for Norwich, it is not clear whether this indicator has achieved its target this year (see objective 2).

Objective 3: to promote economic growth and diversity and provide a wide range of jobs

Indicator	Target	Location	2017/	2018/	2019/	, 2020/
	-		2018	2019	2020	2021
Permitted amount of floorspace and land by employment type	B1 – 118 hectares/295,000m2	Greater Norwich area	B1: 41,259 B2:3,722 B8: 10,338	No data	B1: 105,594 B2: 13,586 B8: 15, 832	No data
Permitted amount of floorspace and land by employment type	B1 – 118 hectares/295,000m2	Broadland	B1: 80,109 B2: 8,566 B3: 17,531	B1: 82,532 B2: 8,060 B3: 15,583	B1: 94,167 B2: 4,230 B3: 10,699	B1: 174,998 B2: 5606 B3: 12,241
Permitted amount of floorspace and land by employment type	B2/8 – 111 hectares 2007 – 2026	Norwich	B1a - 40,205 (net loss) B1b 113.8 (net gain) B1c - 217.7 sq.m (net loss) B2 -8068 (net loss) B8-7633 (net loss)	B1a - 11695 (net loss) B1b - None B1c +145.4 (net gain) B2 - 280(net loss) B8 - 2131 (net loss)	B1a - 2400 (net loss) B1b 0 B1c - 806 (net loss) B2: 2,875 B8: 288	B1a - 6733 (net loss) B1b - 313 (net loss) B1c 1907 B2: 975 B8: 2537
Permitted amount of floorspace and land by employment type	B2/8 – 111 hectares 2007 – 2026	South Norfolk	B1: 1459 B2: 3,224 B8: 440	No data	B1: 14,633 B2: 6,481 B3: 4,845	No data

Table 3.12 Permitted amount of floor space and land by employment type<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> Calculated using figures from the Greater Norwich Employment Growth and Employment Sites and Premises Study 2008

Indicator	Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
Amount of permitted floor space	B2/8 – 111 hectares 2007 – 2026 100,000m <sup>2</sup> Norwich City Centre	Norwich	- 40205m2	- 13961 m2	-293 m2	- 3201m 2	Red
Amount of permitted floor space	B2/8 – 111 hectares 2007 – 2026 100,000m <sup>2</sup> Norwich City Centre	NRP	No data	No data	No data	No data	No data
Amount of permitted floor space	100,000m <sup>2</sup> NRP	BBP	No data	No data	No data	No data	No data
Amount of permitted floor space	50,000m² BBP	South Norfolk	7465.70 M2		No data	No data	No data

Table 3.13 Amount of Permitted Floor Space

3.37 In recent years, it has only been practical to collect data on planning permissions granted. Consequently, as the data presented here is incomplete, it is not clear whether the target has been achieved. What is clear is that there has been a sustained loss of office floor space in the city centre.

## Table 3.14 Office space developed + = net gain

- = net loss

Location	Use	2017/2018	2018/2019	2019/2020	2020/2021
Craater Nerwich eree	Class	+41,259	No data	+105,594	No data
Greater Norwich area (floorspace in sqm)	B1	+41,239	NO Uala	+105,594	no uala
Greater Norwich area	B2	+3,722	No data	+13,586	No data
(floorspace in sqm)	DZ	10,722	No data	10,000	
Greater Norwich area	B8	+10,338	No data	+15,832	No data
(floorspace in sqm)	-				
Broadland (sqm)	B1	+80,109	+82,532	+94,167	+174,998
Broadland (sqm)	B2	+8,566	+8,060	+4,230	+5.606
Broadland (sqm)	B8	+17,531	+15,583	+10,699	+12,241
Norwich (sqm) <sup>3</sup>	B1	No data	No data	No data	No data
Norwich (sqm) <sup>4</sup>	B1a	-40,205	-11,695	-2,400	-6,773
Norwich (sqm) <sup>4</sup>	B1b	+113.8	0	0	-313
Norwich (sqm) <sup>4</sup>	B1c	-217.7	+145.4	-806	1907
Norwich (sqm) <sup>4</sup>	B2	-8068	-280	+2875	975
Norwich (sqm)	B8	-7,633	-2,131	+288	+2537
South Norfolk	B1	+1,459	No data	+14,633	No data
South Norfolk	B2	+3,224	No data	+6,481	No data
South Norfolk	B8	+440	No data	+4,845	No data

Office space developed

- 3.38 There was a net loss of 6,773 sqm of office floor space (use class B1a) in Norwich this monitoring year, predominantly in the city centre. This is significantly less than the loss sustained in 2017/18 and 2018/19, but remains a concern. There is currently very limited commercial impetus to develop any new office space in the city centre due to relatively low rental values making speculative development unviable.
- 3.39 Most of the office floor space losses are being developed into residential properties and schools. There remains no planning control over the loss of office space when converted to these uses.
- 3.40 Data published by the Valuation Office Agency (VOA) (Business

<sup>&</sup>lt;sup>3</sup> Data updated from 2015 information from Norwich City Council and different from previous years

Floorspace (Experimental Statistics VOA, May 2012) shows that the office stock in the Norwich local authority area stood at 362,000sqm in 2006 and that this had grown to 378,000sqm in 2012. The office floorspace total is likely to include a proportion of floorspace which for planning purposes is actually in use class A2 – financial and professional services, or D1 – for example, offices associated with police stations and surgeries, rather than just B1(a). However, in the absence of any more accurate and up to date national or local datasets, the VOA figure of 378,000sqm is used as a baseline Norwich stock figure for 2012.

3.41 Annual monitoring since the base date of the JCS (April 2008) shows the following change in the stock of B1(a) office floorspace in Norwich from 2008 to 2020, derived from planning permissions and completions records. From 2008 to 2020, the overall net reduction in the office floor space equates to just over 30%. There is no indication that there will be any slowdown in this trend so long as residential development values in the city centre remain higher than office values and the absence of any additional planning obligation requirements on developers.

Date	Norwich Office Floor Space
2008/09	13,205 sqm net gain
2009/10	657 sqm net gain
2010/11	2,404 sqm net gain
2011/12	-115 sqm net loss
2012/13	-3,187 sqm net loss
2013/14	-2,024 sqm net loss
2014/15	-31,063 sqm net loss
2015/16	-8,881 sqm net loss
2016/17	-24,449 sqm net loss
2017/18	-40,205 sqm net loss
2018/19	-11,695 sqm net loss
2019/20	-2,400 sqm net loss
2020/21	-6,773 sqm net loss
Total actual/potential	-114,526 sq. m net loss (30.3%)
office floorspace	
change Norwich city	
April 2008-March 2021	

Table 3.15 Norwich Office Floor Space Variances

Table 3.16 Annual count of employee jobs<sup>4</sup>

Location	Target	2017/2018	2018/2019	2019/2020	RAG
Greater	2,222 per	193,000	193,000	188,000	Red
Norwich area	annum increase				
Broadland	Not applicable	47,000	48,000	48,000	Amber
Norwich	Not applicable	93,000	89,000	86,000	Red
South Norfolk	Not applicable	53,000	56,000	54,000	Red

3.42 The 19/20 data is the latest release. The total number of employee jobs has decreased from 18/19.

Table 3.17 Employment rate of the economically active population

Indicator	Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
Employment rate of economically active population	Increase	Greater Norwich	75.40%	78.90%	81.40%	76.80%	Red
Employment rate of economically active population	Increase	Broadland	84.30%	78.50%	86.20%	81.50%	Red
Employment rate of economically active population	Increase	Norwich	68.50%	77.10%	74.60%	77.70%	Green
Employment rate of economically active population	Increase	South Norfolk	75.60%	81.60%	84.90%	71.50%	Red

3.43 Employment rates have decreased over the past year. This may well be due to the lockdown measures for the pandemic having negatively impacted the employment level. It is important to note that this dataset is based on sample surveys and fluctuates

<sup>&</sup>lt;sup>4</sup> Data gathered in September. Although this dataset is not recommended for monitoring purposes it is nonetheless the only dataset available for measuring jobs at lower level geographies.
between surveys.

Indicator	Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
Percentage of workforce employed in higher occupations	Annual increase of 1%	Greater Norwich	50%	44%	43%	47%	Green
Percentage of workforce employed in higher occupations	Not applicable	Broadland	41%	47%	39%	32%	Red
Percentage of workforce employed in higher occupations	Not applicable	Norwich	51%	39%	42%	54%	Green
Percentage of workforce employed in higher occupations	Not applicable	South Norfolk	60%	47%	47%	53%	Green

Table 3.18 Percentage of the workforce employed in higher occupations

3.44 The percentage of the workforce employed in higher occupations across the Greater Norwich area has increased in this monitoring year. This is particularly apparent in Norwich and South Norfolk.

Table 3.19 National Retail Ranking for Norwich

Indicator	Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
National retail ranking	Maintain top 20 ranking	Norwich	13th	13th	13th	13th	Green

- 3.45 There were changes to the Venuescore evaluation criteria between 2011/12 and 2012/13 which affected Norwich's position resulting in a fall to the position of 13<sup>th</sup> from 9<sup>th</sup>. This year, the target for the city centre has been achieved by maintaining 13<sup>th</sup> position.
- 3.46 Overall, Norwich continues to compete well against larger cities in the Venuescore ranking nationally. It has the largest proportion of its retailing in the city centre of any major city nationally and is the only centre in the East of England that ranks in the top twenty.

Table 3.20 Net change in retail floor space in the city centre

Indicator	Target	Location	2016/ 2017	2017/ 2018		2019/ 2020	2020/ 2021	RAG
Net change in retail floorspace in city centre	No decrease in retail floor space	Norwich	No data	-217	-6231	No data	-1534	n/a

- 3.47 Loss of retail floor space (of 1,534m2 (0.7%)) has been identified between October 2019 and July 2021. 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 continues a steady trend of decreasing retail floorspace in the city centre.
- 3.48 In recent years, retail investment in the city centre has concentrated on improvements and enhancements to existing stock.
- 3.49 The trend evident since April 2008 is of a slow reduction in city centre retail floor space at the expense of other uses. Since 2008 the total amount of retail floorspace has decreased by 13,115 sqm (a 5.7% decrease). Changes in the policy approach have allowed more flexibility of uses in the city centre to encourage the development of uses such as cafes, restaurants and leisure facilities. These complementary uses support retail strength and the early evening economy.
- 3.50 It is anticipated that there will be further loss of retail floorspace as a result of the Covid-19 pandemic, but also due to the introduction of Class E which means that planning permission is no longer required to change retail to any other use that fall within Class E (commercial, business and service). In addition, ongoing planning deregulation at a national level has extended the scope of permitted development rights which now also allows for the change of use of Class E to residential with only the consideration of certain matters under a prior approval application (subject to certain limitations and conditions).
- 3.51 Although a reduction in retail floor space is contrary to the aim of Policy 11 of the JCS, to increase the amount of retailing in the city centre, it is in support of the 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 is considered that such diversification of uses has helped strengthen the city centre's function in times of increased internet shopping and a decline in 'bricks and mortar' retailing.

Table 3.21 Percentage of permitted town centre uses in defined centres and strategic growth locations

Location	Town centre uses	2016/ 2017	Town centre uses	2017/ 2018	Town centre uses	2018/ 2019	Town centre uses	2019/ 2020	Town centre uses	2020/ 2021
Broadland	A1	23%	A1	42%	A1	17.6%	A1	5.8%	A1	50%
Broadland	A2	100%	A2	100%	A2	100%	A2	0%	A2	0%
Broadland	B1a	28%	B1a	20%	B1a	38.5%	B1a	0%	B1a	12.5%
Broadland	D2	15%	D2	33%	D2	17.3%	D2	23.5%	D2	30%
Norwich	A1	38.9%	A1	6%	A1	0%	A1	9.6%	A1	47%
Norwich	A2	43.1%	A2	100%	A2	0%	A2	56.9%	A2	None
Norwich	B1a	0%	B1a	0%	B1a	31%	B1a	6.2%	B1a	21%
Norwich	D2	0%	D2	3%	D2	76%	D2	25.6%	D2	81%
South Norfolk	A1	21.7%	A1	70%	A1	38%	A1	25%	A1	No data
South Norfolk	A2	25%	A2	0%	A2	50%	A2	0%	A2	No data
South Norfolk	B1a	50%	B1a	75%	B1a	25%	B1a	10%	B1a	No data
South Norfolk	D2	66.7%	D2	71%	D2	0%	D2	47%	D2	No data

3.52 Proportions of the permitted town centre uses vary depending on the use class and location. There has also been a varied pattern compared to previous years.

Indicator	Target	Source	Location	2015-2018	2018/2019	2019/2020	2020/2021	RAG status
Number of Lower Super Output Areas in national most deprived 20%	Reduction by 50% in plan period (28 out of 242 in 2007)	IMD (DCLG)	Greater Norwich area	No data	0	Data not released	Data not released	n/a
Number of Lower Super Output Areas in national most deprived 20%	Reduction by 50% in plan period (28 out of 242 in 2007)	IMD (DCLG)	Broadland	No data	0	Data not released	Data not released	n/a
Number of Lower Super Output Areas in national most deprived 20%	Reduction by 50% in plan period (28 out of 242 in 2007)	IMD (DCLG)	Norwich	No data	0	Data not released	Data not released	n/a
Number of Lower Super Output Areas in national most deprived 20%	Reduction by 50% in plan period (28 out of 242 in 2007)	IMD (DCLG)	South Norfolk	No data	0	Data not released	Data not released	n/a
The amount of land on brownfield register that has been developed	Increase the amount of completions for housing on land identified in brownfield register in % form	LPA	Broadland	No data	2.19 ha (2.1%)	1.2 ha (1.18%)	0.23 Ha (0,23%)	Red
The amount of land on brownfield register that has been developed	Increase the amount of completions for housing on land identified in brownfield register in % form	lpa	Norwich	No data	1.34 ha	2.07 ha (2.02%)	2.25ha	Green
The amount of land on brownfield register that has been developed	Increase the amount of completions for housing on land identified in brownfield register in % form	lpa	South Norfolk	No data	5.05 Ha (22%)	1.71 ha 17%	8%	Red

# Table 3.22 Objective 4: to promote regeneration and reduce deprivation

Number of Lower Super Output Areas in national most deprived 20%

3.53 The Index of Multiple Deprivation allows each Lower Super Output Area (LSOA) in England to be ranked relative to one another according to their level of deprivation. It must be noted that although the rank of deprivation has improved it does not mean that deprivation itself has improved in any given area, but rather that deprivation has decreased relative to other parts of the country. The 2020 data has not been published at the time of publication of this AMR.

The amount of land on the brownfield register that has been developed

**3.54** This is a new indicator and further data will need to be collected over the years to track the development of this indicator. It is also important to note that since the size of the brownfield register changes every year, the percentage of completions is not necessarily an accurate account of the progress of development. But, there has been an increase been an increase in the amount of land developed that is on the brownfield land register in Norwich.

# Table 3.23 Objective 5: to allow people to develop to their full potential by providing educational facilities to meet the needs of existing and future populations

Indicator	Target	Source	Location	2017/2018	2018/2019	2019/2020	2020/2021	RAG Status
School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades	Year-on-year increase from 2007 value of 53%	Norfolk County Council	Greater Norwich area	Data discontinued	Data discontinued	Data discontinued	Data discontinued	n/a
School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades	Year-on-year increase from 2007 value of 53%	Norfolk County Council	Broadland	Data discontinued	Data discontinued	Data discontinued	Data discontinued	n/a
School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades	Year-on-year increase from 2007 value of 53%	Norfolk County Council	Norwich	Data discontinued	Data discontinued	Data discontinued	Data discontinued	n/a
School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades	Year-on-year increase from 2007 value of 53%	Norfolk County Council	South Norfolk	Data discontinued	Data discontinued	Data discontinued	Data discontinued	n/a
16 to 18-year olds who are not in education, employment or training	Year-on-year reduction from 2006 value of 6%	Norfolk County Council	Greater Norwich area	No data	No data	No data	No data	n/a
16 to 18-year olds who are not in education, employment or training	Year-on-year reduction from 2006 value of 6%	Norfolk County Council	Broadland	No data	2.73%	2.57%	3.30%	Red
16 to 18-year olds who are not in education, employment or training	Year-on-year reduction from 2006 value of 6%	Norfolk County Council	Norwich	No data	5.88%	5.44%	6.83%	Red
16 to 18-year olds who are not in education, employment or training	Year-on-year reduction from 2006 value of 6%	Norfolk County Council	South Norfolk	No data	2.00%	2.12%	3.53%	Red

Indicator	Target	Source	Location	2017/2018	2018/2019	2019/2020	2020/2021	RAG Status
Proportion of population aged 16-64 qualified to NVQ level 4 or higher	Annual increase	Annual Populati on Survey	Greater Norwich area	37.10%	38.40%	33.00%	41.40%	Gree n
Proportion of population aged 16-64 qualified to NVQ level 4 or higher	Annual increase	Annual Populati on Survey	Broadland	30.50%	39.70%	32.90%	36.00%	Gree n
Proportion of population aged 16-64 qualified to NVQ level 4 or higher	Annual increase	Annual Populati on Survey	Norwich	36.80%	38.50%	31.80%	40.90%	Gree n
Proportion of population aged 16-64 qualified to NVQ level 4 or higher	Annual increase	Annual Populati on Survey	South Norfolk	43.70%	36.90%	34.60%	47.00%	Gree n

School leaver qualifications - % of school leavers with 5 or more GCSEs at A\* to C grades including Maths and English

The Government changed its GCSE grading system from A\* to G, to
 9 to 1 in 2017. An accurate direct comparison cannot be made with the previous grading system.

16 to 18-year olds who are not in education, employment or training

3.56 The proportion of 16 to 18-year olds not in education, employment and training has increased in Greater Norwich Area.

Proportion of population aged 16-64 qualified to NVQ level 4 or higher

3.57 The proportion of the population aged 16-64 qualified to at least NVQ level 4 has increased in the Greater Norwich area over this monitoring year.

Indicator	Target	Source	Location	2014/ 2015	2015/ 2018	2018/ 2019	2019/ 2020	0001	RAG status
IMD access to service	Increase the number of LSOAs in the least deprived 50% on the IMD for access to housing and service	IMD	Greater Norwich	127	No data	138	No data	No data	n/a
IMD access to service	Increase the number of LSOAs in the least deprived 50% on the IMD for access to housing and service	IMD	Broadland	40	No data	41	No data	No data	n/a
IMD access to service	Increase the number of LSOAs in the least deprived 50% on the IMD for access to housing and service	IMD	Norwich	58	No data	70	No data	No data	n/a
IMD access to service	Increase the number of LSOAs in the least deprived 50% on the IMD for access to housing and service	IMD	South Norfolk	29	No data	27	No data	No data	n/a

Index of Multiple Deprivation access to services

3.58 The 2018-2019 data release shows the number of LSOAs in the least deprived 50% for access to housing and services has increased. Norwich has experienced the greatest level of improvements. It must be noted that just because the rank of deprivation has improved it does not mean that deprivation itself has improved in any given area, but rather that deprivation has decreased relative to other parts of the country. IMD data is not released on an annual basis and therefore no data is available for 2020/21.

# Table 3.25 Objective 7: to enhance transport provision to meet the needs of existingand future populations while reducing the need to travel

Indicator Percentage of residents who travel to work by:	Target	Location	2001	2011	RAG status
By private motor vehicles	Decrease	Greater Norwich	a) 64%	a) 67%	Red
By public transport	Increase	Greater Norwich	b) 8%	b) 7%	Red
By foot or cycle	Increase	Greater Norwich	c) 17%	c) 18%	Green
Work at or mainly at home	Increase	Greater Norwich	d) 9%	d) 6%	Red
By private motor vehicles	Decrease	Broadland	a)70%	a) 75%	Red
By public transport	Increase	Broadland	b) 8%	b) 6%	Red
By foot or cycle	Increase	Broadland	с) 9%	10%	Green
Work at or mainly at home	Increase	Broadland	10%	6%	Red
By private motor vehicles	Decrease	Norwich	50%	52%	Red
By public transport	Increase	Norwich	9%	9%	Amber
By foot or cycle	Increase	Norwich	32%	33%	Green
Work at or mainly at home	Increase	Norwich	7%	4%	Red
By private motor vehicles	Decrease	South Norfolk	71%	73%	Red
By public transport	Increase	South Norfolk	5%	6%	Green
By foot or cycle	Increase	South Norfolk	10%	10%	Amber
Work at or mainly at home	Increase	South Norfolk	12%	7%	Red

Source: Census (taken every 10 years)

Percentage of residents who travel to work

3.59 The data is derived from the 2011 Census and so is only released for every 10 years. In comparison with the 2001 Census, the overall target was not met. The percentage of residents who travelled to work by private motor vehicles has increased; the percentage of residents who travelled to work by public transport and worked at home decreased. However, there has been an improvement in increasing the percentage of residents travelling to work by foot or cycling. It is worth noting the data is potentially out of date and more recent data suggests a more positive picture. Recent monitoring conducted in the Norwich urban area showed that there has been a 40% increase in cycling since 2013. First Eastern Counties reported a 375,000 increase in Norwich bus journeys in 2015 after completion of Transport for Norwich changes to improve accessibility to the city centre for buses.

Indicator	Target	Source	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG status
Percentage of Conservation Areas with appraisals adopted in the last 10 years	Year-on-year increase	LPA	Broadland	70%	58%	58%	5%	Red
Percentage of Conservation Areas with appraisals adopted in the last 10 years	Year-on-year increase	LPA	Norwich	76%	31%	25%	19%	Red
Percentage of Conservation Areas with appraisals adopted in the last 10 years	Year-on-year increase	LPA	South Norfolk	42%	52%	63%	75%	Green

## Table 3.26 Objective 8: to positively protect and enhance the individual character and culture

Percentage of Conservation Areas with appraisals adopted in the last 10 years

3.60 The percentage of conservation areas with recent appraisals has increased in South Norfolk but decreased in Norwich and Broadland. The figure for Norwich has decreased as a large number of conservation area appraisals were prepared prior to 2010.

Objective 9: to protect, manage and enhance the natural, built, and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation

Indicator	Target	Location	2017/	2018/	2019/	2020/	RAG
			2018	2019	2020	2021	status
Net change in	Year-on-	Greater	73%	74%	No	No	
Local Sites in	year	Norwich			data	data	n/a
"Positive	improve	area					
Conservation	ments						
Management"							

Table 3.27 Net change in local sites in "Positive Conservation Management"

3.61 No data was collected this year due to the outbreak of the Covid-19 pandemic.

Table 2.20 The mercenters	of rivera accord	an an and ar la attar
Table 3.28 The percentage	$\cap$	

Indicator % of river assessed as good or better:	Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
a. Overall Status;	To increase the proportion of Broadland Rivers classified as <b>'good or better'</b>	Broadland Rivers	4%	4%	No data	No data	n/a
b. Ecological Status;	To increase the proportion of Broadland Rivers classified as 'good or better'	Broadland Rivers	4%	4%	No data	No data	n/a
c. Biological Status;	To increase the proportion of Broadland Rivers classified as 'good or better'	Broadland Rivers	17%	17%	No data	No data	n/a
d. General Physio Chem Status;	To increase the proportion of Broadland Rivers classified as <b>'good or better'</b>	Broadland Rivers	23%	23%	No data	No data	n/a
e. Chemical class	To increase the proportion of Broadland Rivers classified as <b>'good or better'</b>	Broadland Rivers	100%	100%	No data	No data	n/a

3.62 The percentage of rivers assessed as good or better has remained the same in 2018/19. No data is available for this reporting year.

Table 2.20 Concentration	ofcoloctod	air pollutopta
Table 3.29 Concentration	OI Selected	ali pollutarits

Indicator	Target	Location		2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
Concentration of selected air pollutants NO2 and PM10 (particulate matter)	Decrease	Broadland	NO2	below 40ug/m3	below 40ug/m3	below 40ug/m 3	below 40ug/ m3	Amber
Concentration of selected air pollutants NO2 and PM10 (particulate matter)	Decrease	Broadland	PM10	below 40ug/m3	below 40ug/m3	N/A	N/A	Amber
Concentration of selected air pollutants NO2 and PM10 (particulate matter)	Decrease	Norwich	NO2	13 (LF); 51 (CM)	12 (LF); 54 (CM)	13 (LF); 41 (CM)	10(LF); 19 (CM)	Amber
Concentration of selected air pollutants NO2 and PM10 (particulate matter)	Decrease	Norwich	PM10	16 (LF); 23 (CM)	16 (LF); 27 (CM)	14 (LF); 19 (CM)	13(LF); 19 (CM	Green
Concentration of selected air pollutants NO2 and PM10 (particulate matter)	Decrease	South Norfolk	NO2	25.0 ug/m3	25.0 ug/m3	N/A	22.2ug /m3	Amber
Concentration of selected air pollutants NO2 and PM10 (particulate matter)	Decrease	South Norfolk	PM10	N/A	N/A	N/A	N/A	N/A

3.28 The pollution levels in most areas of Greater Norwich are well below the recommended maximum. However, some specific locations form hotspots within Norwich. These include Castle Meadow and St Stephens Street where the concentration of nitrogen dioxide has been high. Buses and taxis are the main causes of these emissions. Norwich City Council is working on measures including traffic management and enforcement of Castle Meadow's Low Emission Zone to address this issue. It is also important to view this in the context that there have been significant improvements in air quality in St Stephens and Castle Meadow recently. Please note this year's data has not been ratified by DEFRA and as such it needs to be viewed with a degree of caution. Table 3.30 Percentage of Sites of Special Scientific Interest (SSSIs) in favourable condition or unfavourable recovering condition.

Indicator	Target	Location	2017/ 2018	2018- 2021	RAG
Percentage of SSSIs in favourable condition or unfavourable recovering condition	95% of SSSIs in 'favourable' or 'unfavourable recovering' condition	Broadland	94%	No data	n/a
Percentage of SSSIs in favourable condition or unfavourable recovering condition	95% of SSSIs in 'favourable' or 'unfavourable recovering' condition	Norwich	100%	No data	n/a
Percentage of SSSIs in favourable condition or unfavourable recovering condition	95% of SSSIs in 'favourable' or 'unfavourable recovering' condition	South Norfolk	93%	No data	n/a

3.29 No comparable data has been released this year.

Table 3.31 Number of listed buildings lost/demolished

Indicator	Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
Number of listed buildings lost/demolished	None	Greater Norwich area	0	0	0	0	Green
Number of listed buildings lost/demolished	None	Broadland	0	0	0	0	Green
Number of listed buildings lost/demolished	None	Norwich	0	0	0	0	Green
Number of listed buildings lost/demolished	None	South Norfolk	0	0	0	0	Green

3.30 The target was achieved as no listed building were lost or demolished this year.

Table 3.32 Percentage of new and converted dwellings on Previously Developed Land

Indicator	Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG
Percentage of new and converted dwellings on Previously Developed Land	25%+	Broadland	33%	36%	57%	47%	Green
Percentage of new and converted dwellings on Previously Developed Land	25%+	Norwich	81%	86%	89%	48%	Green
Percentage of new and converted dwellings on Previously Developed Land	25%+	South Norfolk	7.1%	9.1%	11.8%	7.8%	Red

3.31 The target was achieved in Norwich and Broadland.

# Table 3.33 Objective 10: to be a place where people feel safe in their communities

Indicator	Target	Source	Location	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	RAG status
(Reduction in) Overall crime	Decrease in number	Norfolk Police	Greater Norwich area	26,981	29,228	31,449	29,274	Green
(Reduction in) Overall crime	Decrease in number	Norfolk Police	Broadland	4,584	5,162	5,980	6,045	Red
(Reduction in) Overall crime	Decrease in number	Norfolk Police	Norwich	17,176	18,344	19,137	16,500	Green
(Reduction in) Overall crime	Decrease in number	Norfolk Police	South Norfolk	5,221	5,722	6,332	6,729	Red
Number of people killed or seriously injured (KSI) in road traffic accidents	Year-on-year reduction in those KSI	Norfolk County Council	Greater Norwich area	177	210	245	153	Green
Number of people killed or seriously injured (KSI) in road traffic accidents	Year-on-year reduction in those KSI	Norfolk County Council	Broadland	48	46	72	43	Green
Number of people killed or seriously injured (KSI) in road traffic accidents	Year-on-year reduction in those KSI	Norfolk County Council	Norwich	57	85	80	45	Green
Number of people killed or seriously injured (KSI) in road traffic accidents	Year-on-year reduction in those KSI	Norfolk County Council	South Norfolk	72	79	93	65	Green

Reduction in overall crime

3.32 There has been a decrease in total crime in 2020/21. The reduced number of crimes is likely to be a result of lockdown periods

occurring during the Covid pandemic. This is particularly relevant for Norwich which has seen reduction through the night-time economy being locked down for a large part of the year.

Number of people killed or seriously injured in road traffic accidents

3.33 The number of people killed or seriously injured in road traffic accidents has decreased significantly this year. This is likely due to reduced number of road users in general due the Covid pandemic lock down measures.

Objective 11: to encourage the development of healthy and active lifestyles

Percentage of working age population receiving Employment Support Allowance and incapacity benefits

3.34 The data for this indicator has been discontinued.

Indicator	Target	Location	Gender	2017/ 2018	2018- 2020	RAG
Life expectancy at birth	Increase at each survey	Broadland	Male	79.6	81.4	Green
Life expectancy at birth	Increase at each survey	Broadland	Female	84.3	85.0	Green
Life expectancy at birth	Increase at each survey	Norwich	Male	78.1	78.0	Red
Life expectancy at birth	Increase at each survey	Norwich	Female	83.2	82.8	Red
Life expectancy at birth	Increase at each survey	South Norfolk	Male	81.1	81.7	Green
Life expectancy at birth	Increase at each survey	South Norfolk	Female	85.0	84.8	Red

Table 3.34 Life expectancy at birth of males and females

Source: ONS

Life expectancy at birth

3.35 Life expectancy at birth has remained broadly stable across the Greater Norwich area.

Table 3.35 Percentage of physically active adults

Indicator	Target	Location	2017/ 2018	2018/ 2019	2019/ 2020	RAG
Percentage of physically active adults	Increase percentage annually	Broadland	63.00%	69.70%	66.20%	Red
Percentage of physically active adults	Increase percentage annually	Norwich	68.50%	67.10%	75.50%	Green
Percentage of physically active adults	Increase percentage annually	South Norfolk	69.10%	73.30%	66.40%	Red

Percentage of physically active adults

3.36 The latest dataset released is for 2019/20. The proportion of physically active adults has increased significantly for Norwich, but decreased in Broadland and South Norfolk.

Percentage of obese adults

3.37 This data has been discontinued.

Table 3.36 Percentage of obese children

Indicator	Target	Location	2016/2017	2017-2020	RAG
Percentage of obese children (yr 6)	Decrease percentage	Broadland	13.90%	16.20%	Red
Percentage of obese children (yr 6)	Decrease percentage	Norwich	19.20%	19.90%	Red
Percentage of obese children (yr 6)	Decrease percentage	South Norfolk	14.60%	15.00%	Red

Percentage of obese children

3.38 The data for obese children is now available in a 3-year combined data format. Compared to 2016/17 data, there has been an increase in obesity across the Greater Norwich area.

Health Impact Assessment

3.39 All relevant planning applications (over 300 homes) require health impact assessments in order to be validated/approved, so it is assumed that compliance with this indicator has been achieved.

Accessibility of leisure and recreation facilities

3.40 Data is not available for this indicator.

# Table 3.19 Objective 12: to involve as many people as possible in newplanning policy

Indicator	Target	Source	District	2011/2012 <b>-</b> 2016/2017	RAG status
Statement of Community Involvement	Statement of community involvement Less than 5 years old	LPA	Broadland	Adopted 2016	Green
Statement of Community Involvement	Statement of community involvement Less than 5 years old	LPA	Norwich	Adopted 2016	Green
Statement of Community Involvement	Statement of community involvement Less than 5 years old	LPA	South Norfolk	Adopted 2017	Green

Statement of Community Involvement/Engagement

3.41 The Statement of Community Involvements for all three districts were reviewed and revised in 2016 to standardise the approach to public involvement in plan making across the three districts and support the preparation of the new Greater Norwich Local Plan.

For Appendices A to G <u>go to Greater Norwich Growth Board</u> webpage

# For more information or if you require this document in another format or language, please phone:

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Annual Monitoring Report 2020-2021



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# Greater Norwich Area Housing Land Supply Assessment at 1<sup>st</sup> April 2021

## Summary

This note sets out the housing land supply position for the Greater Norwich area for the period 1 April 2021 to 31 March 2026. The Revised National Planning Policy Framework (NPPF) requires local planning authorities to:

"identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old"

The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. The JCS became five years old on 10 January 2019. Although the Greater Norwich authorities have commenced work to replace the JCS, the current plan has not been reviewed in line with the PPG to demonstrate that the housing requirement does not require updating. Indeed, publication of a 2017 SHMA had already indicated the need to update the housing requirement. Therefore, in accordance with NPPF paragraph 73, the Greater Norwich housing land supply must be measured against local housing need (LHN).

The revised NPPF also introduced the Housing Delivery Test (HDT) as an annual measurement of housing delivery. Broadland, Norwich and South Norfolk are measured jointly for the purposes of the HDT. The results of the HDT show that Greater Norwich has delivered 132% of the number of homes required between 2018/19 and 2020/21.

Policy 4 of the JCS sets out a three-district requirement, within which a policy decision was made to focus new allocations within a Norwich Policy Area. Similarly, the HDT is measured jointly across all of Broadland, Norwich and South Norfolk. LHN figures are only provided on a district basis, which can be aggregated up in accordance with Planning Practice Guidance. Lastly, the 2017 SHMA indicated that the vast majority of the three districts are within the same housing market area. Consequently, it is considered appropriate to measure land supply across this area. This approach effectively replaces that of separately measuring housing land supply across the Norwich Policy Area (NPA) and Rural Policy Areas (RPA) of Broadland and South Norfolk, although these areas are still considered in the AMR in relation to monitoring objective 2.

Based upon this calculation of five year housing land supply for Greater Norwich (including the 5% buffer required by the NPPF), the Greater Norwich Authorities can demonstrate:

• 120.2% (6.01 years / 2,098 home surplus)

Within each of the individual districts the following land supply can be demonstrated:

- Broadland: 164.4% (8.22 years / 4,323 home surplus)
- Norwich: 87.4% (4.37 years / 398 home deficit)
- South Norfolk: 117.4% (5.87 years / 798 home surplus)

Notwithstanding the existence of a housing land supply, the Greater Norwich Authorities recognise that further housing land, above and beyond the existing commitments, needs to be identified to 2038. The authorities have committed to the production of the Greater Norwich Local Plan (GNLP) to plan for these additional needs. Ahead of the adoption of the GNLP the authorities will continue to take a positive approach to development proposals that complement, rather than detract from, the existing and emerging development strategies.

## Introduction

1. The policies of the Revised National Planning Policy Framework (NPPF) support Government's objective of "*significantly boosting the supply of homes*". This includes requiring local authorities to:

"identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old" (NPPF, para 74)

- 2. NPPF para 76 requires local authorities to "*monitor progress in building out sites which have permission*", with Government measuring housing delivery against the Housing Delivery Test (HDT).
- 3. In situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites; or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years, applications that involve the provision of housing must be determined taking account of the presumption in favour of sustainable development as set out in the NPPF.
- 4. For purposes of determining planning applications, NPPF para 11 sets out the presumption in favour of sustainable development as:
  - "approving development proposals that accord with an up-to-date development plan without delay; or
  - where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
    - *i* the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
    - ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".
- 5. The following sections of this report set out the issues that relate to housing land supply across Greater Norwich.
- 6. Irrespective of the housing land supply situation, the Greater Norwich Authorities will continue to:
  - i. take a positive approach to development proposals that complement, rather than detract from, the existing development strategy.
  - ii. work closely with partners in the development sectors and the LEP, to stimulate delivery on committed development sites.

# The Starting Point for Calculating the 5 year land supply

7. As set out in the Planning Practice Guidance:

"Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year housing land supply figure where:

- the plan was adopted in the last 5 years, or
- the strategic housing policies have been reviewed within the last 5 years and found not to need updating.

In other circumstances, the 5 year housing land supply will be measured against the area's local housing need calculated using the standard method<sup>"1</sup>.

This echoes paragraph 74 of the NPPF.

- 8. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. The JCS became five years old on 10 January 2019. Although the Greater Norwich authorities have commenced work to replace the JCS, the current plan has not been reviewed in line with the PPG to demonstrate that the housing requirement does not require updating. Indeed, publication of a 2017 SHMA<sup>2</sup> had already indicated the need to update the housing requirement. Therefore the NPPF requires the starting point for the calculation of housing land supply in Greater Norwich to be local housing need (LHN) as calculated using the standard methodology.
- 9. As the base date of the 5 Year Housing Land Supply (5YR HLS) Statement is 1 April 2021, the calculation of annual average household growth has been based on the period 2021 to 2031. The affordability ratios used for the purposes of calculating LHN adjustment factor were the 2019 ratios published on 25<sup>th</sup> March 2021. A summary of this calculation is set out in table 1 below:

	10 Year Average Household 2020- 2030	2019 Median Affordability Ratio	Adjustment Factor	Annual LHN 2020 Based
BDC	389.9	8.54	1.28	501
NRW	505.5	6.95	1.18	599
SNC	669.9	8.85	1.30	873
Тс	1,972			

Table 1 Summary of LHN Calculation

## Past Under-delivery of New Homes

10. The Planning Practice Guidance explains that "Step 2 of the standard method factors in past under-delivery as part of the affordability ratio". As such "there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figures"<sup>3</sup>.

<sup>&</sup>lt;sup>1</sup> Housing Supply and Delivery, Paragraph 005 Reference ID:68-006-20190722

<sup>&</sup>lt;sup>2</sup> Central Norfolk Strategic Housing Market Assessment, Opinion research Services, June 2017

<sup>&</sup>lt;sup>3</sup> Housing and Economic Needs Assessment, Paragraph: 004 Reference ID: 2a-004-20201216

11. It is therefore not necessary to add in any uplift to take account of historic under-delivery against the JCS housing requirement when calculating LHN.

# Sources of Supply

### Sites of 10 or more

- 12. Under the July 2021 NPPF glossary definition of "Deliverable"<sup>4</sup>, all development sites with detailed planning permission "should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years". Where a major development only has outline permission or has only been allocated in a local plan there should be "clear evidence that housing completions will begin on site within five years".
- 13. In consenting to judgement in the recent case between East Northamptonshire Council and Secretary of State for Housing Communities and Local Government and Lourett Developments Ltd (Claim No. CO/917/2020), the Secretary of State has now accepted that the definition of deliverable in the NPPF should not be considered to be a closed list (and that such an interpretation is an error of law). Specifically the Secretary of State confirmed in the Statement of Reasons attached to the Consent Order:

"The proper interpretation of the definition is that any site which can be shown to be "available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years' will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition."

14. Therefore, it is now clear that the Councils' can now include any site in their housing land supply provided that it meets the overarching test of suitable, available and achievable.

#### Sites with detailed permission

- 15. Each of the three Greater Norwich Authorities has taken a similar approach to collecting delivery information for major development sites. Developers of major sites with full or reserve matters planning permission have been approached, where appropriate, in order to establish their programme of delivery. Where programmes of delivery have been provided by developers these have then been reflected in the delivery forecast unless there is clear evidence that the programme is unrealistic or it has been identified that the site will not be delivered.
- 16. This approach reflects developers' site specific knowledge of their sites, their intentions for bringing forward the site and their expectations for the sale of their housing product within the specific area in which their site is located.
- 17. Where programmes have not been provided then sites have been included based on reasonable assumptions of what could be expected on the site in question.

#### Sites with outline permission

18. For sites with only outline permission or subject to allocation, the authorities have reviewed sites and approached developers to understand their delivery programme and have sought to agree Joint Delivery Statements that confirm the developer's delivery

<sup>&</sup>lt;sup>4</sup> National Planning Policy Framework, February 2019, Page 66

intentions and anticipated start and build-out rates. Where, taking account of agreed Joint Delivery Statements and/or the Council's knowledge on the progress of sites, the Councils are satisfied there is clear evidence that housing completions will begin on site within five years, the relevant delivery forecasts have been included in the housing land supply assessment. Appendix C1 of this statement includes the agreed Joint Delivery Statements and related officer comments and clarifications.

19. The weight to be given to the Joint Delivery Statements was specifically challenged in the hearing for the Appeal at Becket's Grove, Wymondham (APP/L2630/W/20/3256206). On this matter the Inspector determined in paragraph 66 of his decision that:

"These documents have been produced by the cooperation of professional persons with knowledge of the sites in question and these persons are signatories to the document. I therefore give these documents significant weight in my decision".

#### Sites of 9 or fewer

- 20. Under the Revised NPPF glossary definition of "*Deliverable*"<sup>5</sup> all sites which do not involve major development "*should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years*".
- 21. The Greater Norwich authorities have assumed that all sites of 9 or fewer will be delivered over the 5-year period at an average annualised rate. However, this is subject to a lapse/non-implementation rate discount of 27%, in accordance with the finding set out in appendix D2.
- 22. The Council's approach to forecasting sites of 9 or fewer dwellings was specifically challenged in the hearing for the Appeal at Becket's Grove, Wymondham (APP/L2630/W/20/3256206). The Inspector found wholly for the Council on this matter stating in paragraph 79 of his decision that:

"I consider this method to be sufficiently robust as to give confidence in the Council's figure for anticipated completions and the number of dwellings to be provided by small sites should be retained."

#### Student Accommodation

23. The Planning Practice Guidance states that:

"All student accommodation, whether it consists of communal halls of residence or selfcontained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on:

- the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and/or
- the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation".

#### and that

"Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, taking steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling."<sup>5</sup>

24. On this basis the Greater Norwich Authorities have included deliverable developments of communal student accommodation in their housing forecast on the basis of a ratio of 1 home to each 2.85 student bedrooms. In accordance with national guidance as set out above, this ratio has been calculated on the basis of the average number of students living in student only households in Norwich and represents the amount of accommodation that new student housing in Norwich can reasonably be expected to release into the wider housing market. This differs from the national ratio of 1 home to 2.5 student bedrooms that is used for the purposes of the Housing Delivery Test. Studio flats which are consistent with the description in the Planning Practice Guidance have been included on a one for one basis. The officer comments and clarifications in Appendix C1 sets out how dwelling equivalents have been calculated for each site.

Older Peoples Housing and Residential Institutions

25. The Planning Practice Guidance states that:

"Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market<sup>6</sup>".

- 26. The guidance on Housing for Older and Disabled People states that "For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published census data<sup>7</sup>".
- 27. On this basis the Greater Norwich Authorities have included deliverable developments of older peoples housing and residential institutions, such as residential care homes, in their housing forecast. For residential institutions this has been on the basis of a ratio of 1 home to each 1.7 units in Norwich or 1.8 units in Broadland and South Norfolk. This ratio has been calculated in accordance with national guidance and is based on the basis of the average number of adults living in households across the Greater Norwich area. This ratio is also consistent with the national average that forms the basis of the housing delivery test. Appendix C1 sets out how dwelling equivalents have been calculated for each site.

#### Windfall

28. The National Planning Practice Guidance states that:

"A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework"<sup>8</sup>.

29. Paragraph 71 of the NPPF states that:

"Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."

<sup>&</sup>lt;sup>5</sup> Housing Supply and Delivery, Paragraph: 034 Reference ID: 68-034-20190722

<sup>&</sup>lt;sup>6</sup> Housing supply and delivery, Paragraph 035 Reference ID: 68-035-20190722

<sup>&</sup>lt;sup>7</sup> Housing for older and disabled people, Paragraph: 016a Reference ID: 63-016a-20190626

<sup>&</sup>lt;sup>8</sup> Housing and economic land availability assessment, Paragraph: 023 Reference ID: 3-023-20190722

#### Strategic housing land availability register

- 30. The Councils' have completed a housing and economic land availability assessment (HELAA). The Councils' consider that the sites within the HELAA are however of limited evidential value to the assessment of windfall rates. This is because:
  - The HELAA assessment only considers land promoted for consideration in the Greater Norwich Local Plan or previously allocated. Therefore it is likely to exclude land that is already in development boundaries where the principle of development is already established.
  - The land considered in the HELAA across Broadland and South Norfolk typically only relates to greenfield extensions to existing settlements either in the form of allocations or sizable settlement limit extensions. By definition these would not be appropriate sources of windfall as they would typically be contrary to policy.
  - The HELAA only considered land of 0.25ha or larger and therefore will not take account of smaller development opportunities.
- 31. For these reasons the Councils' starting point for its assessment of future windfall is based on an assessment of historic rates of windfall development.

#### Assessment of historic rates of windfall development

- 32. Greater Norwich authorities have undertaken an assessment of past Windfall completions on sites of 9 or fewer in Broadland and South Norfolk and across all sites in Norwich. This assessment covers a ten year period between 2008/09 to 2017/18. A summary of this assessment is included in Appendix D1.
- 33. This assessment of historic rates of windfall therefore covers an extensive period of time and takes into account the period in the immediate aftermath of the 2008 global financial crisis. This is considered to be a representative period across a large part of a market cycle and is not skewed by the exclusion of years of depressed housing market activity or only considering period that include more recent policy interventions such as increased permitted development rights for the conversion of barns or offices.

#### Future Trends

- 34. The Councils have taken the following view in respect of expected future trends:
  - Across Broadland and South Norfolk only windfall sites of 9 or fewer have been included as part of the historic windfall analysis. This avoids the inclusion of larger greenfield sites that would only be likely to occur in the absence of a 5 year housing land supply.
  - Garden plots less significant in Norwich but these have proven a consistent source of supply in Broadland and South Norfolk. Whilst the 2021 NPPF indicates that plans should set out policies seeking to restrict inappropriate development of residential gardens, national policy no longer sets out that assessments of windfall *"should not include residential gardens"* as was the case in the 2012 NPPF. The fact that residential sites have consistently gained permission and been built out is prima facie evidence that appropriate garden land sites continue to come forwards. There are a large number of residential

gardens across the Greater Norwich area and therefore these are considered to be a reliable source of supply.

- Barn Conversions and other agricultural buildings Not relevant in Norwich but have been a consistent source of supply across Broadland and South Norfolk throughout assessment period. Given the rural nature of the district, changes in modern agriculture and the changes to permitted development rights under class Q introduced in 2014, with further amendments in 2018, these are considered to provide a consistent source of supply.
- Conversion of shops, offices and schools As would be expected these have been a greater source of supply in Norwich than Broadland or South Norfolk but nonetheless have proven to be consistent sources of supply over the assessment period, albeit subject to some significant year on year variations. Nonetheless, changes such as currently permitted development rights under class MA, G, H or U for Commercial, Business and Service uses provides a clear indication that these sources are likely to be a consistent source of supply of windfall development in the future. The conversion of existing buildings is also likely to be supported by prior approval of B8 storage and distribution uses.
- Brownfield redevelopment the redevelopment of brownfield land has been a consistent source of supply over the assessment period. As would reasonably be expected, completions from brownfield redevelopment have been highest in Norwich but have also contributed in Broadland and South Norfolk. It need to be noted that the early years of South Norfolk data included cert of lawfulness. occupancy restriction removal and sub-divisions within this source of supply. Therefore some caution should be taken in respect of the overall average. Nonetheless, the development of brownfield land has consistently contributed to the supply of housing: brownfield land will often be located in places inherently suitable for residential uses, with national policy (para 121 NPPF) setting an expectation that local planning authorities should "take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purposes in plans". The likelihood of this source of supply continuing into the future is also made more likely by changes such as the new permitted development right under Class ZA, which allows for the "Demolition of buildings and construction of new dwellings houses in their place".
- Affordable Housing Exception Sites this is not a source of supply relevant in Norwich. It is a source that has delivered units in most years across Broadland and South Norfolk. Exceptions sites tend to be located on edge of settlement greenfield sites, there remain significant areas of land which have this characteristic and that could reasonably be expected to be suitable for these purposes. The principle of exception site policies remain established within national and local plan policies. In addition, national policy (para 72) specifically supports entry-level exceptions sites. This is a new type of exception but which is similar in character to affordable housing exceptions and which can reasonably be considered to help ensure contributions from this supply in the future. Therefore this is considered a reliable source of supply, although given the variability in delivery and drop off in supply in recent years some caution should be taken in applying the annual average.
- Other greenfield sites Whilst sources such as school playing field will be inherently limited in number, there remains no shortage of greenfield land across Broadland and South Norfolk, some of which will lie within defined

settlement boundaries, and para.55 dwellings remains acceptable in policy terms. There can also reasonably be expected to remain examples where material consideration justify departures from the development plan, although inherently these will be limited in number. Therefore, this source is expected to remain a reliable source of supply, although it would be sensible to take a prudent approach in respect of the annual average.

 Cert of lawfulness, removal of occupancy restrictions, sub-division of dwellings – These have remained a consistent source of supply across the assessment period. Given that there are large rural areas across Broadland and South Norfolk, it is reasonable to conclude that there will remain a number of agriculturally restricted or holiday accommodation restricted dwellings across the area. It can also reasonable be expected that there will be a number of larger properties with the potential for sub-division. Therefore this is considered a reliable source of supply.

#### Precautionary Approach

- 35. For the reasons set out above the sources of windfall supply are considered to be reliable moving forwards. It is however sensible to take a prudent approach to sources of supply, particularly taking account where future supply is less certain. To account for this, the Councils will apply a precautionary 33% blanket discount across all sources of supply. This should ensure that there is no over-estimation of supply and accounts for changing and unforeseen circumstances. The 33% is above the cautious 27% non-implementation/lapse rate discount that has been calculated from historic trends on sites of 9 or fewer dwellings and that has been applied to small sites with planning permission that form part of the supply.
- 36. In addition to the precautionary blanket discount, the Council has also applied windfall on a stepped basis in accordance with the table below:

Year 1	Year 2	Year 3	Year 4	Year 5
0%	33%	66%	100%	100%

- 37. This stepped approach is consistent with that agreed by Norwich City Council during the Independent Examination of their Site Allocations DPD, and is designed to ensure that there is no double counting of delivery from individual windfall sites that already form part of the supply.
- 38. The inclusion of 33% of the windfall allowance from year 2 onwards reflects the fact that a number of windfall permissions granted shortly after the base date of the assessment and will be of a form that can be implemented relatively quickly permissions granted shortly after the base date of the will have nearly 2 years to come forwards to be completed by the end of year 2. Such permission might include removal of occupancy restrictions, simple conversions of building or small or individual residential developments that have little upfront infrastructure requirements.
- 39. The Council's approach to forecasting Windfall development was challenged in the hearing for the Appeal at Becket's Grove, Wymondham (APP/L2630/W/20/3256206). The Inspector found wholly for the Council on this matter stating in paragraph 76 of his decision that:

"The precautionary approach taken by the Council provides a realistic assessment of the contribution that windfall sites can make to the overall supply of housing. Thus no change should be made to the 5YSHL on the basis of the supply of windfall sites."

Impact of Covid-19 on Housing Delivery

- 40. For sites of 10 or more homes the vast majority of forecasts are based upon the stated intentions of developers. These statements have been largely provided between October 2021 and January 2022 and therefore have been provided in full knowledge of any expected ongoing impacts on delivery result from previous Covid-19 restrictions.
- 41. For sites of 9 or fewer dwellings, the delivery of sites has been subject to a 27% lapse and non-implementation rate. This rate is both set at the highest end of the range and is based on a study of lapse and non-implementation over a period that overlapped the global financial crisis in 2008 in the case of Norwich, or in its aftermath and whilst its effects on the housing market were still being felt across Broadland and South Norfolk. Therefore, it is considered that the Councils have already taken a cautious approach that doesn't need further adjustment to take account of any ongoing impact of Covid-19 on the delivery of small sites.
- 42. In respect of Windfall, the assessment of historic includes the period in the immediate aftermath of the 2008 global financial crisis at a time when the housing market was significant impacted by the economic climate. The overall total is it discounted by a blanket 33% discount across all sources to minimise any potential for over-estimating supply. The supply from windfall is also applied on a stepped basis allowing time for any impact of Covid-19 on the supply of windfall to abate.
- 43. On the basis of the above, it is not considered that any further adjustment to the Council's supply forecast is needed to take account of the fallout of the impact of Covid-19.

## Methodology for Calculating Housing Land Supply

Monitoring of areas which have or are involved in the production of joint plans

44. The Planning Practice Guidance States that:

"Areas which have or are involved in the production of joint plans have the option to monitor their 5 year land supply and have the Housing Delivery Test applied over the whole of the joint planning area or on a single authority basis. The approach to using individual or combined housing requirement figures will be established through the planmaking process and will need to be set out in the strategic policies."<sup>9</sup>

- 45. Broadland, Norwich and South Norfolk have an adopted joint plan in the form of the JCS. This plan seeks to jointly plan for and meet the development requirements of Greater Norwich. On the basis that there is a joint plan in place; that the three authorities are working together on a new joint plan to replace the JCS; and, that the Housing Delivery Test is measured jointly across the Greater Norwich Area, it stands to reason that the calculation of housing land supply should also be applied on this basis.
- 46. Whilst the JCS also includes a requirement to make a significant proportion of new allocations within the Norwich Policy Area, and both the NPA and the JCS settlement hierarchy continue to be important considerations in the determination of planning

<sup>&</sup>lt;sup>9</sup> Planning Practice Guidance, Paragraph 028 Reference ID: 68-028-20190722

applications, application of LHN, the HDT and the conclusion of the 2017 SHMA that the NPA is not a housing market area, mean that subdivision of the Greater Norwich Area for housing land supply purposes is no longer appropriate.

Calculating Local Housing Need where plans cover more than one area

47. The Planning Practice Guidance States that:

"Local housing need assessments may cover more than one area, in particular where strategic policies are being produced jointly ... In such cases the housing need for the defined area should at least be the sum of the local housing need for each local planning authority within the area."<sup>10</sup>

48. In accordance with this guidance, the Greater Norwich LHN has been calculated by adding together the individual LHN for Broadland, Norwich and South Norfolk.

Housing Land Supply Buffer

49. The revised NPPF states that:

"The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- 5% to ensure choice and competition in the market for land; or
- 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year;

or

- 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply"<sup>11</sup>.
- 50. Significant under delivery is measured against the Housing Delivery Test (HDT). The most recent results of the HDT were published on 20 January 2021. Broadland, Norwich and South Norfolk are measured jointly for the purposes of the HDT. The results of the HDT show that Greater Norwich has delivered 132% of the number of homes required between 2018/19 and 2020/21.
- 51. On the basis of the results of the HDT and the fact the Broadland, Norwich and South Norfolk are not seeking to establish a 5 year supply through an annual position statement, a 5% buffer needs to be added to the supply of deliverable sites in the Housing Land Supply calculation.

#### Housing Land Supply in Greater Norwich

52. Table 1 sets out the calculation of Housing Land Supply against the Standard Methodology for the calculation of Local Housing Need and takes account of the additional buffer required in accordance with the outcomes of the HDT.

<sup>&</sup>lt;sup>10</sup> Planning Practice Guidance, Paragraph: 013 Reference ID:2a-013-20201216

<sup>&</sup>lt;sup>11</sup> Revised National Planning Policy Framework, February 2019, Paragraph 73

Greater Norwich 5 Year Housing Land Sup	1 <sup>st</sup> April 2021	
LHN Annual Requirement	1,972	
Requirement 1 April 2021 to 31 Mar	9,860	
Adjustment for Shortfall/Surplu	n/a	
Plus NPPF HDT Buffer at 5%	9,860 x 0.05	493
Total 5 year requirement 2018/19 to 2022/23	9,860 + 493	10,353
Revised Annual Requirement	10,353 / 5 Years	2,071
Supply of Housing	12,451	
Shortfall/Surplus of Supply	12,451 – 10,353	2,098
Supply in Years	12,451 / 2071	6.01

Table 1 Greater Norwich 5YR HLS, 1 April 2021

#### Monitoring the Joint Core Strategy (JCS) Housing Requirement

- 53. For the reasons set out above, the housing requirement set out in the Joint Core Strategy (JCS) no longer forms part of the calculation of 5YR HLS in Greater Norwich.
- 54. Part 8, Section 34 (3) of The Town and Country Planning (Local Planning) (England) Regulations 2012 does however require that:

"(3) Where a policy specified in a local plan specifies an annual number, or a number relating to any other period of net additional dwellings or net additional affordable dwellings in any part of the local planning authority's area, the local planning authority's monitoring report must specify the relevant number for the part of the local planning authority's area concerned —

- (a) in the period in respect of which the report is made, and
- (b) since the policy was first published, adopted or approved."
- 55. To ensure that Broadland, Norwich and South Norfolk continue to comply with this requirement the Annual Monitoring Report will continue to monitor delivery against the JCS housing requirement within the monitoring year and since the base date of the JCS.

#### Conclusion

56. On the basis of the above it is clear that the Greater Norwich Authorities are able to demonstrate a 5 year housing land supply.

#### March 2022
Broadland 5 Year Housing Land Supply	Assessment	1 <sup>st</sup> April 2021								
LHN Annual Requirement		501								
Requirement 1 April 2021 to 31 Marcl	h 2026	2,505								
Adjustment for Shortfall/Surplus	Adjustment for Shortfall/Surplus									
Plus NPPF HDT Buffer at 5%	125									
Total 5 year requirement 2018/19 to 2022/23	2,505 + 125	2,630								
Revised Annual Requirement	2,630 / 5 Years	526								
Supply of Housing	Supply of Housing									
Shortfall/Surplus of Supply	1,693									
Supply in Years	Supply in Years 4,448 / 526									

Norwich 5 Year Housing Land Supply A	ssessment	1 <sup>st</sup> April 2021								
LHN Annual Requirement		599								
Requirement 1 April 2021 to 31 Marc	h 2026	2,995								
Adjustment for Shortfall/Surplus	Adjustment for Shortfall/Surplus									
Plus NPPF HDT Buffer at 5%	Plus NPPF HDT Buffer at 5% 2,995 x 0.05									
Total 5 year requirement 2018/19 to 2022/23	2,995 + 150	3,145								
Revised Annual Requirement	3,145 / 5 Years	629								
Supply of Housing	Supply of Housing									
Shortfall/Surplus of Supply	- 398									
Supply in Years	4.37									

# Appendix A2 – Norwich Area 5 Year Land Supply Assessment

## Appendix A3 – South Norfolk Area 5 Year Land Supply Assessment

South Norfolk 5 Year Housing Land Supply	y Assessment	1 <sup>st</sup> April 2021							
LHN Annual Requirement		873							
Requirement 1 April 2021 to 31 Marcl	h 2026	4,365							
Adjustment for Shortfall/Surplus	3	n/a							
Plus NPPF HDT Buffer at 5%	218								
Total 5 year requirement 2018/19 to 2022/23	4,365 + 218	4,583							
Revised Annual Requirement	4,583 / 5 Years	917							
Supply of Housing	Supply of Housing								
Shortfall/Surplus of Supply	5,381 – 4,583	798							
Supply in Years	5,381 / 917	5.87							

### APPENDIX B1 – BROADLAND SITES FORECAST

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
											Detailed Permission. Under Construction. Developer	
	Land Adj. Hillside Farm,		Reserved		30						has confirmed delivery intentions 05/10/2021.	
Acle	Reedham Road	20180941	Matters	30							Deliverable.	Crocus Homes
											Detailed Permission. Under Construction. Developer	
	Land Adj. Hillside Farm (Phase										has confirmed delivery intentions 05/10/2021.	
Acle	2), Reedham Road	20190241	Full	15		15					Deliverable.	Crocus Homes
											Detailed Permission. Under Construction. Developer	
	Land north of Norwich Road,		Reserved								has confirmed delivery intentions 09/11/2021.	
Acle	Acle, Norwich	20191215	Matters	137	10	34	34	34	25		Deliverable.	Repton Homes
											Detailed Permission. CIL commencement notice	
											dated 17/11/2020. Developer confirmed delivery	
											intentions 05/10/2021. Deliverable. Loss 19	
											dwelllings (based on communual housing ratio) from	
											demolition of Care Home, therefore 39 home net	
Acle	Herondale, Bridewell Lane	20191954	Full	39		39					gain.	Saffron Housing
ALIE		20191954				39					Detailed Permission. Under Construction. Developer	Samon nousing
			Decembed								· · ·	
A		20161711	Reserved	47	47						has confirmed delivery intentions 05/10/2021.	
Aylsham	Aegel House, Burgh Road	20161711	Matters	17	17						Deliverable.	Morston Palentine
	St Michael's Hospital, Cawston										Detailed Permission. Developer has confirmed	
Aylsham	Road	20190597	Full	16				16			delivery intentions 08/12/2021. Deliverable.	Astris Homes
											Detailed Permission. Developer has confirmed	
	Former Piggeries, Manor										delivery intentions 05/11/2021. Uncertainty of	
Blofield	Farm, Yarmouth Road	20150262	Full	13							conditions compliance. Not Deliverable.	Hatch Homes
											Detailed Permissision. CIL Commencement dated	
	Land off Blofield Corner Road,		Reserved								17/09/19. Full CIL payments made. Developer has	
Blofield	Blofield Heath	20162199	Matters	36		18	18				confirmed delivery intentions. Deliverable.	Bennett Homes
											Detailed Permission. Under Construction. Developer	
	Land to the north of Yarmouth		Reserved								has confirmed delivery intentions 08/12/2021.	
Blofield	Road, Blofield	20172131		112	53	32	27				Deliverable.	Hopkin Homes
											Hybrid Permission. Developer confirmed intention	
	Land East of Memorial Hall,										to submitted RM and delivery forecast in JDS.	
Brundall	Brundall, Norwich	20171386	Hybrid	170			15	50	50	55	Deliverable.	Hopkin Homes
Drunuan		20171300	Публа	170			15	50	50	55	Detailed Permission. CIL Commencement Dated	порклитотнез
	Land at Yarmouth										15/12/2021. CIL Installement Paid. Under	
During de ll	Road,Postwick/Brundall,	20202000	<b>F</b>	455	10	20	20	20	20	44	Construction. Developer has confirmed delivery	Newfalls Llaves
Brundall	Norwich	20202009	Full	155	10	26	26	26	26	41	intentions. Deliverable.	Norfolk Homes
											Allocated site. No HLS response from promoter or	
											developer. Developable but not currently	
Buxton	Land East of Lion Road	BUX1	Allocation	20						20	considered deliverable.	
											Allocated site. No HLS response from promoter or	
											developer. Developable but not currently	
Cawston	Land East of Gayford Road	CAW2	Allocation	20						20	considered deliverable.	
											Outline Permission. Committee Resolution to grant	
	Land adj former Railway Line,										Detailed Permission (20201627). Developer confirms	
Coltishall	Rectory Road	20170075	Outline	30		30					delivery intentions in JDS. Deliverable.	Crocus Homes
	· ·										Allocated site. Developable but not currently	
Coltishall	Land at Jordan's Scrapyard	COI 2	Allocation	30						30	considered deliverable.	
												1;

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
											Allocated. Now Full Permission (20200640). CIL	
											Commencement Notice Dated 29/09/2021. CIL	
	Land Adj. Hall Lane, School										Payments Made. Under Construction. Developer	
Drayton	Road, Drayton, Norwich	20161066	Outline	267		56	45	60	63	43	confirmed delivery intentions in JDS. Deliverable.	Hopkin Homes
											Outline Permission. RM Application (20201185)	
	Former David Rice Hospital										Validated 09/04/21. Delivery intentions confirmed in	
Drayton	Site, Drayton High Road	20170196	Outline	29			29				JDS. Deliverable.	Parker Planning
											Detailed Permission. CIL Commencement Notice	
											Dated 13/11/2019. CIL Payments Made. Developer	
Drautan	Land off Drautan Lligh Doad	20170212	E	71	16	25	25	5			confirmed delivery intentions 05/11/2021. Deliverable.	Norfolk Homes
Drayton	Land off Drayton High Road	20170212	Full	/1	10	25	25	5			Detailed Permission. CIL Commencement Notice	
											Dated 21/07/2021. CIL Payments Made. Developer	
	Drayton Old Lodge, 146										confirmed delivery intentions 09/11/2021.	
Drayton	Drayton High Road	20180236	Full	35	8	10	10	7			Deliverable.	The Lodge Drayton
Diayton		20180230		55	0	10	10	/			Site understood to no longer being actively	The Louge Diayton
Drayton	Land East of School Road		Allocation	20							promoted by landowner. Not Deliverable.	
Diayton		DIAZ	Allocation	20							Outline Permisison. Replacement Outline	
											(20200261) approved 17/05/2021. No response	
	Aitchison Brothers Garage, 75										from developer or RM submitted. Developable but	
Freethorpe		20160632	Outline	19						19	not currently considered deliverable.	
Treethorpe											Allocated Site. Applications linked by Obligation.	
											Committee Resolutions 02/12/2020. Permission	
Great and		20201173									issued 06/09/2021. CIL Commencement Notice	
Little	Old Hall Site, Little Plumstead	/									21/10/2021. CIL Payments Made. Under	Cripps
Plumstead	Hospital	20201200	Full	15	15						Construction. Deliverable.	Develpoments
											Outline and Detailed. Under Construction. Further	
											detailed permission for 134 on Portal awaiting fee.	
											Developer confirms delivery intentions for current	
	Royal Norwich Golf Club,										Detailed Permission. Forecast submitted Detailed	
Hellesdon	Drayton High Road	20171514	Full/RM/Outline	933	41	53	60	51	51	677	Permssion at Avg rate forecast. Deliverable.	Persimmon Homes
											Allocation. No update on status secured from	
	Land at Hospital Grounds,										promoter for HLS purposes. Developable but not	
Hellesdon	southwest of Drayton Road	HEL1	Allocation	300						300	currently considered deliverable.	
			Reserved								Detailed Permission. Developer confirmed that all	Cripps
Horsford	Land West of Holt Road	20181136	Matters	31	31						units complete 08/11/21. Deliverable.	Develpoments
											Detailed Permission. Under Construction. Developer	
											has confirmed intention to complete site within 5	
Horsford	Land East of Holt Road	20190999	Full	193	71	45	40	37			year period 19/11/2021. Deliverable.	Barratt Homes
Horsham											Detailed Permission. CIL Commencement Notice	
and											Dated 23/01/2020. CIL Payments Made. Under	
Newton	Land off Manor Road, Manor	2040223			2.1	2.0					Construction. Developer has confirmed delivery	
St. Faiths	Road	20182043	Full	68	34	28					intentions 09/11/2021. Deliverable.	Lovell
Lingwood											Outline Permission. Detailed application (20201611)	
and	Former Lingwood First School,	20100270	Quality -	22		4.4	4.4				approved 26/01/22. Developer has confirmed	Terringters
Burlingham	Chapel Road	20190278	Outline	23		11	11				trajectory in JDS. Deliverable.	Torrington Homes
Docturial	Oakstana	20171110	E	0	8						Detailed Permission. Under Construction. Developer	Proodland Farmer
Postwick	Oaks Lane	20171116	FUII	8	ð						has confirm delivery intentions. Deliverable.	Broadland Farms

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
Roonham	Land off Broomhill Lane	REP1/ 20200847	Allocation	141						141	Allocation. Detailed application submitted 15/04/20. Developer confirms delivery intentions for 5 year period in JDS. Outstanding Sports England objection. Objection not considered to have merit. Nonetheless, cautiously placed outside 5 year period	Lovell
Reepham	Land off Broomnill Lane		Allocation	141						141	based on limited uncertainty. Detailed Permission. CIL Commencement dated	Lovell
Reepham	Old Station Yard, Cawston Road / Stoney Lane	20180963	Full	53		53					25/09/2019. CIL Payments Made. Under Construction. 60 bed care home, 20 assisted flats, 15 assisted bungalows assessed at 1:1.8 dwelling equivalent ratio.	
South Walsham	Land West of Burlingham Road	20161643	Outline	21						21	Outline permission. JDS confirms intention to submit RM application and delivery intentions. Access constraint on current site to be resolve by GNLP allocation. Deliverable if GNLP allocation confirmed. Developable for purposes of HLS.	Torrington Homes
Taverham	Land off Beech Avenue	20191065	Reserved Matters	83	56	19	8				Detailed Permission. Under Construction. Developer confirmed delivery intentions 05/10/2021. Deliverable.	Able Homes
Thorpe St.			Reserved								Detailed permission. Current permission not currently expected to be implemented. New Application submitted. Developable but not	
Andrew	Land at Griffin Lane	20160423	Matters	71						71	currently considered deliverable.	Ocubis
Thorpe St. Andrew	Pinebanks, 9 Yarmouth Road	20160425	Reserved Matters	231						231	Detailed permission. Current permission not currently expected to be implemented. New Application submitted. Developable but not currently considered deliverable.	Ocubis
Thorpe St. Andrew	27 Yarmouth Road, Thorpe St Andrew	20170811	Full	25		25					Detailed Permission. CIL Commencement Notice Dated 06/06/2018. CIL Payments Made. Under Construction. Deliverable.	Estateducation
x.Growth Triangle	Land North of Smee Lane, Great Plumstead, Norwich	20180193	Outline	272		4	55	55	55	103	Outline Permission. Reserve Matters (20211743) validated 27/09/2021. Delivery intentions confirmed in JDS. Deliverable.	Orbit Homes
x.Growth Triangle	Land North of Smee Lane, Great Plumstead, Norwich	20180194	Outline	11						11	Outline Permission. No return from promoter. Developable but not currently considered deliverable.	Landform Estates
x.Growth Triangle	Land at St Faiths Road, Old Catton, Norwich	20180920	Reserved Matters	300	62	76	52	52	58		Detailed Permission. Under Construction. Developer confirmed delivery intentions 21/10/21. Deliverable.	Taylor Wimpey
x.Growth Triangle	Land off Salhouse Road,Rackheath	20151591	Reserved Matters	10	10						Detailed Permission. Under Construction. Deliverable.	
x.Growth Triangle	Land off Salhouse Road, Rackheath	20131351	Reserved	10	10						Detailed Permission. Under Construction. Deliverable.	
x.Growth Triangle	Land off Green Lane West, Rackheath	20152081	Outline	50							Outline Permission. Appears to have lapsed. Not currently considered to be deliverable or developable.	Brown & Co.
x.Growth Triangle	Land off Green Lane West, Rackheath (Northern Parcel)	20171464	Full	120		20	25	25	25	25	Full permission. Developer confirmed delivery intentions 05/10/21. Deliverable.	Norfolk Homes

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
x.Growth	Land off Green Lane West,										Detailed Permission. CIL Commencement Notice Dated 04/11/2021. CIL Payment Made. Developer	
Triangle	Rackheath (Southern Parcel)	20171465	Full	202		46	50	50	50	6	confirms delivery intentions 13/10/21. Deliverable.	Charles Church
x.Growth Triangle	Land South of Green Lane East, Rackheath	20200855		157	27	77	53				Detailed Permission. CIL Commencement Notice Dated 30/06/2021. 100% Affordable Homes. Under Construction. Developer confirmed delivery intentions 05/10/2021. Deliverable.	Lovell
x.Growth	Land South of Moorsticks,							10			Outline Permission. Reserve Matters application	
Triangle	Buxton Road, Spixworth	20152035	Outline	19				19			(20191472) approved 09/03/22. Deliverable.	CNC Properties Ltd
x.Growth Triangle	Land East of Buxton Road, Spixworth, Norwich	20180443	Reserved Matters	225		30	55	55	55	30	Detailed Permisssion. CIL Commencement Notice Dated 30/06/2021. CIL Payments Made. Delivery intention confirmed by Developer 11/01/22. Deliverable.	Orbit Homes
x.Growth Triangle	Land to the North of Sprowston and Old Catton, Btn Wroxham Road & St Faiths Road, Sprowston	20121516	Outline	3520				25	125	3370	Outline Permission. RM for Strategic RM (20180708) Submitted. Delivery intentions confirmed in JDS. Deliverable.	U+I PLC
x.Growth	Phase 1a - Part 2, Land at Blue	20121510	Reserved	3320								
Triangle	Boar Lane, Sprowston	20130224	Matters									Demoiseen Teulen
x.Growth Triangle	HH3 & HH4, Land at Blue Boar Lane, Sprowston	20160751	Reserved Matters	197	92	47	4	28	26		Detailed permission. Under Construction. Developer confirmed delivery intentions 29/11/21. Deliverable.	Permisson, Taylor Wimpey and Hopkin Homes
x.Growth Triangle	TW3 & TW4, Land at Blue Boar Lane, Sprowston	20160930	Reserved Matters									
x.Growth Triangle	Phase 4, Blue Boar Lane, Sprowston	20142051	Full	17	17						Detailed Permission. Under Construction. Developer confirmed delivery intentions 05/10/2021. Deliverable.	Norfolk Homes
x.Growth Triangle	Phase 1, Land to the South of Salhouse Road, Sprowston	20190758	Reserved Matters	251	20	55	55	55	55	11	Detailed Permission. Under Construction. Developer confirmed delivery intentions 06/10/2021. Deliverable.	Tilia Homes
x.Growth Triangle	Land South of Salhouse Road, Sprowston	20190485	Reserved Matters	365		20	40	40	40	225	Detailed Permission. Suite of conditions discharged. CIL Commencement Notice Dated 08/12/2021. CIL Payment Made. Deliverable.	Halsbury Homes
x.Growth Triangle	Phase 2, 3 & 4, Land south of Salhouse Road, Sprowston	20200447	Reserved Matters	535	91	87	99	85	102	71	Detailed Permission. Under Construction. Developer confirmed delivery intentions 05/10/2021. Deliverable.	Barratt David Wilson
x.Growth Triangle	Phase 5, Land south of Salhouse Road, Sprowston	20160498	Outline	45						45	Residual phase of outline. Active discussion with developer. No clear evidence on application or delivery intentions. Developable but not currently considered deliverable.	Carter Jonas
x.Growth Triangle	Land at Brook Farm & Laurel Farm, Green Lane, Thorpe St Andrew	20090886	Outline	600						600	Outline Permission. Promoter cannot currently commit to delivery in 5YRHLS period. Developable but not currently considered deliverable.	Lothbury
x.Growth Triangle	Land East of Pound Lane, Thorpe St. Andrew	20190016		55			55				Detailed Permission. Conditions being actively discharged. Deliverable. Permission relates to 80 bed care home and 19 assisted living bungalows, 55 dwelling equivalent using 1:1.8 communal accommodation multiplier.	Carleton Hall Village Ltd
x.Growth Triangle	Racecourse Plantation, Thorpe St Andrew	20161896		300				53	53	133	Outline Permision. Reserve Matters (20212075) validated 11/11/2021. Reduced yield of 239	Hill

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
											dwellings. Delivery intentions confirms in JDS. Deliverable.	
x. Growth Triangle	Land East of Broadland Business Park	GT11/ 20181601	Allocation	520		122	101	44	42	211	Hybrid Permission. CIL Commencement Notice Dated 28/10/2021. CIL Payments Made. Under Construction. Developer confirms delivery intentions in JDS. Deliverable.	Larkfleet Homes
x. Growth Triangle	Norwich RFU	GT13	Allocation	250		122	101		72	250	Site allocated. On going negotiations with owner and developers. Developable but not currently considered deliverable.	Norwich RFU
x. Growth Triangle	North Rackheath	GT16	Allocation	3,000				50	150	2800	Allocation. Developer confirms intention to submitt application and delivery intentions in JDS. Deliverable.	Taylor Wimpey
x. Growth Triangle	White House Farm (North East)	GT20 / 20191370	Allocation	456			20	114	117	205	Allocation. Resolution to grant Outline Planning Permisison. Developer confirms trajectory in JDS. Delayed 1 year from developer forecast due to progress. Deliverable.	Permisson, Taylor Wimpey and Hopkin Homes
x. Growth Triangle	Land East of Broadland Business Park (North)	GT21	Allocation	350						350	Allocation. Promoter cannot currently commit to delivery in 5YRHLS period. Developable but not currently considered deliverable.	Lothbury
x. Growth Triangle	Land North of Plumstead Road	GT8	Allocation	32						32	Allocated. No application being prepared. Developable but not currently considered deliverable.	Broadland Growth
			Sites of 9 or fewer	454	66	66	66	66	66			
			Discounted Windfall (Per Annum)	60	19	40	60	60	60			
			Total (Windfall included in yearly total only)	15,800	814	1,209	1,138	1,162	1,294	10,147		

#### **APPENDIX B2 – NORWICH SITES FORECAST**

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Current Status	Developer/ Promoter
n/a	Anglia Square (extant permission)	08/00974/F 18/00330/F	Full	198	0	0	0	0	0	800	GNLP Allocation. Developable but not currently considered deliverable.	Western Homes
n/a	Argyle Street (allocation)	CC11	Allocation	12	0	14	0	0	0	0	Allocation. Existing dwellings on site demolished Nov 2016. Intention to Submit Application and Delivery Intentions set out in JDS. Deliverable.	Norwich Regeneration Ltd
n/a	Aylsham Road District Centre, 291-293 and land at Arminghall Close (allocation)	R21	Allocation	100	0	0	0	0	0	0	Allocation. Part implemented (LIDL store). No clear progress. Allocation not carried forward in GNLP.	
n/a	Aylsham Road, 165-187 (allocation)	R22	Allocation	20	0	0	0	0	0	0	Allocation. No clear progress. Allocation not carried forward in GNLP.	
n/a	Aylsham Road, 261-277 (allocation)	R12	Allocation	50	0	0	0	0	0	0	Allocation. No clear progress. Allocation not carried forward in GNLP.	
n/a	Aylsham Road, Former Pupil Referral Unit (allocation)	R23	Allocation	11	0	0	0	0	0	0	Allocation. Part of site (Pupil referral Unit) sold to dance school and occupied. No clear progress. Allocation not carried forward in GNLP.	
,	Barrack Street – CC17a (permission); CC17b and part CC17a (application) and Barrack Street / Whitefriars	CC17a 15/01927/O 18/01286/F	Outline Full	200				22			Allocation. Detailed permission. Under Construction. Developer confirmed delivery intentions 22/11/2021. Deliverable. N.B. CC17a Blocks A and E Outline consent expired, no delivery assumed on these	
n/a n/a	(application) Barrack Street, 126-128 (allocation)	R16	Allocation	15	88 0	50 0	50 0	<u>32</u> 0	0	0	elements. Allocation. No clear progress. Allocation not carried forward in GNLP.	Hill
n/a	Ber Street 147-153 (allocation)	CC2	Allocation	20	0	0	0	0	0	20	Allocation. No clear progress. Developable but not currently considered deliverable	
n/a	Ber Street, 10-14 (allocation)	CC3	Allocation	10	0	0	9	0	0	0	Allocation. Intention to Submit Application and Delivery Intentions set out in JDS. Deliverable.	Norwich Regeneration Ltd
n/a	Ber Street, 60-70 (allocation)	CC1	Allocation	20	0	0	0	0	0	0	Allocation. No clear progress. Allocation not carried forward in GNLP.	
n/a	Bethel Street, land to rear of City Hall (allocation)	CC24	Allocation	20	0	0	0	0	0	20	Allocation. No clear progress. Developable but not currently considered deliverable	
n/a	Bethel Street, 59, Labour Club site (permission, unimplemented residue of consented 22) (permission)	08/00671/F	Full	14	0	0	0	0	0	14	Detailed Permission. Conversion element complete 8 units. No clear evidence. Developable but not currently considered deliverable	
n/a	Bishop Bridge Road, 29-31 (Box and Barrel Site) (extant permission, legal start) (allocation) (permission)	R14 06/00166/F, 08/01316/D	Full	24	0	0	0	0	0	24	Detailed Permission. No clear evidence. Developable but not currently considered deliverable.	
n/a	Bishop Bridge Road, land east of excl 29-31 Bishop Bridge Road (residue of allocation)	R14 15/00756/F (Refused) 18/00081/DE M (Gas Holder)	Demolition	26	0	0	0	0	0	26	Allocation. Gas Holder demolished under 2018 consent. No clear evidence of delivery. Developable but not currently considered deliverable	
n/a	Bishop Bridge Road, Egyptian Road and Ketts Hill, land at (allocation)	R15 15/00756/F (Refused)	Allocation	30	0	0	0	0	0	30	Allocation. No clear progress. Developable but not currently considered deliverable	

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Current
n/a	Bartram Mowers	R42 18/00265/F 19/00911/F	Full	51	0	4	20	16	10	110	Detailed Permission. Under O intentions confirmed in JDS.
n/a	Bowthorpe Road, Norwich Community Hospital Site (allocation)	R37	Outline	80	0	0	0	0	0	80	Allocation. JDS confirms not delivery at this point. Develo considered Deliverable.
n/2	Bracondale, Deal Ground (allocation) excludes May Gurney/Carrow Yacht Club site (SNDC) (allocation)	R9 12/00875/O	Outline	580	0	0	0	0	0	0	Part of East Norwich Allocati
n/a n/a	(permission) Cattle Market Street, 23, St Peters House (prior approval/permission)	15/01256/PDD 18/00830/PDD 17/01482/F	PDD/Full	8	0	0	8	0	0	0	Detailed Permisson. PDD ele Deliverable.
n/a	City Road, 24, John Youngs Ltd (allocation)	R7	Allocation	45	0	0	0	0	0	45	Allocation. No clear progress currently considered Deliver
n/a	Constitution Hill, Constitution Motors (permission)	18/00917/O 19/01031/RM	Full	12	0	12	0	0	0	0	Detailed Consent. Under Cor
n/a	Cremorne Lane, Utilities Site parts within Norwich (allocation)	R10 15/00997/F (withdrawn)	Allocation	100	0	0	0	0	0	0	Part of East Norwich Allocati
n/a	Dereham Road, Site of former Earl of Leicester PH, 238a (allocation)	R33 10/00335/ET	Allocation	12	0	0	0	0	0	12	Allocation. No clear progress currently considered Deliver
2/2	Dereham Road, land & buildings adjacent to & Including 349A & 349B (allocation)	R34	Allocation	24	0	0	0	0	0	24	Allocation. No clear progress currently considered Deliver
n/a n/a	Dibden Road, Van Dal Shoes and car park (allocation)	R17	Allocation	24	0	0	0	0	0	60	Allocation. No clear progress currently considered Deliver
n/a	Drayton Road, 81-93 (allocation)	R25	Allocation	30	0	0	0	0	0	30	Allocation. No clear progress currently considered Deliver
n/a	Drayton Road, adjoining Lime Kiln Mews (allocation)	R24 15/00024/F & 18/00270/D (EXPIRED)	Allocation	15	0	0	0	0	0	0	Allocation. Detailed Applicat units pending consideration. confirmed. Allocation not ca
	Duke Street, EEB site (allocation)	CC21 14/01104/PDD (EXPIRED) 15/00916/F (EXPIRED)									Allocation. No clear evidence
n/a	Duke Street, Mary Chapman Court (permission)	(EXPIRED) 18/01524/F	Allocation Full	-7	-7	0	0	0	0	0	not carried forward in GNLP. Detailed Permission. Student equivalent dwellings shown. Sept 2021. Deliverable.
n/a n/a	St Marys Works Duke Street	16/01950/O	Outline	151	0	0	0	0	0	0	Permission expired. No clear Not deliverable.

t Status	Developer/ Promoter
Construction. Delivery Deliverable. t possible to forecast	McCarthy Stone
lopable but not currently	
tion in GNLP.	
ement complete 20-21.	
ss. Developable but not rable.	
onstruction. Deliverable.	
tion in GNLP.	
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ss. Developable but not grable.	
nton (19/00837/F) for 29 n. Delivery intentions not arried forward in GNLP.	
ce of progress. Allocation	
nt accommodation, net n. Accommodation open	
ar evidence of progress.	

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Current
	Vantage House Fishers Lane Norwich	20/00632/PDD									
			PDD	44	22	22	0	0	0	0	Detailed Permission. Under O
n/a	Garden Street, land at (allocation)	CC10	Allocation	100	0	0	0	0	0	100	Allocation. No clear evidence but not currently considered
<i>n</i> /2	Gas Hill, Gas Holder (allocation)	R13 18/00081/DE	Allocation	15	0	0	0	0	0	15	Allocation. No clear evidence
n/a	Goldsmith Street (Permission)	M R27 15/00272/F		15				0	0	15	but not currently considered Detailed Permission. No clea 12 units will be delivered in 5
n/a	Hall Road, Hewett Yard	17/00220/MA	Full	12	0	0	0	0	0	12	Developable but not current
n/a	(allocation)	R4	Allocation	20	0	0	0	0	0	20	but not currently considered
n/a	Havers Road Industrial Sites (allocation)	R35	Allocation	100	0	0	0	0	0	0	Allocation. No clear evidence not carried forward in GNLP.
n/a	Heigham Street, 231-243 (allocation)	R28	Allocation	25	0	0	0	0	0	0	Allocation. No clear evidence not carried forward in GNLP.
n/2	Hurricane Way (allocation)	R29 - (A&B)	Allocation	30	0	0	0	0	0	30	Mixed Use Allocation (primat owned. No clear evidence of but not currently considered
n/a	Ipswich Road, Norfolk Learning Difficulties Centre	R2									Allocation. No clear evidence
n/a n/a	(allocation) Kerrison Road, Carrow Quay; land north of (permission), Norwich City Football Club (part) Groundsmans Hut (allocation) (permission)	(CC16) 11/02104/O, 13/01270/RM, 17/01091/F	Allocation Outline and Reserve Matters	30 154	0	0	0	0	0	<u>30</u> 0	but not currently considered
n/a	Kerrison Road/Hardy Road, Gothic Works, inc ATB Laurence Scott (allocation)	R11	Allocation	400	0	0	0	0	0	0	Allocation. No clear evidence not carried forward in GNLP.
	King Street, 125-129, 131-133 and Hoborough Lane (allocation)	CC7 07/00412/F 12/00215/ET									Allocation. No clear evidence
n/a	King Street, St Annes Wharf (allocation) (permission).	(EXPIRED) CC6 04/00605/F	Allocation	20	0	0	0	0	0	20	but not currently considered
n/a n/a	King Street, 191 (permission)	16/01893/VC 19/01389/F	Full Full	157 41	40 0	40 41	39 0	38 0	0 0	0	Detailed Permission. Under C Detailed Permission. Under C
n/a	King Street, King Street Stores (allocation)	CC8	Allocation	20	0	0	0	0	0	20	Allocation. No clear evidence
n/a	Lower Clarence Road, car park (allocation)	CC13	Allocation	45	0	0	0	0	0	45	Allocation. No clear evidence but not currently considered
n/a	Mile Cross Depot (allocation)	R36 18/01290/DE M	Allocation	75	0	0	0	50	106		Allocation. Significant Investr Council Owned. Delivery inte Deliverable.

t Status	Developer/ Promoter
Construction. Deliverable.	
ce of progress. Developable d Deliverable.	
ce of progress. Developable	
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ar evidence that remaining	
5 year period. htly considered Deliverable.	
ce of progress. Developable	
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ce of progress. Allocation	
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arily employment). Council	
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Construction. Deliverable.	
Construction. Deliverable.	
ce of progress. Allocation	
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Construction. Deliverable.	
Construction. Deliverable.	
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ce of progress. Developable d Deliverable.	
tment in site Clearance.	
tentions confirmed in JDS.	Norwich
	Regeneration Ltd

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Current Status	Developer/ Promoter
	Mousehold Lane, Start Rite Factory site (allocation)	R18 18/01772/F 20/01624/MA									Detailed Permission (20/01624/MA). Permitted scheme comprises 77 bed care home and 42 supported living units. Equivalent to 70 equivalent dwellings. Under Construction. Delivery Intentions	
n/a			Full	40	0	35	35	0	0	0	confirmed in JDS. Deliverable.	
n/a	Northumberland Street, 120- 130 (allocation) (permission)	R32 16/00835/F	Full	36	0	0	36	0	0	0	Detailed Permission. Permission implemented. Deliverable.	
n/a	Oak Street / Sussex Street commercial sites, 160-162 Oak Street (allocation)	CC20	Allocation	15	0	0	0	0	0	0	Allocation. Site Sold. No clear evidence of progress. Allocation not carried forward in GNLP.	
n/a	Oak Street, 161 (permission)	18/00004/F	Full	40	0	0	40	0	0	0	Detailed Consent. Application 21/01459/D confirmed lawful commencement of works. Deliverable.	
n/a	Oak Street, 140-154 (allocation)	CC18	Allocation	10	0	0	0	0	0	17	Allocation. Understood to be developed in conjunction with 70-72 Sussex Street (see below). No clear evidence of progress. Developable but not currently considered Deliverable.	
n/a	St Peters Methodist Church Park Lane (permission)	18/00962/F	Full	20	20	0	0	0	0	0	Detailed Permission. Under Construction. Deliverable.	
n/a	Pottergate, Kiln House, 27-43 (permission)	18/01270/PDD 18/01271/PDD	PDD	35	0	0	0	0	0	0	Detailed consent. Information received that permission won't be implemented. Not Deliverable.	
n/a	Pottergate car park (allocation)	CC23	Allocation	20	0	0	0	0	0	20	Allocation. No clear evidence of progress. Developable but not currently considered Deliverable.	
	82 - 96 Prince Of Wales Road	19/00875/F	Full	49	0	24	25	0	0	0	Detailed Permission. Under Construction. Deliverable.	
,	Queens Road and Surrey Street (car park adjacent to Sentinel House) (allocation)	CC29 18/00437/F 19/01405/MA					107				Detailed Permission. Development comprises 252 bed student accomodation, equivalent to 107 dwellings. Further amendment (19/01405/MA) aproved	
n/a	(permission) Raynham Street, north of		Full	40	0	0	107	0	0	0	February 2020. Deliverable. Allocation. No clear evidence of progress. Developable	
n/a	(allocation)	R26	Allocation	40	0	0	0	0	0	40	but not currently considered Deliverable.	
n/a	Rose Lane and Mountergate, land at (allocation)	CC4	Allocation	300	0	0	0	0	0	200	Allocation. Part developed for a multi-storey CP. No clear evidence of progress on residential for 5YRHLS purposes. Developable but not currently considered Deliverable.	
n/a	St Georges Street, Merchants Court (prior approval/permission)	20/00887/PDD 20/00884/PDD	PDD	36	0	0	0	0	0	36	Prior Approvals (20/00887/PDD - 34 units) & (20/00884/PDD - 2 units). No clear evidence of progress for 5YRHLS purposes. Developable but not currently considered deliverable.	
n/a	Starling Road, Industrial sites; remainder of allocation (allocation) Part 1&2 (permission)	R20 18/00952/O 18/00271/F	Full & Outline	23	0	0	0	0	0	19	Outline Permission. No clear evidence of progress. Developable but not currently considered Deliverable.	
n/a	Sussex Street, 70-72 (permission, legal start only) (allocation)	09/00296/F CC19	Full	17	0	0	0	0	0	17	Extant Detailed Permisssion. To be developed in conjunction with 140-154 Oak Street. No clear evidence of progress. Developable but not currently considered Deliverable.	
	9 Surrey Street	20/00345/F CC27 (part)	Full	14	0	14	0	0	0	0	Detailed Permission. Conditions being actively discharged. Delivery Intentions confirmed in JDS. Deliverable.	Bignold Estates Ltd

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Current
n/a	Thorpe Road/Lower Clarence Road, Busseys Garage (allocation)	CC14	Allocation	25	0	0	0	0	0	0	Allocation. No clear evidence not carried forward in GNLP.
n/a	Thorpe Road: 13-17 Norwich Mail Centre (allocation)	CC15	Allocation	150	0	0	0	0	0	150	Allocation. No clear evidence but not currently considered
n/a	Three Score, Bowthorpe (permission) (allocation)	R38 12/00703/O 13/02089/VC 19/00978/MA (supercedes 19/00497/MA for 151 dwellings)	Outline/ Reserved matters	755	42	24	52	100	100	437	Allocation. Detailed consent. Council owned. Delivery inte Deliverable.
	Waterworks Road, Heigham										
n/a	Water Treatment Works (allocation)	R31	Allocation	150	0	0	0	0	0	150	Allocation. No clear evidence but not currently considered
n/a	Westlegate 1-17, Boars Head Yard	20/01025/PDD 20/01022/PDD 18/00642/F CC28 (part)	PDD/Full	69	0	0	0	0	0	0	Full permission expired. Site pending consideration. No de intentions confirmed. Allocation in GNLP.
, a	Westwick Street Car Park	CC30									Allocation. No clear evidence
n/a	(allocation)		Allocation	30	0	0	0	0	0	30	but not currently considered
n/a	Westwick Street, BT Exchange Site (permission)	16/00456/F 20/00539/D	Full	42	0	0	0	0	0	42	Detailed Permission. Permiss 2020. Site is in the process of intentions currently uncertai forward in GNLP.
	Windmill Road, land north of	R19									Detailed Permission (19/009
n/a n/a	(permission) Bluebell Road, Blackdale Building (UEA residences) (6a) 915 beds, 401 in phase 2 (allocation) (permission)	19/00971/F R40 15/00121/F 16/00099/MA	Full Full	10	0	0	<u>17</u> 0	0	0	0	implemented. Deliverable. Detailed Permission. Student bedrooms delivered. 401 bed dwellings, remaining. No clea delivery of remainder. Devel considered Deliverable.
n/a	Duke Street, St Crispins House (614 beds) (permission)	17/01391/F 20/00146/NM A 20/00474/MA 20/01268/NM A	Full	406	0	0	406	0	0	0	Student accomodation. Deta (406 equiv. dwellings). Perm Further progress with condit amendments. Deliverable.
n/a	Elaine Herbert House The Great Hospital Bishopgate Norwich NR1 4EJ (permission)	19/00373/F	Full	-1	0	0	-1	0	0	0	Detailed Permission. 19 shelt dwellings. Deliverable.
<u>- 17 a</u>	Car Park Rear Of Premier Travel Inn Duke Street	18/01552/F		-1			-1			0	Detailed Permission. Student
n/a	Norwich		Full	58	0	58	0	0	0	0	equivalent dwellings. Deliver

t Status	Developer/ Promoter
ce of progress. Allocation	
ce of progress. Developable d Deliverable.	
t. Under construction. entions confirmed in JDS.	Norwich City Council
ce of progress. Developable d Deliverable.	
e sold. New applications developer delivery ation not carried forward	
ce of progress. Developable d Deliverable.	Norwich City Council
ssion Implemented early of being sold. Delivery ain. Allocation not carried	
971/F). Permission	
nt accomodation. 514 edrooms, equivalent to 143 ear evidence to support elopable but not currently	
ailed consent - 686 beds nission implemented. ition discharge and	
eltered housing units, -1 net	
nt accomodation, 58 erable.	

Parish	Address	Ref	Арр Туре	Net Homes at 1/4/2021		2022/23	2023/24	2024/25	2025/26	After 1 April Current Status 2026	Developer/ Promoter
	(permission)										
			Sites of 9 or								
			fewer	334	48	48	48	48	48		
			Discounted								
			Windfall								
			(Per								
			Annum)	129	42	86	129	129	129		
			Total								
			(Windfall								
			included in								
			yearly total								
			only)	6,120	396	525	1,020	413	393	2,888	

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#### APPENDIX B3 – SOUTH NORFOLK SITES FORECAST

Parish	Address	Ref	Арр Туре	Net New Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
Aslacton	Coopers Scrap Yard	2020/0493	Detailed	14		7	7				Allocated Site. Detail Planning Permission. Under construction. Delivery intentions confirmed in signed JDS. Deliverable	Tas Valley Developments
Barford	West of the Hall	BAR1	Allocation	10							Allocated Site. Application Refused. Not Deliverable.	Wellington
Bawburgh	South of the Village Hall	2018/1550	Detailed	10	5	5					Detailed Permission. Delivery intentions confirmed by Architect 15/11/21. Deliverable.	Studio35
Bracon Ash	Norwich Road	BRA1	Allocation	23			23				Allocated Site. Detailed application submitted (2021/2579) 25/11/21. Delivery intentions confirmed in JDS. Deliverable.	FW Properties
Bracon Ash	West of Long Lane	2017/2131	Detailed	4	4						Detailed Permission. Confirmed as complete by developer 15/11/21. Deliverable.	Kevin Keable
Brooke	High Green Farm	2014/2041	Detailed	7		7					Detailed Permission. Under Construction. Agent confirmed delivery intentions 01/11/2021. Deliverable.	Durrants
Caistor St Edmund	North of Heath Farm	2018/2232	Detailed	16		8	8				Detailed Permission. Delivery intentions confirmed by Agent 01/11/21. Deliverable.	Lewis Nicholls Associates Ltd
Costessey	West of Poethlyn Drive	2019/1683	Detailed	9	9						Detailed Permission. CIL commencement noticed received 2/9/2020. Deliverable.	Gary John's Architects
Costessey	East of Fieldfare Way	2019/2546	Detailed	16	16						Detailed Permission. Final CIL Receipt Received 21 November 2019. Deliverable.	Gary John's Architects
Costessey	West of Lodge Farm	2013/0567	Detailed	168	63	53	52				Detailed Permission. Delivery intentions confirmed by Developer 01/11/21. Deliverable.	Taylor Wimpey
costcasey		2016/0402	Detailed	2	2						Detailed Permission. Delivery intentions confirmed by Developer 01/11/21. Deliverable.	Taylor Wimpey
Cringleford	Roundhouse Park	2008/2347	Outline	53		12	41				Outline permission. Reserve and Full Applications submitted (2018/0281& 2019/2227). Outstanding objections from LLFA and Highway Authority but clear commitment from developer and realistic prospect issues can be overcome. Delivery intentions confirmed in signed JDS. Deliverable.	Vistry
		2013/1494	Outline	142		30	86	26			Outline permission. Reserve Matters applications submitted across whole site. Wider site is under construction. JDS confirms delivery intentions. Deliverable.	Big Sky
		2018/2783	Detailed	65	58			7			Detailed Permission. Under Construction. Developer confirmed delivery intentions 09/12/2021. Deliverable.	Big Sky
Cringleford	Cringleford NP allocation - South of the A11	2018/2784	Detailed	79	42	37					Detailed Permission. Developer confirmed delivery intentions 09/12/2021. Deliverable.	Big Sky
		2018/2785	Detailed	62		62					Detailed Permission. Developer confirmed delivery intentions 09/12/2021. Deliverable.	Big Sky
		2018/2835	Detailed	199	64	45	45	45			Detailed Permission. Under Construction. Developer confirmed delivery intentions 04/11/2021. Deliverable.	Tilia homes
		2018/2836	Detailed	90				20	45	25	Detailed Permission. Developer confirmed delivery intentions 04/11/2021. Deliverable.	Tilia homes

Parish	Address	Ref	Арр Туре	Net New Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
		2018/2200	Detailed	640	106	110	110	110	110	94	Detailed Permission. Under Construction. Developer confirmed delivery intentions 10/11/2021. Deliverable	Barratt Eastern Counties
Dickleburgh	West of Norwich Road	2018/0980	Outline	22							Outline Pemission. No developer response, no CIL information. No clear evidence. Not Deliverable.	LaRondeWright
Diss	Vinces Road	DIS1	Allocation	44			24	20			Allocated Site. JDC confirms intention to submit planning application and delivery intentions. Deliverable. Delayed 1 year relative to JDS to account for delay in application.	Inside Land Group Ltd
Diss	Park Road	DIS2	Allocation	15							Allocated Site. JDS confirms ongoing negotiations with a developer and delivery intentions. Uncertainty around flood risk boundaries. Not Deliverable.	Durrants
Diss	Former Hamlins Site	DIS6	Allocation	13						62	Alllocated Site. Detailed permission granted on Appeal (2021/0307). 58 Extra Care Apartment and 15 retirement cottages. Subject to 1:1.8 communal accomodation dwelling equivalent multiplier. Permitted after end of monitoring period. Deliverable but excluded in 2021 5YR HLS due to basedate.	Planning Issues
Diss	Former Feather Factory	DIS7	Allocation	17						17	Allocation. Pre-application inquiries received. No clear evidence of progress. Developable but not currently considered deliverable.	
Diss	North of Nelson Street	2020/0478	Detailed	43		28	15				Detailed permission. 77 Extra Care Apartments. Subject to 1:1.8 communal accomodation dwelling equivalent multiplier. Delivery Intentions confirmed by Architect 25/10/21. Deliverable.	rmarchitects
Ditchingham	Tunney's Lane Field	2019/1925	Detailed	27		10	10	7			Detailed Permission. Developer confirmed delivery intentions 28/10/2021. Deliverable.	Badger Building
Easton	Land N & S of Dereham Road	2014/2611	Outline	890		40	80	80	80	610	RM granted for 291 dwellings on phase 1 (2020/0962) on 19 March 2021. Further RM submitted for 114 dwellings on phase 2 (2021/1612) and 350 dwellings on phases 3 and 4 (2021/2417). CIL commencement notice on file for phase 1 dated 23/08/2021. Deliverable. Forecast based on 2020 5YRHLS response with 1 year delay.	Persimmon Homes
Easton	Land N of Dereham Road	2019/1251	Detailed	64		25	30	9			Detailed permission. Developer confirmed delivered intentions 21/11/2021. Deliverable.	Orbit Homes
Gillingham	Norwich Road	2019/1013	Detailed	22	22						Detailed permission. Developer confirmed delivered intentions 22/11/2021. Deliverable.	Hopkins Homes
Great Moulton	High Green	2015/2536 2020/0130	Detailed	11			11				Detailed permission. Architect confirmed delivered intentions 10/01/2021. Deliverable.	Howe and Boosey Architectural Services
Hales	Land at Yarmouth Road/west of Hales Hospital	2018/1934	Outline	23			23				Outline Planning Permission. JDS confirms developer's intention to submit RM and delivery intentions. Deliverable.	FW Properties
Harleston	Spirkett's Lane/ Limes Close	HAR4	Allocation	95						95	Allocated site. JDS indicates sale expected late 2021. No application receieved. Not sufficient clear evidence. Developable but not currently considered deliverable.	Durrants

Parish	Address	Ref	Арр Туре	Net New Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
Harleston	Land east of Station Hill	HAR5	Allocation	40						40	OPA submitted. Committee Resolution to approve. Delivery intentions confirmed in JDS. Agent amended position post JDS. Developable but not currently considered deliverable.	CODE Development Planners
Harleston	Cranes Meadow	1998/1119	Detailed	9	5	4					Detailed Permisison. Delivery intentions confirmed by developer 15/10/2021. Deliverable.	Group Bridge
Harleston	Former Apollo Club	2019/1618	Detailed	46			46				Detailed Permisison. C3 Use. First CIL installment paid 2 March 2022. Delivery intentions confirmed by developer 20/01/2021. Deliverable.	McCarthy & Stone
Hempnall	off Bungay Road	2019/0864	Detailed	23	23						Detailed permission. First CIL installment paid 9/4/2021. Developer confirmed delivered intentions 01/11/2021. Deliverable.	FW Properties
				200				45	45	110	RM Submitted 2021/1965. Continuity site for 2018/2326. Under control of developer. Deliverable.	Taylor Wimpey
		2011/1804	Outline	148				60	60	28	RM Submitted 2021/2226. Continuity site for 2018/2500. Under control of developer. Deliverable.	Persimmon Homes
				200						200	Uplift application for 200 received 2021/0758. Expected to follow on from 2021/1965 & 2021/2226. Developable.	Taylor Wimpey and Persimmon Homes
Hethersett	North Village	2018/2326	Detailed	151	45	57	49				Detailed Permission. Under Construction. Agent confirmed delivery intentions 01/11/2021. Deliverable.	Taylor Wimpey
		2017/1104	Detailed	7	7						Detailed Permission. Under Construction. Developer confirmed delivery intentions 17/02/2022. Deliverable.	Persimmon Homes
		2018/2500	Detailed	191	81	67	43				Detailed Permission. Under Construction. Developer confirmed delivery intentions 17/02/2022. Deliverable.	Persimmon Homes
Hethersett	North of Grove Road	HET2	Allocation	40						40	No response from developer. Developable but not currently considered deliverable.	
Little Melton	South of School Lane	2019/2485	Detailed	30	30						Detailed Permission. First CIL Installment paid 16 December 2021. Deliverable.	LanPro Services
Loddon	Georges Lane	2016/0853	Detailed	57	28	29					Detailed Permission. Under Construction. Deliverable.	Halsbury Homes
Long Stratton	LNGS1, East of the village	LNGS1 (part)	Allocation	1,275						1,275	Hybrid allocation submitted. Delivery intentions confirmed in JDS. Developable.	Norfolk Homes Ltd
Long Stratton	LNGS1, North west of the village.	LNGS1 (part)	Allocation	600			30	30	30	510	Hybrid allocation submitted. Delivery intentions confirmed in JDS. Deliverable.	Norfolk Homes Ltd
Newton Flotman	Flordon Road/Church Road	NEW1	Allocation	31			31				Allocation. Detailed Application (2021/2784) submitted 22/12/2021. JDS confirms developer's delivery intentions. Deliverable.	FW Properties
Poringland	The Street/South of Stoke Road	2010/1332	Detailed	25	25						Detailed Permission. Under Construction. Developer confirmed delivery intentions 25/10/2021. Deliverable.	Norfolk Homes Ltd
Poringland	West of The Street/North of Shotesham Road	2014/0319	Detailed	145	20	25	25	25	25	25	Detailed Permission. Under Construction. Developer confirmed delivery intentions 25/10/2021. Deliverable.	Norfolk Homes Ltd

Parish	Address	Ref	Арр Туре	Net New Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
Poringland	West of The Street/North of Shotesham Road	2019/2209	Detailed	15	15						Detailed Permission. Under Construction. Developer confirmed delivery intentions 22/10/2021. Deliverable.	Big Sky Developments
Poringland	West of Octagon Barn	2015/2326	Detailed	19	5	14					Detailed Permission. Under Construction. Developer confirmed delivery intentions 21/10/2021. Deliverable.	Bennett Homes
Pulham Market	Sycamore Farm	2018/0598	Detailed	4	4						Detailed Permission. Under Construction. Final CIL payment made. Deliverable.	Orchard Developments
Roydon	Land off Denmark Lane	DIS3	Allocation	42		2	25	15			Allocation. Signed JDS confirmed planning application being prepared and deliver intentions. Deliverable.	Rackhams
Scole	West of Norwich Road	2019/0956	Detailed	18	18						Detailed Permission. Final CIL Receipt Received 18/10/21. Deliverable.	Broadleaf Developments
Scole	Old Norwich Road	SCO1	Allocation	15						15	Allocation. No application submitted. Developer's intentions set out in JDS. Not sufficient clear evidence. Developable but not currently considered deliverable.	Last & Tricker Partnership
Spooner Row	Chapel Lane/ Bunwell Road	2014/2472 2016/2424	Detailed	25			15	10			Detailed Permission. CIL payments made. Landowner confirmed delivery intentions 04/11/2021. Deliverable.	J. Alston & Sons Ltd
Swardeston	Land off Bobbins Way	2017/2247	Detailed	38	5	30	3				Detailed Permission. Under Construction. Multiple CIL installments paid. Developer confirmed delivery intentions 21/10/2021. Deliverable.	Bennett Homes
Swardeston	Main Road	SWA1	Allocation	30						30	Allocation. No application submitted. Signed JDS indicates land is under offer with a local developer. Developable but not currently considered deliverable.	Brown&Co
Tacolneston	Land adj. The Fields	2017/0225	Outline	21			21				Outline permission. RM application (2021/2572) submitted 24/11/21. Signed JDS confirms delivery intentions. Deliverable.	Heritage Developments
Tasburgh	Church Road	TAS1	Allocation	30			15	15			Allocation. Detailed application (2022/0087) submitted 14/01/2022. Signed JDS confirms delivery intentions. Deliverable.	Zarah Development Ltd
Trowse	White Horse Lane	2016/0803 & 2016/0805	Detailed	42	18	24					Detailed Permission. Under Construction. Developer confirmed delivery intentions 25/10/2021. Deliverable.	Norfolk Homes Ltd
Trowse	Devon Way/Hudson Avenue	2019/2318	Full	83		5	25	25	25	3	Detailed Permission. Developer confirmed delivery intentions 25/10/2021. Deliverable.	Norfolk Homes Ltd
Trowse	May Gurney/Keir site & Carrow Yacht Club	2011/0152	Outline	90							Part of East Norwich Strategic Development Site.	Maddon Associates
Woodton	Rear of Georges House	2020/1506	Detailed	23		23					Detailed permission. First CIL installment paid 20/12/2021. Developer confirmed delivery intentions. Deliverable.	FW Properties
		2015/2380	Detailed	64	43	21					Detailed Permission. Under Construction. Agent confirmed delivery intentions 02/12/2021. Deliverable.	Vistry
Wymondham	South Wymondham	2016/2586	Detailed	66	44	22					Detailed Permission. Under Construction. Agent confirmed delivery intentions 01/11/2021. Deliverable.	Taylor Wimpey

Parish	Address	Ref	Арр Туре	Net New Homes at 1/4/2021	2021/22	2022/23	2023/24	2024/25	2025/26	After 1 April 2026	Notes on Deliverability	Developer/ Promoter
		2015/2168	Detailed	43	24	19					Detailed Permission. Under Construction. Agent confirmed delivery intentions 22/11/2021. Deliverable.	Hopkins Homes
		2020/2212	Detailed	22		22					Detailed Permission. Continuity of 2016/2586. Deliverable.	Taylor Wimpey
				231			44	44	44	99	Relates to 2021/0125, approved 22/12/2021. NB. Strategic Infrastruture RM (2020/2434) granted on 07 Jan 2022	Taylor Wimpey
		2012/0371	Outline	35		22	13				RM application (2021/0054) approved 07 Jan 2022. Developer confirmed delivery intentions 02/12/2021. Deliverable.	Vistry
				217			30	43	43	101	RM application (2021/0054) approved 07 Jan 2022. Developer confirmed delivery intentions 02/12/2021. Deliverable.	Vistry
				72						72	Residual outline with RM applications submitted. Developable but not currently considered deliverable.	TW/Vistry
Wymondham	London Road/Suton Lane	2014/2495 2018/2758 2019/1804	Detailed	319	30	50	50	50	50	89	Detailed Permission. Under Construction. Signed JDS confirms delivery intentions. Deliverable.	Lovell Construction
Wymondham	Carpenters Barn	2015/1405	Detailed	24	24						Detailed Permission. Under Construction. Deliverable.	Persimmon Homes
Wymondham	Former WRFC	2019/1788	Detailed	90		45	45				Detailed Permission. CIL Commencement noticed dated 6 December 2021. Deliverable.	Saffron Housing Trust
	Elm farm, Norwich Common	2019/0536	Detailed	300	121	84	95				Detailed permission. Developer confirmed delivery intentions. Deliverable.	Persimmon Homes
Wymondham	Former Sale Ground, Cemetery Lane	2016/2668	Outline	61						61	No response from developer. Developable but not currently considered deliverable.	Armstrong Rigg Planning
Wymondham	Friarscroft Lane	WYM1	Allocation	20							Developer indicated not viable. Not currently considered developable or deliverable.	Big Sky Developments
Wymondham	Industrial Site west of Stanleys Lane	2019/0428	Detailed	21		11	10				Detailed permission. Developer confirmed delivery intentions. Deliverable.	Lewis Nicholls
			Sites of 9 or fewer	755	110	110	110	110	110			
			Discounted Windfall (Per Annum)	87	28	58	87	87	87			
			Total (Windfall included in yearly total only)	8,948	1,144	1,223	1,377	883	754	3,601		

## **APPENDIX C1 – SITE FORMS**

## Published as a Separate Appendix

#### APPENDIX D1 – WINDFALL ASSESSMENT SUMMARY

#### SOUTH NORFOLK – Sites of 9 or fewer

SOUTH NORFOLK – Sites of	9 or fewer											
Туре	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	Total	Annual Average
Garden plots	19	15	32	32	25	8	61	50	45	35	322	32
Barn conversions & other agricultural buildings	25	46	37	44	38	15	42	19	30	13	309	31
Conversions shops, offices, schools (including PD)	24	24	15	13	20	4	22	38	14	1	175	18
Other brownfield re- development	41	20	28	13	43	23	1	14	12	8	203	20
Affordable housing exceptions	21	36	33	26	13	21	13	2	0	0	165	17
Other greenfield sites (school playing fields, Para 55 dwellings etc.)	6	13	17	9	0	5	5	15	4	0	74	7
Cert. of lawfulness, removal of occupancy restrictions, sub-division of dwellings etc. (pre- 14/15 included as other brownfield re- development)							22	11	15	10	58	15
TOTAL	136	154	162	137	139	76	166	149	120	67	1306	131
TOTAL excluding garden plots	117	139	130	105	114	68	105	99	75	32	984	98

BROADLAND – Sites of 9 c	BROADLAND – Sites of 9 or fewer											
Туре	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	Total	Annual Average
Garden Plots	41	29	23	23	22	35	51	39	15	29	307	31
Barn conversions & other agricultural buildings	21	6	14	14	18	15	33	17	4	15	157	16
Conversions shops, offices, schools (including PD)	29	1	4	17	4	12	9	16	8	5	105	11
Brownfield Redevelopment	17	4	13	2	8	3	19	34	4	8	112	11
Affordable Housing exceptions	0	8	12	11	0	24	27	3	0	0	85	9
Other greenfield sites (school playing fields, Para 55 dwellings etc.)	2	2	4	9	12	7	12	8	4	13	73	7
Cert. of lawfulness, removal of occupancy restrictions, sub-division of dwellings etc.	2	5	4	13	2	7	3	20	2	6	64	6
TOTAL	112	55	74	89	66	103	154	137	37	76	903	90
TOTAL excluding garden plots	71	26	51	66	44	68	103	98	22	47	596	60

NORWICH – Major and Min	or Sites											1
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	Total	Annual Average
Garden plots	10	1	5	5	5	8	11	6	14	16	81	8
Barn conversions & other agricultural buildings	0	0	0	0	0	0	0	0	0	0	0	0
Conversions shops, offices, schools (including	121	52	12	25	46	23	40	34	210	88	651	65
PD) Brownfield	121	52	12	25	40	23	40	34	210	00	100	05
Redevelopment	121	96	81	185	162	76	45	71	117	83	1,037	104
Affordable Housing exceptions	0	0	0	0	0	0	0	0	0	0	0	0
Other greenfield sites (school playing fields, Para 55 dwellings etc.)	2	3	0	0	0	1	7	1	40	33	87	9
Cert. of lawfulness, removal of occupancy restrictions, sub-division of dwellings etc.	11	0	12	10	9	3	3	3	16	10	77	8
TOTAL	265	152	110	225	222	111	106	115	397	230	1,933	193
TOTAL excluding garden plots	255	151	105	220	217	103	95	109	383	214	1,852	185

### NORWICH – Major and Minor Sites

### APPENDIX D2 – LAPSE RATE STUDY SUMMARY

Sites of 9 or fewer	Completed within 5 years	Started but not completed within 5 years	Lapsed or renewed/replaced	Notes
Broadland	77.0%	1.5%	21.5%	Sample: 478 units permitted 1 April 2011 to 31 March 2015
Norwich	73.3%	4.9%	21.7%	Sample: 469 units permitted 1 April 2007 to 31 March 2012
South Norfolk	73.6%	10.7%	15.7%	Sample: 610 units permitted 1 April 2012 to 31 March 2016

The above analysis indicates that on average sites of 9 or fewer are not completed within 5 years in 23% of cases in Broadland, 26.6% in Norwich and 26.4% in South Norfolk.

To account for this the delivery forecast of sites of 9 or fewer has been discounted by 27%, which represents the highest end of the range.

#### Illustrative housing land supply for the Norwich Policy Area (NPA)

The 2020-21 Greater Norwich AMR has now been published. The AMR monitors policies in the Joint Core Strategy for Broadland, Norwich and South Norfolk and includes a housing land supply assessment for the Greater Norwich area. In the AMR, housing land supply is calculated in accordance with the requirements of the current NPPF and associated guidance. In particular, housing land supply in Greater Norwich must now be calculated against local housing needs and incorporate the buffer as dictated by the outcome of the Housing Delivery Test (HDT). On this basis, the AMR demonstrates that there is a 6.01-year housing land supply across Greater Norwich.

Prior to the publication of the revised NPPF in 2018 and associated revisions to guidance, housing land supply in the Norwich City area was calculated using the JCS Norwich Policy Area (NPA) housing requirement as its starting point. A 20% buffer was applied to the 5 year requirement on the basis that there had been significant under delivery, as defined in former guidance, against the JCS target. This note seeks to illustrate what the housing land supply in the NPA would have been, as of 1<sup>st</sup> April 2021, using the former methodology<sup>1</sup>.

Policy JCS4 requires 36,820 homes to be delivered over the 18-year plan period 2008-2026 in the Greater Norwich area. The policy does not specify annual averages, but this equates to 2,046pa (per annum) across the Greater Norwich area, of which 32,847 (1,825pa) are required in the NPA.

Table 1 sets out completions against the JCS NPA and RPA housing requirement since the base date of the plan in 2008 up to 2021. It shows a 6,962-home shortfall in housing delivery in the NPA compared to the NPA housing requirement of the adopted plan and a surplus of 2,191 homes in the RPA compared to the RPA housing requirement. The reason for the shortfalls set out in Table 1 is due to over delivery of housing in the RPA where 127% of homes required in the plan period have been delivered to date. This is compared with underdelivery in the NPA where 51% of homes required in the plan period have been delivered to date.

The report to SD Panel outlining the findings of the 2017/18 AMR considered that the delivery targets set out in the JCS then appeared unrealistic. The situation is now even more challenging given that the plan targets require delivery at an average of 2,672pa between 2021 and 2026 in the NPA when actual delivery between 2008-2021 has fluctuated between 882 and 2,440pa, and given that the distribution of development between the urban and rural policy areas has not been delivered as envisaged.

<sup>&</sup>lt;sup>1</sup> The supply of housing in the NPA at 1 April 2020, 2019 and 2018 is calculated using the current definition of deliverability as set out in the February 2019 version of the NPPF. This differs from the 2012 NPPF definition that was used for earlier calculations. Therefore the assessment of the supply of housing in the NPA at 1 April 2020, 2019 and 2018 is not directly comparable to that which would have been undertaken under the 2012 NPPF definition.

	NPA (1.825 com	pletions required	RPA (221 completions required		
	• ·	nnum)	per annum)		
Year		Shortfall/Surplus	Actual/Projected	Shortfall/Surplus	
	Completions		Completions		
2008/09	1,193	-632	543	+322	
2009/10	923	-902	314	+93	
2010/11	910	-915	258	+37	
2011/12	915	-910	267	+46	
2012/13	882	-943	362	+141	
2013/14	992	-833	249	+28	
2014/15	1,143	-682	541	+320	
2015/16	1,164	-661	564	+343	
2016/17	1,810	-15	441	+220	
2017/18	1,685	-140	349	+128	
2018/19	2,382	+557	397	+176	
2019/20	1,624	-201	451	+230	
2020/21	1,140	-685	328	+107	
Total 2008-	16,763 (1,289	-6,962	5,064 (390pa)	+2,191	
2021	pa)				
Total GN	21,824 (1,559pa)				
2008-2021					

Table 1 Completions against JCS NPA and RPA Housing Requirements

Table 2 illustrates what the housing land supply position for the NPA would have been under the previously adopted methodology. This indicates a hypothetical land supply in the NPA of 4.74 years at 1<sup>st</sup> April 2021. The land supply for the NPA measured using the same approach at 1<sup>st</sup> April 2020 was 3.02 years. In the JCS AMR 2016-17 at 1<sup>st</sup> April 2018 housing land supply in the NPA was assessed as being 3.94 years.

Table 2 Hypothetical NPA 5YR Housing Land Supply - JCS Based, Liverpool & 20% Buffer

NPA 5 Year Housing Land Supply A	1st April 2019		
JCS NPA Housing Requirement 20	008 - 2026	32,847	
JCS Annual Requiremen	t	1,825	
Requirement 1 April 2020 to 31 N	9,125		
Adjustment for Shortfall/Surplus	6,962 / 5 x 5	4,973	
Plus NPPF HDT Buffer at 20%	(9,125 + 4,973) x 0.20	2,820	
Total 5 year requirement 2019/20 to 2023/24	9,125 + 4,973 + 2,820	16,917	
Revised Annual Requirement	Revised Annual Requirement 16,917 / 5 Years		
Supply of Housing	16,038		
Shortfall/Surplus of Supply	Shortfall/Surplus of Supply <b>16,038</b> – 16,917		
Supply in Years	4.74		

The methodology used in the hypothetical calculation in table 2 has been agreed, for illustrative purposes only, with officers from Broadland and South Norfolk.

#### Charlotte Rivett Planner, Norwich City Council 19<sup>th</sup> August 2022

# AMR Appendix F – Norwich City Council Report against policies in the adopted Norwich Development Management Policies Local Plan 2014.

## Introduction

- 1. The development plan for Norwich comprises the following documents:
- Joint Core Strategy for Broadland, Norwich and South Norfolk (the JCS) adopted in March 2011, amendments adopted January 2014;
- Norwich Site Allocations and Site Specific Policies Local Plan (the Site allocations plan) adopted December 2014; and
- Norwich Development Management Policies Local Plan (the DM policies plan) adopted December 2014.
- 2. This appendix monitors the policies in the Norwich Development Management Policies Local Plan 2014 (the DM policies plan). Monitoring of delivery of sites in the Site Allocations and Site Specific Policies Plan 2014 (Site Allocations plan) is incorporated in Appendix A of the AMR as part of the assessment of the five-year housing land supply.
- 3. Norwich City Council, Broadland District Council and South Norfolk District Council are working together with Norfolk County Council, to prepare the Greater Norwich Local Plan (GNLP). The GNLP will build on the longestablished joint working arrangements for Greater Norwich, which have delivered the current JCS for the area. The JCS plans for the housing and jobs needs of the area to 2026. The GNLP will ensure that these needs continue to be met to 2038. The GNLP will include strategic planning policies and will also allocate individual sites for development. It will aim to ensure that new homes and jobs are delivered and the environment is protected and enhanced, promoting sustainability and the effective functioning of the area.
- 4. The GNLP has now been submitted and is currently undergoing examination with the expectation that the plan will be adopted in 2023.
- Previous AMRs set out progress on other local development documents being produced for the Local Plan for Norwich in the <u>Local Development Scheme</u> (LDS). The LDS was updated in 2021 and provides a timetable for the completion of local development documents. The LDS will require updating to take account of any revised GNLP timescales.
- In November 2019, cabinet adopted the '<u>Purpose Built Student</u> <u>Accommodation in Norwich: evidence and best practice advice note</u>'. Norwich has seen a significant rise in numbers of proposals for new purpose built student accommodation (PBSA) over the past few years. The advice note

includes an assessment of the need for purpose-built accommodation and guidance on a range of issues, including the location, scale, external and internal design, and management of PBSA, and how to encourage an accommodation mix for a wide range of students. This document sets out the intention for a PBSA working group to be formed between the Council and the higher education institutions to discuss issues surrounding PBSA and to share information. The PBSA Working Group was formed in February 2020 and meets to discuss issues surrounding student numbers, student preferences for accommodation and student welfare in PBSA. The Working Group will continue to meet approximately twice a year.

- 7. The <u>River Wensum Strategy</u> has been developed by the River Wensum Strategy Partnership and was adopted by partners in summer 2018. The partnership is led by Norwich City Council, working with the Broads Authority, Norfolk County Council, the Environment Agency, and the Norwich Society. The strategy aims to manage the River Wensum and surrounding area for the benefit of the city and its residents. Its objectives include increasing access to the river for walking/cycling and for water-based leisure, enhancing the natural and historic environment, maximising the efficiency of public expenditure in the river corridor, and accessing external funding opportunities and investment to facilitate change and regeneration in the river corridor. A Delivery Plan for the River Wensum Strategy was reported to Cabinet in December 2021 setting out project prioritisation for the next approx. 2 years.
- 8. The three sites that form East Norwich (the Deal Ground, Utilities site and Carrow Works) present a transformational opportunity to create a highly sustainable new quarter that will regenerate these riverside sites and deliver major new housing and employment development to support the future growth of the city. A public-private sector partnership was established in 2020 the East Norwich Partnership led by Norwich City Council, to commission a masterplan to deliver comprehensive development of the sites. Consultants were commissioned in early 2021 to undertake the masterplan. Stage 1 of the process was completed in November 2021 with publication of a Stage 1 concept masterplan. The Stage 2 masterplan and associated documentation was completed by May 2022 and reported to Cabinet in June 2022. Preparation for a further Stage 3, to be funded by Homes England and focused on delivery related issues, is underway.
- 9. Throughout 2020, the Government announced changes to the existing permitted development rights. The most significant changes include: allowing upward extension of residential buildings without consent, creation of new use class E (including all uses previously within use class A1 retail, A2 financial and professional services, A3 restaurants and cafes, and B1 offices, research and development and industrial processes), allowing the change of use from use class E to residential without consent, new class ZA for the demolition of certain buildings to be replaced with flats or a dwelling. The impacts of these

changes to permitted development rights are considered in the commentary below.

10. It is likely that the COVID-19 pandemic throughout 2020/21 has impacted upon several of the indicators that are monitored. The potential impacts of this are considered in the commentary below.

## **Summary of Main Findings**

- 11. The AMR gives an overview of progress against the adopted policies of the DM policies plan with reference to the <u>Monitoring Framework</u> contained in Appendix 9 of that plan and also reproduced as Appendix 3 of the Site Allocations plan.
- 12. A number of the monitoring indicators specified within Appendix 9 of the DM policies plan do not necessarily yield information that provides a full understanding of the effectiveness of the policy application and implementation. As concluded by the <u>Regulation 10A review of the local plan</u> conducted in 2019, it is proposed that the monitoring indicators will also be revised as part of the full local plan review.

13. The following is a summary of the main findings of the AMR for 2020/21:

- There has been a reduction at both the Lakenfields and Castle Meadow monitoring stations for air quality indicator Nitrogen Dioxide (NO<sub>2</sub>) and airborne particulates (PM<sup>10</sup>) compared with previous monitoring periods. The reduction in NO<sub>2</sub> levels at Castle Meadow has been particularly noticeable this year. This is in part due to the impacts related to reduced travel in the Covid-19 pandemic and reduced bus services.
- In 2020/21, 335 new homes were granted consent compared with 746 new homes granted consent in 2019/20.
- The total housing commitment (the number of dwellings with outstanding planning permission (and unbuilt) and those allocated for development in the local plan) was 6,245. Although this is a reduction on the previous years' figure, it is still significantly greater than the figures recorded for the other monitoring periods since the adoption of the local plan
- Housing completions in 2020/21 were recorded at 300 dwellings (inclusive of student and C2 accommodation). This is a significant reduction on previous years' completions figures and does not meet the average annual target for Norwich set by the JCS of 477 dwellings per annum. It is likely that the reduced delivery of homes across the 2020/21 period is as a result of the Covid-19 pandemic. This is likely to be both a result of closed construction sites under government rules, and then ongoing material supply chain issues and shortages of labour. This trend has been reflected across the country and is not unique to Norwich.

- There were no new consents granted in the 2020/21 period for student or C2 accommodation.
- In 2020/21, there was a continued loss of office space of -6,773.31 m<sup>2</sup>. Interestingly, this period also saw an increase in the number of permitted prior approval consents for office to residential conversions, and these applications were responsible for the largest overall losses to office floorspace. It is also interesting to note that this monitoring period saw the biggest increase in the amount of office floorspace permitted (note this indicator relates to permissions and not completions). This is largely as a result of 3,300m<sup>2</sup> of office floorspace being approved at Hanger 5 Anson Road for the addition of mezzanine office floorspace associated with an existing business
- The city centre retail sector appeared to be performing well in the 2020/21 period with none of the primary or secondary retail centres falling below their required retail thresholds, despite the monitoring period covering several periods of national lockdown. However, there has been a net loss of retail floorspace across the city centre overall in this period. In terms of district and local centres, the picture is more balanced, with several centres having a reduced proportion of retail floorspace, but several centres also increasing their proportion of retail floorspace.
- The largest amount of community facilities floorspace was approved since the adoption of the local plan, at 11,012m<sup>2</sup>. In total, 12 applications were granted consent.
- The largest amount of education and training floorspace was also approved since the adoption of the local plan, at 44,842m<sup>2</sup>. The majority of this floorspace results from the approval of the application for the Sky House building at UEA.
- The 2020/21 period saw the highest number of applications refused on car parking, servicing or cycle parking grounds since the adoption of the local plan. The refusal of these applications amounts to 24 dwellings that otherwise could have been granted consent.

Policy	Indicator	2020/21	Commentary
DM1	Achieving and delivering sustainable development	n/a	Policy DM1 is an overarching policy to ensure that sustainable development is delivered in Norwich through development management decisions. Because of its generic nature it does not lend itself to detailed monitoring although it is referred to in the great majority of decisions for significant development.
DM2	Refusals on the grounds of loss of light/outlook	16	16 applications were refused on the grounds of loss of light or outlook. There has been a continued reduction in the number of DM2 refusals since 2018/19.
	Refusals on the grounds of schemes falling below minimum space standards	7	The target for this indicator is no refusals on the grounds of falling below minimum space standards. This is a particularly challenging target, which has not been achieved in any monitoring period since the adoption of the local plan. There has been a continuation of this trend in 2020/21. Whereas in the last few periods the applications recorded under this indicator have largely been for HMOs and construction of student accommodation, in this monitoring period, the refusals were largely for general needs housing. A total of 7 dwellings were refused on these grounds.
DM3	% of schemes meeting relevant Building for Life 12 criteria	No data	It has not been possible to monitor the Building for Life 12 indicator for several years due to resource constraints. However, BFL12 has now been replaced with <u>Building for a Healthy Life</u> . This original twelve- point structure and underlying principles of BFL12 are

Policy	Indicator	2020/21	Commentary
			at the heart of Building for a Healthy Life. The new name reflects changes in legislation as well as refinements made to the twelve considerations in response to good practice and user feedback.
	% of built schemes achieving minimum net residential density (40dph)	74.7%	There is no target for this indicator. The 2020/21 monitoring period saw 74.7% of all completed dwellings achieve a minimum density of 40dph. This is a decrease on the percentage recorded for the 19/20 monitoring period and is a sizeable reduction on the 93.9% achieved in the 2016/17 period.
	"Green" design features on approved development	-	Green and wildlife friendly design features continue to be negotiated on schemes across the city including green roofs and bat/bird boxes. In this monitoring period, it has not been possible to quantify the number of applications which have incorporated green design features.
DM4	Renewable energy capacity permitted by type	4,000 kWh pa	There is no target for this indicator. This provision comes solely from application 20/00538/PA at the Big Yellow Storage store for 152 solar panels on the existing building.

Policy	Indicator	2020/21	Commentary
DM5	Number of schemes approved contrary to Environment Agency advice: 1) flood protection 2) water quality	0	The target for this indicator is no schemes approved contrary to Environment Agency advice. This target was achieved for the 2020/21 monitoring period.
DM6	Development resulting in the loss of, or reduction in the area of: 1) SSSI 2) County Wildlife sites 3) County Geodiversity sites	0	The target for this indicator is no loss of SSSI, CWS or CGS sites. There was no reported loss of these sites for the 2020/21 period.
	Development resulting in a loss or reduction in area within the Yare Valley Character Area (m <sup>2</sup> )	306	The target for this indicator is no loss of or reduction of the Yare Valley Character Area (YVCA) as a result of development. For this monitoring period, there were two applications approved within the YVCA. One of these applications (20/00836/F) was approval for a householder extension and was permitted on the basis that policy DM6 allows extensions to existing buildings within the YVCA. The only application approved contrary to DM6, was for the installation of a sculpture at UEA campus, which was deemed acceptable given its limited impact upon the river valley. It should also be noted that the largest contribution to this year's figure is from the large overall site area of the application for the sculpture at UEA – in

Policy	Indicator	2020/21	Commentary
			reality, the area lost in the YVCA is much smaller and limited to the size of the sculpture itself.
DM7	Number of protected trees/hedgerows lost as a result of development	No data	There is no target for this indicator. It has not been practicable to explicitly monitor the number of trees and hedges lost as a direct result of development. However, officers continue to negotiate replacement planting where an application results in the loss of protected trees/hedgerows.
	Number of new street trees delivered through development	0	There is no target for this indicator. No new planning obligations and no commuted sum funded expenditure on tree planting in 2020/21. The planning team may have secured street tree provisions through the imposition of planning conditions however these are not directly monitored.
			For application 21/00484/F at Guildhall Hall £10,000 maintenance contribution for one tree has been received, however development had not commenced and therefore there is no expenditure recorded in this monitoring period.
DM8	Development resulting in a net loss of open space (contrary to policy)	-456.90m <sup>2</sup>	The target for this indicator is no loss of open space (contrary to policy DM8).
			Three applications were approved within areas of designated open space in 2020/21. The largest loss was application 20/01536/F Jessop Road for the construction of a scout hut and alterations to the

Policy	Indicator	2020/21	Commentary
			parking area. The loss of open space was deemed acceptable given the nature of the new development, that it would result in an overall improvement in facilities and the benefits to recreation outweighed the loss.
	Areas of new open space and/or play space delivered through development	-	There is no target for this indicator. No new open space or play space was provided in 2020/21 via commuted sum.
DM9	Number of listed buildings lost or demolished	0	The target for this indicator is no listed buildings to be lost or demolished. This indicator refers to the total loss or demolition, rather than partial demolition, which is often required to facilitate redevelopment and alterations to listed buildings. There was no reported total demolition of listed buildings within the monitoring period.
			There were five applications which included partial demolition of listed structures. For all five applications, it was considered that on balance the harm of the demolition was outweighed by the benefits of the scheme.
	Number of buildings on the Heritage at Risk Register	28	The target for this indicator is a reduction in the number of Heritage at Risk buildings from 32, which is the 2012/13 baseline. For the 2020/21 period, the number

Policy	Indicator	2020/21	Commentary
			of buildings on the register was 28, including two Scheduled Ancient Monuments. The Council continues to work with property owners and Historic England to address the most serious problems of deterioration and neglect on the 8 priority buildings on the register.
DM10	Number of permitted installations/prior approval notifications within: 1) Conservation areas 2) Other protected areas (where planning permission is required)	19	There is no target for this indicator. A total of 19 applications for notifiable telecommunications installations were approved in the monitoring period which is a significant increase on all the previous monitoring years for this plan. 7 were in conservation areas and 12 were outside conservation areas.
			Whilst the reason behind the significant increase in telecomms applications is unknown, it may be related to the prevalence of homeworking and electronic communications that became the norm during the pandemic and the need to upgrade existing systems. Two of the applications were allowed on appeal - inspectors reasons for overturning the decisions included determining that the public benefit from improved access to communications outweighed the harm to designated heritage assets.
	Number of appeals lost where officer recommendations are overturned	2	The target for this indicator is no appeals lost.
Policy	Indicator	2020/21	Commentary
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			In the 2020/21 monitoring period 19/01735/FT and 20/00241/T for new telecoms infrastructure were allowed on appeal.
			In the first appeal the inspector agreed that the application would cause harm to heritage assets however considered that the public benefit of providing improved and continued access to communications infrastructure outweighed this harm. In the second appeal, the inspector's view was that the proposal was acceptable in terms of its design, appearance and impact on the character of the surrounding area.
DM11	Number of hazardous substance consents	0	There is no target for this indicator. There were no hazardous substances consents submitted during the 2020/21 monitoring period.
	Impact of development on air quality indicators: 1) NO2 2) PM10	-	Lakenfields NO <sub>2</sub> - 10 μg/m3 (slight decrease from 2019/20) PM <sup>10</sup> - 13 μg/m3 (slight decrease from 2019/20) <u>Castle Meadow</u> NO <sub>2</sub> - 30 μg/m3 (decreased from 2019/20) PM <sup>10</sup> - 19 μg/m3 (same as 2019/20) Measurements for both nitrogen dioxide and airborne particulates are taken at Lakenfields and Castle

Policy	Indicator	2020/21	Commentary
			Meadow AURN stations, respectively monitoring urban background and city centre pollutant levels.
			There has been a reduction across the board in NO2 and airbourne particulates compared with previously reported levels, and they are well below the recommended annual mean of 40 micrograms per cubic metre. At Castle Meadow the reduction in NO2 measurement is particularly noticeable. It is likely that this reduction is related to the impacts of the Covid-19 pandemic and reduced bus services.
DM12	Number of homes permitted in the monitoring period	335	Permissions and prior approvals were granted in the monitoring period for a total of 335 new dwellings in 20/21. This represents a reduction in permitted dwellings compared with the previous monitoring period. The figure includes homes from prior approval applications, student and C2 accommodation.
			Notable new permissions in 20/21 include approval of the next phase of development at Bartram Mowers for 50 units, and a prior approval application for 44 units at Vantage House, Fishers Lane.
	Annual change in total housing commitment (number of dwellings with outstanding planning permission but unbuilt)	6,245	At 1 April 2021 the total number of dwellings with outstanding planning permission (and unbuilt) and those allocated for development in the local plan was 6,245. Although this is a reduction on the previous two years' figures, it is still significantly greater than the figures recorded for the other monitoring periods since

Policy	Indicator	2020/21	Commentary
			the local plan was adopted. This significant increase is partly due to the ability to now include student and communal institutional (C2) accommodation within the housing commitment due to changes in the NPPF. Further discussion of issues around communal accommodation appears below in DM13.
	Number of housing completions	300	The number of completions reduced significantly in 2020/21 monitoring period and this does not meet the average annual target for Norwich set by the JCS (477 dwellings per annum).
			It is likely that the reduced delivery of homes across the 2020/21 period is as a result of the Covid-19 pandemic. This is likely to be both a result of closed construction sites under government rules, and then ongoing material supply chain issues and shortages of labour (also influenced by Brexit). This is something that has been reflected across the country and is not unique to Norwich. The government have recognised this and have reduced the requirements to meet the housing delivery test for that period.
	Housing land supply	N/A	This information is reported in the Greater Norwich Five Year Land Supply Statement.

Policy	Indicator	2020/21	Commentary
DM13	Number of HMO licences	No data	No specific data has been collected for this indicator. The requirements and guidelines for HMO licenses under Private Sector Housing differ from issues covered under the planning process. Therefore, the number of HMO licenses does not provide any indication as to the success of policy DM13.
	Institutional development permitted on housing allocations (hectares)	0	The target for this monitoring indicator is no institutional development permitted on allocated housing land. There were no new applications approved for institutional development in the 2020/21 monitoring period.
	Number of student bedrooms permitted	0	<ul> <li>There was a further decrease in the number of student bedrooms permitted in the 20/21 period compared with previous years with zero applications for purpose built student accommodation being approved.</li> <li>It is likely that this trend has been impacted by the Covid-19 pandemic and the disruption to the construction industry (discussed above for DM12).</li> </ul>
	Number of residential institution bedrooms permitted	0	There is no target for this indicator. In the 20/21 period, there were no residential institution bedrooms permitted. It is likely that this is as a result of the Covid- 19 pandemic and the disruption to the construction industry (discussed above for DM12).

Policy	Indicator	2020/21	Commentary
DM14	Number of new pitches permitted	0	There were no new pitches permitted within the 20/21 monitoring period.
	Loss of existing pitches	0	The target for this indicator is no overall loss of pitches.
			No pitches were lost within the 20/21 monitoring period.
DM15	Number of dwellings lost to other uses (where planning permission is required)	0	There is no target for this indicator. This indicator records implemented permissions only.
			There were no dwellings lost to other uses in the 20/21 monitoring period.
	Loss of allocated housing land to other	0	There is no target for this indicator.
	uses (number of allocated dwellings)		There was no loss of allocated housing land to other uses.
			It should be noted that application 18/01315/F at the Barn Road Car Park was implemented, and student accommodation development completed. Although this type of development differs from the that envisaged in the allocation policy, student accommodation can still be counted as a contribution towards housing supply and therefore this is not considered a loss of allocated housing land to another use for this monitoring indicator.
DM16	Use Class B development permitted (m <sup>2</sup> ):	-	The target for this indicator is to contribute to the JCS target of 100,000m <sup>2</sup> increase by 2026.
			B1a: minus 6,773.31m <sup>2</sup>

Policy	Indicator	2020/21	Commentary
	Class B1 (a) offices,		B1b: minus 313m <sup>2</sup>
	Class B1 (b) R&D		B1c: minus 1,907m <sup>2</sup>
	Class B1 (c) industrial uses suitable in residential areas		In this monitoring period there was a continued loss of office space and at a greater rate than the 2019/20 period. Interestingly, this monitoring period saw an increase in the number of permitted prior approval for office to residential conversions compared with the last monitoring period. These applications were responsible for the largest losses including -2,927m <sup>2</sup> at Vantage House, -1,296m <sup>2</sup> at 1-17 Westlegate and -1,006m <sup>2</sup> at Boars Head Yard. It is important to note that there were also a number of smaller applications resulting in the loss of office space, as well as a significant addition of 3,300m <sup>2</sup> of office floorspace at Hanger 5 Anson Road for the addition of mezzanine office floorspace associated with an existing business.
			<ul> <li>There has also been a comparative increase in the amount of permitted B1c Light industrial floorspace.</li> <li>The applications largely responsible for this are 1,675m<sup>2</sup> of potato storage at Kettle Foods.</li> <li>It is important to mention that this indicator records</li> </ul>
			permitted losses; completions are not currently monitored. Therefore, a number of the previously permitted losses have not necessarily been implemented and as such the overall loss of floorspace

Policy	Indicator	2020/21	Commentary
			is likely to be less than reported in this monitoring report.
	Employment uses permitted (net change):	a) -4,309	The target for this indicator is to contribute to the JCS target of 100,000m <sup>2</sup> increase by 2026.
	a) within employment areas	b) 2,641	Employment Area –
	b) elsewhere		Gains: 1,728.22 m <sup>2</sup>
			Losses: minus 6,038 m <sup>2</sup>
			Net change: <b>minus 4,309m</b> ²
			Elsewhere –
			Gains: 14,660.2 m <sup>2</sup>
			Losses: minus 12,018 m <sup>2</sup>
			Net change: <b>2,641.9 m</b> ²
			In 2020/21, the overall trends for employment space shows a net loss within designated employment areas, and a net gain elsewhere in the city. The biggest loss of employment floorspace to other uses includes several prior approval office to residential applications including the changes of use at Vantage House and 1- 17 Westlegate.

Policy	Indicator	2020/21	Commentary
DM17	Loss of B1a use class office space under 1,500m <sup>2</sup> (m <sup>2</sup> )	-6,918	The target for this indicator is no loss of small office space (under 1,500 m <sup>2</sup> ).
			The net loss of office space continued in 2020/21 at an increased rate compared with the previous past few monitoring periods. This is largely due to applications for the change of use to residential floorspace, however the largest floorspace change was to a place of worship with associated office space. It will be important to continue to monitor the changes in office floorspace in the city.
	New small/medium business space permitted (premises up to 1500m <sup>2</sup> ) (m <sup>2</sup> )	5,298.42	The target for this indicator is to contribute to the JCS target of 100,000m <sup>2</sup> increase by 2026.
			2020/21 permitted floorspace (gross) - B1a = 2452.8 m <sup>2</sup> , B1b = 0 m <sup>2</sup> , B1c = 232 m <sup>2</sup> , B2 = 1689.61 m <sup>2</sup> , B8 = 924.01 m <sup>2</sup>
			2020/21 saw a slight reduction in the amount of permitted small business floorspace compared with the previous monitoring period. Whilst several of the use classes experienced a net increase in floorspace, both B1c and B2 saw an overall net loss.
DM18	Main town centre uses permitted (m <sup>2</sup> ):	a) 2,696	There is no target for this indicator.
	a) within defined centres		The purpose of this indicator is to monitor whether
	b) elsewhere	b) 2,322.5	development is being located in the most sequentially

Policy	Indicator	2020/21	Commentary
			preferable locations, in accordance with the hierarchy of centres, contained within the JCS.
			The data shows that in 2020/21 a greater proportion of floorspace for main town centre uses was permitted in defined centres than elsewhere in Norwich and continues the trend also observed in the last monitoring period.
	New retail floorspace permitted (m <sup>2</sup> ) in:	a)-287	The target for this indicator is the contribution towards the provision of 20,000m <sup>2</sup> net of comparison goods
	a) city centre	b) 27.8	floorspace to 2016 and no loss of floorspace in district
	b) district centres	c) -150	and local centres.
	c) local centres		Overall, there has been a net loss of retail floorspace across the city in the 2020\21 monitoring period, which is likely to be related to the impacts of the Covid-19 pandemic and periods of lockdown on the retail sector. However, this year there was a net increase in retail floorspace permitted in district centres for the first time in the last 5 years.
	Development approved contrary to the maximum indicative floorspace limits for individual units in appendix 4 (unless specifically allocated):	0	There is no target for this indicator. No development was approved contrary to the indicative scales of development set out in Appendix 4 of the DM Policies Plan, where this information was collected.
	a) within defined centres		

Policy	Indicator	2020/21	Commentary
	b) elsewhere		
	Number of C1 hotel:	a) 405	There is no target for this indicator.
	a) floorspace (m²) b) bedrooms permitted	b) 16	16 hotel bedrooms were approved in an extension to the Premier Inn Delft Way in application 20/00222/F.
	Improvements to public realm as a result of development	-	There is no target for this indicator. This indicator has not been monitored for the 2020/21 period due to resource constraints.
DM19	Use Class B1a office floorspace permitted (m <sup>2</sup> ):	a) 1088.3	The target for this indicator is to contribute to the JCS target of 100,000m <sup>2</sup> increase by 2026.
	a) within the office development priority area (ODPA)	b) 0	The biggest increase in office floorspace was as a result of application 20/00704/F Hangar 5 Anson Road
	b) elsewhere in city centre c) in employment areas	c) 4068.5	for the alteration of the existing building to incorporate additional office floorspace.
	d) elsewhere	d) 596	
	Loss of office floorspace (m <sup>2</sup> )	-12,562	The target for this indicator is to contribute to the JCS target of 100,000m <sup>2</sup> increase by 2026.
			In 2020/21 there was a significant increase in the amount of office space lost compared with the previous year and continues the trend observed over the last 4 years. The majority of applications responsible for this

Policy	Indicator	20	020/21	Commentary
				loss are prior approval office to residential applications, including several large consents at Vantage House, Fishers Lane, and 1-17 Westlegate.
				It is important to mention that this indicator records permitted losses; completions are not currently monitored. Therefore, a number of the previously permitted losses may not have necessarily been implemented and as such the overall loss of floorspace is likely to be less than reported in this monitoring report.
DM201	Percentage of measured ground floor frontage in A1 retail use in each defined	PC01	88.1%	There is no target for this indicator.
	retail frontage zone in the centre (primary/secondary/large district centres)			The aim of the policy is to ensure that none of the specified frontage zones drop below the thresholds indicated in the Main Town Centre and Retail Frontages SPD. There are specific thresholds for each of the retail centres.
				None of the primary or secondary retail frontages were below the indicative thresholds outlined in the main town centre uses and retail frontages SPD. However, there was a reduction in retail frontage in PC01, PC02, PC03, PR01, PR03, SR01 and SR03 compared with previous years.
				It is worth noting that permitted development rights provide a degree of flexibility for units to change use

<sup>&</sup>lt;sup>1</sup> See note at end of table for list of defined centres referred to in policies DM20 and DM21.

Policy	Indicator	20	020/21	Commentary	
		PC02 PC03 PR01 PR03 PR03 PR04 PR05 PR05 PR06 SR01 SR01	83.0% 95.7% 67.7% 71.8% 83.6% n/a n/a 66.0% 76.1% 67.6%	such as the ability to change between shops and financial and professional services etc. In addition, further changes to permitted development rights were introduced on 1 <sup>st</sup> September 2020 involving the creation of a new use class (Class E). This means that the majority of commercial business and service uses now fall within the same class and so can change easily without the need for planning permission. Ongoing monitoring of different use in centres will need to be reviewed on the back of these changes.	
		01.02	07.070	]	

Policy	Indicator	20	020/21	Commentary
		SR03	59.4%	
		SR04	N/A	
		SR05	N/A	
		LD01	N/A	
		LD02	N/A	
	Zones where the proportion of measured ground floor frontage in A1 retail use is below the indicative minimum threshold specified in SPD	PC01	N/A	There is no target for this indicator. In the 2020/21 monitoring period, only SR03 St Benedicts Street was below the indicative minimum threshold for A1 ground floor frontage specified in the SPD. However, during this monitoring period the proportion of retail has actually increased compared with the last survey of this area 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.
		PC02	N/A	
		PC03	N/A	
		PR01	N/A	
		PR02	N/A	
		PR03	N/A	
		PR04	N/A	]

Policy	Indicator	20	020/21	Commentary
		PR05	N/A	
		PR06	N/A	
		SR01	N/A	
		SR02	N/A	
		SR03	59.4%	
		SR04	N/A	
		SR05	N/A	
		LD01	N/A	
		LD02	N/A	
	% of units within zones breaching indicative policy thresholds (if any) which support the evening economy/vitality and viability	SR03	19%	There is no target for this indicator. SR03 is below the indicative frontage threshold in the SPD. However, of the units not in A1 use, 19% of those are in A3/A4 use and therefore support the evening and late-night economy. These uses contribute towards providing a diverse and therefore more resilient centre.
DM21	Proportion of A1 uses within district and local centres	DC01	52.9%	The target for this indicator is that the proportion of retail uses within district centres should not fall below 60%, and in local centres, 40%.
				Data for this indicator was not collected in the 2019/20 monitoring period due to the impacts of the Covid-19

Policy	Indicator	20	)20/21	Commentary
				pandemic. Therefore, the current data is compared with that collected in 2018/19.
				District Centres - Since then, five district centres have a lower proportion of A1 uses within them. This year, an additional centre, DC08 Dereham Road/Distillery Square has fallen below the 60% threshold. However, within the same period five centres have either retained the same proportion or increased the proportion of retail uses within the centres.
		DC02	73.3%	
		DC03	47.1%	
		DC04	56.2%	
		DC05	52.4%	
		DC06	80%	
		DC07	57.1%	
		DC08	59.5%	
		DC09	42.9%	
		DC10	57.9%	
		LC01	85.7%	Local Centres: Since the last full monitoring period, there were five local centres where the proportion of A1 units was reduced. This year an additional three centres have fallen below their indicative thresholds;

Policy	Indicator	20	020/21	Commentary
				LC02 Hall Road/Queens Road, LC10 Aylsham Road/Glenmore Gardens and LC20 Colman Road/The Parade. Interestingly several local centres had an increased proportion of A1 uses, although this did not result in any centres being above their indicative A1 thresholds.
		LC02	46.4%	
		LC03	57.1%	
		LC04	64.3%	
		LC05	55.6%	
		LC06	46.5%	
		LC07	25.0%	
		LC09	87.5%	
		LC10	46.2%	
		LC11	50.0%	
		LC12	42.9%	
		LC13	66.7%	
		LC14	50.0%	
		LC15	37.0%	
		LC17	50.0%	

Policy	Indicator	20	020/21	Commentary
		LC18	54.5%	
		LC19	75.0%	
		LC20	45.5%	
		LC21	66.7%	
		LC22	72.7%	
		LC23	80.0%	
		LC24	66.7%	
		LC25	60.0%	
		LC26	22.2%	
		LC27	80.0%	
		LC28	50.0%	
		LC29	20.0%	
		LC30	45.5%	
	Proportion of community uses/non-retail uses in district and local centres		N/A	There is no target for this indicator.
				Further details in relation to alternative uses and the vitality and diversity of centres can be found in the retail survey report.
	Loss of anchor food store floorspace (m <sup>2</sup> )		0	There was no loss of anchor food store space in the 20/21 monitoring period.

Policy	Indicator	2020/21	Commentary
DM22	New community facilities permitted (m <sup>2</sup> )	11,012	There is no target for this indicator.
			In the 2020/21 monitoring period, the largest amount of community facilities floorspace was approved since the adoption of the local plan. In total 12 applications were granted consent, with the largest contribution to community floorspace provided through permission 20/01418/F 24 Ipswich Road for a new building for a skin and wellbeing clinic.
	New education or training facilities permitted (m <sup>2</sup> )	44,842	There is no target for this indicator. The 2020/21 monitoring period saw the greatest amount of education or training facility floorspace approved since the adoption of the local plan. The majority of the current years' floorspace was consented through permission 19/01427/F for the new Sky House building at UEA.
	Loss of a) community facilities (m <sup>2</sup> ) and b) Public Houses	a) 0 b) 0	There is no target for this indicator. There were no applications resulting in the loss of community facilities floorspace in the 2020/21 monitoring period. However, there are a number of applications resulting in the change of use from community uses to other types of community uses.
	ACV registrations	0	There is no target for this indicator.

Policy	Indicator	2020/21	Commentary
			Within the 2020/21 period, no new ACVs were added to the list.
DM23	Development of new evening economy and leisure uses (m <sup>2</sup> )	2,080	The target for this indicator is to contribute to the JCS target for the provision of 3000(m <sup>2</sup> ) of leisure and tourism floorspace by 2016. Within the 2020/21 monitoring period, 11 applications for evening economy and leisure uses were approved.
	Development of late night uses in the a) late night activity zone and b) elsewhere (m <sup>2</sup> )	a) 0 b) 142.2	The target for this indicator is no late night activity uses outside of the late night activity zone (LNAZ). In 2020/21 there were more late night/evening economy uses approved outside of the LNAZ than within it. The purpose of DM23 is to direct late night uses which could have noise and other related impacts on the surrounding area to protect amenity across the city. In the 2020/21 period, one application for the change of use from retail to a micro pub was approved outside of the LNAZ.
DM24	<ul> <li>Floor space (m<sup>2</sup>) for A5 uses within:</li> <li>a) district centres</li> <li>b) local centres</li> <li>c) elsewhere</li> </ul>	a) 160.5 b) 60 c) 0	There is no target for this indicator. The purpose of this indicator is to monitor whether A5 hot food takeaway floorspace is being directed to

Policy	Indicator	2020/21	Commentary
			defined centres to minimise their impacts on residential amenity and on highway and pedestrian safety.
			In the 2020/21 period, three applications for hot food takeaways were approved within either district or local centres. No A5 floorspace was permitted elsewhere in the city within this period.
	No refusals on grounds of amenity	0	There is no target for this indicator.
			There were no refusals on ground of amenity for A5 uses within the monitoring period.
DM25	Number of approvals and refusals to vary conditions on retail warehousing and other retail premises	0	There is no target for this indicator.
DM26	Progress on the implementation of the UEA Masterplan	_	The strategic masterplan for the UEA is embodied in the UEA Development Framework Strategy, November 2010 (the DFS) which identified three areas for development; Earlham Hall, the Blackdale School site and land between Suffolk Walk and Bluebell Road. Each of these has been allocated in the adopted Norwich Site Allocations Local Plan: respectively sites R39, R40 and R41.
			In Autumn 2015 a new strategic growth plan was announced for the UEA (UEA 2030 Vision) which would involve increasing student numbers and investment in the university campus. It will consider the latest higher education and wider global trends that

Policy	Indicator	2020/21	Commentary
			might impact on the university and its development priorities over the next 15 years. The UEA 2016–20 Plan represented the first of three five-year plans that will to guide the UEA through to their longer term vision which included £300 million investment in their estate by 2030 to develop new buildings and to refurbish the 1960s Lasdun Academic Wall.
			The UEA current projections based on 2019 evidence are for an incremental increase in overall student numbers of 22% from 2016/17 (17,195 total full and part-time students) to 2035/36 (22,000 total students). Progress has been made on the DFS review in 2019/20, which is now in final draft stage until further information is available as part of the preparation of the GNLP examination.
			Historic England also designated Earlham Park (and not the Campus) in 2020 as historic parkland which has potential implications for Earlham Hall development and the now lapsed permissions.
			Covid 19 has had some impact on university operations and will likely affect the rate of expansion and development into the future. There is only one additional proposed allocation area within the GNLP which is proposed as a reserve site. Any impacts on development rates are unlikely to require a radical rethink of planned allocation areas. In any event UEA are also undertaking a review of their Estates Strategy

Policy	Indicator	2020/21	Commentary
			(which is 10 years since the last update) in order to understand building refurbishment or extension requirements with a view to maximising development within the existing plan boundary. They will discuss their findings with Norwich City Council in Autumn 2022 to identify options for growth and refurbishment of their building stock.
DM27	Progress on the implementation of the Airport masterplan	-	The airport masterplan was endorsed by the Council in October 2019. This was subject to an expectation that a Surface Access Strategy would follow within 1 year of this, however due to the impacts of COVID-19 such a strategy was delayed. A SAS has now been submitted in draft to the council for comment.
	Relevant applications	-	There have been no new permissions within this monitoring period.
DM28	Site specific obligations for transport improvements	0	There is no target for this indicator. No new planning obligations were raised for transport improvements within the monitoring period.
	Walking and cycling levels at each main cordon	No data	There is no target for this indicator. Data could not be obtained.
	CIL spending on Reg 123 List	0	There is no target for this monitoring indicator. There was no spend of commuted sums within the monitoring period.

Policy	Indicator	2020/21	Commentary
	Enhancements to strategic cycle network	No data	There is no target for this indicator. Data could not be obtained.
	Progression of introduction of Bus Rapid Transport System scheme	No data	There is no target for this indicator. Data could not be obtained.
DM29	Number of car parking spaces lost/gain (estimated)	9,800	The target for this indicator is no increase in parking spaces above 10,000 spaces.
			The number of car parking spaces in Norwich has continued to increase steadily in Norwich since the adoption of the local plan, although there was a very slight reduction in 2020/21. The data does not include the 600 spaces proposed at the Anglia Square Multi Storey Car Park, as the consent for this site was refused by the Secretary of State in 2020. Therefore the existing car parking provision at this site is assumed as provision within the recorded figures.
			The recorded figure is technically below the 10,000 policy cap for parking spaces at the moment, although it is important to note that this is not an exact science and so actual figures may vary.
DM30	Expansion of 20mph zones	-	Policy DM30 sets local planning criteria for the consideration of proposals involving the creation of new vehicular accesses. It requires measures to be included in new developments, which improve highway safety by: removing unnecessary access points onto

Policy	Indicator	2020/21	Commentary
			<ul> <li>main traffic routes, designing to limit traffic speeds to 20mph, ensuring pedestrian safety and adequate circulation within the site and allowing for any alterations to on-street parking arrangements necessary as a result of the new development.</li> <li>Development proposals continue to be designed to achieve 20mph traffic zones. Some recent improvements include the Earlham Road upgrades.</li> </ul>
DM31	No. applications refused on car parking, servicing, cycle parking grounds	7	There is no target for this indicator. During the 2020/21 monitoring period, seven applications were refused on the grounds of car parking, servicing and cycle parking. This is the highest number of applications refused against DM31 since the adoption of the local plan. The refusal of these applications amounts to 24 dwellings that otherwise could have been granted consent.
DM32	No. approved schemes of low car and car free housing	4	There is no target for this indicator. The Council continues to negotiate both low car and car free housing on developments (both large and small) that are located in appropriate and sustainable locations.

Policy	Indicator	2020/21	Commentary
			In the 2020/21 period, one scheme was approved for low car housing, and three schemes were approved as car free housing.
DM33	N/A	N/A	This indicator has not been monitored in previous years. Although outside of the monitoring period, the Affordable Housing SPD was produced and adopted in July 2019. Key aspects of the SPD include the extent to which proposed affordable housing meets identified needs in Norwich, the requirement to include affordable housing on sites of 10 dwellings or more and encouraging affordable housing on development proposals for care homes and purpose built student accommodation on residential land allocations via commuted sums. This document also provides best practice guidance in relation to what should be contained in viability assessment in order to better inform developers of the Council's expectations and to ease the process at the planning application stage.

DM20 list of defined centres	DM21 list of defined district and local centres
PC01 – Gentleman's Walk	DC01 – Bowthorpe

DM20 list of defined centres	DM21 list of defined district and local centres
PC02 – Castle Mall (levels 1 and 2)	DC02 – Drayton Road
PC03 – Chapelfield (main retail levels)	DC03 - Eaton centre
PR01 – Back of the Inns/Castle Street	DC04 - Plumstead Road
PR02 – The Lanes East	DC05 - Aylsham Road/Mile Cross
PR03 – St Stephen's Street/Westlegate	DC06 - Earlham House
PR04 – Castle Meadow North	DC07 - The Larkman
PR05 – Chapelfield Plain	DC08 - Dereham Road/Distillery Square
PR06 – Timberhill/Red Lion Street	DC09 - Hall Road
	DC10 - Sprowston Road/Shipfield
SR01 – The Lanes West	LC01 - Hall Road/Trafalgar Street
SR02 – Upper St Giles Street	LC02 - Hall Road/Queens Road
SR03 – St Benedict's Street	LC03 - Hall Road/Southwell Road
SR04 – Elm Hill/Wensum Street	LC04 - Grove Road
SR05 – London Street East	LC05 - Suffolk Square
	LC06 - Unthank Road
LD01 – Magdalen Street/Anglia Square	LC07 - St Augustines Gate
LD02 - Riverside	LC09 - Aylsham Road/Junction Road
	LC10 - Aylsham Road/Glenmore Gardens
	LC11 - Aylsham Road/Boundary Road
	LC12 - Woodcock Road
	LC13 - Catton Grove Road
	LC14 - Magdalen Road
	LC15 - Sprowston Road/Silver Road
	LC17 - Bishop Bridge Road
	LC18 - Earlham West centre
	LC19 - Colman Road/The Avenues
	LC20 - Colman Road, The Parade
	LC21 - Woodgrove Parade
	LC22 - St John's Close/Hall Road
	LC23 - Tuckswood centre

DM20 list of defined centres	DM21 list of defined district and local centres
	LC24 - Witard Road LC25 - Clancy Road LC26 - UEA LC27 - Long John Hill LC28 - Magdalen Road/Clarke Road LC29 - Aylsham Road/Copenhagen Way LC30 - St Stephens Road

# Sustainable development panel - 15 November 2022 Item 4 2020/2021 Annual Monitoring Report - Appendix 5

# Norwich City Council Housing Completions Figures 2021/22

	Net Housing Completions
Excluding C2 and student accommodation	320
Including C2 and student	316**
accommodation*	

\*C2 accommodation is included at a ratio of 1.8 C2 bedrooms to 1 equivalent dwelling. Student accommodation is included at a ratio of 2.5 student bedrooms to 1 equivalent dwelling.

\*\* Net completions including C2 and student accommodation is less than those excluding these accommodation types as there was a net loss of student accommodation as part of the redevelopment of the NUA Mary Chapman Court site.



#### Committee Name: Sustainable development panel Committee Date: 15/11/2022 Report Title: Article 4 Direction to remove permitted development rights for the conversion of offices to residential

Portfolio:	Councillor Stonard, Cabinet member for inclusive and sustainable growth		
Report from:	Head of planning and regulatory services		
Wards:	Mancroft, Lakenham, Town Close, Thorpe Hamlet		

# OPEN PUBLIC ITEM

### Purpose

To update members on the introduction of an article 4 direction to remove permitted development rights for the conversion of offices to residential within Norwich city centre and to feedback on the recent discussions with the Department for Levelling Up, Housing and Communities.

### **Recommendation:**

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

### **Policy framework**

The council has five corporate priorities, which are:

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

This report meets all the corporate priorities.

This report helps to meet the Local development plan for the city.

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

# **Report Details**

- Norwich City Council made an Article 4 Direction on 28 July 2021 in order to remove permitted development rights for the conversion of offices to residential within the city centre. The Direction was confirmed on 8 December 2021 further to it being considered at <u>Cabinet</u> however due to the need to give 12 months notice to avoid compensation claims it was not due to come into force until 29<sup>th</sup> July 2022.
- 2. The Council received correspondence from Department of Levelling Up, Housing and Communities about the Article 4 Direction in May 2022 which set out that they are not convinced that the Article 4 Direction complies with new national policy where an Article 4 Direction related to change from non-residential to residential use should apply to the smallest geographical area possible. Whilst they feel that the evidence provided is helpful in setting the strategic context and helps demonstrate the condition of the office market in Norwich, they consider that we have failed to take a sufficiently targeted approach to the assessment of the impacts of the permitted development rights in locations throughout the city centre. They highlight that such an approach is necessary to ensure that the Article 4 Direction meets the tests that they should apply only to the smallest geographical area possible. This was a risk that was identified within previous committee reports.
- 3. In order to make the Article 4 Direction more targeted, Norwich City Council commissioned Ramidus Consulting Ltd to help produce additional evidence in the form of a study which recommends areas, streets and/or buildings which should be protected by virtue of the newly defined Article 4 Direction area. The purpose of this additional work was to inform a revised geographical area for the Article 4 Direction in the hope that we can successfully bring the Article 4 Direction into force.
- 4. Working closely with Ramidus we have undertaken significant work and submitted a proposed revised geographical boundary to officers at DLUHC for their informal consideration and comment. Feedback was received on 19<sup>th</sup> October 2022 to say that officers at DLUHC are comfortable with our revised proposal. Therefore, it is proposed that a recommendation is put to Cabinet on 14 December 2022 that the Council formally asks the Secretary of State for Levelling Up, Housing and Communities to modify the Direction so that it can be brought into force at the earliest possible opportunity. It is not proposed to withdraw the existing Article 4 Direction and submit a new one as this would require a further 12 months' notice; however the Secretary of State is able to modify the Direction which means it can come into force a lot sooner.
- 5. The section below outlines the process which we went through to redefine the geographical area and the newly proposed boundaries for the Article 4 Direction are shown in the appendices to this report.

### The process

- 6. The first stage of the process involved mapping all of Norwich's city centre offices using data obtained from Valuation Office Agency records. This data includes any hereditaments that are recorded as being offices. Whilst this data is not 100% accurate it was considered a good starting point and any non listed office buildings that were not included within it were hopefully picked up during the site visit process. The mapping process also allowed us to be able to identify which of these offices were statutory listed buildings. The decision was made that there would be no need to survey the statutory listed buildings as these do not need protection through an Article 4 Direction; but we felt that it is important to show them on our mapping exercises as it helps to identify clusters and shows the true picture of how Norwich's offices are distributed across the city centre. Appendix 1 shows all offices within the city centre (including offices within statutory listed buildings) and Appendix 2 shows all offices other than those within listed buildings. One of the main observations gained from this mapping exercise is how scattered offices are across the city centre although there are some areas of the centre where clusters can be identified.
- 7. A spreadsheet containing details of occupiers and address points for all nonlisted office buildings was then supplied to Ramidus. In order to make the survey work more manageable, the city centre was broken down into seven key character areas, namely:
  - North of the River
  - Norwich Lanes
  - Whitefriars
  - St Stephens
  - Norvic House
  - Prince of Wales & King Street
  - Station area.
- 8. Local knowledge and desk-based research enabled some sifting of buildings, with for example offices situated within shopping centres and purpose built student accommodation being discounted along with those proposed for demolition as part of a wider redevelopment scheme.
- 9. The survey work was carried out by Ramidus and for each site the following details were observed and recorded on the spreadsheet. Photos were taken of all sites.
  - Occupier/owner
  - Address details
  - Occupied/vacant
  - Floors, use, condition and age
  - Typology, size and locational factors
  - Curb appeal, historic significance
  - Comments

10. Ramidus then used their professional judgement to apply a 'RAG' status to each office building. This separated the offices into the following categories:

Red – office premises that must be protected as their loss would be wholly unacceptable

Amber – very important premises but where there are uncertainties that needed discussion with the Council. These were subsequently recategorizes as either red or green.

Green – A case could be made for their release despite some of the offices still being considered important as their loss could not be justified as 'wholly unacceptable'.

- 11. Norwich City Council then produced two maps. The first map shows the proposed modified Article 4 Direction (appendix 3) so this includes any offices that were identified as red within the RAG status. The second version of the map (appendix 4) not only shows the proposed direction but also shows offices that were discounted and offices that are listed buildings. This contextual map is not proposed to be published alongside the modified Direction however it is considered important in demonstrating how the proposed Article 4 Direction would relate to the wider office economy. A list of proposed buildings for Article 4 Direction protection is included within Appendix 5.
- 12. Ramidus also produced a short report which sets out their findings (appendix 6). One of the key things to note is that Norwich's office economy would appear to be very different from a number of other cities. It does not have a central business district but instead offices are scattered across the city centre which in itself makes the office economy quite vulnerable. A number of very important clusters have been identified through the mapping exercise, but the exercise has also highlighted how important a number of our individual offices are too.
- 13. Ramidus undertook a very thorough assessment, and we feel that a justified case has been made for each office that has been identified for protection. Each of these offices play an important role due to their size, location, character or affordability but each of them also plays a fundamental role in ensuring that Norwich retains a variety of premises from small, affordable offices to large corporate office buildings. Norwich has lost around a third of its office accommodation since 2008 and through assessing all existing individual office buildings we have now identified a significant amount of office accommodation that we feel wouldn't meet the 'wholly unacceptable' test and would need to accept its loss (in some instances rather reluctantly). We are however of the opinion that the loss of any of the premises identified for protection would not only be wholly unacceptable on an individual basis, but it would erode the office economy to the extent whereby the very survival of the city centre office market is at risk. Only through seeking to protect the identified offices will Norwich be able to meet need and demand and ensure that the office economy thrives. Therefore, it is officer's opinion that the principle of the loss of any of the identified offices would be wholly unacceptable without being able to fully consider its impact through the planning application process. The Direction does not necessary mean that all offices will be prevented from changing to residential. Instead, it will enable the Council to manage it and to consider all material planning

considerations including the impact that the loss of offices will have upon our economy as well as ensuring that housing is of good quality.

- 14. It should be noted that we have included some office buildings which do exceed 1,500sqm which officers at DLUHC have warned against doing. These are strategically important offices and whilst we acknowledge that the current wording of the General Permitted Development Order would prevent the building in its entirety being converted in one go, we do have concerns that the threshold could change or one floor at a time could be converted to residential which could have a significant and wholly unacceptable impact in itself. Therefore, it is proposed that these buildings be included as we believe a justified case has been made; however we acknowledge that there is a risk that DLUHC will ask that these be removed.
- 15. We have now put forward our case to DLUHC on an informal basis and feedback received from officers so far would suggest that they are comfortable with our revised proposal. The next step is to put forward a formal request to the Secretary of State to modify our Direction and the recommendation for this panel is that we recommend to Cabinet that this request is made. Subject to the Secretary of Statement for Levelling Up, Housing and Communities agreeing that our case is now supported by overwhelming evidence and meets the test of applying to the smallest geographical area possible the Direction should be able to be brought into force on the revised boundaries.
- 16. If successfully brought into force, then any change of use from office to residential within the Article 4 Direction area will require full planning permission and the assessment of planning applications will need to take into account the existing and emerging local plan which enables the LPA to consider all material planning matters. Currently policy DM19 seeks to protect high quality office space over 1,500sqm and DM17 seeks to protect smaller businesses. In terms of the emerging Greater Norwich Local Plan, the regulation 19 version of the plan set out that the loss of existing office floorspace will be resisted. A modification has since been proposed to take into account that the Article 4 Direction is going to be more targeted but to also add a clause that enables offices to change use if it can be demonstrated that the loss of the office accommodation would not be of detriment to Norwich's office economy. The proposed wording also seeks to protect offices within listed buildings as these will not be covered by the Article 4 Direction. The proposed working is as follows:
  - To support this, loss of existing office floorspace will be resisted a) within the area to be defined under the 'Article 4 direction relating to the conversion of offices to residential';

b) where the office accommodation to be lost would exceed 1,500sqm and the site is within the city centre (as defined by map 9), with the exception of any existing office building situated within site allocation GNLP0506; or

c) for all statutory listed office buildings situated within the city centre (as defined by map 9),

unless it can be demonstrated that its loss will not be of detriment to Norwich's office economy.
### Consultation

- 17. A consultation took place when the Council made the Direction in July 2021. Responses to the consultation were set out within the November 2021 SD panel report. There is no requirement for a further stage of consultation where Ministers agree to modify a Direction; however the Council will be required to publicise the notice as soon as practicable and the Direction can then come into force from the date of publication.
- 18. Informal comments have been sought from the DLUHC on the modified boundary and officers have confirmed that they are comfortable with the revised proposal.
- 19. The portfolio holder has been briefed and has advised that we proceed.

### Implications

### **Financial and Resources**

- 20. 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.
- 21. There will be a financial cost associated with further publicity for introducing an Article 4 direction. It is expected that this will be met from existing budgets.
- 22. The initial Ramidus study was funded through Towns Deal funding. The most recent study was met from existing budgets. We have already given 12 months notice of bring the direction into force which will avoid any compensation claims.

### Legal

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

### Statutory Considerations

Consideration	Details of any implications and proposed measures to address:
Equality and Diversity	The LPA is not able to secure affordable housing under prior approval applications. The impact of this report to make an article 4 direction will not have any direct impacts but, once the direction is confirmed and comes into force, the Article 4 direction will enable the LPA to secure affordable housing where it is viable.

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

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

### Risk Management

Risk	Consequence	Controls Required
There is a risk that DLUHC do not accept the modification and that the article 4 direction may fail.	Given that the majority of work has already been done, the further financial resource implications are relatively minimal.	We have submitted our proposed modification to officers at DLUHC on an informal basis which should minimise the risk of failure. We feel that our case is supported by overwhelming evidence and is now geographically limited.

### **Other Options Considered**

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

### Reasons for the decision/recommendation

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

### Background papers: None

### Appendices:

Appendix 1: All offices within Norwich City Centre

Appendix 2: All offices within Norwich City Centre (excluding offices within Listed building)

Appendix 3: Proposed modified Article 4 Direction geographical area

Appendix 4: Contextual map

Appendix 5: List of proposed office buildings for Article 4 Direction protection

Appendix 6: Summary of research to support the introduction of an article 4 Direction for Norwich City Centre, Ramidus, September 2022

### **Contact Officer:**

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### Appendix 1: All offices within Norwich City Centre



## Appendix 2: All offices within Norwich City Centre (excluding offices within Listed building)





Appendix 3: Proposed modified Article 4 Direction geographical area





### Appendix 5: List of proposed office buildings for Article 4 Direction protection

1-3 Saint Court, All Saints Green 47 All Saints Green 49 All Saints Green 51 All Saints Green Norwich Union Island Site, All Saints Green 1 Bank Plain 7 Bank Plain 9 Bank Plain 19 Bank Plain 8-10 Bank Plain 12 Bank Plain 16 Bank Plain 1 Bedding Lane 17-23 Ber Street 7 Castle Meadow 10 Castle Meadow 24 Castle Meadow 10-12 Cathedral Street 13-15 Cathedral Street **17 Cathedral Street** 23 Cathedral Street The Old Drill Hall, 23 a Cattle Market Street 26 Cattle Market Street 27 Cattle Market Street 28 Cattle Market Street Brancaster House, 30 Cattle Market Street Nadler House, 31 Cattle Market Street Norvic House, 29-33 Chapel Field Road 1 Charing Cross **3 Charing Cross 5** Charing Cross 7 Charing Cross 9 Charing Cross 11 Charing Cross 15 Charing Cross 17 Charing Cross **19 Charing Cross** 21 Charing Cross 23 Charing Cross 25 Charing Cross St Clements House, 2 -16 Colegate 21 Colegate 47 – 49 Colegate The Guildhall, 51 Colegate 55 Colegate Townshend House, 30 Crown Road 32 Crown Road Mall Chambers, 40 Crown Road

12-14 Exchange Street Dragonfly House, 2 Gilders Way Kingfisher House, 1 Gilders Way Netherconesford, King Street 31 King Street Communications Centre, 33 King Street 46 King Street 61 King Street 10 London Street 56-58 London Street 68 London Street Sackville Place, 44 – 48 Magdalen Street 2 Millennium Plain **19 Muspole Street** 21 Muspole Street 3-5 Orford Place Centenary House, 19 Palace Street Kiln House, 27-43 Pottergate 1 Prince of Wales Road 2 Prince of Wales Road 11 Prince of Wales Road 32 Prince of Wales Road 34 Prince of Wales Road 36 Prince of Wales Road 38 Prince of Wales Road 40 Prince of Wales Road 44 Prince of Wales Road 46 Prince of Wales Road 48 Prince of Wales Road 100 Prince of Wales Road Portland House, 102-104 Prince of Wales Road 15-17 Princes Street Victoria House, Queens Road 2-4 Queen Street **5** Queen Street 16-18 Queen Street Haldin House, Old Bank of England Court, Queen Street Jacquard House, Old Bank of England Court, Queen Street New Patrick's Yard, 2 Recorder Road 44 Rose Lane Union Building, 51-59 Rose Lane Rouen House, Rouen Road 20 Rouen Road Prospect House, Rouen Road 3 St Andrews Hill Lawrence House, 5 St Andrews Hill Cavendish House, 28-32 St Andrews Street Woolgate Court, St Benedicts Street Woburn House, 80-84 St Benedicts Street

Stannard Place, St Crispins Road 90 St Faiths Lane 13 -15 St Georges Street 17 - 19 St Georges Street The Atrium, St Georges Street St Giles House, 27 St Giles Street 1 St James Court Carmelite House, 2 St James Court 3 St James Court Golden Lion House, 15 St John Maddermarket Charing Cross Centre, 17-19 St John Maddermarket Norfolk House, St John Maddermarket Cotman House, 53 - 57 St Martins Lane 1-5 St Stephens Street St Vedast House, 5-7 St Vedast Street 2 Surrey Street **5** Surrey Street 8 Surrey Street 25-27 Surrey Street 32-38 Surrey Street Norfolk Tower, 48-52 Surrey Street Boars Head Yard, Surrey Street South Tower, Surrey Street Holland Court, The Close 13 The Close 14 The Close 15 The Close Dencora House, Theatre Street 4 Theatre Street 8 Thorpe Road 10 Thorpe Road 12 Thorpe Road 16 Thorpe Road 18-20 Thorpe Road Yare House, 62-64 Thorpe Road 66-70 Thorpe Road Compass House, 4 Upper King Street 8-10 Upper King Street 12 Upper King Street Kingstreet House, 15 Upper King Street 19 Upper King Street 22 Wensum Street 1-17 Westlegate

Appendix 5: Summary of research to support the introduction of an article 4 Direction for Norwich City Centre, Ramidus, September 2022

# NORWICH CITY COUNCIL

SUMMARY OF RESEARCH TO SUPPORT THE INTRODUCTION OF AN ARTICLE 4 DIRECTION FOR NORWICH CITY CENTRE

16<sup>th</sup> SEPTEMBER 2022



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### 1. Context

Norwich City Council made an Article 4 Direction on 28<sup>th</sup> July 2021 in order to remove Permitted Development Rights allowing the conversion of offices to residential within the city centre. The Direction was due to come into force on 29<sup>th</sup> July 2022. However, in May 2022, the Department of Levelling Up, Housing and Communities informed the Council that the Article 4 Direction failed to comply with new national policy stating that Article 4 Direction should apply to the smallest geographical area possible.

The Department advised the Council that it had failed to take a sufficiently targeted approach to the assessment of the impacts of Permitted Development Rights in locations throughout the city centre. In light of this advice, the Council asked Ramidus Consulting to undertake a study to help inform a revised geographical area for the Article 4 Direction and to produce the additional evidence base required to successfully bring the revised Article 4 Direction into force.

### 2. Study requirements

The Brief for the study required output which recommended areas, streets and/or buildings which should be protected by virtue of the newly defined Article 4 Direction area. The brief asked that the key outputs from the study should include the following.

- Map of existing offices within the A4D area (excluding listed buildings).
- Spreadsheet of existing offices within the A4D (excluding listed buildings).
- Spreadsheet of all offices (non-listed) including data which identifies factors such as user, class/typology, age, locational factors, historical significance and amenities.
- Identification of offices which would have a wholly unacceptable impact if they were lost to residential (taking into account size thresholds).
- List of buildings to be protected.
- Map identifying the streets and/or buildings for inclusion within the Article 4 Direction (possibly to be produced by Norwich City Council).
- Summary of key findings.

### 3. Study methodology

The Council provided Ramidus with maps and spreadsheets of all offices within Norwich city centre. This information was obtained from Valuation Office Agency records and includes any hereditaments that are recorded as being offices. Appendix One provides a map showing the buildings identified for detailed survey work. The Council and Ramidus identified a series of character areas to make the survey work more manageable, which resulted in the city centre being broken down into seven key character areas, as follows.

- North of the River Wensum
- Norwich Lanes
- Whitefriars
- St Stephens
- Norvic House
- Prince of Wales & King Street
- Station Area

Local knowledge/desk based research enabled some sifting of buildings at this stage to exclude, for example, any sites with little prospect of being converted due to being situated within shopping centres or those proposed for demolition as part of a wider redevelopment scheme.

Survey work was undertaken on Monday 1<sup>st</sup>, Tuesday 2<sup>nd</sup>, Wednesday 3<sup>rd</sup> and Sunday 21<sup>st</sup> August. Each building was visited, photographed and surveyed. Some 239 buildings were surveyed, and the following details were recorded. Appendix Two shows an extract from the spreadsheet.

- Occupier/owner
- Address details
- Occupied/vacant
- Floors, use, condition and age
- Typology, size and locational factors
- Curb appeal, historic significance
- Red-amber-green status
- Comments

Premises sizes and ages were estimated. Clearly this cannot be a precise exercise, and so categories were used in each case, as shown below.

Category	Approx. size ranges, sq m	Approx. size ranges, sq ft
1	<100	<1,000
2	100-500	1,000-5,000
3	500-1,000	5,000-10,000
4	1,000-1,500	10,000-15,000
5	1,500-3,000	15,000-30,000
6	>3,000	>30,000

The 1,500 sq m (15,000 sq ft) boundary was selected so that premises requiring a full planning permission prior to conversion to residential can be identified.

Category	Туроlоду
1	Purpose built, since 2000 (est.)
2	Purpose built, 1980-2000 (est.)
3	Purpose built, post-war
4	Purpose built, pre-war
5	Former dwelling
6	Former commercial premises
7	Other (specify)

A fundamental aspect to the revised guidance on Article 4 Directions is that protected buildings must be identified as such only when their potential loss could be deemed to have a 'wholly unacceptable' impact. To this end the survey involved applying a 'RAG' status to each building – Red, Amber or Green. Red applied to buildings that should certainly be protected as the existing office meets a particular need and the loss of the individual office or cluster would have a wholly unacceptable impact upon Norwich's office stock; green was applied where there was a case for their release, and amber was used when there was uncertainty.

Following the fieldwork, all of the 'Ambers' were then discussed with the Council. Combining local knowledge and policy background, the Ambers were then allocated either Red or Green status, depending on the outcome of the discussion. Black was used when survey work identified that the building was no longer in commercial office use.

#### 4. Summary findings

The key output from this study is the Excel spreadsheet recording the detailed survey work. This, along with the photographic record, should be read alongside this summary. Figure One provides a visual record, prepared by the Council, of all those buildings allocated a 'Red' status in the RAG assessment described above. Having visited and surveyed in detail each of these premises, and the context within which they sit, it is our opinion that each of these buildings should be subject to an Article 4 Direction as the loss of any of these offices would be wholly unacceptable. The map excludes Listed buildings.



Figure One Map showing buildings proposed for Article 4 Direction protection

There are a number of points that can be drawn from the spreadsheet and the map.

- The office stock in Norwich city centre is scattered rather than concentrated. There is no 'central business district', nor are there identifiable concentrations, where office use is dominant.
- The scattered nature of the office stock increases the vulnerability of the individual parcels. Without policy protection, these could be gradually denuded until the point where the whole office market is further weakened.
- The strongest areas in terms of office use include the following.
  - Bank Plain/St Andrew's Street 0

- Charing Cross
- North of River Wensum
- Prince of Wales Road/Cattlemarket Street
- Surrey Street/St Stephens Street
- o Thorpe Road
- o Whitefriars
- The stock of office premises is enormously variable, ranging from small, period offices above retail premises to large, modern corporate office buildings.
- The range of types and sizes of office space in Norwich is essential for meeting a diverse demand profile, including the need for affordable offices.
- A significant proportion of Norwich's offices are in 19<sup>th</sup> century and earlier buildings, often town houses. These work exceptionally well for small, professional firms, providing sub-divisibility, natural light and air, and a central location.
- A number of self-contained, office buildings particularly those dating from the 1960s-1980s have already been converted to residential use and those remaining are particularly vulnerable due to the relative ease with which they can be converted.
- The premises surveyed were, on the whole, well occupied, with little evidence of vacancy. There was minimal indication of neglect or obsolescence.

### 5. Concluding remarks

Norwich has lost a significant amount of office floorspace since the extension of Permitted Development Rights to ease the change of use from office to residential. This has left the office economy in a fragile state. The existing office stock is scattered across the city centre which leaves it highly vulnerable. It is fundamental that Norwich retains a variety of premises from small, affordable offices to large corporate office buildings in order to meet need and demand and to ensure that Norwich's office economy thrives.

The comprehensive survey work has identified those buildings which must be retained as offices as their loss would be considered wholly unacceptable. It has also identified offices which could be released for other uses. The loss of a number of these more marginal offices would be considered regrettable; however it is unlikely that Norwich City Council could justify that their loss would be wholly unacceptable.

### Appendix One

# Norwich City centre Offices (excluding offices within statutory Listed buildings)



NORWICH LANES							
Occupier/owner	Name	Number	Street	Postcode	Occupied or vacant	Floors	Use
Watsons		-	Bank Plain	NR2 4SF	occupied	1.3	estate agent office
Trustees Of The Georgics Pension Fund		7	Bank Plain	NR2 4SF	vacant (to let)	G-2	retail + office
		6	Bank Plain		occupied	<u>9</u> -2	offices over estate agent
Dna Norwich Limited/Northwood Lettings		11	Bank Plain	NR2 4SF	retail unit		
Fosters Solicitors	William House	19	Bank Plain	NR2 4FS	occupied	1-2	solicitor
		8-10	Bank Street	NR2 4SE	occupied	g-1	professional office
BUILD		12	Bank Street	NR2 4SE	occupied	g-1	Build Charity
Na Marketing Services Limited		16	Bank Street	NR2 4SE	occupied	g-2	estate agent office
Howes Percival LLP	Flint Building	-	Bedding Lane	NR3 1RG	occupied	g-1	law firm
Uttings Limited	Graphics House	60	Bethel Street	NR2 1NR	occupied	g-1	parcel collection point
Ymca		62	Bethel Street	NR2 1NR	occupied		
Miss Mia Boorman T/A La Cala/Suntrap		2	Castle Meadow	NR1 3PY	vacant	-	office over f&b
First Eastern Counties Buses Limited	Davey House	7	Castle Meadow	NR1 3DE	occupied	g-2	office over travl centre
Don'T Paye Too Much Ltd		10	Castle Meadow	<b>NR1 3DE</b>	occupied	g-2	accountancy
Cambridge Accountancy Services Ltd		24	Castle Meadow	NR1 3DH	occupied	2-3	offices over Trailfinders
Mrs Natalie Bussey T/A Fossi Hair & Beauty		8	Castle Street	NR2 1PD	occupied	1-2	office over shop
Malmains & Co Ltd T/A Martin & Co		-	Charing Cross	NR2 4AL	occupied	g-2	estate agent
Philip Noble & Son		e	Charing Cross	NR2 4AX	occupied	g-2	property management
Root Norwich Ltd/Howards Residential Lettings		2	Charing Cross	NR2 4AX	occupied	C-0	Root

### ••

Condition	Age	Type	Size	Locational Factors	Curb Appeal	Historic Significance	RAG status	Comments
very good	1930s	4	3	good, high street	yes	some		upper floors of ground floor estate agent; quality space
fair	1920s	4	e	high street	yes	some		niche space, but good quality
fair	1970s	3	2	in a cluster	ou	ou		
	1970s							ground floor retail unit beneath Fosters
very good	1970s	33	9	high street	limited	ou		tired but useful office stock
good	19th	5	2	side street	limited	OL		good quality space; recently refurbished
poor	1910s/1920s	5	-	side street	yes	some		multiple businesses
poor	1900s	5	-	side street/corner	ou	ou		three businesses listed; good affordable space
very good	2000s	-	9	quiet location	yes	yes		part historic/mostly modern office building
fair	1900s	5	-	quiet street	no	DO		former resi property converted to quasi office use
								building been converted to YMCA
very poor	1890s	4	-	off pitch. Fair location	DO	OL		poor quality office above f&b poss beauty parlour
goog	1920s	4	4	off pitch, fair location	no	С		quality, regular space; must be protected
poob	1950s	e	e	off pitch, fair location	yes	С		quality, affordable space over ground retail
goog	1960s	33	2	off pitch, fair location	no	OL		upper floors of travel business
poor	1880s	9	-	central	no	OL		very small scale; difficult to protect; maybe access issues
very good	1990s	2	c	busy road, corner plot	yes	С		quite vulnerable
very good	1980s	S	e	busy road	ou	С		quite vulnerable
very good	1970s	3	S	busy road	0	OL		quite vulnerable