Committee Name: Sustainable Development Panel

Committee Date: 14/09/2021

Report Title: 2019/20 Annual Monitoring Report

Portfolio:	Cllr Mike Stonard, Inclusive and Sustainable Growth
Report from:	Executive director of development and city services
Wards:	**All wards**
OPEN PUBLIC ITEM	

Purpose

To present the 2019-20 Greater Norwich Development Partnership (GNDP) Annual Monitoring Report for Broadland, Norwich and South Norfolk.

Recommendation:

To note the contents of the 2019-20 GNDP Annual Monitoring Reporting.

Policy Framework

The Council has three corporate priorities, which are:

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

This report meets the corporate priorities People living well, and Great neighbourhoods, housing and environment.

This report addresses following strategic actions in the Corporate Plan:

- Provide means for people to lead healthy, connected and fulfilling lives
- Maintain a clean and sustainable city with a good local environment that people value
- Ensure our services mitigate against any adverse effects of climate change and are efficient to reduce carbon emissions
- Build and maintain a range of affordable and social housing

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

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

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

Report Details

Introduction

1. The 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 2019-20. This AMR is being published later than usual due to delays associated with the submission of the Greater Norwich Local Plan (GNLP).

2. 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.

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 baseline 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 to this report. The full AMR is available to view at: Annual Monitoring Report » Greater Norwich Growth Board

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 A1 of the AMR as part of the assessment of the five-year housing land supply.

6. In July 2020, the Greater Norwich Local Plan (GNLP) was submitted for examination. Once adopted, the GNLP will replace the strategic policies in the JCS.

7. This AMR covers the period 1st April 2019 – 31st March 2020. The impacts of the Covid-19 pandemic were beginning to take shape in the UK in March

2020, however the implications of this were not fully realised or understood until later on in 2020. Therefore, the information reported within the 2019-20 AMR and this covering report is not likely to be affected by the pandemic. Information which will be reported in the 2020-21 AMR will cover a much greater time period impacted by the pandemic, and therefore its effects will be discussed and noted in the next AMR.

Overview of the Joint Core Strategy AMR

8. The AMR's key findings are set out in the Executive Summary, which is attached in Appendix 1 of this report.

9. The AMR demonstrates that progress is being made on a number of indicators. The percentage of household waste has increased in general, but has decreased very minimally in Norwich. Increasing recycling rates remains difficult with the increase in digital material, and recyclable items increasingly being made using less materials. The market also now dictates that a higher quality of material is required for recycling which has resulted in an increased rejection rate.

10. The AMR reports a mixed picture in terms of CO2 emissions per capita for each sector. Norwich saw a reduction in emissions across all sectors, whilst South Norfolk saw stable or reducing emissions rates. Broadland saw an increase in emissions from the transport and industrial and commercial sectors. It should be noted that this information is based upon the latest dataset available for the 2018-19 period, as the data for 2019-20 were not available at the time the AMR was published.

11. The number of solar energy capacity schemes permitted has decreased since the peak in 2015-16. However, in 2019-20 Norwich saw an increase in the amount of Solar PV approved.

12. In relation to the objectives to ensure sufficient housing and affordable housing completions, the latest AMR presents a mixed picture. Overall, there has been a reduction in the amount of housing delivered across Greater Norwich (2,075 units) compared with the previous year (2,779 units). However, this reduced figure still exceeds the JCS target of delivering 2,046 dwellings per annum. This delivery figure is also still one of the higher delivery figures achieved since the adoption of the JCS. Housing delivery in the Norwich Policy Area (NPA) is significantly reduced (1,624 units) compared with last year's delivery (2,382 units), however the 2019-20 figure is very similar to previous years' delivery. There are still implications to be considered from previous years' under-delivery. This is considered further in the Housing Land Supply Issues section below.

13. Housing delivery for Norwich (as reported against the JCS) in 2019-20 was 495 dwellings; a significant decrease on the previous year's delivery of 927 dwellings. This figure does not include completions from C2 communal accommodation or purpose-built student accommodation and therefore does not provide the full delivery picture for Norwich. The monitoring against the local plan (paragraph 24 onwards in this report), which does account for these accommodation types reports 798 dwellings delivered in 2019-20. Of

this figure, 62% were C3 residential units (495 units), and 38% (303 units) were C2 communal and student accommodation. Despite the reduction in unit numbers on the 2018-19 period, the 2019-20 delivery is more in line with previous years' delivery.

14. Affordable housing completions have decreased across the Greater Norwich area to 658 units compared to 724 in 2018-19 period. This is due to reduced delivery in South Norfolk. Both Broadland and Norwich saw an increase in affordable housing delivery in 2019-20. Specifically in Norwich, the figures increased from 137 units in 2018-19 to 184 units in 2019-20. This included 44 units delivered at Goldsmith Street, 60 units at Carrow Quay and 41 units at St Anne's Wharf. Despite the reduced delivery in South Norfolk in the 19-20 period, this is the third year in succession where the affordable housing target of 525 units from the 2017 Strategic Housing Market Assessment (SHMA) has been exceeded by the Greater Norwich authorities.

15. Whilst this is a positive picture overall, affordable housing completions are presented as gross, not net figures. Therefore, gross delivery of affordable homes will need to continue to exceed the target from the 2017 SHMA to ensure housing needs across Greater Norwich are met. The challenge of affordable housing delivery has been made more difficult by government changes to the planning system which means that affordable housing cannot be required in certain circumstances eg. Certain types of prior approval applications, and vacant building credit.

16. In addition, it is worth noting the housing completions figures for the 2020-2021 period included in Appendix 5. These figures do not form part of the AMR summarised in this report. These completions figures cover the period impacted by the Covid-19 pandemic and show that significantly less homes were delivered during this period. The implications of this will be discussed in further detail when the 2020-21 AMR is published and reported.

Housing Land Supply Issues

17. Within the AMR reported to SD Panel in 2018, 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 this more direct comparison. Similar calculations have been undertaken for the 2019-20 period and are included at Appendix 3. These are not included within the AMR itself.

18. Prior to the 2017-18 reporting period, the AMR presented the housing land supply assessment against targets established in policy JCS4. This meant that the housing land supply concerning Norwich was established across the Norwich Policy Area (Norwich and 50 parishes in Broadland and South Norfolk). Calculating the land supply on this basis, the AMR for 2018-19 demonstrated a 3.36 year supply for Norwich (Liverpool approach [1]with 20%

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[1] The Liverpool method of calculating historic undersupply of housing involves spreading any shortfall of housing in the local plan from previous years over the whole of the remaining plan period, whereas the Sedgefield method spread the shortfall over the next 5 years of delivery.

buffer). By comparison, if the data for 2019-20 uses the same approach, then a 3.02 year supply can be demonstrated.

19. Policy JCS4 requires 36,820 homes to be delivered over the 18-year plan period 2008-2026 in the Greater Norwich area. Table 1 sets out the housing requirement and delivery rates (both total and per annum) in the Greater Norwich area, and those of which are located in the Norwich Policy Area.

	Greater Norwich	**Of which are located in the NPA**
Homes required	36,820 (2,046 pa)	32,847 (1,825 pa)
Homes delivered up to 31st March 2020	20,356 (1,696 pa)	15,623 (1,302 pa)
Remaining homes to be delivered before the end of plan period	16,464 (2,744 pa)	17,224 (2,871 pa)

Table 1: Homes required, delivered and remaining to be delivered across the plan period 2008-2026 in Greater Norwich and the Norwich Policy Area (NPA)

20. Table 1 shows that the remaining homes to be delivered in the NPA before the end of the plan period, actually exceeds the number of homes required to be delivered across the whole of Greater Norwich for the same period. The reason for this is due to over delivery of housing in the rural policy area (Greater Norwich Area minus Norwich Policy Area), where 118% of homes required in the plan period have been delivered to date. This is compared with under delivery in the Norwich Policy Area, where 48% of homes required in the plan period have been delivered to date.

21. The report to SD Panel outlining the main findings from the 2017-2018 AMR considered that the delivery targets set out in the JCS now appear unrealistic. The situation is now even more challenging given that the plan targets requires delivery at an average of 2,744 homes per annum between 2020 and 2026 in the Norwich Policy Area, when actual delivery between 2008 and 2020 has fluctuated between 882 and 2,440 homes per annum and given that the distribution of development between the urban and rural policy areas has not been delivered as envisaged.

22. However, the new 2019-20 AMR and the AMRs from the previous two years 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 Norwich Policy Area. Using the standard methodology, the AMR presented the housing land supply at April 2019 as 5.89 years across Greater Norwich and 4.03 years across Norwich City. By comparison, the housing land supply at April 2020 is calculated as

6.16 years across Greater Norwich and 4.34 years across the city (Appendix 2).

23. The five-year land supply has increased compared with last year's figures, however it is still below the 5 year threshold. It should be noted that the information provided for the housing land supply in Norwich is a conservative estimate based upon information available at the time, which has impacted upon the 5-year land supply figure. In addition, there are a number of new and large sites that have recently been granted planning consent, such as Barrack Street, which are expected to make a significant contribution to the housing land supply in coming years. Officers have also taken care to consider the impact of the Covid-19 pandemic upon five year land supply forecasts. For sites of 10 homes or more, the majority of site forecasts are based on the stated intentions of the developers provided towards the latter half of 2020, and were therefore provided in full knowledge of the pandemic. For sites of 9 or fewer homes, a lapse rate is already applied to these delivery figures therefore no further adjustment is required to account for the impact of the pandemic (see paragraph 38 of Appendix 2).

24. 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 policy JCS4. 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)

25. The following is a summary of the information provided in Appendix F of the AMR and Appendix 4 of this report. This information is relevant to the Norwich City Council local planning policies only.

26. 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_10a_review_of_the_local_plan

27. The following is a summary of the main findings of the Norwich Appendix of the AMR for 2019-20:

• -12,425m^2 of designated open space was lost in this monitoring period. Applications responsible for the largest losses during this period were deemed acceptable given replacement provision of open space and other benefits to amenity, heritage and biodiversity. For example, application 19/00007/F at the site of the former Norwich Family Life Church at Heartsease Lane gave permission for the loss of 10,000m^2 of open space for a new church and community facilities, however this was deemed acceptable as replacement open space is to be provided as part of the development.

•The air quality indicators Nitrogen Dioxide (NO2) and airborne particulates(PM10) remained relatively stable at the Lakenfields monitoring location, although a slight reduction in PM10 was observed in 2019/20. At the Castle Meadow monitoring location both NO2 and PM10 decreased significantly in2019/20 and were at their lowest levels recorded since the adoption of the local plan.

• In 2019/20, 746 new homes were granted consent, compared with 473 new homes in 2018/19. Several large consents were responsible for this increase, including 252 student bedrooms at the land adjacent to Sentinel House, Phase 2a of the Three Score site to provide 153 dwellings and the Barrack Street Site to provide 218 dwellings.

• The total housing commitment (the number of dwellings with outstanding planning permission (and unbuilt) and those allocated for development in the local plan) was 6,234. Although this is a reduction on the previous years' figure of 7,289, it is still significantly greater than the figures recorded for the other monitoring periods since the adoption of the local plan.

• Housing completions in 2019/20 were recorded at 798 dwellings, which is a reduction on the 1,085 dwellings completed in 2018/19. This figure is still significantly greater than housing completions recorded in other monitoring periods and still exceeds the average annual target for Norwich set by the JCS of 477 dwellings per annum. Interestingly, there were very few completions in 2019/20 from office to residential prior approval applications which contributed to the peak figure in 2018/19. Instead, the majority of completions were from standard full planning applications. A good proportion of the 2019/20 housing completions were delivered through student accommodation and residential institution development (303 equivalent dwellings or 38%).

• The 2019/20 period saw the loss of 1.37ha of land allocated for residential use to residential institution (Class C2) development. This was as a result of the consents at 28 Mousehold Lane for a care home and supported living apartments, and the car park adjacent to Sentinel House for 252 student bedrooms.

• The loss of office space across the city has continued into 2019/20, however this was at a reduced rate of -2,400m2 suggesting further slowing of the trend. Only one application for office to residential prior approval was responsible for part of this loss (-62m2) with the remainder from full and change of use applications, suggesting the reduced loss of office space is as a result of fewer prior approval office to residential applications. New office floorspace permitted was primarily directed to existing employment areas and elsewhere in the city rather than the Office Development Priority Area.

• Since the publication of the AMR, the Council has commenced the process for implementing an Article 4 Direction which would remove permitted development rights for the conversion of offices to residential in the City Centre given that these types of applications have been responsible for the significant loss of office space in Norwich over the past few years.

• The 2019/20 period saw an increase in small/medium business space permitted, as well as more business space permitted within defined employment areas than elsewhere in the city.

• Despite a reduction in the amount of information available for retail monitoring this year due to COVID-19, the retail sector appeared to be performing well in the 2019/20 period with none of the primary or secondary retail centres falling below their required retail thresholds. The 2020/2021 monitoring period will cover the various periods of national lockdown and restrictions which may have impacted upon the retail sector, and therefore this will need to be monitored closely in the following years.

• The largest amount of community facilities floorspace was approved since the adoption of the local plan, at 9,810.62m2. In total, 22 applications were granted consent.

• A greater proportion of floorspace for main town centre uses was permitted in defined centres (5,324m2) than elsewhere in Norwich (3,526m2). This is the first time that this has occurred since the adoption of the local plan and is largely as a result of the change of use of the Royal Hotel on Bank Plain from offices to hotel use.

Consultation

28. 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.

29. In addition, the relevant portfolio holder was made aware of the contents and main conclusions of the AMR prior to this report being completed.

Implications

Financial and Resources

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

Legal

31. 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
Include operational, financial, compliance, security, legal, political or reputational risks to the council	None	None

Other Options Considered

32. 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

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

Tracking Information

Governance Check	Name	Date Considered
Relevant Executive Director	Graham Nelson	3 September 21
Legal opinion		
Relevant finance officer		
Chief Finance Officer (or Deputy)		
Monitoring Officer (or Deputy)		

Background papers

None.

Appendices

1. **Greater Norwich Annual Monitoring Report 2019-20**
2. **Greater Norwich AMR Appendix A 5 Year Land Supply 2019-20**
3. **Illustrative housing land supply for the Norwich Policy Area**
4. **Norwich City Council Development Management Policies monitoring 2019-20**
5. **Norwich City Council Housing Completions 2020-21**

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Joint Core Strategy for Broadland, Norwich and South Norfolk:

Annual Monitoring Report 2019-20

Jobs, homes, prosperity for local people

Broadland District Council
NORWICH City Council
South Norfolk COUNCIL
Norfolk County Council

Contents

1. Executive Summary

1.1 This Annual Monitoring Report (AMR) assesses how the Greater Norwich area performed for 2019/20 against the objectives set out in the Joint Core Strategy.

1.2 There are many indicators that are currently being met or where clear improvements have been made:

- The percentage of household waste that is recycled or composted has generally increased;
- The CO2 emissions per sector have mostly decreased;
- The number of housing completions has surpassed the JCS annual target;
- The number of affordable housing completions has exceeded the target for the third consecutive year;
- The employment rate of economically active population has mostly increased;
- Norwich has maintained its13th 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 development reflect older business models and less efficient use of space.

1.5 Some "contextual indicators" in the AMR that the local plans are able to have more limited impact on show negative trends:

- Total crime level has increased this year and
- The number of people killed or seriously injured in road traffic accidents has increased, apart from in Norwich.

1.6 A 5-year land supply can be demonstrated for this monitoring year.

Greater Norwich Authorities can demonstrate 6.16 years of housing supply.

1.7 A range of activities are underway that will have a positive impact on stimulating growth and help deliver against targets over the coming years.

1.8 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 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 "Transforming cities "and
- engagement in skills initiatives to improve the match between labour supply and demand.

1.9 The LPAs are reviewing and rolling forward the JCS to produce the Greater Norwich Local Plan (GNLP), scheduled to be adopted in 2022. 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 long-term vision and objectives for the area and was adopted on 24 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 January 2014.

2.3. For more information on the adoption of the Joint Core Strategy please see the Greater Norwich Growth Board's website.

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:

- 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 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 **1st April 2019 and 31st March 2020.** **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.

Table 3.1 indicators measured by the JCS monitoring framework

Indicator	Target	Source	Location	15/16	16/17	17/18	18/19	19/20	RAG status
Total CO_2 emissions per capita	Decrease	DECC	Broadland	6.2	6.0	5.5	5.8	Data not released	n/a
			Norwich	4.3	3.9	3.7	3.5		
			South Norfolk	6.6	6.3	6.2	6.1		
Total CO_2 emissions per each sector	Decrease	DECC	See Table 3.2						n/a
Sustainable and Renewable energy capacity permitted by type	Year-on-year megawatts capacity permitted increase	LPA	See Table 3.3						n/a
Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality	Zero	LPA	Greater Norwich area	0	1	0	0	0	G
			Broadland	0	0	0	0	0	G
			Norwich	0	0	0	0	0	G
			South Norfolk	0	1	0	0	0	G
All new housing schemes to achieve water efficiency standard of 110L/Person/Day	All new housing schemes to achieve water efficiency of 110 LPD	LPA	All housing developments in Broadland, Norwich and South Norfolk have to show they will meet this standard therefore 100% compliance has been assumed as permission is not granted without this assurance.						n/a
Percentage of household waste that is a) recycled and b) composted	No Reduction	LPA	Broadland	a)26%	a)24.88%	a)23.60%	a)21.45%	a)21.97%	G
				b)25%	b)26.02%	b)26.34%	b)26.79%	b)27.61%	G
			Norwich	a)32%	a)27%	a)24.86%	a)22.90%	a)22.60%	A
				b)7%	b)13%	b)12.7%	b)16.10%	b)16%	A
			South Norfolk	a)44	a)44	a) 42.34%	a) 22.15%	a) 42.5%	G
				b)18	b)19	b) 18.4%	b) 19.20%	b) 20.04%	G

Rag Status Key
R = Red
A = Amber
G = Green

Table 3.2 Total CO^2 emissions per capita for each sector

Location	Sector	15/16	16/17	17/18	18/19	RAG status
Broadland	Ind & Com	2.5	2.4	2.0	2.1	R
	Domestic	1.8	1.7	1.6	1.5	G
	Transport	1.9	1.9	2.0	2.1	R
Norwich	Ind & Com	1.8	1.6	1.5	1.4	G
	Domestic	1.4	1.4	1.3	1.2	G
	Transport	1.0	1.0	1.0	0.9	G
South Norfolk	Ind & Com	2.8	1.6	1.5	1.5	A
	Domestic	1.7	1.7	1.5	1.5	A
	Transport	3.2	3.1	3.3	3.2	G

Rag Status Key
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3.8 CO^2 emissions per capita decreased in Norwich and South Norfolk, but increased in Broadland between 2018 and 2019, the latest year in which figures are available.

3.9 CO^2 emissions per capita across the industrial and commercial and Transport sectors in Broadland increased between 2017/18 and 2018/19, while in Norwich and South Norfolk emissions remained even or decreased across all three sectors.

Table 3.3 Sustainable and Renewable energy capacity permitted by type

Location	Type	15/16	16/17	17/18	18/19	19/20
Broadland	TOTAL	13.94MW	17.5kW	8.67MW	0.78MW	0MW
	Wind	0MW	0MW	0 MW	0MW	0MW
	Solar PV	11.14MW	2.5kW	8.67 MW	0.64MW	0MW
	Hydro	0MW	0MW	0 MW	0MW	0MW
	Biomass	2.8MW	15kW	0 MW	0.14MW	0MW
Norwich	Solar PV Only	355.03 kW (0.36MW) (six schemes)	1.9MW (1750mW per year)	No schemes submitted	No schemes submitted	13.8 kW
South Norfolk	TOTAL	39.45MW	0MW	17MW	0MW	0MW
	Wind	0MW	0MW	0MW	0MW	0MW
	Solar PV	37MW	0MW	17MW	0MW	0MW
	Sewerage	0MW	0MW	0MW	0MW	0MW
	Biomass	2.45MW	2.0MW	0MW	0MW	0MW

	Air	0MW	0MW	0MW	0MW	0MW

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. Additionally, funding for solar energy projects has diminished in recent years, leading to reduced take-up and impetus to bring schemes forward.

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

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 2019/20.

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.

Percentage of household waste that is recycled and composted

3.18 The percentage of household waste that is recycled and composted has increased across Broadland and South Norfolk but decreased slightly in Norwich. The overall performance in 2018/19 across Greater Norwich shows an improvement from previous years. 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 councils to improve services and increase the amount of waste diverted from landfill.

Table 3.4 Objective 2: to allocate enough land for housing, and affordable housing, in the most sustainable settlements

Indicator	Target	Source	Location	15/16	16/17	17/18	18/19	19/20	RAG status
Net housing completions	NPA – 1,825 per annum	LPA	NPA	1,164	1,810	1,685	2,382	1624	R
	Greater Norwich area – 2,046 pa		Greater Norwich area	1,728	2,251	2,034	2,779	2075	G
	Broadland NPA – 617 pa		Broadland - NPA	340	410	449	482	540	R
	Broadland RPA – 89 pa		Broadland - RPA	258	234	230	158	123	G
	Norwich – 477 pa		Norwich	365	445	237	927	495	G
	South Norfolk NPA – 731		South Norfolk - NPA	459	955	999	973	589	R
	South Norfolk RPA – 132		South Norfolk - RPA	306	207	119	239	328	G
Affordable housing completions	Affordable housing target of 525 per year[1]	LPA	Greater Norwich area	222	456	531	724	658	G
			Broadland	107	237	177	195	211	G
			Norwich	25	44	56	137	184	G
			South Norfolk	90	175	298	392	263	G
(Gross)New house completions by bedroom number, based on the proportions set out in the most recent Sub-Regional Housing Market Assessment	New Target 1 bedroom – 7% 2 bedrooms – 23% 3 bedrooms – 52% 4+ bedrooms – 18%	LPA	Greater Norwich area	No data	No data	No data	No data	No data	n/a
			Broadland						
			Norwich						
			South Norfolk						
Provision of Gypsy and Traveller pitches to meet local plan requirements	To meet CHANA (Option 1) targets:29 pitches in total (15 from 2017-22, further 14 to 2022-27)	LPA	Greater Norwich area	4	4	0	0	2	G
			Broadland	1	4	0	0	0	G
			Norwich	0	0	0	0	0	G
			South Norfolk	3	0	0	0	2	G
Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900)	No decrease	Norfolk County Council	Greater Norwich area	92.5%	58.7%	67.3%	63.8%	No data	n/a

Rag Status Key
R = Red
A = Amber
G = Green

[1] The Central Norfolk SHMA, 2017, identified a need of 11,030 affordable homes for the period 2015 to 2036

Net housing completions

3.20 Housing delivery in 2019/20 has decreased from the previous year but it has met the JCS annual housing requirement target. The performance in the previous year of 2018/19 was exceptionally high and would always be difficult to maintain same level of growth year on year. The decrease in delivery this year is mainly due to a decrease in housing delivery in Norwich and the Norwich Policy Area (NPA) area of South Norfolk. Housing delivery rates in the NPA part of Broadland have continued to rise but remain below the target established by the JCS. The rates of delivery in the rural areas of Broadland and South Norfolk remain significantly above the JCS target levels. The minimum JCS housing requirement for the rural areas of Broadland and South Norfolk was exceeded within the 2018/19 monitoring year, 7 years before the end of the plan period.

3.21 Despite these recent successes and the strength of delivery in the rural areas, housing delivery overall has fallen 4,226 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 6,277 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 2,871 homes per year as of 1 April 2020. 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. 705 student bed spaces (equivalent to 282 dwellings) have been delivered in 2019/20. This level of delivery reflects an increased market demand for this type of accommodation in the City Centre. In addition, a further 7 units were delivered in the Norwich City area as separate communal dwellings (equivalent to 4 dwellings). If the delivery of student and communal accommodation are taken into account overall delivery in Greater Norwich would increase to 2,361.

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; and, 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. The impact of these factors was intensified due to the JCS's dependence on 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.

3.24 Despite these challenges, the Greater Norwich Authorities have now delivered 20,326 homes since 2008 and maintain a commitment (the sum of planning permissions and site allocations) of 31,559. This is significantly (124%) 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 helps 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.

Affordable housing completions

3.26 658 affordable homes were completed in 2019/20. This exceeds the current target of 525 completions per year, which is based on the 2017 Strategic Housing Market Assessment (SHMA). This is the 3rd year in succession when the affordable housing target has been exceeded. If the number of new affordable homes delivered since the 2015 base date is considered against the SHMA target, there has only been a relatively modest shortfall of 34 homes. The increased level of delivery of affordable homes in the past few years is clearly linked to general upward trend in overall housing delivery across the Greater Norwich area.

3.27 Whilst this is a positive picture 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 area 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.

Provision of Gypsy and Traveler pitches

3.29 Additional sites for Gypsy and Traveler 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.

3.30 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.

3.31 The need for residential caravans was studied specifically for those of Gypsy and Traveler heritage. A distinction was also drawn between Gypsy and Traveler households who have not ceased to travel permanently (Option 1) and those who only travel for work purposes (Option 2).

3.32 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).

Table 3.5 Provision of Gypsy and Traveler 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 Showpeopl e	25	6	7	8	**46**
Residential boat dwellers	0	0	0	0	**0**
Residential caravan dwellers	91	5	5	5	**106**

3.33 There is ongoing work to keep evidence current, and an updated Needs Assessment is expected in 2021. 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.

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

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

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

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

Table 3.6 Gross new house completions by bedroom number

Location		15/16	16/17	17/18	18/19	19/20
Broadland [2]	1 bed	26	57	27	69	72
	2 bed	133	146	205	187	197
	3 bed	221	217	234	198	219
	4 bed	241	233	228	195	193

[2] Gross completions

	Unknown	0	0	0	0	0
Norwich		No data collected	No data collected	No data collected	No data collected	No data collected
South Norfolk	1 bed	70	94	121	98	81
	2 bed	173	251	230	266	167
	3 bed	263	435	396	483	317
	4 bed	248	375	335	310	238
	Unknown	11	7	36	71	114

No comparable data for the Greater Norwich Area due to the lack of data from Norwich.

Table 3.7 Objective 3: to promote economic growth and diversity and provide a wide range of jobs

Indicator	Target	Source	Location	15/16	16/17	17/18	18/19	19/20	RAG status
Permitted amount of floorspace and land by employment type	B1 – 118 hectares/295,000m2 B2/8 – 111 hectares 2007 – 2026	LPA	Greater Norwich area Broadland Norwich South Norfolk	No data	No data	No data	No data	No data	n/a
Amount of permitted floor space	100,000m² Norwich City Centre	LPA	Norwich	-7774m2	-24370 m2	-40205m2	-13961 m2	-293 m2	R
	100,000m² NRP		NRP	1512m2	0m2	No data	No data	No data	n/a
	50,000m² BBP		BBP	No data	No data	No data	No data	No data	n/a
			South Norfolk	1288m2	443m2	7465.70 M2	No data	No data	n/a
Annual count of employee jobs by BRES across Plan area	2222 per annum increase	ABI/BRES (Nomis)	Greater Norwich area	182,000	187,000	193,000	193,000	Data not yet released	n/a
			Broadland	45,000	46,000	47,000	48,000		
			Norwich	87,000	90,000	93,000	89,000		
			South Norfolk	50,000	51,000	53,000	56,000		
Employment rate of economically active population	Increase	Annual Population Survey (Nomis)	Greater Norwich area	79.20%	80.50%	75.40%	78.90%	81.40%	G
			Broadland	80.90%	80.50%	84.30%	78.50%	86.20%	G
			Norwich	77.10%	78.30%	68.50%	77.10%	74.60%	R
			South Norfolk	80.30%	83.20%	75.60%	81.60%	84.90%	G
Percentage of workforce employed in higher occupations	Annual increase of 1%	Nomis	Greater Norwich area	41%	43%	50%	44%	43%	R
			Broadland	43%	50%	41%	47%	39%	R
			Norwich	37%	37%	51%	39%	42%	G
			South Norfolk	44%	45%	60%	47%	47%	A
National retail ranking	Maintain top 20 ranking	Venuescore	Norwich	13th	13th	13th	13th	13th	G
Net change in retail floorspace in city centre	No decrease in retail floor space	LPA	Norwich	+225 sqm	No data	-217	-6231	No data	n/a
Percentage of permitted town centre uses in defined centres and strategic growth locations	100%	LPA	Broadland	A1 18.18%	A1 23%	A1 42%	A1 17.6%	A1 5.8%	R
				A2 0%	A2 100%	A2 100%	A2 100%	A2 0%	R
				B1a 19.04	B1a 28%	B1a 20%	B1a 38.5%	B1a 0%	R
				D2 0%	D2 15%	D2 33%	D2 17.3%	D2 23.5%	R
			Norwich	A1 28.1%	A1 38.9%	A1 6%	A1 0%	A1 9.6%	R
				A2 100%	A2 43.1%	A2 100%	A2 0%	A2 56.9%	R
				B1a 100%	B1a 0%	B1a 0%	B1a 31%	B1a 6.2%	R
				D2 73.1%	D2 0%	D2 3%	D2 76%	D2 25.6%	R
			South Norfolk	A1 100%	A1 21.7%	A1 70%	A1 38%	A1 25%	R
				A2 100%	A2 25%	A2 0%	A2 50%	A2 0%	R
				B1a 73.1%	B1a 50%	B1a 75%	B1a 25%	B1a 10%	R
				D2 55.6%	D2 66.7%	D2 71%	D2 0%	D2 47%	R

Rag Status Key
R = Red A = Amber G = Green

Permitted amount of floor space and land by employment type[3]

3.36 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 while the permitted amount of employment space has increased overall over the last 3 years, there has been a sustained loss of office floor space in the city centre.

Table 3.8 Office space developed

	Use Class	15/16	16/17	17/18	18/19	19/20
Greater Norwich area (floorspace in sqm)	B1	+26,617	+34,284	+41,259	No data	+105,594
	B2	+2,035	+2,453	+3,722	No data	+13,586
	B8	+13,194	+20,781	+10,338	No data	+15,832
Broadland (sqm)	B1	+28,923	+53,451	+80,109	+82,532	+94,167
	B2	+1,364	+6,197	+8,566	+8,060	+4,230
	B8	+105	+376	+17,531	+15,583	+10,699
Norwich (sqm)[4]	B1					
	B1a	-8,881	-24,449	-40,205	-11,695	-2400
	B1b	0	0	+113.8	0	0
	B1c	-8,562	-1,119	-217.7	+145.4	-806
	B2	+1,498	-5,003	-8068	-280	+2875
	B8	-1,968	+3,254	-7,633	-2,131	+288
South Norfolk	B1	+15,157	+7,401	+1,459	No data	+14,633
	B2	-827	+1,259	+3,224	No data	+6,481
	B8	+15,057	+17,151	+440	No data	+4,845

Key
+ = net gain
- = net loss

Office space developed

3.37 There was a net loss of 2400 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 last 3 years. There is currently very limited commercial impetus to

[3] Calculated using figures from the Greater Norwich Employment Growth and Employment Sites and Premises Study 2008

[4] Data updated from 2015 information from Norwich City Council and different from previous years

develop any new office space in the city centre due to relatively low rental values making speculative development unviable. The impact of the Covid-19 pandemic where more people are now working from home will further intensify this trend.

3.38 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.

3.39 Data published by the Valuation Office Agency (VOA) (Business 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.

3.40 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 2019, derived from planning permissions and completions records. From 2008 to 2019, the overall net reduction in the office floor space equates to around 29%. 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.

Table 3.9 Norwich Office Floor Space Variances

Date	Norwich Office Floor Space Variances
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
Total actual/potential office floorspace change Norwich city April 2008-March 2020	**-107,753 sq. m net loss (-28.5%)**

Annual count of employee jobs[5]

3.41 The total number of employee jobs has remained the same as the previous across the whole Greater Norwich area. While there has been decrease in number of jobs in Norwich City, the increase in South Norfolk meant the total of number of jobs across the area remained stable.

Employment rate of the economically active population

3.42 Employment rates have increased over the past year. However, it is important to note that this dataset is based on sample surveys and fluctuates between surveys.

Percentage of the workforce employed in higher occupations

3.43 The percentage of the workforce employed in higher occupations across the Greater Norwich area has decreased slightly in this monitoring year.

National Retail Ranking for Norwich

3.44 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 13th from 9th. This year, the target for the city centre has been achieved by maintaining 13th position.

3.45 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.

Net change in retail floor space in the city centre

3.46 Due to the outbreak of Covid -19, the City has not conducted any retail related monitoring this year and therefore no data is reported. However, over the last years there have been a steady trend of decreasing retail floorspace in the City, part of the reason for the reduction is the diversification of the recently

[5] 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.

rebranded Castle Quarter, and this will likely to be exacerbated by the impacts on physical retail as a result of the Covid-19 pandemic. The reduction is also largely contributed to the diversification of the recently rebranded Castle Quarter where there has been the opening of a number of leisure uses which now occupy some of the larger units which were previously retail.

3.47 In recent years, retail investment in the city centre has concentrated on improvements and enhancements to existing stock, for example the refurbishment of Castle Quarter, and the extension of Primark.

Previous Years

3.48 The trend evident since April 2008 is of a slow reduction in retail floor space at the expense of other uses. Changes in policy have allowed more flexibility of uses in the city centre to encourage the development of uses such as cafes and restaurants. These complementary uses support retail strength and the early evening economy. In addition, ongoing planning deregulation at a national level has extended the scope of permitted development rights.

3.49 These have introduced more flexibility in the use of retail and commercial floor space; in many cases allowing former shops to change their use without the need for planning permission.

3.50 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. Such diversification of uses has helped strengthen the city centre's function in times of increased internet shopping.

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

3.51 Proportions of the permitted town centre uses vary depending on the use class and location. However, overall targets for town centre uses have not been met.

Table 3.10 Objective 4: to promote regeneration and reduce deprivation

Indicator	Target	Source	Location	14/15	15-18	18/19	19/20	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	17	No data	0	Data not released	n/a
			Broadland	0		0		
			Norwich	17		0		
			South Norfolk	0		0		
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	No data	2.19 ha (2.1%)	1.2 ha (1.18%)	R
			Norwich			1.34 ha	2.07 ha (2.02%)	G
			South Norfolk			5.05 Ha (22%)	1.71 ha 17%	G

Rag Status Key
R = Red
A = Amber
G = Green

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

3.52 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 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. The 2020 data had not been published at the time of publication of this AMR.

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

3.53 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 in brownfield land registrations in both Norwich and South Norfolk and a reduction in registrations in Broadland.

Table 3.11 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	15/16	16/17	17/18	18/19	19/20	RAG status
School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades including Maths and English	Year-on-year increase from 2007 value of 53%	Norfolk County Council	Greater Norwich area	65%	No data	Data discontinued	Data discontinued	Data discontinued	n/a
			Broadland	68.80%					
			Norwich	54.30%					
			South Norfolk	69.30%					
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	5.30%	3.40%	No data	No data	No data	n/a
			Broadland	3.50%	2.30%	No data	2.73%	2.57%	G
			Norwich	8.20%	6.10%	No data	5.88%	5.44%	G
			South Norfolk	2.80%	2.20%	No data	2.00%	2.12%	R
Proportion of population aged 16-64 qualified to NVQ level 4 or higher	Annual increase	Annual Population Survey	Greater Norwich area	34.20%	36.80%	37.10%	38.40%	33.00%	R
			Broadland	31.40%	28.60%	30.50%	39.70%	32.90%	R
			Norwich	39.30%	38.80%	36.80%	38.50%	31.80%	R
			South Norfolk	30.80%	42.00%	43.70%	36.90%	34.60%	R

Rag Status Key
R = Red
A = Amber
G = Green

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

3.54 The Government has 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

3.55 The proportion of 16 to 18-year olds not in education, employment and training has decreased in Broadland and Norwich but increased slightly in South Norfolk.

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

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

Table 3.12 Objective 6: to make sure people have ready access to services

Indicator	Target	Source	Location	14/15	15/18	18/19	19/20	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	n/a
			Broadland	40		41		
			Norwich	58		70		
			South Norfolk	29		27		

Index of Multiple Deprivation access to services

3.57 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 does not release on an annual basis and therefore no data is available for 2019/20.

Table 3.13 Objective 7: to enhance transport provision to meet the needs of existing and future populations while reducing the need to travel

Indicator	Target	Source	Location	2001	2011	RAG status
Percentage of residents who travel to work: a) By private motor vehicles b) by public transport c) By foot or cycle d) work at or mainly at home	Decrease in a), increase in b), c) and d)	Census (taken every 10 years)	Greater Norwich	a) 64%	a) 67%	R
				b) 8%	b) 7%	R
				c) 17%	c) 18%	G
				d) 9%	d) 6%	R
			Broadland	a) 70%	a) 75%	R
				b) 8%	b) 6%	R
				c) 9%	c) 10%	G
				d) 10%	d) 6%	R
			Norwich	a) 50%	a) 52%	R
				b) 9%	b) 9%	A
				c) 32%	c) 33%	G
				d) 7%	d) 4%	R
			South Norfolk	a) 71%	a) 73%	R
				b) 5%	b) 6%	G
				c) 10%	c) 10%	A
				d) 12%	d) 7%	R

Rag Status Key
R = Red
A = Amber
G = Green

Percentage of residents who travel to work

3.58 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 been 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 these data are 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.

Table 3.14 Objective 8: to positively protect and enhance the individual character and culture

Indicator	Target	Source	Location	15/16	16/17	17/18	18/19	19/20	RAG status
Percentage of Conservation Areas with appraisals adopted in the last 10 years	Year-on-year increase	LPA	Broadland	76%	76%	70%	58%	58%	A
			Norwich	76%	76%	76%	31%	25%	R
			South Norfolk	12%	19%	42%	52%	63%	G

Rag Status Key
R = Red
A = Amber
G = Green

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

3.59 The percentage of conservation areas with recent appraisals has increased in South Norfolk but decreased in Norwich and did not increase in Broadland. The figure for Norwich has decreased significantly as a large number of conservation area appraisals were prepared prior to 2010.

Table 3.15 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	Source	Location		15/16	16/17	17/18	18/19	19/20	RAG status
Net change in Local Sites in "Positive Conservation Management"	Year-on-year improvements	Norfolk Wildlife Trust	Greater Norwich area		No data	73%	73%	74%	No data	n/a
			Broadland			75%	77%	76%		
			Norwich			90%	90%	87%		
			South Norfolk			71%	69%	71%		
% of river assessed as good or better:	To increase the proportion of Broadland Rivers classified as 'good or better'	Environment Agency	Broadland Rivers						No data	n/a
a. Overall Status;					4%	4%	4%	4%		
b. Ecological Status;					4%	4%	4%	4%		
c. Biological Status;					17%	17%	17%	17%		
d. General Physio Chem Status;					23%	23%	23%	23%		
e. Chemical class					100%	100%	100%	100%		
Concentration of selected air pollutants NO2 and PM10 (particulate matter)	Decrease	LPA	Broadland	NO2	below 40ug/m3	below 40ug/m3	below 40ug/m3	below 40ug/m3	below 40ug/m3	A
				PM10	below 40ug/m3	below 40ug/m3	below 40ug/m3	below 40ug/m3	Monitoring not required	A
			Norwich	NO2	12(LF); 55 (CM)	14 (LF); 56 (CM)	13 (LF); 51 (CM)	12 (LF); 54 (CM)	13 (LF); 41 (CM)	A
				PM10	15 (LF); 21 (CM)	16 (LF); 20 (CM)	16 (LF); 23 (CM)	16 (LF); 27 (CM)	14 (LF); 19 (CM)	G
			South Norfolk	NO2	18.6µg/m3	25.9 ug/m3	25.0 ug/m3	25.0 ug/m3	N/A	
				PM10	N/A	N/A	N/A	N/A	N/A	
Percentage of SSSIs in favourable condition or unfavourable recovering condition	95% of SSSIs in 'favourable' or 'unfavourable recovering' condition	Natural England	Broadland		94%	94%	94%	No data	No data	n/a
			Norwich		100%	100%	100%			
			South Norfolk		93%	93%	93%			
Number of listed buildings lost/demolished	None	LPA	Greater Norwich area		0	0	0	0	0	G
			Broadland		0	0	0	0	0	G
			Norwich		0	0	0	0	0	G
			South Norfolk		0	0	0	0	0	G
Percentage of new and converted dwellings on Previously Developed Land	25%	LPA	Broadland		44%	46%	33%	36%	57%	G
			Norwich		69%	93%	81%	86%	89%	G
			South Norfolk		27%	9.4%	7.1%	9.1%	11.8%	R

Rag Status Key
R = Red
A = Amber
G = Green

Net change in local sites in "Positive Conservation Management"

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

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

Concentration of selected air pollutants

3.62 The pollution level 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 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.

Percentage of Sites of Special Scientific Interest (SSSIs) in favourable condition or unfavourable recovering condition.

3.63 No comparable data has been released this year.

Number of listed buildings lost/demolished

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

Percentage of new and converted dwellings on Previously Developed Land

3.65 The target was achieved in Norwich and Broadland.

Table 3.16 Objective 10: to be a place where people feel safe in their communities

Indicator	Target	Source	Location	15/16	16/17	17/18	18/19	19/20	RAG status
Reduction in overall crime		Norfolk Police	Greater Norwich area	22,403	24,431	26,981	29,228	31,449	R
	Broadland 3,871		Broadland	3,985	4,089	4,584	5,162	5,980	R
	Norwich 14,409		Norwich	13,919	15,513	17,176	18,344	19,137	R
	South Norfolk 4,033		South Norfolk	4,499	4,829	5,221	5,722	6,332	R
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	173	194	177	210	245	R
			Broadland	45	61	48	46	72	R
			Norwich	58	63	57	85	80	A
			South Norfolk	70	70	72	79	93	R

Rag Status Key
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G = Green

Reduction in overall crime

3.66 There has been an increase in total crime in 2019/20. The Crime Survey of England and Wales continues to cite the impact of improvements in crime recording processes as a reason for increases in police recorded crime.

Number of people killed or seriously injured in road traffic accidents

3.67 The number of people killed or seriously injured in road traffic accidents has increased this year in all areas apart from Norwich as 5 fewer road traffic accidents were recorded. The greatest increase was recorded in Broadland, where vulnerable road users such as pedestrians and cyclists make up the greatest number of casualties.

Table 3.17 Objective 11: to encourage the development of healthy and active lifestyles

Indicator	Target	Source	Location		15/16	16/17	17/18	18/19	19/20	RAG status
Percentage of working age population receiving Employment Support Allowance and incapacity benefits	In line with annual national average	DWP benefits claimants (NOMIS)	Greater Norwich area		5.70%	Data discontinued	Data discontinued	Data discontinued	Data discontinued	n/a
			Broadland		4.60%					
			Norwich		7.80%					
			South Norfolk		4.20%					
Life expectancy at birth of males and females	Increase at each survey	ONS	Broadland	Males	80.7	81.1	79.6	Data not yet released	Data not yet released	n/a
				Females	84.4	84.5	84.3			
			Norwich	Males	78.9	78.3	78.1			
				Females	82.9	82.8	83.2			
			South Norfolk	Males	81.4	81.3	81.1			
				Females	84.4	84.8	85.0			
Percentage of physically active adults	Increase percentage annually	Public Health England	Broadland		62.10%	No data	63.00%	69.70%	Data not yet released	
			Norwich		59.50%	No data	68.50%	67.10%		
			South Norfolk		63.40%	No data	69.10%	73.30%		
Percentage of obese adults	Decrease percentage	Public Health England	Broadland		No data	19.90%	22.80%	Data Discontinued	Data discontinued?	
			Norwich			18.20%	22.50%			
			South Norfolk			22.70%	21.90%			
Percentage of obese children (yr 6)	Decrease percentage	Public Health England	Broadland		13.40%	13.90%	15.50%	15.60%	Data not yet released or discontinued?	
			Norwich		18.60%	19.20%	18.70%	20.20%		
			South Norfolk		15.80%	14.60%	15.10%	15.60%		
Health Impact Assessment	All development of 500+ dwellings to have health impact assessment	LPA	Broadland Norwich South Norfolk		Assume all relevant planning applications comply					n/a
Accessibility of leisure and recreation facilities based on Sport England Active Places Power website	Trajectory to reduce by half the percentage of wards with less than the EoE average personal share of access to sports halls (2009 base = 67%), swimming pools (65%) and indoor bowls (12%)	LPA/Sport England			See table in para 3.72					n/a

Rag Status Key
R = Red
A = Amber
G = Green

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

3.68 The data for this indicator has been discontinued.

Life expectancy at birth

3.69 No data for 19/20.

Percentage of physically active adults

3.70 No data for 19/20.

Percentage of obese/overweight adults

3.71 There is no comparable data this year.

Percentage of obese children

3.72 No data for 19/20.

Health Impact Assessment

3.73 All relevant planning applications (over 500 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

3.74 Data is not available for this indicator.

Table 3.18 Accessibility of leisure and recreation facilities

Area		**15/16**	**16/17**	**17/18**	**18/19**	**19/20**	**RAG status**
Greater Norwich area	Sports Halls	No data	No data	No data	No data	No data	n/a
	Swimming Pool						
	Indoor Bowls						

Table 3.19 Objective 12: to involve as many people as possible in new planning policy

Indicator	Target	Source	District	2011/12 – 2016/17	RAG status
Statement of Community Involvement	Statement of community involvement Less than 5 years old	LPA	Broadland	Adopted 2016	G
			Norwich	Adopted 2016	G
			South Norfolk	Adopted 2017	G

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Statement of Community Involvement/Engagement

3.75 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.

Appendices A to G see webpage

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

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Annual Monitoring Report
2019-2020

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Joint Core Strategy for Broadland, Norwich and South Norfolk:

Annual Monitoring Report 2019-20 Appendix A(1)

Jobs, homes, prosperity for local people

Broadland District Council
NORWICH City Council
South Norfolk COUNCIL
Norfolk County Council

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Appendix A - Greater Norwich Area Housing Land Supply Assessment at 1st April 2020

Summary

This note sets out the housing land supply position for the Greater Norwich area for the period 1 April 2020 to 31 March 2025. 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 133% of the number of homes required between 2017/18 and 2019/20.

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:

- 123% (6.16 years / 2,455 home surplus)

Within each of the individual districts the following HLS can be demonstrated:

- Broadland: 184% (9.18 years / 2,270 home surplus)
- Norwich: 87% (4.35 years / 407 home deficit)
- South Norfolk: 113% (5.63 years / 593 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 73)

2. NPPF para 75 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, and through initiatives such as the Local Infrastructure Fund and Housing Infrastructure Fund, 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"[1].

This echoes paragraph 73 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[2] 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 2020, the calculation of annual average household growth has been based on the period 2020 to 2030. The affordability ratios used for the purposes of calculating LHN adjustment factor were the 2019 ratios published on 19th March 2020, which are the most recent ratios available. A summary of this calculation is set out in table 1 below:

Table 1 Summary of LHN Calculation

	10 Year Average Household 2020-2030	2019 Median Affordability Ratio	Adjustment Factor	Annual LHN 2020 Based
BDC	393.6	9.01	1.31	517
NRW	504.9	6.97	1.19	598
SNC	679.8	9.02	1.31	893
Total Local Housing Need for Greater Norwich				**2,008**

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*"[3].

[1] Paragraph 005 Reference ID:68-006-20190722
[2] Central Norfolk Strategic Housing Market Assessment, Opinion research Services, June 2017
[3] Paragraph: 031 Reference ID: 68-031-20190722

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.

12. This approach is consistent with the principles established in Zurich Assurance Ltd v Winchester City Council [2014] EWHC 758 (admin) and the specific reasoning set out in Land on East Side of Green Road, Woolpit (APP/W3520/W/18/3194926)[4].

Sources of Supply

Sites of 10 or more

13. Under the Revised NPPF glossary definition of "*Deliverable*"[5], 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*".

14. 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."

15. 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

16. 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.

17. This approach reflects developer's 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.

18. 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.

[4] Paragraph 64, page 12.
[5] National Planning Policy Framework, February 2019, Page 66

Sites with outline permission

19. 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 intentions and anticipated start and build-out rates. Where, taking account of agreed Joint Delivery Statements and 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.

Sites of 9 or fewer

20. Under the Revised NPPF glossary definition of "*Deliverable*"[5] 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.

Student Accommodation

22. The Planning Practice Guidance states that:

"*All student accommodation, whether it consists of communal halls of residence or self-contained 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.*"[6]

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

[6] Paragraph: 034 Reference ID: 68-034-20190722

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 calculated for each site.

Older Peoples Housing and Residential Institutions

23. 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*[7]*".*

24. 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*[8]".

25. 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 8 units. 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

26. The National Planning Practice Guidance states that:

"*A windfall allowance may be justified in the 5-year supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework*"[9].

27. Paragraph 70 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."

Strategic housing land availability register

28. 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.

[7] Paragraph 035 Reference ID: 68-035-20190722
[8] Paragraph: 016a Reference ID: 63-016a-20190626
[9] Paragraph: 24 Reference ID: 3-24-20140306

- 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.

29. 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

30. 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.

31. 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

32. 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 2019 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 current permitted development rights under class O for Office to Residential Conversions and new temporary and permanent permitted rights under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 show a clear trend of increasing flexibility. This coupled with the fact that this was a reliable source of supply ahead of the changes to the permitted development rights in ahead of May 2013, indicates that this is likely source of supply that will continue to generate windfall completions.

- 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 71) 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

33. 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.

34. 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%

35. 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.

36. 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.

Impact of Covid-19 on Housing Delivery

37. For sites of 10 or more homes the vast majority of forecasts are based upon the stated intentions of developers. These statements have been provided between August and November 2020 and therefore have been provided in full knowledge of the expected impacts on delivery of Covid-19.

38. 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 the impact of Covid-19 on the delivery of small sites.

39. 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.

40. 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 impact of Covid-19.

Methodology for Calculating Housing Land Supply

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

41. 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 plan-making process and will need to be set out in the strategic policies.*"[10]

42. 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.

43. 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 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

44. 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.*"[11]

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

[10] Planning Practice Guidance, Paragraph 028 Reference ID: 68-028-20190722
[11] Planning Practice Guidance, Paragraph: 013 Reference ID:2a-013-20201216

Housing Land Supply Buffer

46. 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*"[12].

47. 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 133% of the number of homes required between 2017/18 and 2019/20.

48. 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

49. 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.

[12] Revised National Planning Policy Framework, February 2019, Paragraph 73

Table 1 Greater Norwich 5YR HLS, 1 April 2020

Greater Norwich 5 Year Housing Land Supply Assessment		**1st April 2020**
LHN Annual Requirement		2,008
Requirement 1 April 2020 to 31 March 2025		10,040
Adjustment for Shortfall/Surplus		n/a
Plus NPPF HDT Buffer at 5%	10,040 x 0.05	502
Total 5 year requirement 2018/19 to 2022/23	10,040 + 502	10,542
Revised Annual Requirement	**10,542 / 5 Years**	**2,108**
Supply of Housing		**12,998**
Shortfall/Surplus of Supply	12,998 – 10,542	2,455
Supply in Years	**12,998 / 2,108**	**6.16**

Monitoring the Joint Core Strategy (JCS) Housing Requirement

50. 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.

51. 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."

52. 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

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

22 January 2021

Appendix A1 – Broadland Area 5 Year Land Supply Assessment

Broadland 5 Year Housing Land Supply Assessment		1st April 2020
LHN Annual Requirement		517
Requirement 1 April 2018 to 31 March 2023		2,584
Adjustment for Shortfall/Surplus		n/a
Plus NPPF HDT Buffer at 5%	2,584 x 0.05	129
Total 5 year requirement 2018/19 to 2022/23	2,584 + 129	2,713
Revised Annual Requirement	**2,713 / 5 Years**	**543**
Supply of Housing		**4,983**
Shortfall/Surplus of Supply	4,983 – 2,713	2,270
Supply in Years	**4,983 / 543**	**9.18**

Appendix A2 – Norwich Area 5 Year Land Supply Assessment

Norwich 5 Year Housing Land Supply Assessment		**1st April 2020**
LHN Annual Requirement		598
Requirement 1 April 2018 to 31 March 2023		2,990
Adjustment for Shortfall/Surplus		n/a
Plus NPPF HDT Buffer at 5%	2,990 x 0.05	150
Total 5 year requirement 2018/19 to 2022/23	2,990 + 150	3,140
Revised Annual Requirement	**3,140 / 5 Years**	**628**
Supply of Housing		**2,733**
Shortfall/Surplus of Supply	2,733 – 3,140	-407
Supply in Years	**2,733 / 628**	**4.35**

Appendix A3 – South Norfolk Area 5 Year Land Supply Assessment

South Norfolk 5 Year Housing Land Supply Assessment		**1st April 2020**
LHN Annual Requirement		893
Requirement 1 April 2018 to 31 March 2023		4,466
Adjustment for Shortfall/Surplus		n/a
Plus NPPF HDT Buffer at 5%	4,466 x 0.05	223
Total 5 year requirement 2018/19 to 2022/23	4,466 + 223	4,689
Revised Annual Requirement	**4,689 / 5 Years**	**938**
Supply of Housing		**5,282**
Shortfall/Surplus of Supply	5,282 – 4,689	593
Supply in Years	**5,282 / 938**	**5.63**

APPENDIX B1 – BROADLAND SITES FORECAST

Parish	Address	Ref	App Type	Net Homes at 1/4/2020	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026 and Beyond
Acle	Land north of Norwich Road	20172189	Outline	140		20	34	34	34	18	
Acle	Land Adj. Hillside Farm, Reedham Road	20180941	Reserved Matters	30		30					
Aylsham	Aegel House, Burgh Road	20161711	Reserved Matters	22	5	17					
Blofield	Land off Blofield Corner Road, Blofield Heath	20162199	Reserved Matters	36		18	18				
Blofield	Land to the north of Yarmouth Road	20172131	Reserved Matters	133	74	32	27				
Blofield	Land at Dawsons Lane	20190844	Full	12		12					
Brundall	Land at Yarmouth Road	20161483	Outline	155		10	26	26	26	26	41
Cawston	Land East of Gayford Road	CAW2	Allocation	20						20	
Coltishall	Land adj former Railway Line, Rectory Road	20170075	Outline	30			30				
Coltishall	Land at Jordan's Scrapyard	COL2	Allocation	30						30	
Drayton	Land Adj. Hall Lane, School Road	20161066	Outline	250			40	48	48	48	66
Drayton	Land East of School Road	DRA2	Allocation	20							
Drayton	Former David Rice Hospital Site, Drayton High Road	20170196	Outline	29			29				
Drayton	Land off Drayton High Road	20170212	Full	71	5	25	25	16			
Drayton	Drayton Old Lodge, 146 Drayton High Road	20180236	Full	35	5	10	10	10			
Freethorpe	Aitchison Brothers Garage, 75 The Green	20160632	Outline	19							
Great and Little Plumstead	Land to the North East Side of Church Road	20161151	Reserved Matters	4	4						
Great and Little Plumstead	Little Plumstead Hospital West, Hospital Road	20160808	Reserved Matters	5	5						
Great and Little Plumstead	Land at Little Plumstead Hospital West, Hospital Road	20171008	Full	11	11						
Hellesdon	Royal Norwich Golf Club, Drayton High Road	20151170 20171514	Outline (Part) Full (Part)	962	53	17					892
Hellesdon	Land at Hospital Grounds, southwest of Drayton Road	HEL1	Allocation	300							300
Horsford	Land to the East of Holt Road	20161770	Full	223	50	62	62	49			
Horsford	Land West of Holt Road	20181136	Reserved Matters	84	44	40					
Horsham St. Faith and Newton St. Faith	Land off Manor Road, Manor Road	20182043	Full	68	3	30	35				
Lingwood and Burlingham	Former Lingwood First School, Chapel Road	20190278	Outline	23		23					
Postwick with Witton	Oaks Lane, Postwick	20171116	Full	12	4	8					
Reedham	Land at Station Road, Reedham, Norwich	20151061	Full	7	7						
Reepham	New Road, Reepham	871709	Full	9							
Reepham	Old Station Yard, Cawston Road / Stoney Lane	20180963	Full	14			14				

Reepham	Land off Broomhill Lane	REP1	Allocation	120			26	26	31	31	26
South Walsham	Land West of Burlingham Road, South Walsham	20161643	Outline	21							
Strumpshaw	Land at Mill Road, Strumpshaw	20171622	Reserved Matters	5	5						
Swannington	1-4 Station Road, Swannington	20181400	Reserved Matters	6	6						
Taverham	Land off Beech Avenue, Taverham	20191065	Reserved Matters	93	20	44	29				
Thorpe St. Andrew	Oasis Sport and Leisure Centre / Land East of Pound Lane	20190016	Full	15			15				
Thorpe St. Andrew	Land at Griffin Lane	20160423	Reserved Matters	71							71
Thorpe St. Andrew	Pinebanks, 9 Yarmouth Road	20160425	Reserved Matters	231							231
Thorpe St. Andrew	27 Yarmouth Road	20170811	Full	25		25					
x.Growth Triangle	Land at St Faiths Road	20180920	Reserved Matters	328	24	62	76	52	52	62	
x.Growth Triangle	Land South of Moorsticks, Buxton Road	20152035	Outline	19				10	9		
x.Growth Triangle	Land East of Buxton Road	20141725	Outline	225		5	34	55	55	55	21
x.Growth Triangle	Beeston Park	20121516	Outline	3,520			25	125	150	150	3,045
x.Growth Triangle	Phase 4, Blue Boar Lane	20142051	Full	41	25	16					
x.Growth Triangle	Phase 1a - Part 2, Land at Blue Boar Lane	20130224	Reserved Matters	375	150	92	47	4	28	26	
x.Growth Triangle	HH3 & HH4, Land at Blue Boar Lane	20160751	Reserved Matters								
x.Growth Triangle	Parcel P4, Land at Blue Boar Lane	20160911	Reserved Matters								
x.Growth Triangle	Parcel P3, Land at Blue Boar Lane	20160912	Reserved Matters								
x.Growth Triangle	Parcels TW3 & TW4, Land at Blue Boar Lane	20160930	Reserved Matters								
x.Growth Triangle	Land off Green Lane West	20152081	Outline	50							50
x.Growth Triangle	Phase 1, Land to the South of Salhouse Road	20190758	Reserved Matters	251		45	45	45	45	45	26
x.Growth Triangle	Phase 2 Land South of Salhouse Road	20190485	Reserved Matters	365			30	40	40	40	215
x.Growth Triangle	Phase 3, Land South of Salhouse Road	20160498	Outline	535		100	100	100	100	60	65
x.Growth Triangle	Racecourse Plantation, Plumstead Road East	20161896	Outline	300			75	75	75	75	
x.Growth Triangle	Land off Salhouse Road, Rackheath	20151591	Reserved Matters	10	10						
x.Growth Triangle	Land off Salhouse Road, Rackheath	20171906	Reserved Matters	10	10						
x.Growth Triangle	Land South of Green Lane East, Rackheath	20191032	Reserved Matters	157		39	70	48			

x.Growth Triangle	Land at Brook Farm & Laurel Farm, Green Lane, Thorpe St Andrew	20090886	Outline	600							
x.Growth Triangle	Land North of Smee Lane, Great Plumstead	20180193	Outline	272		20	40	40	40	40	92
x.Growth Triangle	Land North of Smee Lane, Great Plumstead	20180194	Outline	11		2	3	2	3	1	
x. Growth Triangle	Land East of Broadland Business Park	GT11	Allocation	315			12	56	58	58	131
				235							235
x. Growth Triangle	Norwich RFU	GT13	Allocation	250							
x. Growth Triangle	North Rackheath	GT16	Allocation	3,000					50	150	2,800
x. Growth Triangle	Land South of Green Lane West	GT18	Allocation	322			25	25	25	25	222
x. Growth Triangle	White House Farm (North East)	GT20	Allocation	456			64	174	140	78	
x. Growth Triangle	Land East of Broadland Business Park (North)	GT21	Allocation	350							
x. Growth Triangle	Land North of Plumstead Road	GT8	Allocation	45							
	Sites of 9 or fewer			476	69	69	69	69	69		
	Discounted Windfall (Per Annum)			60		19	40	60	60	60	
	Total (Windfall included in yearly total only)			**15,858**	**589**	**892**	**1,160**	**1,204**	**1,138**	**1,108**	**9,500**

APPENDIX B2 – NORWICH SITES FORECAST

Parish	Address	Ref	App Type	Net Homes at 1/4/2020	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	Beyond 2026
n/a	Anglia Square (extant permission)	08/00974/F 18/00330/F	Full	198	0	0	0	0	0	0	0
n/a	Argyle Street (allocation)	CC11		12	0	0	14	0	0	0	0
n/a	Aylsham Road District Centre, 291-293 and land at Arminghall Close (allocation)	R21		100	0	0	0	0	0	0	0
n/a	Aylsham Road, 165-187 (allocation)	R22		20	0	0	0	0	0	0	0
n/a	Aylsham Road, 261-277 (allocation)	R12		50	0	0	0	0	0	0	0
n/a	Aylsham Road, Former Pupil Referral Unit (allocation)	R23		11	0	0	0	0	0	0	0
n/a	Barn Road Car Park (allocation) (permission)	CC22 18/01315/F	Full	40	179	0	0	0	0	0	0
n/a	Barrack Street – CC17a (permission); CC17b and part CC17a (application) and Barrack Street / Whitefriars (application)	CC17a 15/01927/O 18/01286/F	Outline Full	200	88	50	50	32	0	0	0
n/a	Barrack Street, 126-128 (allocation)	R16		15	0	0	0	0	0	0	0
n/a	Ber Street 147-153 (allocation)	CC2		20	0	0	0	0	0	0	0
n/a	Ber Street, 10-14 (allocation)	CC3		10	0	0	0	10	0	0	0
n/a	Ber Street, 60-70 (allocation)	CC1		20	0	0	0	0	0	0	0
n/a	Bethel Street, land to rear of City Hall (allocation)	CC24		20	0	0	0	0	0	0	0
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	0	0
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	0	0
n/a	Bishop Bridge Road, land east of excl 29-31 Bishop Bridge Road (residue of allocation)	R14 15/00756/F (Refused) 18/00081/DEM (Gas Holder)	Demolition	26	0	0	0	0	0	26	0
n/a	Bishop Bridge Road, Egyptian Road and Ketts Hill, land at (allocation)	R15 15/00756/F (Refused)	-	30	0	0	0	0	0	0	0
n/a	Bluebell Road, Bartram Mowers site (remainder of allocation)	R42 18/00265/F	Full	51	0	35	15	0	0	60	35
n/a	Bowthorpe Road, Norwich Community Hospital Site (allocation)	R37	Outline	80	0	0	0	0	0	0	0

n/a	Bracondale, Deal Ground (allocation) excludes May Gurney/Carrow Yacht Club site (SNDC) (allocation) (permission)	R9 12/00875/O	Outline	580	0	0	0	0	0	0	0
n/a	Cattle Market Street, 23, St Peters House (prior approval/permission)	15/01256/PDD 18/00830/PDD 17/01482/F	PDD/Full	61	20	20	21	0	0	0	0
n/a	City Road, 24, John Youngs Ltd (allocation)	R7		45	0	0	0	0	0	0	0
n/a	Constitution Hill, Constitution Motors (permission)	18/00917/O	Outline	12	0	12	0	0	0	0	0
n/a	Cremorne Lane, Utilities Site parts within Norwich (allocation)	R10 15/00997/F (withdrawn)	-	100	0	0	0	0	0	0	0
n/a	Dereham Road, Site of former Earl of Leicester PH, 238a (allocation)	R33 10/00335/ET	-	12	0	0	0	0	0	0	0
n/a	Dereham Road, land & buildings adjacent to & Including 349A & 349B (allocation)	R34	-	24	0	0	0	0	0	0	0
n/a	Dibden Road, Van Dal Shoes and car park (allocation)	R17	-	25	0	0	0	0	0	60	0
n/a	Drayton Road, 81-93 (allocation)	R25	-	30	0	0	0	0	0	0	0
n/a	Drayton Road, adjoining Lime Kiln Mews (allocation)	R24 15/00024/F & 18/00270/D (EXPIRED)	-	15	0	0	0	0	0	0	0
n/a	Duke Street, EEB site (allocation)	CC21 14/01104/PDD (EXPIRED) 15/00916/F (EXPIRED)	-	30	0	0	0	0	0	0	0
n/a	Duke Street, 36-42 (permission)	16/00699/F	Full	37	37	0	0	0	0	0	0
n/a	Duke Street, Mary Chapman Court (permission)	18/01524/F	Full	-7	0	-7	0	0	0	0	0
n/a	Duke Street, St Marys Works (permission)	16/01950/O (extant) 19/00430/F (withdrawn)	Outline	151	0	0	0	0	0	0	0
n/a	Garden Street, land at (allocation)	CC10	-	100	0	0	0	0	0	0	0
n/a	Gas Hill, Gas Holder (allocation)	R13 18/00081/DEM	-	15	0	0	0	0	0	15	0
n/a	Goldsmith Street (Permission)	R27 15/00272/F 17/00220/MA		12	0	0	0	0	0	12	0
n/a	Hall Road, Hewett Yard (allocation)	R4	-	20	0	0	0	0	0	0	0
n/a	Havers Road Industrial Sites (allocation)	R35	-	100	0	0	0	0	0	0	0
n/a	Heigham Street, 231-243 (allocation)	R28	-	25	0	0	0	0	0	0	0
n/a	Hurricane Way (allocation)	R29 - (A&B)	-	30	0	0	0	0	0	30	0

n/a	Ipswich Road, Norfolk Learning Difficulties Centre (allocation)	R2	-	30	0	0	0	0	0	0	0
n/a	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	-	174	73	101	0	0	0	0	0
n/a	Kerrison Road/Hardy Road, Gothic Works, inc ATB Laurence Scott (allocation)	R11	-	400	0	0	0	0	0	0	0
n/a	King Street, 125-129, 131-133 and Hoborough Lane (allocation)	CC7 07/00412/F 12/00215/ET (EXPIRED)	-	20	0	0	0	0	0	0	0
n/a	King Street, St Annes Wharf (allocation) (permission).	CC6 04/00605/F 16/01893/VC	Full	162	41	41	40	40	0	0	0
n/a	King Street, 191 (permission)	19/01389/F	Full	41	0	41	0	0	0	0	0
n/a	King Street, King Street Stores (allocation)	CC8	-	20	0	0	0	0	0	0	0
n/a	Lower Clarence Road, car park (allocation)	CC13	-	45	0	0	0	0	0	0	0
n/a	Mile Cross Depot (allocation)	R36 18/01290/DEM	-	75	0	0	0	50	106	0	0
n/a	Mousehold Lane, Start Rite Factory site (allocation)	R18 18/01772/F	Full	40	0	0	15	0	0	0	0
	Northumberland Street, 120-130 (allocation) (permission)	R32 16/00835/F	Full	36	0	0	0	0	0	36	0
n/a	Oak Street / Sussex Street commercial sites, 160-162 Oak Street (allocation)	CC20	-	15	0	0	0	0	0	0	0
n/a	Oak Street, 161 (permission)	18/00004/F	Full	40	0	0	0	0	0	0	0
n/a	Oak Street, 140-154 (allocation)	CC18	-	10	0	0	0	0	0	0	0
n/a	St Peters Methodist Church Park Lane (permission)	18/00962/F	Full	20	0	20	0	0	0	0	0
n/a	Pottergate, Kiln House, 27-43 (permission)	18/01270/PDD 18/01271/PDD	PDD	35	0	0	0	0	0	0	0
n/a	Pottergate car park (allocation)	CC23	-	20	0	0	0	0	0	20	0
n/a	Queens Road and Surrey Street (car park adjacent to Sentinel House) (allocation) (permission)	CC29 18/00437/F 19/01405/MA	Full	40	0	0	107	0	0	0	0
n/a	Raynham Street, north of (allocation)	R26	-	40	0	0	0	0	0	0	0
n/a	Rose Lane and Mountergate, land at (allocation)	CC4	-	300	0	0	0	0	0	0	0
n/a	St Faiths Lane, 60 (permision)	17/00361/U	Full	41	0	0	0	0	0	0	0
n/a	St Georges Street, Merchants Court (prior approval/permission)	17/01811/PDD	PDD/Full	34	0	0	0	0	0	0	0

n/a	Starling Road, Industrial sites; remainder of allocation (allocation) Part 1&2 (permission)	R20 18/00952/O	Full & Outline	23	0	0	0	0	0	19	0
n/a	Sussex Street, 70-72 (permission, legal start only) (allocation)	09/00296/F CC19	Full	17	0	0	0	0	0	0	0
n/a	Thorpe Road/Lower Clarence Road, Busseys Garage (allocation)	CC14	-	25	0	0	0	0	0	0	0
n/a	Thorpe Road: 13-17 Norwich Mail Centre (allocation)	CC15	-	150	0	0	0	0	0	0	0
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	829	48	25	45	45	100	100	466
n/a	Waterworks Road, Heigham Water Treatment Works (allocation)	R31	-	150	0	0	0	0	0	0	0
n/a	Westlegate 1-17, Boars Head Yard & St Stephens Street 1-9. (allocation) (permission)	18/00642/F 18/00651/PDD	PDD/Full	69	0	15	54	0	0	0	0
n/a	Westwick Street Car Park (allocation)	CC30	-	30	0	0	0	0	0	0	0
n/a	Westwick Street, BT Exchange Site (permission)	16/00456/F 20/00539/D	Full	42	0	0	21	21	0	0	0
n/a	Windmill Road, land north of (permission)	R19 19/00971/F	Full	10	0	0	17	0	0	0	0
n/a	Bluebell Road, Blackdale Building (UEA residences) (6a) 915 beds, 401 in phase 2 (allocation) (permission)	R40 15/00121/F 16/00099/MA	Full	143	0	0	0	0	0	143	0
n/a	Duke Street, St Crispins House (614 beds) (permission)	17/01391/F 20/00146/NMA	Full	406	0	0	406	0	0	0	0
n/a	Elaine Herbert House The Great Hospital, Bishopgate Norwich, NR1 4EJ (permission)	19/00373/F	Full	-1	0	0	-1	0	0	0	0
n/a	Car Park Rear Of Premier Travel Inn Duke Street Norwich (permission)	18/01552/F	Full	58	0	0	58	0	0	0	0
n/a	112 St Mildreds Road	17/01762/F	Full	12	12	0	0	0	0	0	0
			Sites of 9 or fewer	317	46	46	46	46	46		
			Discounted Windfall (Per Annum)	129		40	86	129	129	129	
			Total (Windfall included in yearly total only)	**6,482**	**544**	**441**	**994**	**373**	**381**	**650**	**501**

APPENDIX B3 – SOUTH NORFOLK SITES FORECAST

Parish	Address	Ref	App Type	Net New Homes at 1/4/2020	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026 and Beyond
Ashwellthorpe	r/o Wood Farm, The Street	2011/0506	Detailed	27	27						
Aslaction	Coopers Scrap Yard	2006/0171	Outline	15							15
Barford	West of the Hall	BAR1	Allocation	10							10
Bawburgh	South of the Village Hall	2018/1550	Detailed	10	5	5					
Bracon Ash	Norwich Road	BRA1	Allocation	20			10	10			
Bracon Ash	West of Long Lane	2017/2131	Outline and Detailed	10	5	5					
Brooke	High Green Farm	2014/2041	Detailed	8	8						
Caistor St Edmund	North of Heath Farm	2018/2232	Detailed	16							
Costessey	Queen's Hills/North of the River Tud	2007/1443	Detailed	2	2						
		2019/1683	Detailed	9		9					
Costessey	West of Lodge Farm	2013/0567 & 2016/0402	Detailed	230	37	58	64	62			
Cringleford	Roundhouse Park	2008/2347	Outline (Lapsed)	50		2	38	10			
Cringleford	Cringleford NP allocation - South of the A11	2013/1494	Outline	204							
		2018/2783	Detailed	67	20	119	125	86			
		2018/2784	Detailed	79							
		2018/2404	Detailed	7							
		2018/2835	Detailed	203	44	45	45	45	45	45	31
		2018/2836	Detailed	90							
		2018/2200	Detailed	650	12	115	119	117	121	121	45
Dickleburgh	West of Norwich Road	2018/0980	Outline	22							
Diss	Frenze Hall Lane	2016/1566	Detailed	20	20						
Diss	Vinces Road	DIS1	Allocation	35				15	20		

Diss	Park Road	DIS2	Allocation	15			5	10			
Diss	Former Hamlins Site	DIS6	Mixed-use allocation	13							13
Diss	Former Feather Factory	DIS7	Mixed-use allocation	17							17
Ditchingham	Tunney's Lane Field	2018/0121	Outline	24			8	8	11		
Earsham	Lodge Field, School Lane	2018/1317	Detailed	6	6						
Easton	Land N & S of Dereham Road	2014/2611	Outline	890		40	80	80	80	80	530
Easton	Land S & E of Easton	EAS1 (part)	Allocation	64				20	40	4	
Gillingham	Norwich Road	2019/1013	Detailed	22		22					
Great Moulton	High Green	2015/2536	Detailed	7	2	3	3	3			
Hales	Land at Yarmouth Road/west of Hales Hospital	2018/1934	Outline	20			10	10			
Harleston	Spirkett's Lane/Limes Close	HAR4	Allocation	95					15	40	40
Harleston	Cranes Meadow	1998/1119	Detailed	9	3	6					
Hempnall	off Bungay Road	2019/0864	Detailed	20		23					
Hethersett	North Village	2011/1804	Outline	405							
		2017/1104	Detailed	24	71	100	74	70	70	70	165
		2018/2500	Detailed	191							
		2017/0151	Detailed	29	33	54	60	44	2		
		2018/2326	Detailed	181							
Hethersett	North of Grove Raod	HET2	Allocation	40							40
Little Melton	Gibbs Close	2015/1697	Detailed	8	8						
Little Melton	South of School Lane	2019/2485	Detailed	30		30					
Loddon	Georges Lane	2016/0853	Detailed	106	26	40	40				
Long Stratton	LNGS1 AAP Allocation	LNGS1 (part)	Allocation	1,200							
		LNGS1 (part)	Allocation	600				30	30	30	510
Newton Flotman	Flordon Road/Church Road	NEW1	Allocation	30							30
Poringland	The Street/South of Stoke Road	2010/1332	Detailed	50	25	5					
Poringland	West of The Street/North of Shotesham Road	2014/0319	Detailed	145	5	25	25	25	25	25	15

Poringland	West of The Street/North of Shotesham Road	2011/0476/0	Outline	15		15					
Poringland	Heath Farm	2016/2388	Detailed	74	15	29					
Poringland	West of Octagon Barn	2015/2326	Detailed	40	15	15	10				
Pulham Market	Sycamore Farm	2018/0598	Detailed	10	9	1					
Roydon	Land of Denmark Lane	DIS3	Allocation	42			30	12			
Scole	West of Norwich Road	2019/0956	Detailed	18		18					
Scole	Old Norwich Road	SCO1	Allocation	15			10	15			
Spooner Row	Chapel Lane/Bunwell Road	2014/2472 & 2016/2424	Detailed	25			15	5	5		
Stoke Holy Cross	South of Long Lane	2016/2153	Detailed	4							
Stoke Holy Cross	Chandler Road	2018/2454	Detailed	5	5						
Swardeston	Land off Bobbins Way	2017/2247	Detailed	38	6	24	8				
Swardeston	Main Road	SWA1	Allocation	30							30
Tacolneston	Land adj. The Fields	2017/0225	Outline	20						10	11
Tasburgh	Church Road	TAS1	Allocation	20						20	
Trowse	White Horse Lane	2016/0803 & 2016/0805	Detailed	74	25	25	24				
Trowse	Devon Way/Hudson Avenue	2014/0981	Outline	75			13	25	25	12	
Trowse	May Gurney/Keir site & Carrow Yacht Club	2011/0152	Outline	90							
Woodton	Rear of Georges House	2016/0466	Outline	21			23				
Wymondham	South Wymondham	2015/2380	Detailed	107	31	55	21				
		2015/1649	Detailed	17	35	48	19				
		2016/2586	Detailed	104							

		2015/2168	Detailed	79	20	24	19				
		2012/0371	Outline	577			33	73	73	73	253
Wymondham	London Road/Suton Lane	2014/2495 & 2018/2758	Outline & part detailed	335		20	40	40	40	40	125
Wymondham	Spinks Lane/Norwich Road	2014/2042	Detailed	15	15						
Wymondham	Carpenters Barn	2015/1405	Detailed	69	52	4					
Wymondham	Elm Farm, Norwich Common	2019/0536	Detailed	300	35	100	100	65			
Wymondham	Former WRFC	2014/0779	Outline	90			45	45			
Wymondham	Former Sale Ground, Cemetery Lane	2016/2668	Outine	61			20	20	18		
Wymondham	Friarscroft Lane	WYM1	Allocation	20							20
			Sites of 9 or fewer	844	123	123	123	123	123		
			Discounted Windfall (Per Annum)	87	0	28	58	87	87	87	
			Total (Windfall included in yearly total only)	**9,259**	**745**	**1,235**	**1,317**	**1,155**	**830**	**657**	**1,930**

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

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Annual Monitoring Report
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Appendix 3

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

The 2019-20 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 6.16 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 1st April 2020, using the former methodology[1].

Table 1 sets out completions against the JCS NPA housing requirement since the base date of the plan. It shows a 6,277 home shortfall in housing delivery compared to the NPA housing requirement of the adopted plan. This shortfall is accounted for in the illustrative calculation in table 2.

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 3.02 years at 1st April 2020. The land supply for the NPA measured using the same approach at 1st April 2019 was 3.36 years. In the JCS AMR 2016-17 at 1st April 2018 housing land supply in the NPA was assessed as being 3.94 years.

Table 1 Completions against JCS NPA Housing Requirement

Year	Actual/Projected Completions	Required Completions	Shortfall/Surplus
2008/09	1,193	1,825	-632
2009/10	923	1,825	-902
2010/11	910	1,825	-915
2011/12	915	1,825	-910
2012/13	882	1,825	-943
2013/14	992	1,825	-833
2014/15	1,143	1,825	-682
2015/16	1,164	1,825	-661
2016/17	1,810	1,825	-15
2017/18	1,685	1,825	-140
2018/19	2,382	1,825	+557
2019/20	1,624	1,825	-201
Total 2008-20	**15,623**	**21,900**	**-6,277**

[1] 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.

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

NPA 5 Year Housing Land Supply Assessment		**1st April 2019**
JCS NPA Housing Requirement 2008 - 2026		32,847
JCS Annual Requirement		1,825
Requirement 1 April 2020 to 31 March 2025		9,125
Adjustment for Shortfall/Surplus	6,277 / 6 x 5	5,231
Plus NPPF HDT Buffer at 20%	(9,125 + 5,231) x 0.20	2,871
Total 5 year requirement 2019/20 to 2023/24	9,125 + 5,231 + 2,871	17,227
Revised Annual Requirement	**17,227 / 5 Years**	**3,445**
Supply of Housing		**10,400**
Shortfall/Surplus of Supply	**10,400**– 17,227	-6,827
Supply in Years	**10,400 / 3,445**	**3.02**

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

Please note that the contents of this note will be included in a report to Norwich City Council's Sustainable Development Panel on the 2019-2 Greater Norwich AMR, anticipated in September 2021.

Charlotte Hounsell
Planner, Norwich City Council
25th August 2021

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 long-established 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. It is anticipated that the draft (Regulation 19) GNLP will be published for consultation in February/March 2021, with a view that the plan will be adopted in September 2022.

5. Previous AMRs set out progress on other local development documents being produced for the Local Plan for Norwich in the Local Development Scheme (LDS). The LDS was updated in 2020 and provides a timetable for the completion of local development documents. The LDS will require updating to take account of any revised GNLP timescales.

6. In November 2019, cabinet adopted the 'Purpose Built Student Accommodation in Norwich: evidence and best practice advice note'. 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 has met twice across the year, discussing issues surrounding student numbers, student preferences for accommodation and student welfare in PBSA. The Working Group will continue to meet twice a year.

7. The River Wensum Strategy 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. In 2020, several projects included within the strategy were completed, including a new canoe portage at New Mills. The Delivery Board are currently working on producing a Delivery Plan which will set out delivery priorities for the next two years to ensure the visions and the objectives of the strategy are delivered.

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 new public-private sector partnership has been established - the East Norwich Partnership – led by Norwich City Council, to commission a masterplan to deliver comprehensive development of the sites. The partnership is currently in the process of procuring consultants to undertake a masterplan with the expectation that consultants will be appointed in early 2021. For further detail of the masterplan project, please see the report to Norwich City Council cabinet in June 2020.

9. In 2020, a working group was set up with officer representation from each of the Norfolk local authorities to look at commissioning an update to the Strategic Housing Market Assessment 2017. Following the preparation of a brief, the Government consulted on its Changes to the Current Planning System document, which proposed a new standard methodology for calculating housing need. The Government has since updated this methodology which was announced on 17th December 2020. The preparation of this document will need to be informed by evidence preparation for the GNLP.

10. Throughout 2020, the Government also 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. These changes were adopted after the 2019/20 monitoring period and therefore it is not possible to observe their impacts at this time. Future monitoring periods will need to consider these changes in greater detail.

11. Due to the impacts of COVID-19 in 2020, some of the monitoring information is not available or was unable to be collected due to the nationwide lockdown, social distancing measures and available resources due to staff furloughing/re-deployment. In some cases, modified information has been collected where this was possible. For example, ordinarily the housing completions survey would involve site visits to relevant locations. However, this was not always possible (for example entering office buildings to identify whether they had been converted to dwellings). Instead exterior inspections, liaison with developers and council tax records were used to collect the data. In addition, it has not been possible to conduct a full retail survey across all of the district and local centres. Retail monitoring data is therefore provided for the City Centre only.

12. As the situation continues to evolve, it will be important to carefully monitor changes to retail and business sectors in future monitoring periods as a result of COVID-19.

Summary of Main Findings

13. The AMR gives an overview of progress against the adopted policies of the DM policies plan with reference to the Monitoring Framework contained in Appendix 9 of that plan and also reproduced as Appendix 3 of the Site Allocations plan.

14. 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 Regulation 10A review of the local plan conducted in 2019, it is proposed that the monitoring indicators will also be revised as part of the full local plan review.

15. The following is a summary of the main findings of the AMR for 2019/20:

- The greatest amount of open space was lost than in any other period since the adoption of the local plan (-12,425m^2). The applications responsible for the largest losses were deemed acceptable given replacement provision of open space and other benefits to amenity, heritage and biodiversity.

- The air quality indicators Nitrogen Dioxide (NO_2) and airborne particulates (PM^{10}) remained relatively stable at the Lakenfields monitoring location, although a slight reduction in PM^{10} was observed in 2019/20. At the Castle Meadow monitoring location both NO_2 and PM^{10} decreased significantly in 2019/20 and were at their lowest levels recorded since the adoption of the local plan.
- In 2019/20, 746 new homes were granted consent, compared with 473 new homes in 2018/19. Several large consents were responsible for this increase, including 252 student bedrooms at the land adjacent to Sentinel House, Phase 2a of the Three Score site to provide 153 dwellings and the Barrack Street Site to provide 218 dwellings.
- The total housing commitment (the number of dwellings with outstanding planning permission (and unbuilt) and those allocated for development in the local plan) was 6,234. Although this is a reduction on the previous years' figure of 7,289, it is still significantly greater than the figures recorded for the other monitoring periods since the adoption of the local plan.
- Housing completions in 2019/20 were recorded at 798 dwellings, which is a reduction on the 1,085 dwellings completed in 2018/19. This figure is still significantly greater than housing completions recorded in other monitoring periods and still exceeds the average annual target for Norwich set by the JCS of 477 dwellings per annum. Interestingly, there were very few completions in 2019/20 from office to residential prior approval applications which contributed to the peak figure in 2018/19. Instead, the majority of completions were from standard full applications. A good proportion of the 2019/20 housing completions were delivered through student accommodation and residential institution development (303 equivalent dwellings).
- The 2019/20 period saw the loss of 1.37ha of land allocated for residential use to residential institution development. This was as a result of the consents at 28 Mousehold Lane for a care home and supported living apartments, and the car park adjacent to Sentinel House for 252 student bedrooms.
- The loss of office space across the city has continued into 2019/20, however this was at a reduced rate of -2,400m^2 suggesting further slowing of the trend. Only one application for office to residential prior approval was responsible for part of this loss (-62m2) with the remainder from full and change of use applications, suggesting the reduced loss of office space is as a result of fewer prior approval office to residential applications. New office floorspace permitted was primarily directed to existing employment areas and elsewhere in the city rather than the Office Development Priority Area.
- The 2019/20 period saw an increase in small/medium business space permitted, as well as more business space permitted within defined employment areas than elsewhere in the city.

- Despite a reduction in the amount of information available for retail monitoring this year due to COVID-19, the retail sector appeared to be performing well in the 2019/20 period with none of the primary or secondary retail centres falling below their required retail thresholds. The 2020/2021 monitoring period will cover the various periods of national lockdown and restrictions which may have impacted upon the retail sector, and therefore this will need to be monitored closely in the following years.
- The largest amount of community facilities floorspace was approved since the adoption of the local plan, at 9,810.62m^2. In total, 22 applications were granted consent.
- A greater proportion of floorspace for main town centre uses was permitted in defined centres (5,324m^2) than elsewhere in Norwich (3,526m^2). This is the first time that this has occurred since the adoption of the local plan and is largely as a result of the change of use of the Royal Hotel on Bank Plain from offices to hotel use.

Policy	Indicator	2019/20	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	22	22 applications were refused on the grounds of loss of light or outlook. Although there has been a slight reduction in the number of DM2 refusals since 2018/19, this number has been relatively constant since the 2016/17 monitoring period.
	Refusals on the grounds of schemes falling below minimum space standards	9	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 reporting period since the adoption of the local plan. There has been a continuation of this trend in the 2019/20 monitoring period. Whereas in the last few periods the applications recorded under this indicator have largely been HMOs and construction of student accommodation, in this monitoring period, the refusals were largely for general housing. A total of 14 dwellings plus a development of serviced accommodation were refused on these grounds. The Government has announced that in future there will be the requirement for office to residential prior approval applications to be assessed against the

Policy	Indicator	2019/20	Commentary
			National Space Standards.
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 Building for a Healthy Life. This original twelve point structure and underlying principles of BFL12 are 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)	81.2%	There is no target for this indicator. The 2019/20 monitoring period saw 81.2% of all completed dwellings achieve a minimum density of 40dph. This is a decrease on the percentage recorded for the 18/19 monitoring period and is still 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. One notable example is application 18/01554/D for land at the corner of Hall Road and Neatmarket. This application included the use of air source heat pumps to provide 45% of the building's energy.
DM4	Renewable energy capacity permitted by type	13.8kW	There is no target for this indicator. In addition to an application for the installation of solar panels on a domestic dwellings, 86.4kW of solar PV panels were considered permitted development at the Riverside Leisure Centre (not included in reported

Policy	Indicator	2019/20	Commentary
			2019/20 figure).
DM5	Number of schemes approved contrary to Environment Agency advice: 1) flood protection 2) water quality	1	The target for this indicator is no schemes approved contrary to Environment Agency advice. The Environment Agency raised concerns in relation to application 19/01389/F and objected to the application. Following receipt of revised information and re-consultation, the objection was withdrawn and the application approved. The Environmental Agency are still recording the objection on their website, therefore is has been included within this report for completeness.
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 2019/20 period.
	Development resulting in a loss or reduction in area within the Yare Valley Character Area (m^2)	24.4	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 four applications approved within the YVCA. Two of the applications at 58 Sandy Lane and The Arches in Bracondale were for the change of use of existing buildings and therefore there was no increase in floorspace. In addition one application at 65 Church Lane for householder extensions 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

Policy	Indicator	2019/20	Commentary
			upon the river valley.
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.
	No 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 2019/20.The planning team may have secured street tree provisions through the imposition of planning conditions however these are not directly monitored.
DM8	Development resulting in a net loss of open space (contrary to policy)	-12,425.18m^2	The target for this indicator is no loss of open space (contrary to policy DM8). This is the greatest amount of open space loss reported since the adoption of the local plan. Seven applications were approved within areas of designated open space in 2019/20. Two applications were responsible for the majority of this large amount of open space loss: approval of a new church (with associated facilities) at Heartsease Lane, which was deemed acceptable given the nature of the new development and provision of open space within it, and approval of three dwellings at Hall Road adjacent to the Lakenham Reservoirs, which was deemed acceptable on balance because of the benefits to heritage, housing supply and local amenity that weighed in its favour.
	Areas of new open space and/or play	-	There is no target for this indicator.

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	space delivered through development		No new obligations were raised in the 2019/20 period for the provision of open space and play.
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. Applications at Plantation House, Earlham Road and 191 King Street were approved which involved the partial demolition and rebuild of parts of the site that were in poor condition to facilitate their re-use.
	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 2019/20 period, the number of buildings on the register was 28, including two Scheduled Ancient Monuments. This represents an increase from the figure reported for the last monitoring period but is still below the peak of 32 buildings recorded in 2014/15. 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	4	There is no target for this indicator. Two of the approved applications were in conservation areas and two applications were replacement of existing equipment on listed buildings. This is an increase in

Policy	Indicator	2019/20	Commentary
	planning permission is required)		the number of applications over the 2018/19 period.
	Number of appeals lost where officer recommendations are overturned	N/A	The target for this indicator is no appeals lost. One appeal for application 19/01735/FT at Epic Studios on Magdalen Street was submitted during the monitoring period. This is still in progress and there has been no decision by the Planning Inspectorate at this time.
DM11	Number of hazardous substance consents	0	There is no target for this indicator. There were no hazardous substances consents submitted during the 2019/20 monitoring period.
	Impact of development on air quality indicators: 1) NO2 2) PM10	-	<u>Lakenfields</u> NO_2 - 13 µg/m3 (slight increase from 2019/20) PM^{10} - 14 µg/m3 (slight decrease from 2019/20) <u>Castle Meadow</u> NO_2 - 41 µg/m3 (decreased from 2019/20) PM^{10} - 19 µg/m3 (decreased from 2019/20) Measurements for both nitrogen dioxide and airborne particulates are taken at Lakenfields and Castle Meadow AURN stations, respectively monitoring urban background and city centre pollutant levels. Levels have been relatively stable at Lakenfields for the past few years however, there has been a decrease in PM^{10} levels in the 2019/20 period. In contrast, Castle Meadow measured sizeable decreases in both NO_2 and PM^{10} compared with the previous monitoring period. It is worth noting, that the figures for both NO_2 and PM^{10} at Castle Meadow are the lowest values that have been measured in this location since the

Policy	Indicator	2019/20	Commentary
			adoption of the local plan. The Air Quality Objectives for England (DEFRA) specify that annual mean NO_2 should not exceed 40µg/m3. The measurements at Castle Meadow have exceeded this threshold for the past few years, however the 2019/20 figure is more in line with this standard. The same targets outline that annual mean PM^{10} should also not exceed 40µg/m3. The measurements at both Lakenfields and Castle Meadow were below this threshold.
DM12	Number of homes permitted in the monitoring period	746	Permissions and prior approvals were granted in the monitoring period for a total of 746 new dwellings in 19/20. This represents an increase in permitted dwellings compared with the last two monitoring periods. The figure includes homes from prior approval applications, student and C2 accommodation. Notable new permissions in 19/20 include the redevelopment of the car park adjacent to Sentinel House to provide 252 student units, phase 2a of the Three Score site to provide 153 dwellings and the Barrack Street development to provide 218 new dwellings.
	Annual change in total housing commitment (number of dwellings with outstanding planning permission but unbuilt)	6,324	At 1 April 2020 the total number of dwellings with outstanding planning permission (and unbuilt) and those allocated for development in the local plan was 6,234. Although this is a reduction on the previous years' figure of 7,289, it is still significantly greater than the figures recorded for the other monitoring periods since the local plan was adopted. This significant increase is partly due to

Policy	Indicator	2019/20	Commentary
			the ability to now include student and communal institutional 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	798	Although the annual housing completions figure of 798 dwellings in 2019/20 is less than the 1,085 completed in 2018/19, this figure is still significantly greater than previous monitoring periods. In addition, the 2019/20 figure still exceeds the average annual housing target for Norwich set by the JCS (477 dwellings per annum). This is partly attributed to the ability to include student and communal residential accommodation within housing completion calculations. Interestingly, there were very few completions from office to residential prior approval applications in 2019/20, which contributed to the peak figure in 2018/19. Instead, the majority of completions were from standard full applications. Notable completions include: 253 student units at St Stephens Towers, 189 dwellings at St Anne Wharf and 149 dwellings at Carrow Quay.
	Housing land supply	N/A	This information is reported in the Greater Norwich Five Year Land Supply Statement.
DM13	Number of HMO licences	No data	No specific 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

Policy	Indicator	2019/20	Commentary
			number of HMO licenses does not provide any indication as to the success of policy DM13. In the 2019/20 period, there appear to have been fewer applications for large HMO's compared with previous years. Following an appeal decision in relation to an enforcement notice for a large HMO, the Council has taken a stronger stance on the application of Policy DM13 for this type of application. During the 2019/20 period there was only one appeal against this type of application, which was dismissed.
	Institutional development permitted on housing allocations (hectares)	1.37ha	The target for this monitoring indicator is no institutional development permitted on allocated housing land. The 2019/20 period saw the loss of 1.37ha of land allocated for residential use to institutional development. This was as a result of the consents at 28 Mousehold Lane for a care home and supported living apartments, and the car park adjacent to Sentinel House for 252 student bedrooms. Although the target for this indicator was not strictly met, the development consented on allocated housing land was of a residential nature.
	Number of student bedrooms permitted	392	There is no target for this indicator. There was a further decrease in the number of student bedrooms permitted in 2019/20 compared with the peak figure of 1,425 in 2017/18. Notable permissions include the car park to the rear of Premier Inn, Duke Street for 140 bedrooms, and the car park adjacent to Sentinel House for 252 bedrooms.
	Number of residential institution	140	There is no target for this indicator. The 2019/20

Policy	Indicator	2019/20	Commentary
	bedrooms permitted		period saw the highest number of residential institution bedrooms approved than any other year since the adoption of the local plan. This is attributed to several smaller applications, but the consent at 28 Mousehold Lane for a care home and supported living apartments contributed 125 bedrooms to this total.
DM14	Number of new pitches permitted	0	The target for this indicator is no overall loss of pitches. There were no new pitches permitted within either 2019/20 monitoring period. It is understood that Broadland Housing Association have commenced work on permission 16/01554/F to create 13 new pitches and an associated amenity block.
	Loss of existing pitches	0	The target for this indicator is no overall loss of pitches. No pitches were lost within the 2019/20 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 2019/20 monitoring period. Application 19/00432/F at 2 Mill Hill Road saw the conversion of three apartments into one dwellings resulting in a net loss of dwellings. However, the resultant use was still residential in nature.
	Loss of allocated housing land to other uses (number of allocated dwellings)	250	There is no target for this indicator. The 2019/20 period saw the loss of 250 dwellings allocated in the local plan lost to other uses overall. This is solely as a result of application 17/00357/F for the conversion

Policy	Indicator	2019/20	Commentary
			of St Stephens Towers to 702 beds of student accommodation. It should be noted that this equates to 281 dwellings (calculated equivalent). In the above case, there was acknowledgement that the site allocation envisaged wholesale redevelopment of this site to provide the 250 dwellings, and that if this was unviable, that the refurbishment and re-use of the two towers for a mixture of offices, residential or student accommodation would be acceptable in principle. Therefore the approval of the application was not strictly contrary to the allocation policy.
DM16	Use Class B development permitted (m^2): Class B1 (a) offices, Class B1 (b) R&D Class B1 (c) industrial uses suitable in residential areas	-	The target for this indicator is to contribute to the JCS target of 100,000m^2 increase by 2026. B1a: minus 2,400m^2 B1b: 0m^2 B1c: minus 806m^2 The 2019/20 monitoring period saw the continued loss of office floorspace; a trend which has been observed over the last few monitoring periods. However, this year saw the smallest loss reported since the adoption of the local plan. Previous significant losses of office floorspace were due to high numbers of prior approval applications for changes of use to residential. In the 2019/20 period, only one prior approval application for office to residential was responsible for part of this loss (-62m^2) with the remainder from full and change of use applications. The application with the greatest loss of floorspace was 19/00573/F at the Royal

Policy	Indicator	2019/20	Commentary
			Hotel on Bank Plain for the change of use of office floorspace to hotel floorspace. In 2020, the Government announced further changes to permitted development rights for office uses, including combining several use classes into the new use class E and the need to consider the amount of light received in each dwellings created. It has also been proposed in future to allow the change of use of any premises in use class E to residential without the need for full planning consent. It will be important to continue to monitor the changes to these rights and to observe any impacts on office floorspace in Norwich. R&D floorspace has remained relatively stable over the last few monitoring periods with little or no change reported.
	Employment uses permitted(net change): a) within employment areas b) elsewhere	a) 4,298 b) -4,341	The target for this indicator is to contribute to the JCS target of 100,000m^2 increase by 2026. Employment Area – Gains: 5,797 m^2 Losses: minus 1,499 m^2 Net change: **4,298m^2** Elsewhere – Gains: 4,755 m^2 Losses: minus 9,096 m^2 Net change: **minus 4,341 m^2** In 2019/20, overall there was a very slight increase in permitted employment floorspace. Encouragingly, there was a significant increase in the amount of

Policy	Indicator	2019/20	Commentary
			floorspace permitted within designated employment areas; the largest increase since the adoption of the plan. This increase is largely as a result of several applications permitted for employment uses at Norwich Airport and the surrounding land, and changes of use of existing buildings within employment areas. However, a reduction in employment floorspace was recorded elsewhere in the City. It should be noted that the rate of loss elsewhere has slowed in 2019/20 period to its lowest since the adoption of the local plan.
DM17	Loss of B1a use class office space under 1,500m^2 (m^2)	-2,131	The target for this indicator is no loss of small office space (under 1,500 m^2). The target for this indicator was not met with 2,131m^2 of small office space lost in the 2019/20 period. Given that the total loss of any sized floorspace across Norwich was -2,400m^2 small office made up a significant proportion of the loss in 2019/20.
	New small/medium business space permitted (premises up to 1500m^2) (m^2)	5,430	The target for this indicator is to contribute to the JCS target of 100,000m^2 increase by 2026. 2019/20 permitted floorspace (gross) - B1a = 1793 B1b = 0 B1c = 901 B2 = 2655 B8 = 81 2019/20 saw an increase in the amount of permitted small business floorspace overall. Whilst several of the use classes experienced a net increase in floorpsace, both B1a office and B1b Research and Development premises saw an overall net loss. The 2019/20 figures represent the greatest amount of small/medium business space permitted of any

Policy	Indicator	2019/20	Commentary
			monitoring period since the adoption of the local plan.
DM18	Main town centre uses permitted (m^2): a) within defined centres b) elsewhere	a) 5,709 b) 3,526	There is no target for this indicator. The purpose of this indicator is to monitor whether development is being located in the most sequentially preferable locations, in accordance with the hierarchy of centres, contained within the JCS. The data shows that in 2019/20 a greater proportion of floorspace for main town centre uses was permitted in defined centres than elsewhere in Norwich. This is the first time that this has occurred since the adoption of the local plan and is largely as a result of the change of use of the Royal Hotel on Bank Plain from offices to hotel use. NB: this application site is not a defined retail centre but DM18 refers to appendix 4 text which outlines that uses such as hotels should be situated anywhere within the city centre as a whole and would be considered to comply with policy DM18.
	New retail floorspace permitted (m^2) in: a) city centre b) district centres c) local centres	a)-1,590 b) N/A c) N/A	The target for this indicator is the contribution towards the provision of 20,000m^2 net of comparison goods floorspace to 2016 and no loss of floorspace in district and local centres. The data shows that there was an overall loss of retail floorspace within the city centre. Interestingly, whilst there was an overall loss of floorspace, there was an increase in the number of retail units to 976 from the 971 recorded in October 2019. It should be noted that these figures are as of October 2020, and therefore may include any changes to retail

Policy	Indicator	2019/20	Commentary
			units as a result of the COVID-19 pandemic. The number of vacant units has increased in 2020, although it is thought that many of these units were closed due to the pandemic. As the pandemic continues into 2021, it will be necessary to continue to monitor the longer term changes to defined centres. Due to the impacts of COVID-19, it was not possible to survey all of the defined retail centres in Norwich. As such there are no data recorded for district and local centres for the 2019/20 monitoring period.
	Development approved contrary to the maximum indicative floorspace limits for individual units in appendix 4 (unless specifically allocated): a) within defined centres b) elsewhere	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. As above, district and local centres were unable to be surveyed due to the impacts of COVID-19.
	Number of C1 hotel: a) floorspace (m^2) b) bedrooms permitted	a) 4,841 b) 133	There is no target for this indicator. A significant amount of new hotel floorspace was permitted in the 2019/20 monitoring period. Although there were some small-scale bed and breakfast proposals, the majority of this floorspace is as a result of the change of use of a part of the Royal Hotel on Bank Plain from offices, to provide 115 bedrooms.
	Improvements to public realm as a result of development	-	There is no target for this indicator. This indicator has not been monitored for the 2019/20 period due to resource constraints. During 2020, work commenced on the public realm improvement project in Tombland which will provide better walking and cycling links, provide better access to

Policy	Indicator	2019/20	Commentary
			public transport, make the area more accessible for disabled people and to attract investment by improving the quality and look of the area. The project is expected to be complete in March 2021.
DM19	Use Class B1a office floorspace permitted (m^2): a) within the office development priority area (ODPA) b) elsewhere in city centre c) in employment areas d) elsewhere	a) 22 b) 945 c) 1355 d) 826	The target for this indicator is to contribute to the JCS target of 100,000m^2 increase by 2026. The biggest increase in office floorspace was as a result of application 19/00784/F at 59 Hurricane Way for the retrospective change of use of 1355m^2 of floorspace to offices. Although this site is not located in the ODPA (the most preferable location for office development) it was demonstrated that the office use was associated with business operations already occurring in the employment area. Although there has been an increase in permitted floorspace as a whole, the majority of this has not been within the ODPA, the most sequentially preferable location for this type of use.
	Loss of office floorspace (m^2)	-2,400	The target for this indicator is to contribute to the JCS target of 100,000m^2 increase by 2026. In the 2019/20 monitoring period there was still a recorded loss of office floorspace. However, this was a significantly lower amount of lost floorspace compared with recent monitoring years and there was a continuation the slowing trend observed in recent years. Interestingly, only one application for office to residential prior approval was responsible for part of this loss (-62m^2) and the rest was from full and change of use applications. The application with the greatest loss of floorspace was 19/00573/F at the

Policy	Indicator	2019/20		Commentary
				Royal Hotel, Bank Plain for the change of use to a hotel. 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 therefore the overall loss of floorspace is likely to be less than reported in this monitoring report.
DM20[1]	Percentage of measured ground floor frontage in A1 retail use in each defined retail frontage zone in the centre (primary/secondary/large district centres)	PC01	88.3%	There is no target for this indicator. 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. There are several entries for this indicator where results are not available as district and local centre surveying was not undertaken due to the impacts of COVID-19. Of the results included, none of the primary or secondary retail frontages were below the indicative thresholds outlined in the main town centre uses and retail frontages SPD in the 2019/20 monitoring period. Although there was a reduction in retail frontage in PC01, PC02 and PC03 compared with last years' data all other centres either stayed the same or increased their level of retail frontage. It is worth noting that there still exists permitted development rights, which results in a degree of

[1] See note at end of table for list of defined centres referred to in policies DM20 and DM21.

Policy	Indicator	2019/20		Commentary
				flexibility of the uses across the city such as the ability to change between shops and financial and professional services etc. As previously mentioned at the start of this report, further changes to permitted development rights have been recently introduced, however the impacts of this will need to be understood in future monitoring periods.
		PC02	83.0%	
		PC03	92.0%	
		PR01	72.8%	
		PR02	71.4%	
		PR03	84.1%	
		PR04	n/a	
		PR05	n/a	
		PR06	66.0%	
		SR01	77.6%	
		SR02	67.6%	
		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. See above commentary.
		PC02	N/A	
		PC03	N/A	
		PR01	N/A	

Policy	Indicator	2019/20		Commentary
		PR02	N/A	
		PR03	N/A	
		PR04	N/A	
		PR05	N/A	
		PR06	N/A	
		SR01	N/A	
		SR02	N/A	
		SR03	N/A	
		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			There is no target for this indicator. As no zones breach the indicative thresholds, no data can be reported for this indicator.
DM21	Proportion of A1 uses within district and local centres	DC01	N/A	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%. Due to the impacts of COVID-19, surveys of district and local centres were not undertaken for the 2019/20 monitoring period. Therefore no data can be reported for this indicator.
		DC02	N/A	
		DC03	N/A	
		DC04	N/A	
		DC05	N/A	
		DC06	N/A	
		DC07	N/A	

Policy	Indicator	2019/20		Commentary
		DC08	N/A	
		DC09	N/A	
		DC10	N/A	
		LC01	N/A	
		LC02	N/A	
		LC03	N/A	
		LC04	N/A	
		LC05	N/A	
		LC06	N/A	
		LC07	N/A	
		LC08	N/A	
		LC09	N/A	
		LC10	N/A	
		LC11	N/A	
		LC12	N/A	
		LC13	N/A	
		LC14	N/A	
		LC15	N/A	
		LC16	N/A	
		LC17	N/A	
		LC18	N/A	
		LC19	N/A	
		LC20	N/A	
		LC21	N/A	
		LC22	N/A	
		LC23	N/A	
		LC24	N/A	
		LC25	N/A	
		LC26	N/A	
		LC27	N/A	

Policy	Indicator	2019/20		Commentary
		LC28	N/A	
		LC29	N/A	
		LC30	N/A	
	Proportion of community uses/non-retail uses in district and local centres	N/A		There is no target for this indicator. Due to the impacts of COVID-19, district and local centres were not surveyed. Therefore no data can be reported for this indicator.
	Loss of anchor food store floorspace (m^2)	N/A		Due to the impacts of COVID-19, district and local centres were not surveyed. Therefore no data can be reported for this indicator.
DM22	New community facilities permitted (m^2)	9,810.62		There is no target for this indicator. In the 2019/20 monitoring period, the largest amount of community facilities floorspace was approved since the adoption of the local plan. In total 22 applications were granted consent, with the largest contribution to community floorspace provided through permission 19/00007/F for a new church at Heartsease Lane.
	New education or training facilities permitted (m^2)	3,172		There is no target for this indicator. The 2019/20 monitoring period saw the smallest 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 19/00932/F for the construction of a new Digi-Tech factory education centre at Southwell Lodge, Ipswich Road.
	Loss of a) community facilities (m^2) and b) Public Houses	a) -3,372		There is no target for this indicator. There were four applications approved in the 2019/20 monitoring period that would result in the loss of community facilities floorspace. In all cases, the applications were deemed acceptable as the

Policy	Indicator	2019/20	Commentary
		b) 1	replacement uses were also for community use. During 2019/20 one permission was granted which would result in the loss of a public house protected under policy DM22 - 19/01162/U King Edward VII, Aylsham Road for the change of use to a community centre and place of worship for a temporary period of up to five years. This change of use was considered to be acceptable given the replacement use would still be a community use.
	ACV registrations	3	There is no target for this indicator. Within the 2019/20 period, the new ACV registration were for Train Wood, The York Tavern and The Red Lion.
DM23	Development of new evening economy and leisure uses (m^2)	1,795	The target for this indicator is to contribute to the JCS target for the provision of 3000(m^2) of leisure and tourism floorspace by 2016. Within the 2019/20 monitoring period, 11 applications for evening economy and leisure uses were approved. This permitted floorspace represents the smallest amount of evening economy and leisure floorspace granted since the adoption of the local plan. Permission 19/01454/U at 18A-20 St Stephens Street for a change of use from retail to a restaurant represented the largest change of use this year.
	Development of late night uses in the a) late night activity zone and b) elsewhere (m^2)	a) 331 b) 322	The target for this indicator is no late night activity uses outside of the late night activity zone (LNAZ). In 2019/20, one application for a late night use was permitted within the LNAZ, and two applications

Policy	Indicator	2019/20	Commentary
			were granted elsewhere. Although a greater number of applications have been granted elsewhere, a greater amount of floorspace was permitted within the LNAZ as required by policy DM23. One of the consents granted elsewhere was for the increase in A4 drinking establishment floorspace at an existing late night use on London Street (19/00836/U) which is very close to the boundary with the LNAZ. The other application, was to formalise an intensification of an existing brewery and taproom use (19/00617/F).
DM24	Floor space (m^2) for A5 uses within: a) district centres b) local centres c) elsewhere	a) N/A b) N/A c) N/A	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 defined centres to minimise their impacts on residential amenity and on highway and pedestrian safety. In the 2019/20 monitoring period, surveys of district and local centres were not undertaken due to the impacts of COVID-19 and therefore no data a reported specifically for these areas. However, no A5 hot food takeaway floorspace was permitted anywhere in Norwich, following the same trend as was observed for 2018/19.
	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	1	There is no target for this indicator. There was one application approved for the variation of conditions on retail premises at Sandy

Policy	Indicator	2019/20	Commentary
			Lane (Hall Road Asda site) to allow one retail unit to be used for an A3/A5 Restaurant/hot food takeaway premises (19/00050/VC).
DM26	Progress on the implementation of the UEA Masterplan	-	The strategic masterplan for the University of East Anglia (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. A review of the DFS (to produce the 2019 draft version) was endorsed by the Council in 2019 to form part of the evidence base for the Greater Norwich Local Plan. In Autumn 2015 a new strategic growth plan was announced for the UEA (UEA 2030 Vision) to look at increasing student numbers and investment in the university campus. That considered the latest higher education and wider global trends that might impact on the university and its development priorities at that time over the following 15 years to 2030. The UEA projections have recently looked 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). Such information informed the review of the DFS in 2019. In turn the UEA are now looking at a new Estates Strategy or Campus Redevelopment Programme and to set in place an overarching strategic

Policy	Indicator	2019/20	Commentary
			framework to guide campus activities for the next 40 to 50 years. It should be noted that, due to the impacts of COVID-19, student numbers and growth patterns may require further consideration and such issues along with a drive to net zero carbon, flexibility and a reimagining in estate requirements and a desire to refurbish or repurpose important buildings such as the Lasdun Teaching Wall are likely to be included in the framework assessment. They will discuss their findings with Norwich City Council to identify options for growth and refurbishment of their building stock and options for the Council to endorse a strategic framework for the UEA main campus, thereby stabilising to a degree future targets and ambitions. Historic England have also designated Earlham Park (but not the UEA main Campus) as historic parkland which has potential implications for Earlham Hall, its allocation and, following the lapse of the earlier outline consent, future permissions on this site.
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 has been delayed and was not in place by this time.
	Relevant applications	-	During 2019/20, the following applications were approved within the airport operational area: 19/00662/CLP: Amsterdam Way – Certificate of Lawful Development for a two bay hangar and

Policy	Indicator	2019/20	Commentary
			engineering workshop 19/01253/F – Norwich Airport – Extension of baggage handling facility 19/01009/F – 14 Gambling Close – Extension and recladding of existing hangar and mezzanine floor. Construction of car park and associated landscaping.
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 2019/20 monitoring period.
	Walking and cycling levels at each main cordon	No data	There is no target for this indicator. No data could be obtained for this indicator.
	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.
	Enhancements to strategic cycle network	-	There is no target for this indicator. No data could be obtained for this indicator.
	Progression of introduction of Bus Rapid Transport System scheme	-	There is no target for this indicator. No data could be obtained for this indicator.
DM29	Number of car parking spaces lost/gain (estimated)	9,936	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 2019/20. 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

Policy	Indicator	2019/20	Commentary
			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 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. Development proposals continue to be designed to achieve 20mph traffic zones. Some recent improvements include the Earlham Road upgrades.
DM31	No. applications refused on car parking, servicing, cycle parking grounds	6	There is no target for this indicator. During the 2019/20 monitoring period, six 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 13 dwellings that otherwise could have been granted consent.
DM32	No. approved schemes of low car and	No data	There is no target for this indicator.

Policy	Indicator	2019/20	Commentary
	car free housing		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. Examples include permission 19/01389/F 191 King Street where 21 parking spaces were proposed for 41 dwellings, and 20/00345/F – Bignold House, Surrey Street for the conversion of offices to car-free residential units.
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 PC02 – Castle Mall (levels 1 and 2)	DC01 – Bowthorpe DC02 – Drayton Road

DM20 list of defined centres	DM21 list of defined district and local centres
PC03 – Chapelfield (main retail levels) PR01 – Back of the Inns/Castle Street PR02 – The Lanes East PR03 – St Stephen’s Street/Westlegate PR04 – Castle Meadow North PR05 – Chapelfield Plain PR06 – Timberhill/Red Lion Street SR01 – The Lanes West SR02 – Upper St Giles Street SR03 – St Benedict’s Street SR04 – Elm Hill/Wensum Street SR05 – London Street East LD01 – Magdalen Street/Anglia Square LD02 - Riverside	DC03 - Eaton centre DC04 - Plumstead Road DC05 - Aylsham Road/Mile Cross DC06 - Earlham House DC07 - The Larkman DC08 - Dereham Road/Distillery Square DC09 - Hall Road DC10 - Sprowston Road/Shipfield LC01 - Hall Road/Trafalgar Street LC02 - Hall Road/Queens Road LC03 - Hall Road/Southwell Road LC04 - Grove Road LC05 - Suffolk Square LC06 - Unthank Road LC07 - St Augustines Gate 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 LC24 - Witard Road

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

Appendix 5

Norwich City Council Housing Completions Figures 2020-21

	Housing Completions
Excluding C2 and student accommodation	166
Including C2 and student accommodation*	300

*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.