

### Sustainable development panel

Date: Wednesday, 18 March 2020

Time: 09:30

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

Committee members:\* For further information please

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### Agenda

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1	Apologies	
	To receive apologies for absence	
2	Declarations of interest	
	(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)	
3	Minutes	5 - 10
	To approve the minutes of the meeting held on 15 January 2020	
4	Greater Norwich Development Partnership Annual Monitoring Report 2018-19	11 - 112
	<b>Purpose -</b> To present the 2018-19 Greater Norwich Development Partnership (GNDP) Annual Monitoring Report for Broadland, Norwich and South Norfolk	
5	Local Development Scheme 2020-2022	113 - 138
	<b>Purpose -</b> To consider the draft revised Local Development Scheme. This is the work programme for producing key planning documents, which will form part of the local plan for Norwich. The scheme is attached at Appendix 1 and covers a two-year period to 2022.	
6	First Homes Consultation	139 - 152
	<b>Purpose -</b> To consider Norwich City Council's response to the First Homes Consultation.	

The Ministry of Housing, Communities and Local Government is currently seeking views on the First Homes scheme. The Government states that it is committed to making home ownership a reality for everyone. The proposal is that First Homes will be sold to local people with a minimum discount of 30 per cent off the market price.

Date of publication: Tuesday, 10 March 2020



MINUTES

### **Sustainable Development Panel**

09:30 to 11:50 15 January 2020

Present: Councillors Stonard (chair), Maguire (vice chair), Ackroyd (substitute

for Councillor Lubbock), Carlo, Davis, Giles, Grahame, Maxwell,

Stutely

Apologies: Councillors Lubbock

#### 1. Declarations of Interest

There were no declarations of interest.

#### 2. Minutes

**RESOLVED** to agree the accuracy of the minutes of the meeting held on 13 November 2019.

### 3. Greater Norwich Local Plan - Regulation 18 Draft Plan Consultation

(Mike Burrell, GNLP manager, attended the meeting for this item.)

(A supplementary report containing *Further information to be considered with the report*, which was circulated at the meeting and emailed to members before the meeting.)

The planning policy team leader presented the report. She commented that since she had drafted the report the period covered by the plan had been extended from 2036 to 203, and apologised that some references had not been amended (paragraphs 3 and 11(b)). The consultation would run from 29 January 2020 to 16 March 2020. The Greater Norwich Local Plan (GNLP) would supersede the Joint Core Strategy (JCS) and site allocation plan. The 47 preferred sites for housing development in Norwich were set out in the draft GNLP Sites document (attached at Appendix 2 to the consultation document). This document excluded preferred site allocations for smaller villages in South Norfolk. South Norfolk Council would therefore be developing a separate "village clusters plan." The council's response to the draft plan was set out in the covering report.

The GNLP manager commented on the strategy position on growth and referred to the maps contained in the document and pointed out the main growth areas. He explained that the 9 per cent buffer would be more than was required as it did not account for "windfall" sites that could come forward during the period of the plan. He pointed out that there were contingency sites on the edge of the city at Costessey and at Wymondham. Proposed new settlement locations west of Easton at

Honingham Thorpe and near to Wymondham, around Stanfield Hall and Silfiled, have been identified as "reasonable alternatives" through the draft plan for further consideration in the longer term. Around 20 per cent of the GNLP area lived in villages and it did not seem fair to deny new housing in villages. He explained that the proposal for a separate site allocations plan for villages in South Norfolk was legal and complied with National Planning Policy Framework (NPPF). Housing needed to be in sustainable locations on the edge of existing villages, with primary schools and access to public transport. This would be up to South Norfolk Council to determine the allocation of 1200 homes.

The chair by way of introduction to the discussion said that the plan was produced in partnership with Broadland District Council, South Norfolk Council and Norfolk County Council. Each authority had a veto and therefore the plan was based on compromise. There would be opportunities for the council to raise points of concern following the consultation, especially if responses provide leverage to the council's position.

In reply to a member's question, the GNLP manager explained the policy provision which required the use of renewable energy and the electrification of vehicles. During discussion members noted that there would be a modal shift and that technology would come forward during the life of the plan.

The planning policy team leader, in reply to a member, said that evidence was being worked on to support a potential Article 4 Direction to prevent poor quality conversions of office buildings under permitted development rights. A report would be brought before the panel at a further date but early indications suggested that there was evidence. The panel expressed its support for this work.

During discussion on rural dispersal and village clusters, members expressed concern about the need for decent public transport which was affordable and served rural communities. It was noted that many rural villages were inhabited by high paid workers who commuted to Norwich for work and school and did not contribute to local economy of the village. There was also an inequality in that residents on low wages could not afford public transport or purchase new hybrid/electric vehicles. Members agreed that they reinforced the city council's view on the separate site allocations plan for village clusters in South Norfolk.

The panel had a lengthy discussion on transport regarding the modal shift to low carbon modes of transport. The panel considered that there needed to be further information on funding for transport infrastructure to meet the growth agenda. Members also considered that there needed to be investment in rail services and consideration of a train station at Thickthorn/Hethersett. The panel also considered bus fares should be affordable and that franchising bus services could address this. Members also noted the potential growth at Costessey and Taverham, on the periphery of the city, and it was suggested that as all bus routes should be orbital as well as radial to prevent short car journeys between places on the edge of the city. Members noted that Transforming Cities funding was supporting the growth agenda and that the GNLP could be used as leverage to help access future funding. A member expressed concern that the county council would need to ensure that funding available for transport supported the modal shift to low carbon modes of transport.

During discussion the panel noted the policy provision for sustainable energy but expressed concern that there was too much reliance on the development of new technology and that there was no contingency if the technology did not come forward to meet carbon zero by 2050. The panel also considered that as 73 per cent of the proposed development would be on Greenfield sites, greater weight should be given to biodiversity and the protection of wildlife corridors. It was noted that the Environment Bill, when it became legislation, would require a net gain in biodiversity from developments.

During discussion members considered that it was important that there was sufficient infrastructure to support sustainable communities. The GNLP manager said that officers were working very closely with health services and that the evidence will inform where additional health provision would be required, which would be inserted into the consultation documents under office delegation. This evidence would cover all levels of health provision and would be reported to a future meeting of this panel.

Members were also reminded that the SPG on purpose built student accommodation had been considered by the panel and agreed at cabinet (13 November 2019.

Members noted the changes to affordable housing that the government was proposing. The panel noted that the intention of the GNLP was to support sustainable development with good access to services and infrastructure. The GNLP manager advised members that there was a requirement of 20 per cent of new homes to be "lifetime homes" which were suitable for people of all ages and needs.

**RESOLVED** that despite the council's concerns as noted in the covering report, which the panel endorses, and accepting that plan is partnership document which may require a degree of compromise, to recommend to cabinet that it endorses the publication of the draft Greater Norwich Local Plan documents for the Regulation 18 Draft Plan but wishes the following issues of outstanding concern to be taken into account in discussions about future iterations:

### (a) Emphasis on rural dispersal/village clusters

The proportion of rural dispersal/village clusters is a concern. Members would not want to deny people who live and work in the rural economy the opportunity to continue to live in villages but identified that a lack of affordable and reliable public transport was a problem for them in terms of accessing employment and services. It identified the potential to support this level of rural dispersal by investing in renewable energy in villages which could be used to power electric vehicles. It was recognised that people with low incomes or living in affordable housing would be disadvantaged as they would not be able to purchase electric cars until prices come down, if at all. There also is concern that villages could become dormitories with a limited contribution to the local economy and about potential social inequality in villages, where a significant proportion of residents are high income professionals who commute into the city, which needs to be addressed. The infrastructure is not in place to serve village clusters and accommodate growth. The plan identifies access to primary schools but access to other essential infrastructure needs should be expanded.

Therefore location and sustainability of rural dispersal and village clusters development should be given further consideration.

### (b) Transport infrastructure

The basic information on the modal shift to a low carbon mode of transport should be stronger in the plan, which does not recognise the need to integrate transport and land use polices or the use of mobility hubs, and further information is required on how this infrastructure will be funded to meet the needs of the growth agenda.

The panel believes there needs to be greater investment in rail transport, particularly on the Norwich to Cambridge route, to support the Cambridge-Norwich Tech Corridor and to promote links with Norwich Research Park. There is a need for both fast and slower services, stopping between Norwich and Cambridge, and this will require investment in additional track to create the necessary capacity. Consideration should be given to an additional station at Thickthorn/Hethersett.

Public transport needs to be affordable and serve local communities to encourage use. The franchising of bus operators could address this and should be examined as a possibility.

Growth is recommended at Costessey and Taverham, on the periphery of the urban built up area, but current bus service routes into the city are radial rather than orbital. This encourages car use for short journeys and needs to be addressed.

### (c) Climate change

Given that the end of the plan period is only 12 years from 2050, the current target for carbon neutrality, policies relating to climate change need to be more ambitious in order for that target to be met. There is concern that the reliance on the development of new technology, such as carbon capture, may not be sufficient to deliver the step changes needed to achieve this target and that, therefore, this requires additional measures to be identified. It is recognised that the Environment Bill will make it mandatory for all developments to have a biodiversity net gain and that once the bill passes into law, this requirement will be incorporated into the Greater Norwich Development Plan. Given that 73 per cent of the proposed growth in the development plan area will be on Greenfield sites, it is important that enhanced biodiversity measures are included in the policy to mitigate the impacts of this development.

### 4. Retail Monitor 2019

The chair introduced the report and commented that the reduction in vacant available floor space and decrease in vacant units in the city centre was positive. The removal of traffic in Westlegate had made it pleasant for shoppers.

The senior planner (policy) presented the report and circulated a colour version of Table 9 at the meeting. She explained that the retail vacancies have continued to increase in the secondary retail area but that the large retail unit that had been occupied by Toys R Us remained vacant. She explained that the retail policy in the

emerging GNLP would allow for the diversification of retail units for leisure use which although would reduce retail floor space, would reflects current retail trends.

(Councillor Stonard, chair, left the meeting at this point. Councillor Maguire, vice chair, was in the chair for the remainder of the meeting.)

Discussion ensued on the closure of department or chain stores and potential to use large department stores for other uses. The senior planner (policy) said that if one of the large department stores such as Debenhams were to close then the council would have to assess whether it was appropriate to allow for diversification to other uses. In may be appropriate to retain retail uses at street level whilst allowing more flexibility at upper floor levels with for example encouraging living accommodation on the upper floors.

In response to a question, the senior planner (policy) said that the city was doing better than the national average although it is hard to compare figures due to various methodologies of data collection. The national data was obtained from the Local Data Company and its data could be used to compare Norwich with other cities. Members of the panel agreed that there should be opportunities for small retailers in the city and that the policy should reflect that. Norwich Market was considered to be the best in the country.

**RESOLVED** to note the findings of the 2019 Retail Monitor.

**CHAIR** 

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Report to Sustainable development panel

18 March 2020

Report of Director of Place

Subject Greater Norwich Development Partnership Annual

Monitoring Report 2018-19

4

Item

### **Purpose**

To present the 2018-19 Greater Norwich Development Partnership (GNDP) Annual Monitoring Report for Broadland, Norwich and South Norfolk.

### Recommendation

To note the contents of the 2018-19 GNDP Annual Monitoring Report.

### Corporate and service priorities

The report helps to meet the corporate priority great neighbourhoods, housing and environment, inclusive economy and people living well.

### **Financial implications**

None directly.

Ward/s: All Wards

Cabinet member: Councillor Stonard - Sustainable and inclusive growth

### **Contact officers**

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Charlotte Hounsell, Planner (policy) 01603 212629

### **Background documents**

None

### Report

### Introduction

- 1. The purpose of this report is to inform members of the publication of the Greater Norwich Development Partnership Annual Monitoring Report (AMR) for Broadland, Norwich and South Norfolk for the period 2018-19.
- 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: https://www.greaternorwichgrowth.org.uk/planning/monitoring/
- 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. As part of the last AMR, it was not possible to include the results of monitoring of the Norwich DM policies plan for the 2017/18 period. Therefore, this report (and that included at Appendix F of the AMR) covers the periods 1 April 2017-31 March 2018 and 1 April 2018-31 March 2019.
- 7. In January 2020, the Regulation 18 consultation of the Greater Norwich Local Plan (GNLP) commenced. This consultation runs until 16 March 2020. Once adopted, the GNLP will replace the strategic policies in the JCS.

### **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 (pages 1-2).
- 9. The AMR demonstrates that progress is being made on a number of indicators. For example, it shows that that the number of affordable housing completions has increased to its highest level in the last 5 years and showing that Norwich has maintained its 13<sup>th</sup> position in the national retail rankings.

- 10. The percentage of household waste recycled has decreased across all three districts, most notably in South Norfolk. This is considered to be as a result of an increased rate of material rejection as the market requires a higher quality of recycling material. The rate of composting has increased across all districts.
- 11. The AMR reports an overall decrease in the CO<sup>2</sup> emissions per capita. In Norwich, there was a decrease in both industrial and domestic emissions per capita, and emissions for transport remained at their previously reported level. It should be noted that this information is based upon the latest dataset available for the 2017-18 period, as data for the 2018-19 period were not available at the time the AMR was published.
- 12. The number of solar energy capacity schemes permitted has decreased from the peak in 2015-16 and no such schemes were permitted within Norwich. However, it is difficult to monitor the overall uptake of micro-renewable energy generation schemes given that much of this development can be undertaken without requiring planning permission.
- 13. In relation to the objectives to ensure sufficient housing and affordable housing completions against JCS requirements, the latest AMR reports a positive picture. For overall housing delivery, there has been a significant increase in the delivery for Greater Norwich as a whole in 2018-19 (2,779 units) compared with the previous year (2,034 units). This is the greatest level of housing delivery for Greater Norwich since the adoption of the JCS, and is the first time the JCS target of 2,046 dwellings per annum has been exceeded. Housing delivery for the Norwich Policy Area also shows a significant increase to 2,440 dwellings in 2018-19 from 1,685 dwellings in 2017-18, and also exceeds the annual delivery target for the Norwich Policy Area of 1,825 dwellings per annum. Despite this increased delivery in recent years, there are still implications to be considered from previous years' under delivery. This is considered further in the Housing Land Supply Issues section below.
- 14. Housing delivery for Norwich (as reported against the JCS) in 2018-19 was 927 dwellings; a significant increase on the previous year's 237 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 (paragraphs 24 onwards in this report), which does account for these accommodation types reports 1,085 dwellings delivered in 2018-19. Of this figure, 85% (927 units) were C3 residential units, and 15% (157 units (equivalent dwellings)) were C2 communal and student accommodation. This large increase in housing delivery can partially be attributed to the completion of several large office to residential prior approval conversions, including 199 units at Sentinel House.
- 15. Affordable housing completions have increased across the Greater Norwich area to 724 dwellings in 2018-19 from 531 in 2017-18, and in Norwich, this has increased to 137 dwellings from 56 dwellings in the previous monitoring period. This continues the year on year increase in affordable housing delivered since 2015-16. A significant contribution to this was the delivery of affordable housing at Goldsmith Street, Bartram Mowers and Three Score sites. This is despite the fact that development delivered through the prior approval process is exempt

from providing affordable housing. The council adopted a revised supplementary planning document for affordable housing (July 2019) which seeks to maximise delivery of affordable housing. It is anticipated that this will continue to contribute to the delivery of affordable housing in future years. However, members should note that potential changes in the form of the First Homes consultation may have implications for affordability of housing.

16. In relation to economic growth indicators, the AMR reports the continued loss of office floorspace in Norwich, although this is at a slower rate than previous years. However, the net overall reduction in office floorspace since the start of the plan period (2008-09) amounts to -105,353m², or 29% of the total stock at 2008. Much of the floorspace lost in recent years has been or is being developed into residential accommodation under the Prior Approval process. The Council has recently commissioned evidence to inform a decision on the need, or otherwise, for an Article 4 Direction to control such changes of use.

### **Housing Land Supply Issues**

- 17. Within the last AMR reported to SD Panel in September 2019, changes to the methodology for calculating the five-year land supply were outlined. These changes resulted in significant differences to the figures and there was concern that this could obscure changes on a year-by-year basis. As such, an additional five-year land supply calculation was provided using the same methodology as previous years to allow for this more direct comparison. Similar calculations have been undertaken for the 2018-19 period and are included at Appendix 3. These are not included within the AMR itself (Appendix A).
- 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 2017-18 demonstrated a 3.94 year supply for Norwich (Liverpool approach <sup>1</sup>with 20% buffer). By comparison, if the data for 2018-19 uses the same approach, then a 3.36 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. The policy does not specify annual averages but this equates to 2,046pa (per annum) across the Greater Norwich area, of which 32,847 (1,825pa) are required in the Norwich Policy Area. Between 1 April 2008 and 31 March 2019 a total of 18,281 new homes (1,662 pa) have been delivered across the Greater Norwich area of which 14,054 (1,278 pa) has been delivered in the Norwich Policy Area. The result is that there remain 18,539 homes (2,648 pa) in the Greater Norwich area and 18,793 homes (2,685 pa) in the Norwich Policy Area to be delivered by 2026.
- 20. The reason for the shortfalls set out above is due to over delivery of housing in the rural policy area (Greater Norwich Area minus Norwich Policy Area), where

<sup>&</sup>lt;sup>1</sup> 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.

- 106% of homes required in the plan period have been delivered to date. This is compared with under delivery in the Norwich Policy Area, where 43% 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 requiring delivery at an average of 2,648 homes pa between 2019 and 2026 in the Norwich Policy Area, when actual delivery between 2008 and 2019 has fluctuated between 882 and 2,440 homes pa, and given that the distribution of development between the urban and rural policy areas has not been delivered as envisaged.
- 22. However, the new 2018-19 AMR, and the AMR from the 2017-18 monitoring period, no longer uses 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 2018 as 6.54 years across Greater Norwich and 6.82 years across the city. By comparison, the housing land supply at April 2019 is calculated as 5.89 years across Greater Norwich and 4.03 years across the city (Appendix 2).
- 23. The five-year land supply has diminished significantly compared with last year's figures and this is as a result of a significant reduction in deliverable supply in Norwich, as well as a reduction in South Norfolk. 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.
- 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 10 a review of the local plan

- 27. 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. Due to time and resource constraints, the local plan monitoring for the 2017/18 and 2018/19 periods has been streamlined. As a result, information is not available for some indicators. However, where possible, general commentary on progress and notable trends or applications has been included where specific data is not provided.
- 28. The following is a summary of the main findings of the Norwich Appendix of the AMR for 2017/18 and 2018/19:
  - Several applications were approved across both monitoring periods resulting the loss of/reduction of the Yare Valley Character Area (YVCA). These applications were largely residential developments, and the benefits of the proposals were considered to outweigh the harm to the YVCA.
  - The number of buildings on the Heritage at Risk Register increased in 2017/18 but reduced to the lowest number in 2018/19 since the adoption of the DM policies plan.
  - The air quality indicators Nitrogen Dioxide (NO<sub>2</sub>) and airborne particulates (PM<sup>10</sup>) remained relatively stable at the Lakenfields monitoring location. At the Castle Meadow monitoring location both NO<sub>2</sub> and PM<sup>10</sup> increased across both the 2017/18 and 2018/19 periods. In particular, the PM<sup>10</sup> figures for the 2018/19 period were at the highest level recorded since the adoption of the DM policies plan. The measured NO<sub>2</sub> at Castle Meadow has exceeded the Air Quality Objectives for England (DEFRA) target of 40μg/m3 (annual mean) for the past few years and this remains the situation in the 2018/19 monitoring period. However, PM<sup>10</sup> figures for Castle Meadow and both air quality indicators at Lakenfields remain well below this threshold.
  - In 2017/18, 640 new homes were granted consent, compared with 473 new homes in 2018/19. The 2018/19 figure represents the lowest number of homes permitted in a monitoring period since the adoption of the DM policies plan and continues the year on year decrease since the 2015/16 peak of 1,018 homes. These reduced figures are likely a result

- of the reduced number of PBSA applications and Prior Approval office to residential applications in that year.
- However, the housing commitment figures at 1st April 2019 were at their greatest since the adoption of the DM policies plan. At 7,289 dwellings, this represents a significant increase on the 4,199 dwellings from the 2017/18 monitoring period. This is attributed to the ability to include both student accommodation and communal institutional accommodation within housing delivery figures following changes to the NPPF in 2018.
- Housing completions in 2017/18 (at 235 dwellings) were at their lowest since the adoption of the DM policies plan. However, the 2018/19 figure of 1,035 completed dwellings represents a significant increase and the highest annual housing completion figure since the adoption of the DM policies plan. This is the first time housing completions have exceeded the average annual target for Norwich set by the JCS of 477 dwellings per annum. This is partly attributed to the ability to include both student accommodation and communal institutional accommodation within housing completions calculations, as well as the delivery of several large Prior Approval office to residential schemes.
- The loss of office space across the city has continued across both the 2017/18 and 2018/19 monitoring periods. The 2017/18 period saw a significant loss at -40,205m². This is the greatest amount of floorspace lost since the adoption of the DM policies plan and is attributed to several significant Prior Approval office to residential schemes. However, 2018/19 saw -11,695m² of office space lost, which may suggest a slowing of this trend. It will be important to continue to monitor the loss of office floorspace.
- Both 2017/18 and 2018/19 monitoring periods saw significant losses of employment floorspace outside of defined employment areas at -47,990m<sup>2</sup> and -14,143m<sup>2</sup> respectively.
- Norwich is performing well overall in terms of retailing. Where defined centres are operating below recommended thresholds, an appropriate amount and variety of other supporting services is ensuring their vitality and viability. More detailed information of the latest retail survey and trends can be found in the 2019 Norwich City Centre Shopping Floorspace Monitor & Local & District Centres Monitor.
- Since the last AMR, the Norwich Airport Masterplan was endorsed by Norwich City Council cabinet and scrutiny committee on 17th October 2019, subject to submission of a Surface Access Strategy to the council within a year of endorsement.

# Joint Core Strategy for Broadland, Norwich and South Norfolk: **Annual Monitoring Report 2018-19** January 2020



Jobs, homes, prosperity for local people



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### 1. Executive Summary

- 1.1 This Annual Monitoring Report (AMR) assesses how the Greater Norwich area performed for 2018/19 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 number of Lower Super Output areas among the most deprived 20% nationally has been reduced from 17 to zero;
  - The number of LSOAs in the in the least deprived 50% of the country for access to housing and service has increased;
  - The number of housing completions reached its highest level in recent years, exceeding the JCS annual target;
  - The number of affordable housing completions has increased to its highest level in the last 5 years, exceeding the JCS annual target;
  - The proportion of the population aged 16-64 qualified to NVQ level 4 has increased year on year;
  - Norwich has maintained its13th position in the national retail ranking;
  - No listed buildings have been lost or demolished;
  - CO2 emissions per capita have decreased.
- 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;
  - Affordable housing completions are below target in both percentage and absolute terms overall;
  - 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:

- Recycling rates have decreased;
- Total crime level has increased this year and
- The number of people killed or seriously injured in road traffic accidents has increased.
- 1.6 A 5-year land supply can be demonstrated for this monitoring year. Greater Norwich Authorities can demonstrate 5.89 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, working with the 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 NDR 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 Local Planning Authorities (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 Joint Core Strategy (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:

  www.greaternorwichgrowth.org.uk/planning/joint-core-strategy/

### **Purpose**

- 2.4. The Annual Monitoring Report (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 2018 and 31st March 2019.

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.

As Norwich City Council did not produce an appendix for the monitoring of the local plan for the 2017-18 AMR, Appendix F contains monitoring information covering both 2017-18 and 2018-19 periods.

# 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

Indicator	Target	Source		Location	14/15	15/16	16/17	17/18	18/19	RAG status
				Broadland	6.4	6.2	6.0	5.5		
Total CO2 emissions per capita	Decrease	DECC	Norwich		4.5	4.3	3.9	3.8	Data not released	
por oupling				South Norfolk	6.7	6.6	6.3	6.2	10100300	
Total CO2 emissions per each sector	Decrease	DECC		See Table 3.8						
Sustainable and Renewable energy capacity permitted by type	Year-on-year megawatts capacity permitted increase	LPA		See Table 3.10						
Number of planning permissions granted				Greater Norwich area		0	1	0	0	
contrary to the advice of the Environment Agency on either	Zero			Broadland	0	0	0	0	0	
		LPA		Norwich		0	0	0	0	
flood defence grounds or water quality				South Norfolk	0	0	1	0	0	
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	Broadland Norwich South Norfolk	Norwich South All housing developments have to show they will meet this standard therefore 100% compliance has been assumed as permission is not granted without this assurance.						
					a) 25%	a)26%	a)24.88%	a)23.60%	a)21.45%	
				Broadland	b) 22%	b)25%	b)26.02%	b)26.34%	b)26.79%	
Percentage of household waste					a) 29%	a)32%	a)27%	a)24.86%	a)22.90%	
that is a) recycled and b) composted	No Reduction	on LPA		Norwich  South Norfolk		b)7%	b)13%	b)12.7%	b)16.10%	
and by composied						a)44	a)44	a) 42.34%	a) 22.15%	
			South Norfolk		b) 18%	b)18	b)19	b) 18.4%	b) 19.20%	

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

Location	Sector	14/15	15/16	16/17	17/18	RAG status
	Ind & Com	2.6	2.5	2.4	2.0	
Broadland	Domestic	1.8	1.8	1.7	1.6	
	Transport	1.9	1.9	1.9	2.0	
	Ind & Com	2.0	1.8	1.6	1.5	
Norwich	Domestic	1.5	1.4	1.4	1.3	
	Transport	1.0	1.0	1.0	1.0	
	Ind & Com	2.0	2.8	1.6	1.5	
South Norfolk	Domestic	1.9	1.7	1.7	1.5	
	Transport	3.1	3.2	3.1	3.3	

- 3.8 C0<sup>2</sup> emissions per capita decreased in each of the local authority areas in the Greater Norwich between 2017 and 2018, the latest year in which figures are available.
- 3.9 CO<sup>2</sup> emissions per capita across the industrial and commercial and domestic sectors in the Greater Norwich area decreased between 2017 and 2018, while the transport sector increased slightly for Broadland and South Norfolk.

Sustainable and Renewable energy capacity permitted by type

Location	Туре	14/15	15/16	16/17	17/18	18/19
	TOTAL	13.36MW	13.94MW	17.5kW	8.67MW	0.78MW
Broadland	Wind	0.01MW	0MW	OMW	0 MW	OMW
	Solar PV	10.17MW	11.14MW	2.5kW	8.67 MW	0.64MW
	Hydro	OMW	0MW	OMW	0 MW	OMW
	Biomass	3.18MW	2.8MW	15kW	0 MW	0.14MW
Norwich		No schemes submitted	Solar PV 355.03 kW (0.36MW) (six schemes)	Solar PV 1.9MW (1750mW per year)	No schemes submitted	No schemes submitted
	TOTAL	8.0MW	39.45MW	OMW	17MW	OMW
	Wind	OMW	WMO	OMW	OMW	OMW
South	Solar PV	7.5MW	37MW	0MW	17MW	OMW
Norfolk	Sewerage	OMW	WMO	OMW	OMW	OMW
	Biomass	0.5MW	2.45MW	2.0MW	OMW	OMW
	Air	0MW	WMO	OMW	OMW	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 from 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 No planning permission has been granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality this year.

### 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 a) recycled and b) composted

- 3.18 The percentage of household waste that is recycled has decreased across all three districts, most notably in South Norfolk. This is mainly due to the amount of dry recycling that has been sent for recycling. The market 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. In contrast, the rate of composting has increased across all districts.
- 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"). Norfolk County Council is working with all other Norfolk councils to improve services and increase the amount of waste diverted from landfill.

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

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status	
	NPA – 1,825 per annum		NPA	1,140	1,164	1,810	1,685	2,440		
	Greater Norwich area – 2,046 pa		Greater Norwich area	1,681	1,728	2,251	2,034	2,779		
	Broadland NPA – 617 pa		Broadland - NPA	217	340	410	449	482		
Net housing completions	Broadland RPA – 89 pa	LPA	Broadland - RPA	188	258	234	230	158		
Completions	Norwich – 477 pa		Norwich	249	365	445	237	927		
	South Norfolk NPA – 731		South Norfolk - NPA	674	459	955	999	973		
	South Norfolk RPA – 132		South Norfolk - RPA	353	306	207	119	239		
Affordable housing completions			Greater Norwich area	243 14%	222	456	531	724		
	Affordable housing target of 525		Broadland	98 24%	107	237	177	195		
	per year <sup>1</sup>	LPA	Norwich	50 20%	25	44	56	137		
			South Norfolk	95 9%	90	175	298	392		
(Gross)New house	New Target				•	•				
completions by	1 bedroom – 7%									
bedroom number, based on the	}	}			See table 3.32					
proportions set out in	2 bedrooms – 23%	LPA								
the most recent Sub-	3 bedrooms – 52%									
Regional Housing Market Assessment	4+ bedrooms – 18%									
Dravisian of Cymay and	To most CHANA (Option 1)		Greater Norwich area	3	4	4	0	0		
Provision of Gypsy and Traveller pitches to	To meet CHANA (Option 1) targets:29 pitches in total (15		Broadland	1	1	4	0	0		
meet local plan	from 2017-22, further 14 to 2022-	LPA	Norwich	0	0	0	0	0		
requirements	27)		South Norfolk	2	3	0	0	0		
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	94.6%	92.5%	58.7%	67.3%	63.8%		

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<sup>&</sup>lt;sup>1</sup> 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 2018/19 has increased significantly (39%) from the previous year and in doing so has reached its highest levels since the adoption of the plan. The Joint Core Strategy (JCS) annual housing requirement target has been met for the second time in three years. The improvement in delivery is mainly due to an increase in housing delivery in Norwich. Housing delivery in the Norwich Policy Area (NPA) part of South Norfolk has maintained its generally high level. 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 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 4,255 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 6,076 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 2,693 homes per year as of 1 April 2019. 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. 250 student bed spaces (equivalent to 100 residential units) have been delivered in 2018/19. This level of delivery reflects an increased market demand for this type of accommodation in the City Centre. In addition, a further 58 units were delivered in the Norwich City area as separate communal dwellings. If the delivery of student and communal accommodation are taken into account overall delivery in Greater Norwich would increase to 2,937.
- 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 since 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 a large, strategic scale, growth, in particular the Broadland Growth Triangle and the challenge presented by the redevelopment of complex brownfield sites in the urban area.

- 3.24 Despite these challenges, the Greater Norwich Councils' have now delivered a commitment (the sum of planning permissions and site allocations) of 33,270. This is significantly (236%) 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 Councils' 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 2019 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

Affordable housing completions have exceeded the current 3.26 target of 561 completions per year. This marks the highest level of delivery in the last 7 years and is the first time the annual target has been achieved. This level of delivery is clearly linked to the significant increase in overall housing delivery across the Greater Norwich area. Continuing to meet the delivery target for affordable homes will remain a challenge however. 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). 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

- 3.27 Additional sites for Gypsy and Traveler pitches will be delivered through the grant 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.
- 3.28 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.
- 3.29 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).
- 3.30 The Needs Assessment was completed in October 2017 and assesses the needs for the period 2017-2036. 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).

	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

3.31 There is no requirement for LPAs to demonstrate a five-year supply of sites for Travelling Showpeople, residential boat dwellers or residential caravan dwellers. There is, however, a requirement to demonstrate a five-year supply of pitches for Gypsies and Travelers (paragraph 10a of Planning Policy for Traveller Sites). The expectation is for an ongoing requirement for Gypsy and Traveler pitches to be met through a combination of "windfall" sites and allocated pitches in the GNLP.

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

3.32 This indicator has shown a slight reduction in accessibility during this monitoring year. Buses times are run on a winter month timetable where there is a more limited service.

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

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

Location		14/15	15/16	16/17	17/18	18/19
	1 bed	50	26	57	27	69
	2 bed	115	133	146	205	187
Broadland <sup>2</sup>	3 bed	174	221	217	234	198
	4 bed	112	241	233	228	195
	Unknown	3	0	0	0	0
Norwich <sup>43</sup>		No data collected	No data collected	No data collected	No data collected	No data collected
	1 bed	56	70	94	121	98
	2 bed	257	173	251	230	266
South	3 bed	461	263	435	396	483
Norfolk	4 bed	240	248	375	335	310
	Unknown	13	11	7	36	71

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

<sup>&</sup>lt;sup>2</sup> Gross completions

 $<sup>^{\</sup>scriptscriptstyle 3}$  Includes conversions, data updated from Aug 2015 information from Norwich City Council and different from previous years

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

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Permitted amount of floorspace and land by employment type	B1 – 118 hectares/ 295,000m2 B2/8 – 111 hectares	LPA	Greater Norwich area Broadland Norwich	·		See table 3.34			
стірюутісті турс	2007 – 2026		South Norfolk						
	100,000m <sup>2</sup> Norwich City Centre		Norwich	-29122m2	-7774m2	-24370 m2	-40205m2	-13961 m2	)
	100,000m² NRP		NRP	1797m2	1512m2	0m2	No data	No data	1
Amount of permitted floor space	50,000m <sup>2</sup> BBP	LPA	BBP	0	No data	No data	No data	No data	1
			Elsewhere	S. Norfolk - 78m2	S. Norfolk - 1288m2	S. Norfolk - 443m2	S. Norfolk - 7465.70 M2	No data	1
			Greater Norwich area	177,100	182,000	187,000	193,000	Data not yet	
Annual count of employee jobs by BRES across Plan area	2222 per annum increase	ABI/BRES	Broadland	43,700	45,000	46,000	47,000	released	
		(Nomis)	Norwich	85,300	87,000	90,000	93,000		
			South Norfolk	48,100	50,000	51,000	53,000		
Employment rate of economically active population	Increase	Annual Population Survey (Nomis)	Greater Norwich area	72.90%	79.20%	80.50%	75.40%	78.909	
			Broadland	78.10%	80.90%	80.50%	84.30%	78.509	76
			Norwich	69.10%	77.10%	78.30%	68.50%	77.109	<b>%</b>
			South Norfolk	72.40%	80.30%	83.20%	75.60%	81.609	76
			Greater Norwich area	41%	41%	43%	50%	449	76
Percentage of workforce employed in higher	Annual increase of 1%		Broadland	36%	43%	50%	41%	479	76
occupations			Norwich	44%	37%	37%	51%	399	<b>%</b>
			South Norfolk	46%	44%		60%	479	
National retail ranking	Maintain top 20 ranking	Venuescore	Norwich	13th	13th	13th	13th	13th	
Net change in retail floorspace in city centre	No decrease in retail floor space	LPA	Norwich	-859	+225 sqm	No data	-217	-6231	
				A1 0%	A1 18.18%		A1 42%	A1 17.69	
			Broadland	A2 0%	A2 0%		A2 100%	A2 1009	
			bioddiana	B1a 15%	B1a 19.04		B1a 20%	B1a 38.59	
				D2 13%	D2 0%	D2 15%	D2 33%	D2 17.39	6
					A1 28.1%	A1 38.9%	A1 6%	A1 09	7
Percentage of permitted town centre uses in defined	100%	I D A	NI no citata	NI- del	A2 100%	A2 43.1%	A2 100%	A2 09	76
centres and strategic growth locations	100%	LPA	Norwich	No data	B1a 100%		B1a 0%	B1a 319	•
					D2 73.1%		D2 3%	D2 769	
				A1 62.5%	A1 100%	A1 21.7%	A1 70%	A1 389	7
			South Norfolk	A2 50%	A2 100%		A2 0%	A2 509	•
	1		JOURINOHOR	B1a 41%	B1a 73.1%		B1a 75%	B1a 259	
				D2 0%	D2 55.6%	D2 66.7%	D2 71%	D2 09	%

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### Permitted amount of floor space and land by employment type<sup>4</sup>

3.34 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 we have achieved our target. 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 itself.

	Use Class	14/15	15/16	16/17	17/18	18/19	RAG Status
Greater	В1	-30,694	+26,617	+34,284	+41,259	No data	
Norwich area (floorspace in sqm)	B2	+724	+2,035	+2,453	+3,722	No data	
	B8	+819	+13,194	+20,781	+10,338	No data	
	B1	-12.2	+10.6	+13.7	+16.5	No data	
Greater Norwich area	B2	+0.2	+0.5	+0.6	+0.9	No data	
(hectares)	В8	+0.5	+8.8	+13.9	+6.9	No data	
	B2/B8	+0.7	+9.3	+14.5	+8.8	No data	
	В1	+2,861	+28,923	+53,451	+80,109	+82,532	
Broadland (sqm)	B2	+2,389	+1,364	+6,197	+8,566	+8,060	
(==	В8	+552	+105	+376	+17,531	+15,583	
	В1						
	Bla	+31,063	-8,881	-24,449	-40,205	-11,695	
Norwich	B1b	+785	0	0	+113.8	0	
(sqm) <sup>5</sup>	Blc	+3,940	-8,562	-1,119	-217.7	+145.4	
	B2	-3,051	+1,498	-5,003	-8068	-280	
	В8	-214	-1,968	3,254	-7,633	-2,131	
	B1	2,233	15,157	+7,401	+1,459	No data	
South Norfolk	В2	1,386	-827	+1,259	+3,224	No data	
	В8	481	15,057	17,151	+440	No data	

<sup>+ =</sup> net gain

<sup>- =</sup> net loss

<sup>&</sup>lt;sup>4</sup> Calculated using figures from the Greater Norwich Employment Growth and Employment Sites and Premises Study 2008

<sup>&</sup>lt;sup>5</sup> Data updated from 2015 information from Norwich City Council and different from previous years

#### Office space developed

- 3.35 There was a net loss of 11,695 sqm of office floor space (use class B1a) in Norwich this monitoring year, predominantly in the city centre. Loss includes change of use of long-term empty offices at St Mary's Works. There is currently very limited commercial impetus to develop any new office space in the city centre due to relatively low rental values making speculative development unviable.
- 3.36 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.
- 3.37 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.
- 3.38 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.

Date	Norwich Office Floor Space Variances
2008/09	13,205sqm net gain
2009/10	657sqm net gain
2010/11	2,404sqm net gain
2011/12	-115sqm net loss
2012/13	-3187sqm net loss
2013/14	-2024sqm net loss
2014/15	-31063 sqm net loss
2015/16	-8881 sqm net loss
2016/17	-24449 sqm net loss

2017/18	-40205 sqm
2018/19	-11695 sqm
Total actual/potential office floorspace change Norwich city April 2008-March 2019	-105,353 sq. m net loss (-29.0%)

### Annual count of employee jobs<sup>6</sup>

3.39 No data has been released for this year.

### Employment rate of the economically active population

3.40 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

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

### National Retail Ranking for Norwich

- 3.42 There were changes to the Venuescore evaluation criteria between 2011/12 and 2012/13 which affected Norwich's position resulting in a fall to the position of 13<sup>th</sup> from 9<sup>th</sup>. This year, the target for the city centre has been achieved by maintaining 13<sup>th</sup> position.
- 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

- 3.44 Loss of retail floor space (of 6,231 sqm) has been identified from Norwich's retail monitor. This decrease is greater than the last 10 years combined. This significant reduction can be 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.
- 3.45 In recent years, retail investment in the city centre has

<sup>6</sup> Data gathered in September. Although this dataset is not recommended for monitoring purposes it is nonetheless the only dataset available for measuring jobs at lower level geographies.

concentrated on improvements and enhancements to existing stock, for example the refurbishment of Castle Quarter, the emerging new proposals for Anglia Square, and the extension of Primark.

#### **Previous Years**

- 3.46 The trend evident since April 2008 is for a continued 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.
- 3.47 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.
- 3.48 Although a reduction in retail floor space runs counter 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 completed town centre uses in defined centres and strategic growth locations

3.49 Proportions vary depending on use class and location. In Broadland, the use of Financial and professional services (A2) has achieved the set target of 100%, however, overall targets for town centre uses have not been met.

Objective 4: to promote regeneration and reduce deprivation

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Number of Lower Super Output Areas in national most deprived 20%	Reduction by		Greater Norwich area	17				0	
	50% in plan	IMD	Broadland	0	No data	No data	No data	0	
	period (28 out of 242 in 2007)	(DCLG)	Norwich	17				0	
	01 242 111 2007 ]		South Norfolk	0				0	
The amount of land on brown field register that has been developed	Increase the amount of completions for housing on land identified in brown field register in % form		Broadland			No data	No data	2.19 ha (2.1%)	
		LPA	Norwich			No data	No data	1.34 ha	
			South Norfolk			No data	No data	5.05 Ha (22%)	

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

3.50 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 2019 Index of Multiple Deprivation data shows the number of Lower Super Output Areas in the Greater Norwich area has reduced from 17 to 0, achieving and exceeding the set target.

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

3.51 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.

# 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	14/15	15/16	16/17	17/18	18/19	RAG status
School leaver qualifications - % of	Year-on-		Greater Norwich area	57.14%	65%	No data			
school leavers with 5	from 2007  Value of Council		Broadland	59.41%	68.80%		Data	Data	
or more GCSEs at A*		,	Norwich	45.52%	54.30%		discontinu	discontinu	
to C grades including Maths and English		Council	South Norfolk	64.47%	69.30%		ed	ed	
16 to 18-year olds who are not in	Year-on- year	Norfolk	Greater Norwich area	5.10%	5.30%	3.40%	No data	No data	
education,	reduction	County	Broadland	3.60%	3.50%	2.30%	No data	2.73%	
employment or	from 2006	Council	Norwich	9.50%	8.20%	6.10%	No data	5.88%	
training	value of 6%		South Norfolk	2.80%	2.80%	2.20%	No data	2.00%	
Proportion of		Annual	Greater Norwich area	33.80%	34.20%	36.80%	37.10%	38.40%	
population aged 16-	.Annual	Population	Broadland	29.30%	31.40%	28.60%	30.50%	39.70%	
64 qualified to NVQ level 4 or higher	increase	Survey	Norwich	35.90%	39.30%	38.80%	36.80%	38.50%	
level 4 of Higher			South Norfolk	35.70%	30.80%	42.00%	43.70%	36.90%	

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

3.52 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

3.53 The proportion of 16 to 18-year olds not in education, employment and training has decreased in Norwich and South Norfolk.

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

3.54 The proportion of the population aged 16-64 qualified to at least NVQ level 4 increased in the Greater Norwich area as a whole over the monitoring year, though there was a slight decline in South Norfolk.

### Objective 6: to make sure people have ready access to services

Indicator	Target	Source	Location	14/15	15/18	18/19	RAG status
			Greater Norwich	127		138	
IMD access to	Increase the number of LSOAs in the least deprived	IMD	Broadland	40	No	41	
service	50% on the IMD for access to housing and service	INID	Norwich	58	data	70	
			South Norfolk	29		27	

### Index of Multiple Deprivation access to services

3.55 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.

## 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:			Greater Norwich	a) 64% b) 8% c) 17% d) 9%	a) 67% b) 7% c) 18% d) 6%	
a) By private motor vehicles	Decrease in a),	Census (taken	Broadland	a) 70% b) 8% c) 9% d) 10%	a) 75% b) 6% c) 10% d) 6%	
b) by public transport c) By foot or	increase in b), c) and d)	every 10 years)	Norwich	a) 50% b) 9% c) 32% d) 7%	a) 52% b) 9% c) 33% d) 4%	
cycle d) work at or mainly at home			South Norfolk	a) 71% b) 5% c) 10% d) 12%	a) 73% b) 6% c) 10% d) 7%	

### Percentage of residents who travel to work

The data is derived from the 2011 Census and so is only released 3.56 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.

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

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Percentage of Conservation Areas	Voor on		Broadland	76%	76%	76%	70%	58%	
with appraisals	Year-on- year	LPA	Norwich	76%	76%	76%	76%	31%	
adopted in the last 10 years	increase		South Norfolk	12%	12%	19%	42%	52%	

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

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

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

Indicator	Target	Source	Locat	ion	14/15	15/16	16/17	17/18	18/19	RAG status
			Greater N	lorwich area	73%	No data	73%	73%	74%	
Net change in Local Sites in "Positive Conservation	Year-on-year	Norfolk		Broadland	75%		75%	77%	76%	
Management"	improvements	Wildlife Trust		Norwich	93%		90%	90%	87%	
			S	South Norfolk	70%		71%	69%	71%	
% of river assessed as good or better: a. Overall Status; b. Ecological Status; c. Biological Status; d. General Physio Chem Status; e. Chemical class	To increase the proportion of Broadland Rivers classified as 'good or better'.	Environment Agency	Broc	ıdland Rivers	No data	4% 4% 17% 23% 100%	4% 4% 17% 23% 100%	4% 4% 17% 23% 100%	4% 4% 17% 23% 100%	
						2015	2016	2017	2018	
			Broadland	NO2	No data	below 40ug/m3 below	below 40ug/m3 below	below 40ug/m3 below	below 40ug/m3 below	
Concentration of selected air	Decrease	LPA		PM10		40ug/m3	40ug/m3	40ug/m3	40ug/m3	
pollutants NO2 and PM10 (particulate matter)			Norwich	NO2	No data	12(LF); 55 (CM)	14 (LF); 56 (CM)	13 (LF); 51 (CM)	12 (LF); 54 (CM)	
				NOIWICII	PM10		15 (LF); 21 (CM)	16 (LF); 20 (CM)	16 (LF); 23 (CM)	16 (LF); 27 (CM)
			South	NO2	No data	18.6µg/m3	25.9 ug/m3	25.0 ug/m3	25.0 ug/m3	
			Norfolk	PM10		N/A	N/A	N/A	N/A	
	95% of SSSIs in			Broadland	94%	94%	94%	94%		
Percentage of SSSIs in favourable condition or unfavourable recovering condition	'favourable' or 'unfavourable recovering'	Natural England		Norwich	100%	100%	100%	100%	No data	
	condition		S	South Norfolk	93%	93%	93%	93%		
			Greater N	lorwich area	0	0	0	0	0	
Number of listed buildings	None	LPA		Broadland	0	0	0	0	0	
lost/demolished				Norwich	0	0	0	0	0	
			S	South Norfolk	0	0	0	0	0	
Percentage of new and				Broadland	54%	44%	46%	33%	36%	
converted dwellings on Previously	25%	LPA		Norwich	88%	69%	93%	81%	86%	
Developed Land			S	South Norfolk	28%	27%	9.4%	7.1%	9.1%	

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### Net change in local sites in "Positive Conservation Management"

- 3.58 Target has been achieved across the Greater Norwich area for increasing the proportion of sites in positive conservation management.
- 3.59 The percentage of river assessed as good or better

The percentage of rivers assessed as good or better has remained the same from the previous monitoring year.

### Concentration of selected air pollutants

3.60 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 of there having recently been significant improvement in air quality in St Stephens and Castle Meadow. 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.

3.61 No comparable data has been released this year.

#### Number of listed buildings lost/demolished

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

### Percentage of new and converted dwellings on Previously Developed Land

3.63 The target was achieved in Norwich and Broadland.

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

Indicator	Target		Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
		12/13 (pro rata)		Greater Norwich area	20,363	22,403	24,431	26,981	29,228	
Reduction in overall	Broadland	3,871	Norfolk	Broadland	3,619	3,985	4,089	4,584	5,162	
crime	Norwich	14,409	Police	Norwich	12,562	13,919	15,513	17,176	18,344	
	South Norfolk	4,033		South Norfolk	4,182	4,499	4,829	5,221	5,722	
Number of people			Norfolk	Greater Norwich area	196	173	194	177	210	
killed or seriously	Year-on-year reduction		County	Broadland	68	45	61	48	46	
injured in road traffic accidents	In the	in those KSI		Norwich	65	58	63	57	85	
accidents				South Norfolk	63	70	70	72	79	

#### Reduction in overall crime

3.64 There has been an increase in total crime in 2018/19. 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

3.65 The number of people killed or seriously injured in road traffic accidents has increased this year. The greatest increase is experienced in Norwich, where vulnerable road users such as pedestrians and cyclists make up the greatest number of casualties.

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

Indicator	Target	Source	Loc	Location		15/16	16/17	17/18	18/19	RAG status
Percentage of working age			Greater No	orwich area	5.50%	5.70%				
population receiving Employment	In line with annual	DWP benefits claimants	Broad	dland	4.40%	4.60%	Data	Data	Data .	
Support Allowance and incapacity benefits	national average	(NOMIS)	Non	wich	7.50%	7.80%	discontinued	discontinued	discontinued	
incapacity benefits			South Norfolk		4.10%	4.20%				
			Broadland	Males	80.8	80.7	81.1			
			broadiana	Females	84.3	84.4	84.5			
Life expectancy at birth of males and females	Increase at each survey	ONS	Norwich	Males	79.6	78.9	78.3	Data not yet released	Data not yet released	
and ferridies				Females	82.9	82.9	82.8			
			South	Males 	81.7	81.4	81.3			
			Norfolk	Females	84.3	84.4	84.8			
Percentage of physically active	Increase percentage	Public Health	Broad	dland	59.60%	62.10%	No data	63.00%	Data not yet released	
adults	annually	England	Nor	wich	61.10%	59.50%	No data	68.50%		
			South Norfolk		58.70%	63.40%	No data	69.10%		
		Public Health	Broadland		25.60%	No	19.90%	22.80%	Data not yet released	
Percentage of obese adults	Decrease percentage	England	Non	wich	19.60%	data	18.20%	22.50%		
			South	Norfolk	23%		22.70%	21.90%		
Percentage of obese children (yr 6)	Decrease percentage	Public Health England	Broad	dland	14.80%	13.40%	13.90%	15.50%	Data not yet released	
			Nor	wich	18.60%	18.60%	19.20%	18.70%		
			South	Norfolk	16.30%	15.80%	14.60%	15.10%		
	All 10 10 10 10 10 10 10 10 10 10 10 10 10		Broad	dland		A				
Health Impact Assessment	All development of 500+ dwellings to have health impact assessment	LPA	Nor	wich		Assume	ali relevant plann	ing applications o	comply	
	impaci assessiniem		South	Norfolk						
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 tab				n para 3.72		

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

3.66 The data for this indicator has been discontinued.

#### Life expectancy at birth

3.67 Life expectancy remained broadly the same as the previous year (2015-16).

### Percentage of physically active adults

3.68 The latest release of data suggests there is an increasing proportion of physically active adults across all three districts.

### Percentage of obese/overweight adults

3.69 There is an increasing proportion of obese/overweight adults in Broadland and Norwich, but a slight decrease in South Norfolk.

### Percentage of obese children

3.70 There is a slight rise in the proportion of obese children in Broadland and South Norfolk and a slight decline in Norwich.

### **Health Impact Assessment**

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

### Accessibility of leisure and recreation facilities

3.72 Data is not available for this indicator.

Area		14/15	15/16	16/17	17/18	18/19	RAG status
Greater Norwich area	Sports Halls Swimming Pool Indoor Bowls	No data					

## 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		Broadland	Adopted 2016	
h i i	community involvement Less than 5 years old	LPA	Norwich	Adopted 2016	
			South Norfolk	Adopted 2017	

### Statement of Community Involvement/Engagement

3.73 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 <u>webpage</u>

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

01603 431133 for Broadland District Council

0344 980 3333 for Norwich City Council

0808 168 3000 for South Norfolk Council

Annual Monitoring Report 2018-2019 January 2020



## Joint Core Strategy for Broadland, Norwich and South Norfolk

**Appendices** January 2020



Jobs, homes, prosperity for local people





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# Appendix A – Greater Norwich area Housing Land Supply Assessment 1st April 2019

### Summary

This note sets out the housing land supply position for the Greater Norwich area for the period 1 April 2019 to 31 March 2024. 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. The results of the first HDT were published on 19 February 2019. 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 2015/16 and 2017/18.

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

• 118% (5.89 years / 1,899 home surplus)

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

- Broadland: 170% (8.50 years / 1,935 home surplus)
- Norwich: 77% (4.03 years / 614 home deficit)

### • South Norfolk: 112% (5.61 years / 578 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 in accordance with the presumption in favour of sustainable development.
- 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:

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

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 strategic policies should be used as the starting point for calculating the 5 year land supply figure:

for the first 5 years of the plan, and

where the strategic housing policies plans are more than 5 years old, but have been reviewed and are found not to need updating.

In other circumstances, the starting point for calculating the 5 year land supply will be local housing need 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 SHMA² 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 2019, the calculation of annual average household growth has been based on the period 2019 to 2029. The affordability ratios used for the purposes of calculating LHN adjustment factor were the 2018 ratios published on 28<sup>th</sup> March 2019, 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 2019- 2029	2018 Median Affordability Ratio	Adjustment Factor	Annual LHN 2018 Based
BDC	396.8	9.23	1.33	527
NRW	504.9	7.03	1.19	601
SNC	690.8	8.78	1.30	897
Total Local Housing Need for Greater Norwich				2,024

<sup>&</sup>lt;sup>1</sup> Paragraph 030 Reference ID:3-030-20180913

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

#### **Past Under Delivery of New Homes**

- 10. The Planning Practice Guidance explains that the affordability adjustment is applied to the calculation of Local Housing Need to "to take account of past under-delivery". As such "the standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately" <sup>3</sup>.
- 11. It is therefore not necessary to add in any uplift to take account of historic underdelivery 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)<sup>4</sup>.

### **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. 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. Programmes provided by developers have then been reflected in the delivery forecast unless clear evidence has been identified that the site will not be delivered.
- 15. For sites with only outline permission or subject to allocation, the authorities have reviewed sites and approached developers to understand their delivery programme. Where 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. Further justification that supports the forecasts is set out in Appendix C1. Wherever possible Statements of Common Ground confirming the developer's intentions have been included.

Sites of 9 or fewer

<sup>&</sup>lt;sup>3</sup> Paragraph: 011 Reference ID: 2a-11-20190220

<sup>&</sup>lt;sup>4</sup> Paragraph 64, page 12.

<sup>&</sup>lt;sup>5</sup> National Planning Policy Framework, February 2019, Page 66

- 16. Under the Revised NPPF glossary definition of "Deliverable" 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".
- 17. 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

- 18. The Planning Practice Guidance states that:
- "All student accommodation, whether it consists of communal halls of residence or selfcontained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market".

and that

"To establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of students living in student only households, using the published census data" 6.

On this basis the Greater Norwich Authorities have included deliverable developments of student accommodation in their housing forecast on the basis of a ratio of 1 home to each 2.5 student bedrooms.

Older Peoples Housing and Residential Institutions

- 19. 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, against their housing requirement. 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".
- 20. 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.

Windfall

- 21. The National Planning Practice Guidance states that
  - " A windfall allowance may be justified in the 5-year supply if a local planning

<sup>&</sup>lt;sup>6</sup> Paragraph: 042 Reference ID: 3-042-20180913

authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework" 7.

22. The 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. A summary of this assessment is included in Appendix D1. The annual average number of windfall housing completions in each district has then been calculated. The annual average has then been discounted by a precautionary 33% to avoid over-estimation of supply. The discounted windfall average is then applied to the land supply assessment 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%

- 23. This approach is consistent with that agreed by Norwich City Council during the Independent Examination of their Site Allocations DPD.
- 24. The exclusion of major sites in Broadland and South Norfolk and the precautionary discounting result in a windfall assessment that is a cautious short-term estimate. Longer term forecasts of windfall may need to take alternative approaches.

### **Methodology for Calculating Housing Land Supply**

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

- 25. 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." 8
- 26. 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.
- 27. 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

<sup>&</sup>lt;sup>7</sup> Paragraph: 24 Reference ID: 3-24-20140306

<sup>&</sup>lt;sup>8</sup> Planning Practice Guidance, Paragraph 046 Reference ID: 3-046-20180913

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

28. 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." 9

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

Housing Land Supply Buffer

30. 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" 10.

- 31. Significant under delivery is measured against the Housing Delivery Test (HDT). The results of the first HDT were published on 19 February 2019, these remain the most recently published results of the HDT. 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 2015/16 and 2017/18.
- 32. 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

<sup>&</sup>lt;sup>9</sup> Planning Practice Guidance, Paragraph: 013 Reference ID:2a-013-20190220

<sup>&</sup>lt;sup>10</sup> Revised National Planning Policy Framework, February 2019, Paragraph 73

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**

33. 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.

Table 1 Greater Norwich 5YR HLS, 1 April 2019

Greater Norwich 5 Year Housing Land Supp	April 2019	
LHN Annual Requirement	2,024	
Requirement 1 April 2018 to 31 March	10,121	
Adjustment for Shortfall/Surplus	n/a	
Plus NPPF HDT Buffer at 5%	10,121 x 0.05	506
Total 5 year requirement 2018/19 to 2022/23	10,121+ 506	10,627
Revised Annual Requirement	2,125	
Supply of Housing	12,526	
Shortfall/Surplus of Supply	1,899	
Supply in Years	5.89	

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

- 34. 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.
- 35. 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."

36. 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

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

31st January 2020

### Appendix A1 – Broadland Area 5 Year Land Supply Assessment

Broadland 5 Year Housing Land Supply Ass	April 2019	
LHN Annual Requirement	527	
Requirement 1 April 2018 to 31 March 2	2,633	
Adjustment for Shortfall/Surplus	n/a	
Plus NPPF HDT Buffer at 5%	2,633 x 0.05	132
Total 5 year requirement 2018/19 to 2022/23	2,764	
Revised Annual Requirement	553	
Supply of Housing	4,699	
Shortfall/Surplus of Supply	1,935	
Supply in Years	8.50	

### **Appendix A2 – Norwich Area 5 Year Land Supply Assessment**

Norwich 5 Year Housing Land Supply Asse	April 2019	
LHN Annual Requirement	601	
Requirement 1 April 2018 to 31 March 2	3,003	
Adjustment for Shortfall/Surplus	n/a	
Plus NPPF HDT Buffer at 5%	3,003 x 0.05	150
Total 5 year requirement 2018/19 to 2022/23	3,153	
Revised Annual Requirement	631	
Supply of Housing	2,539	
Shortfall/Surplus of Supply	-614	
Supply in Years	4.03	

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

South Norfolk 5 Year Housing Land Supply A	April 2019	
LHN Annual Requirement	897	
Requirement 1 April 2018 to 31 March 2	4,486	
Adjustment for Shortfall/Surplus	n/a	
Plus NPPF HDT Buffer at 5%	4,486 x 0.05	224
Total 5 year requirement 2018/19 to 2022/23	4,486 + 224	4,710
Revised Annual Requirement	942	
Supply of Housing	5,288	
Shortfall/Surplus of Supply	578	
Supply in Years	5,288 / 942	5.61

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

The 2018-19 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 5.89 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 2019, using the former methodology<sup>1</sup>.

Table 1 sets out completions against the JCS NPA housing requirement since the base date of the plan. It shows a 6,076 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 3.36 years at 1<sup>st</sup> April 2019. The land supply for the NPA measured using the same approach at 1<sup>st</sup> April 2018 was 3.94 years. In the JCS AMR 2016-17 at 1<sup>st</sup> April 2017 housing land supply in the NPA was assessed as being 4.61 years.

Table 1 Completions against JCS NPA Housing Requirement

Year Actual/Projected Required Shortfall/Surplus Completions Completions 2008/09 1,193 1,825 -632 1,825 2009/10 923 -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 -15 1,825 2017/18 1,685 1,825 -140 +557 2018/19 2,382 1,825 Total 2008-19 13,999 20,075 -6,076

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<sup>&</sup>lt;sup>1</sup> The supply of housing in the NPA at 1 April 2019 and 1 April 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 2019 and 1 April 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 A	1st April 2019	
JCS NPA Housing Requirement 20	32,847	
JCS Annual Requiremen	t	1,825
Requirement 1 April 2019 to 31 N	9,125	
Adjustment for Shortfall/Surplus	4,340	
Plus NPPF HDT Buffer at 20%	Plus NPPF HDT Buffer at 20% (9,125 + 4,340) x 0.20	
Total 5 year requirement 2019/20 to 2023/24	16,158	
Revised Annual Requirement	3,232	
Supply of Housing	10,845	
Shortfall/Surplus of Supply	-5,313	
Supply in Years	3.36	

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

## 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. As part of the last Annual Monitoring Report (AMR), it was not possible to include the results of monitoring of the DM policies plan for the 2017/18 period. Therefore, this report covers the periods 1<sup>st</sup> April 2017-31<sup>st</sup> March 2018 and 1<sup>st</sup> April 2018-31<sup>st</sup> March 2019. The results of both monitoring periods are displayed in the table below.
- 4. 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.
- 5. It is anticipated that the draft (Regulation 18) GNLP will be published for consultation between January and March 2020. Publication of the Pre-Submission (Regulation 19) Draft plan is likely in early 2021 with formal submission to the Secretary of State in summer 2021, followed by public examination later in 2021 and adoption by September 2022.

- 6. 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 concludes 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: <a href="https://www.norwich.gov.uk/info/20199/adopted\_local\_plan/2494/regulation\_10a\_review\_of\_the\_local\_plan">https://www.norwich.gov.uk/info/20199/adopted\_local\_plan/2494/regulation\_10a\_review\_of\_the\_local\_plan</a>
- 7. 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 October 2018 and provides a timetable for the completion of local development documents. As a result, of the conclusions of the Regulation 10A review of the local plan, the LDS will require updating to provide information on the timescales for the preparation of a new local plan, and to reflect changes to the timetable for the GNLP. The LDS can be found at the following link: <a href="https://www.norwich.gov.uk/downloads/file/1671/local\_development\_scheme">https://www.norwich.gov.uk/downloads/file/1671/local\_development\_scheme</a>
- 8. In November 2019, cabinet adopted the 'Purpose Built Student Accommodation in Norwich: evidence and best practice advice notice' (the 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. By encouraging good quality and appropriate student accommodation in Norwich, the advice note helps to support the success of the city's higher educational institutions and the city's economic prospects.
- 9. The Affordable Housing Supplementary Planning Document (SPD) was adopted by cabinet in July 2019. This SPD replaces the previous 2015 SPD and supplements JCS policy 4 and local plan policy DM33. 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.

10. 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.

## **Summary of Main Findings**

- 11. The AMR gives an overview of progress against the adopted policies of the DM policies plan with reference to the Monitoring Framework contained in Appendix 9 of that plan and also reproduced as Appendix 3 of the Site Allocations plan.
- 12. Due to time and resource constraints, the local plan monitoring for the 2017/18 and 2018/19 periods has been streamlined. As a result, information is not available for some indicators. However, where possible, general commentary on progress and notable trends or applications has been included where specific data is not provided.
- 13. A number of the monitoring indicators specified within Appendix 9 of the DM policies plan do not necessarily yield information that a provides a full understanding of the effectiveness of the policy application and implementation. As concluded by the Regulation 10A review of the local plan, it is proposed that the monitoring indicators will also be revised as part of the full local plan review.
- 14. The following is a summary of the main findings of the AMR for 2017/18 and 2018/19:
  - Several applications were approved across both monitoring periods resulting the loss of/reduction of the Yare Valley Character Area (YVCA). These applications were largely residential developments, and the benefits of the proposals were considered to outweigh the harm to the YVCA.
  - The number of buildings on the Heritage at Risk Register increased in 2017/18 but reduced to the lowest number in 2018/19 since the adoption of the DM policies plan.
  - The air quality indicators Nitrogen Dioxide (NO<sub>2</sub>) and airborne particulates (PM<sup>10</sup>) remained relatively stable at the Lakenfields monitoring location. At the Castle Meadow monitoring location both NO<sub>2</sub> and PM<sup>10</sup> increased across both the 2017/18 and 2018/19 periods. In particular, the PM<sup>10</sup> figures for the 2018/19 period were at the highest level recorded since the adoption of the DM policies plan. The measured NO<sub>2</sub> at Castle Meadow has exceeded the Air Quality Objectives for England (DEFRA) target of 40µg/m3 (annual mean) for the past

few years and this remains the situation in the 2018/19 monitoring period. However, PM<sup>10</sup> figures for Castle Meadow and both air quality indicators at Lakenfields remain well below this threshold.

- In 2017/18, 640 new homes were granted consent, compared with 473 new homes in 2018/19. The 2018/19 figure represents the lowest number of homes permitted in a monitoring period since the adoption of the DM policies plan and continues the year on year decrease since the 2015/16 peak of 1,018 homes. These reduced figures are as a result of the reduced number of PBSA applications and Prior Approval office to residential applications in that year.
- However, the housing commitment figures at 1st April 2019 were at their greatest since the adoption of the DM policies plan. At 7,289 dwellings, this represents a significant increase on the 4,199 dwellings from the 2017/18 monitoring period. This is attributed to the ability to include both student accommodation and communal institutional accommodation within housing delivery figures following changes to the NPPF in 2018.
- Housing completions in 2017/18 (at 235 dwellings) were at their lowest since the adoption of the DM policies plan. However, the 2018/19 figure of 1,035 completed dwellings represents a significant increase and the highest annual housing completion figure since the adoption of the DM policies plan. This is the first time housing completions have exceeded the average annual target for Norwich set by the JCS of 477 dwellings per annum. This is partly attributed to the ability to include both student accommodation and communal institutional accommodation within housing completions calculations, as well as the delivery of several large Prior Approval office to residential schemes.
- The loss of office space across the city has continued across both the 2017/18 and 2018/19 monitoring periods. The 2017/18 period saw a significant loss at -40,205m². This is the greatest amount of floorspace lost since the adoption of the DM policies plan and is attributed to several significant Prior Approval office to residential schemes. However, 2018/19 saw -11,695m², which may suggest a slowing of this trend. It will be important to continue to monitor the loss of office floorspace.
- Both 2017/18 and 2018/19 monitoring periods saw significant losses of employment floorspace outside of defined employment areas at -47,990m<sup>2</sup> and -14143m<sup>2</sup> respectively.
- Norwich is performing well overall in terms of retailing. Where defined centres
  are operating below recommended thresholds, an appropriate amount and
  variety of other supporting services is ensuring their vitality and viability. More
  detailed information of the latest retail survey and trends can be found in the

- 2019 Norwich City Centre Shopping Floorspace Monitor & Local & District Centres Monitor.
- Since the last AMR, the Norwich Airport Masterplan was endorsed by Norwich
  City Council cabinet and scrutiny committee on 17th October 2019, subject to
  submission of a Surface Access Strategy to the council within a year of
  endorsement.

Policy	Indicator	2017/18	2018/19	Commentary
DM1	Achieving and delivering sustainable development	n/a	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	24	24	In both monitoring periods, 24 applications were refused on the grounds of loss of light or outlook. This number has been relatively constant since the 2016/17 monitoring period.
	Refusals on the grounds of schemes falling below minimum space standards	1	6	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 across both the monitoring periods. Several of the applications recorded for the 2018/19 period involve the change of use to large HMOs and construction of student accommodation.  It is important to note that the data recorded cannot include developments for the change of use from offices to residential under prior approval, as the General Permitted Development Order does not allow for the consideration of space standards as part of that process.

Policy	Indicator	2017/18	2018/19	Commentary
DM3	% of schemes meeting relevant Building for Life 12 criteria	No data	No data	It has not been possible to monitor the Building for Life 12 indicator for several years due to resource constraints.  However the emphasis has now shifted away from formal assessments to using the Bfl 12 assessment primarily as a discussion tool through the planning application process.
	% of built schemes achieving minimum net residential density (40dph)	71.2%	87.1%	There is no target for this indicator. The 2018/19 monitoring period saw 87.1% of all completed dwellings achieve a minimum density of 40dph. This is an increase over the numbers recorded in the 2017/18 period. However, these figures are 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 in schemes across the city including green roofs and bat/bird boxes. As an example, the Barn Road student accommodation will include both a green and blue roof, bird boxes and bee bricks. Schemes continue to make use of landscaping as well as including small mammal accesses within boundary fencing.
DM4	Renewable energy capacity permitted by type	0	0	There is no target for this indicator. No renewable energy schemes were submitted or determined within either monitoring period.
DM5	Number of schemes approved contrary to Environment Agency advice:  1) flood protection	1	0	The target for this indicator is no schemes approved contrary to Environment Agency advice.

Indicator	2017/18	2018/19	Commentary
2) water quality			The Environment Agency raised concerns in relation to several applications in 2017/18: 17/01355/F The Marlpit, for providing an unsatisfactory FRA. This application was approved following assessment that there were wider sustainability benefits and the properties would be of flood resilient design, and 18/00062/F Rear of St Faiths House Mountergate, due to risk to life/property. This application was withdrawn.  The Environment Agency raised concerns in relation to two applications in 2018/19: 18/01526/F New Mills Pumping Station, for providing an unsatisfactory FRA. This application was withdrawn. 18/00443/F Carrow Bridge House, for non-provision of an FRA. This application was refused, although not for reasons of flood protection or water quality.
Development resulting in the loss of, or reduction in the area of:  1) SSSI  2) County Wildlife sites  3) County Geodiversity sites	0	0	The target for this indicator is no loss of SSSI, CWS or CGS sites. There was no reported loss of these sites for both the 2017/18 and 2018/19 monitoring periods.
Development resulting in a loss or reduction in area within the Yare Valley Character Area (m²)	0	814	The target for this indicator is no loss of or reduction of the Yare Valley Character Area (YVCA) as a result of development. In the 2017/18 period, there was no loss of the YVCA.  In the 2018/19 period, two applications were approved
	Development resulting in the loss of, or reduction in the area of:  1) SSSI 2) County Wildlife sites 3) County Geodiversity sites  Development resulting in a loss or reduction in area within the Yare	Development resulting in the loss of, or reduction in the area of:  1) SSSI 2) County Wildlife sites 3) County Geodiversity sites  Development resulting in a loss or reduction in area within the Yare	Development resulting in the loss of, or reduction in the area of:  1) SSSI 2) County Wildlife sites 3) County Geodiversity sites  Development resulting in a loss or reduction in area within the Yare  0  814

Policy	Indicator	2017/18	2018/19	Commentary
				Cock Public House, Long John Hill into a dwelling and for the construction of two new dwellings resulted in the reduction of 560m² of the YVCA. In this instance, the proposal was considered to result in harm to the YVCA due to impacts on its openness and undeveloped character. However, these impacts were considered to be confined to a small area and not to damage the character of the YVCA overall.  In addition, 254m² of YVCA was lost at The Alders Cooper Lane for a new dwelling (18/01026/F). In this case, the benefits of the proposal were considered to outweigh the harm to the YVCA given that the council could not demonstrate a 5-year land supply at the time, and given the environmental characteristics of this particular site.
DM7	Number of protected trees/hedgerows lost as a result of development	No data	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.
	No of new street trees delivered through development	0	0	There is no target for this indicator. No new planning obligations were raised in either 2017/18 or 2018/19 relating to the provision of street trees, neither was there any spend of commuted sums collected in previous years for the planting of new trees. This was also the situation represented in the 2016/17 monitoring period. The development management team have secured new street planting through the imposition of planning conditions, however these are not directly monitored.

Policy	Indicator	2017/18	2018/19	Commentary
DM8	Development resulting in a net loss of open space (contrary to policy)	No data	No data	The target for this indicator is no loss of open space (contrary to policy DM8). Due to time and resource constraints, it has not been possible to monitor this indicator for the 2017/18 and 2018/19 monitoring periods.
	Areas of new open space and/or play space delivered through development	-	-	There is no target for this indicator.
	space delivered tillough development			Within the 2017/18 period, the transfer to the Council of two areas of public open space off of Crome Road in relation to a S106 agreement raised in 2006 (05/00569/F) was completed.
				No new obligations were raised in the 2018/19 period for the provision of open space and play. Several park and play spaces across the city were upgraded including the Runnell Play Project, Mile Cross Gardens Play Project and Castle Green Play Project.
DM9	Number of listed buildings lost or demolished	0	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 either monitoring period.
	Number of buildings on the Heritage at Risk Register	31	26	The target for this indicator is a reduction in the number of Heritage at Risk buildings from 32, which is the

Policy	Indicator	2017/18	2018/19	Commentary
				2012/13 baseline. The 2017/18 period saw an increase in buildings considered at risk from the 2016/17 figure of 28. However, the number of buildings recorded on the register for the 2018/19 period represents the lowest number of buildings at risk since the adoption of the plan.  The Council continues to work with property owners and Historic England to address the most serious problems of deterioration and neglect on the 8 priority buildings on the register.
DM10	Number of permitted installations/prior approval notifications within: 1) Conservation areas 2) Other protected areas (where planning permission is required)	3	2	There is no target for this indicator. The number of telecoms applications approved in protected areas has been steadily decreasing since the peak of 5 applications in 2015/16.
	Number of appeals lost where officer recommendations are overturned	N/A	N/A	The target for this indicator is no appeals lost. There were no appeals of telecommunications applications in either monitoring period.
DM11	Number of hazardous substance consents	1	0	There is no target for this indicator. In 2017/18, there was one hazardous substances consent 17/00914/H. This application was made to vary a previous consent to cover additional hazardous substances required for the manufacture of a new herbicide.
	Impact of development on air quality indicators:	-	-	2017/18 Lakenfields

Policy	Indicator	2017/18	2018/19	Commentary
Policy	1) NO2 2) PM10	2017/18	2018/19	NO₂ - 13 μg/m3 (slight decrease from 2016/17) PM¹¹⁰ - 16 μg/m3 (no change from 2016/17) Castle Meadow NO₂ - 51 μg/m3 (reduced from 2016/17) PM¹¹⁰ - 23 μg/m3 (increased from 2016/17) $\frac{2018/19}{2018/19}$ Lakenfields NO₂ - 12 μg/m3 (slight decrease from 2017/18) PM¹⁰ - 16 μg/m3 (no change from 2017/18) Castle Meadow NO₂ - 54 μg/m3 (increased from 2017/18) PM¹⁰ - 27 μg/m3 (increased from 2017/18) $\frac{1000}{2000}$ 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 NO₂ levels in the 2018/19 period. In contrast, Castle Meadow measured an increase in both NO₂ and PM¹⁰ compared with the previous monitoring period. It is worth noting, however, that the 2018/19 figure of 54 μg/m3 for NO₂ is still well below the peak figure of 66 μg/m3 measured in 2014/15. The PM¹⁰ figure of 27μg/m3 at Castle Meadow is the highest particulates measurement since the adoption of
				the local plan.

Policy	Indicator	2017/18	2018/19	Commentary
				The Air Quality Objectives for England (DEFRA) specify that annual mean NO <sub>2</sub> should not exceed 40µg/m3. The measurements at Castle Meadow have exceeded this threshold for the past few years. The same targets outline that annual mean PM <sup>10</sup> 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	640	473	Permissions and prior approvals were granted in the monitoring period for a total of 640 new homes in 2017/18 and 473 in 2018/19.  The 2018/19 figure represents the lowest number of homes permitted since the local plan was adopted and continues the year on year decrease since the peak of 1018 homes permitted in 2015/16. The 2017/18 and 2018/19 figures include homes from both prior approval changes of use from office to residential and student and communal accommodation.  Notable new permissions within 2017/18 include consent for 199 homes at Sentinel House on Surrey Street and 42 dwellings at the former BT Telephone Exchange on Westwick Street. In 2018/19, permission was granted for 151 dwellings at St Mary's Works, Duke Street and 73 dwellings on Land North of Carrow Quay.
	Annual change in total housing commitment (number of dwellings	4199	7289	At 1 April 2018 the total number of dwellings with outstanding planning stood at 4,199. The total number as

Policy	Indicator	2017/18	2018/19	Commentary
	with outstanding planning permission but unbuilt)			of 1st April 2019 was 7,289 which is significantly greater than the housing commitment of the previous monitoring periods. This significant increase is likely due to 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	235	1035	The number of new homes completed dipped to the lowest figure in 2017/18 since the adoption of the local plan, at 235 dwellings. However, housing completions increased significantly within the 2018/19 monitoring period at 1035 dwellings. This is the first time housing completions have exceed the average annual 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. In addition, a number of significant office to residential prior approval schemes were completed including Sentinel House on Surrey Street (191 dwellings).
	Housing land supply	N/A	N/A	This information is reported in the main body of the JCS AMR.
DM13	Number of HMO licences	No data	No data	No specific data were collected for this indicator. The requirements and guidelines for HMO licenses under Private Sector Housing differ from issues covered under the planning process. Therefore, the number of HMO

Policy	Indicator	2017/18	2018/19	Commentary
				licenses does not provide any indication as to the success of policy DM13.  The number of applications for large HMOs has continued to be prevalent throughout both monitoring periods.
				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. There have been multiple successful appeals against the refusal of HMO applications, including 18/00544/F 21 Sotherton Road, 18/01721/F 2 Edgeworth Road and 18/01583/U 36 Primula Drive.
	Institutional development permitted on housing allocations (hectares)	0.65	0.42	The target for this monitoring indicator is no institutional development permitted on allocated housing land. Both monitoring periods saw the loss of such land to institutional development. In 2017/18, this was as a result of consents at the Bartram Mowers site and St Stephens Towers. In 2018/19, this loss was attributed to the consent at Barn Road car park.  Although the target for this indicator was not strictly met, the development consented on allocated housing land
	Number of student bedrooms permitted	1425	404	was of a residential nature.  There is no target for this indicator. There was a significant increase in the number of student bedrooms permitted in the 2017/18 period. This is attributed to

Policy	Indicator	2017/18	2018/19	Commentary
				several large schemes being granted consent in this period such as 614 beds at St Crispins House and 702 beds at St Stephens Towers. The number of student bedrooms permitted in 2018/19 was reduced significantly, as fewer and smaller schemes were approved. Examples include Barn Road car park for 120 beds and Mary Chapman Court for 40 beds.
	Number of residential institution bedrooms permitted	3	46	There is no target for this indicator. The number of institutional bedrooms permitted in 2017/18, at 3 bedrooms, is relatively low compared with previous monitoring years. This resulted from a change of use of a dwelling to a residential educational training facility at 40 Angel Road and a variation to the Bartram Mowers permission to include one additional living unit. In 2018/19, the number of bedrooms increased to 46, more in line with previous monitoring periods. This was attributed to a single application for the conversion of an existing care home to provide 46 bed spaces (net increase of 7 beds) at Mountfield, Millcroft.
DM14	Number of new pitches permitted	0	0	The target for this indicator is no overall loss of pitches.  There were no new pitches permitted within either the 2017/18 or 2018/19 monitoring periods. It is understood that Broadland Housing Association are intending to commence implementation permission 16/01554/F to create 13 new pitches and an associated amenity block before it expires in January 2020.

Policy	Indicator	2017/18	2018/19	Commentary
	Loss of existing pitches	0	0	The target for this indicator is no overall loss of pitches.  No pitches were lost within either the 2017/18 or the 2018/19 monitoring periods.
DM15	Number of dwellings lost to other uses (where planning permission is required)	0	0	There is no target for this indicator. This indicator records implemented permissions only. In 2017/18 application 17/01516/F 40 Angel Road was approved for the change of use of one dwelling to C2 institutional accommodation. However, this permission has not yet been implemented and therefore the loss of the dwelling has not occurred. Similarly, there were no recorded losses of dwellings to other uses within the 2018/19 period.
	Loss of allocated housing land to other uses (number of allocated dwellings)	250	40	There is no target for this indicator. The 2017/18 monitoring period saw the loss of 250 dwellings allocated at St Stephens Towers when application 17/00357/F was approved for 702-bedroom student accommodation. In 2018/19, application 18/01315/F Barn road Car Park saw the loss of 40 allocated dwellings with the approval of a 302-bed student accommodation block.  In the above cases, there was acknowledgement that development would be contrary to the respective site allocations. Consent was granted, on balance, given ownership circumstances, unviability of the other elements of the allocation policies and the benefit of relieving pressures that student living has elsewhere in

Policy	Indicator	2017/18	2018/19	Commentary
		,		the city as well as addressing the need for student accommodation in the city.  Since the above decisions, the Council has adopted the Purpose Built Student Accommodation in Norwich: Evidence and Best Practice Advice Note, which outlines the need for student accommodation within the city and setting out best practice principles as a guide to development proposals.
DM16	Use Class B development permitted (m²):  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 100,000m² increase by 2026.  2017/18 B1a (Offices): minus 40,205m² B1b (Research and Development): 113m² B1c (Industrial uses suitable in residential areas): minus 217m²  2018/19 B1a: minus 11,695m² B1b: 0m²
				B1c: 145.4m <sup>2</sup> The data for both monitoring periods shows that the trend of the loss of office space within the city is continuing. The 2017/18 period saw significant losses; the greatest loss of any previous monitoring period since the local plan was adopted. However, although there was still

Policy	Indicator	2017/18	2018/19	Commentary
Policy	Indicator	2017/18	2018/19	a loss of office space in 2018/19 this was at significantly reduced scale and could suggest a slowing of this trend. The significant loss of office space within the city is attributed to the change of use of office to residential dwellings under the prior approval process. Applications of particular note include 17/00304/PDD for 199 residential units at Sentinel House and 17/00357/F for the provision of 702 student bedrooms at St Stephens Towers. The Council is considering its options for responding to this loss, including the potential introduction of an Article 4 Direction.  R&D floorspace has remained relatively stable over the last few monitoring periods with little or no change reported.  2018/19 was the first time positive floorspace was reported for light industrial uses. Over previous monitoring periods, continual losses of light industrial floorspace was as a result of a proliferation of changes of use to leisure uses. The positive figure for 2018/19 is attributed to the construction of new floorspace at Old Hall Road 18/00471/F and change of use at 41 Barker
1	oyment uses permitted(net	a)-7952	a)182	The target for this indicator is to contribute to the JCS
	ge): thin employment areas sewhere	b) -47990	b)-14143	target of 100,000m <sup>2</sup> increase by 2026.  2017/18

Policy	Indicator	2017/18	2018/19	Commentary
				Employment Area –
				Gains: 3126m <sup>2</sup>
				Losses: minus 11,295 m <sup>2</sup>
				Net change: minus 7952 m <sup>2</sup>
				Elsewhere -
				Gains: 711 m <sup>2</sup>
				Losses: minus 49,249 m <sup>2</sup>
				Net change: minus 47,990 m <sup>2</sup>
				2018/19
				Employment Area –
				Gains: 462 m <sup>2</sup>
				Losses: minus 280 m <sup>2</sup>
				Net change: 182 m <sup>2</sup>
				Elsewhere –
				Gains: 1663 m <sup>2</sup>
				Losses: minus 15,806 m <sup>2</sup>
				Net change: minus 14,143 m <sup>2</sup>
				The overall trend across both the 2017/18 and 2018/19 monitoring periods was the loss of employment floorspace across the city as a whole. Encouragingly, 2018/19 saw a net increase in the amount of employment floorspace within designated employment areas.
DM17	Loss of B1a use class office space	-5902	-2063	The target for this indicator is no loss of small office space
	under 1,500m² (m²)			(under 1,500 m²).

Policy	Indicator	2017/18	2018/19	Commentary
				The data show that the target for this indicator was not met for both monitoring periods and the net loss of office space continued through to 2018/19. 2017/18 saw a significant loss in floorspace compared to the previous monitoring year, however this trend appears to have slowed over the 2018/19 period. Across both monitoring periods, the loss of office floorspace under 1500m² is largely attributed to permissions for residential dwellings or changes to Class D leisure and non-residential institution uses.
	New small/medium business space permitted (premises up to 1500m²) (m²)	4818	2645	The target for this indicator is to contribute to the JCS target of 100,000m <sup>2</sup> increase by 2026.
				The upturn in consents for small and medium scale business space continued, in 2017/18. However, this was not the case for 2018/19. Most notably there were no
				permissions for R&D, light industrial or storage and distribution uses in the 2018/19 period which has
				contributed to the reduction in permitted business floorspace overall within the latest monitoring period.
DM18	Main town centre uses permitted (m²):	a) 1708	a) 5507	There is no target for this indicator.
	a) within defined centres b) elsewhere	b) 19852	b) 7010	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

Policy	Indicator	2017/18	2018/19	Commentary
Policy	New retail floorspace permitted (m²) in: a) city centre b) district centres c) local centres	a)-1382 b) -32 c) 0	a)-2417 b) -183 c) 0	both 2017/18 and 2018/19 monitoring periods, a greater number of main town centre uses were permitted outside of defined centres, contrary to the core aims of the policy. This was particularly the case for the 2017/18 period and is likely as a result of 17/00605/U at 10 St Francis Way and 17/01607/U at Guardian Road Industrial Estate both for changes of use of significant floorspace to gyms.  The target for this indicator is the contribution towards the provision of 20,000m² net of comparison goods floorspace to 2016 and no loss of floorspace in district and local centres.  Across both monitoring periods, and across the city overall, there was a net loss of retail floorspace. This trend was more evident in 2018/19. Only district centres saw any gain in retail floorspace during 2017/18. This is concurrent with the findings of the latest Retail Monitor which includes further explanation as to the loss of retail floorspace overall. Interestingly, local centres saw no change in the retail floorspace across both monitoring
	Development approved contrary to the maximum indicative floorspace limits for individual units in appendix 4	0	0	periods. The data shows that the loss of retail floorspace does not contribute to the JCS target.  There is no target for this indicator. No development was approved within district or local centres contrary to the indicative scales of development set out in Appendix 4 of
	(unless specifically allocated): a) within defined centres			the DM Policies Plan.

Policy	Indicator	2017/18	2018/19	Commentary
	b) elsewhere			
	Number of C1 hotel: a) floorspace (m²)	a) 3381	a)3565	There is no target for this indicator. No new hotel bedrooms were permitted in 2016/17. Both the 2017/18
	b) bedrooms permitted	b) 168	b) 92	and 2018/19 monitoring periods saw relatively high permitted hotel floorspace and bedrooms compared with previous monitoring periods .
				Notable permissions in 2017/18 include 17/0016/F Land and Buildings North East of Spitfire Road for 125 beds. Applications 16/01950/O St Marys Works for 85 beds, 18/01140/MA at The Quebec for 2 beds and 18/01453/U 547 Earlham Road for 5 beds were approved in 2018/19.
	Improvements to public realm as a result of development	-	-	There is no target for this indicator. Due to time and resource constraints, it has not been possible to monitor this indicator for the 2017/18 and 2018/19 monitoring periods.
DM19	Use Class B1a office floorspace permitted (m²):	a) 0	a) 544	The target for this indicator is to contribute to the JCS target of 100,000m <sup>2</sup> increase by 2026.
	a) within the office development priority area (ODPA)	b) 639	b) 776	The 2016/17 monitoring period saw a significant upturn in
	b) elsewhere in city centre c) in employment areas	c) 114	c) 209	the number of consents for new office floorspace. For the 2017/18 period, the number of consents were reduced on
	d) elsewhere	d) 72	d) 343	the previous year's figures across all areas of the city, although the ODPA appears to have been particularly affected with no change in permitted floorspace. The 2018/19 period is more encouraging with increased permitted office floorspace in all areas of the city

Policy	Indicator	201	17/18	2018/19	Commentary
			,		compared with the 2017/18 figures. A notable permission from this year includes 18/01505/F Lloyds TSB 2 Surrey Street for the change of use of the first and second floors to offices which contributed 544m² within the ODPA. It is important to note these trends in the context of overall net loss of floorspace across the city.
	Loss of office floorspace (m²)		97.2%	-11695	The target for this indicator is to contribute to the JCS target of 100,000m² increase by 2026.  The data for both monitoring periods shows that the trend of the loss of office space within the city is continuing. The 2017/18 period saw significant losses; the greatest loss of any previous monitoring period since the local plan was adopted. However, although there was still a loss of office space in 2018/19 this was at significantly reduced scale and could suggest a slowing of this trend. The significant loss of office space within the city is attributed to the change of use of office to residential dwellings under the prior approval process. Applications of particular note include 17/00304/PDD for 199 residential units at Sentinel House and 17/00357/F for the provision of 702 student bedrooms at St Stephens Towers. The Council continues to look into what would be an appropriate response to this loss, including the potential introduction of an Article 4 Direction.
	Percentage of measured ground floor	PC01	87.3%	88.8%	There is no target for this indicator.
	frontage in A1 retail use in each	PC02	95.6%	85.2%	

Policy	Indicator	201	L7/18	2018/19	Commentary
	defined retail frontage zone in the	PC03	97.1%	97.1%	The aim of the policy is to ensure that none of the
	centre (primary/secondary/large	PR01	69.0%	69.7%	specified frontage zones drop below the thresholds
	district centres)	PR02	72.2%	71.4%	indicated in the Main Town Centre and Retail Frontages
		PR03	83.7%	84.1%	SPD. There are specific thresholds for each of the retail
		PR04	N/a	N/A	centres.
		PR05	N/a	N/A	
		PR06	67.7%	66.0%	In 2017/18, none of the frontages dropped below their
		SR01	76.2%	74.1%	minimum thresholds. The most significant decrease was
		SR02	61.1%	65.4%	PRO2 The Lanes East (Bedford Street/Bridewell Alley),
		SR03	60.5%	59.2%	which still had low vacancy levels but many units have
		SR04	N/a	N/A	changed use to bars, cafes and other leisure uses.
		SR05	N/a	N/A	In 2010/10, only one vetail fromtone area CD03 Ct
DM20 <sup>11</sup>		LD01	62.4%	61.0%	In 2018/19, only one retail frontage area SR03 St
		LD02	N/a	N/A	Benedicts Street dropped below the minimum threshold.
					This frontage area had a relatively high proportion of A2, A3 and A4 uses. The most significant decrease in retail
					frontage was at PC02 Castle Mall. This is associated with
					the reduction in vacancy rates within the Mall, through
					the introduction of non-retail leisure uses.
					the introduction of non-retainersure uses.
					It is worth noting that there still exists permitted
					development rights, which results in a degree of flexibility
					of the uses across the city such as the ability to change
					between shops and financial and professional services
					etc.
		PC01	87.3%	88.8%	There is no target for this indicator.

<sup>&</sup>lt;sup>11</sup> See note at end of table for list of defined centres referred to in policies DM20 and DM21.

Policy	Indicator	201	L7/18	2018/19	Commentary
		PC02	95.6%	85.2%	
		PC03	97.1%	97.1%	See above commentary.
		PR01	69.0%	69.7%	
		PR02	72.2%	71.4%	
		PR03	83.7%	84.1%	
	Zanas uda sus tha usas sution of	PR04	N/a	N/A	
	Zones where the proportion of	PR05	N/a	N/A	
	measured ground floor frontage in A1 retail use is below the indicative	PR06	67.7%	66.0%	
	minimum threshold specified in SPD	SR01	76.2%	74.1%	
	Illillillialli tillesilola specillea ili 3PD	SR02	61.1%	65.4%	
		SR03	60.5%	59.2%	
		SR04	N/a	N/A	
		SR05	N/a	N/A	
		LD01	62.4%	61.0%	
		LD02	N/a	N/A	
	% of units within zones breaching	SR03	-	23%	There is no target for this indicator. The purpose of this
	indicative policy thresholds (if any)				
	which support the evening				In 2017/18, no zones breached the minimum thresholds
	economy/vitality and viability				and therefore data were not collected for this indicator.
					In 2018/19, 23% of the uses within SR03 St Benedicts
					Street supported the evening economy and the
					vitality/viability of the city overall. This particular area has
					a significant proportion of bars and restaurants, which
					contributes strongly to its character and serves as an
					extension of the services and leisure facilities available
					within the city centre.
DM21		DC01	52.9%	52.9%	

Policy	Indicator	203	17/18	2018/19	Commentary
		DC02	73.3%	73.3%	The target for this indicator is that the proportion of retail
		DC03	47.4%	47.4%	uses within district centres should not fall below 60%, and
		DC04	53.3%	54.8%	in local centres, 40%.
		DC05	59.1%	57.1%	in local centres, 40%.
		DC06	82.4%	80.0%	Overall, vacancy rates have increased to 11.7% from 9.6%
		DC07	53.8%	53.8%	in 2016. In 2018, the number of units has decreased from
		DC08	64.9%	64.9%	198 to 197; however, this is through the merging of 2
		DC09	57.1%	50.0%	units in Plumstead Road (DC04). The vacancy figures show
		DC10	55.0%	55.0%	a gradual decline over recent years with 88% of retail
		LC01	85.7%	85.7%	units now occupied. The percentage of non-retail units is
		LC02	53.6%	50.0%	41%, which is a gradual decrease from recent monitoring
	Proportion of A1 uses within district	LC03	57.1%	57.1%	years.
		LC04	64.3%	64.3%	
		LC05	55.6%	55.6%	7 out of 10 district centres have exceeded the 40% non-
	and local centres	LC06	47.6%	47.6%	retail threshold and 7 out of 30 local centres have
		LC07	25.0%	25.0%	exceeded the 60% non-retail threshold. Earlham House
		LC08	87.5%	87.5%	(DC06), which was previously the poorest performing
		LC09	50.0%	53.8%	district centre, has now been refurbished and enjoys
		LC10	50.0%	50.0%	occupation of 15 of 17 units and is one of the best
		LC11	42.9%	42.9%	performing retail centres. Bowthorpe (DC01) is the
		LC12	66.7%	66.7%	poorest performing with a vacancy rate increase from
		LC13	50.0%	50.0%	17.6% in 2016 to 35.3% in 2018. Hall Road (DC09) was
		LC14	28.6%	28.6%	regarded as poorly performing in 2016; the situation
		LC15	50.0%	50.0%	remains unchanged with 2 out of 7 long-term vacant units
		LC16	65.0%	55.0%	& 3 of the occupied units being non-A1 retail use. Two of the district centres (DC03: Eaton Centre & DC07: The Larkman) continue to have all of their units occupied.
		LC17	81.2%	81.2%	
		LC18	54.5%	54.5%	
		LC19	66.7%	66.7%	

Policy	Indicator	201	L7/18	2018/19	Commentary
		LC20	70.0%	72.7%	As recorded in the 2019 Retail Monitor, despite a number
		LC21	80.0%	80.0%	of centres offering non-retail uses above the thresholds
		LC22	66.7%	66.7%	outlined in policy DM21, overall, the district and local
		LC23	60.0%	60.0%	centres continue to perform their function and offer an
		LC24	22.2%	22.2%	appropriate range of services and facilities.
		LC25	80.0%	80.0%	
		LC26	50.0%	50.0%	
		LC27	20.0%	20.0%	
		LC28	35.7%	35.7%	
		LC29	85.7%	85.7%	
		LC30	53.6%	50.0%	
	Loss of anchor food store floorspace	0		0	The target for this indicator is no loss of anchor foodstore
	(m <sup>2</sup> )				floorspace.
					There has been no loss of anchor foodstore floorspace
					within defined centres across the monitoring periods.
					Within the Aylsham Road District Centre (DC05) one
					foodstore (Lidl) closed but re-opened in a larger store
					within the same centre.
	Proportion of community uses/non-	No	data	No data	There is no target for this indicator.
	retail uses in district and local centres				Due to time and recovered and the latest the latest to
					Due to time and resource constraints, it has not been
					possible to monitor this indicator for either the 2017/18
					or 2018/19 monitoring periods.
DM22	New community facilities permitted	No	data	No data	There is no target for this indicator.
DIVIZZ	New Community facilities permitted	INO	uata	ino data	There is no target for this indicator.

Policy	Indicator	2017/18	2018/19	Commentary
				Due to time and resource constraints, it has not been
				possible to monitor this indicator for the 2017/18 and
				2018/19 monitoring periods.
	New education or training facilities permitted	No data	No data	There is no target for this indicator.
				Due to time and resource constraints, it has not been
				possible to monitor this indicator for the 2017/18 and
				2018/19 monitoring periods.
	Loss of a) community facilities and b) Public Houses	a) No data	a) No data	There is no target for this indicator.
				Due to time and resource constraints, it has not been
		b) 2	b) 1	possible to monitor the loss of community facilities for
		·		the 2017/18 and 2018/19 monitoring periods.
				During 2017/18, two permissions were granted which would result in the loss of public houses 17/01706/F King Edward VII, Aylsham Road for the change of use to an Islamic Community Centre and Café and 17/02033/F The
				Quebec, Quebec Road for the change of use to a B&B.
				In 2018/19, one application was approved for the conversion of the existing pub to residential and construction of two additional dwellings at The cock Long John Hill (18/00534/F).
	ACV registrations	2	2	There is no target for this indicator.
				Within the 2017/18 period, the new ACV registrations were for The Brickmakers and Fiveways pubs. In 2018/19,

Policy	Indicator	2017/18	2018/19	Commentary
				a further pub, The York Tavern, was registered as well as Train Wood, which was registered for its benefits and contribution to social wellbeing or social interests of the local community.
DM23	Development of new evening economy and leisure uses	No data	No data	The target for this indicator is to contribute to the JCS target for the provision of 3000(m²) of leisure and tourism floorspace by 2016.  Due to time and resource constraints, it has not been possible to monitor this indicator for either the 2017/18 or the 2018/19 monitoring periods.
	Development of late night uses in the a) late night activity zone and b) elsewhere (m²)	a) 0 b) 46	a) 0 b) 46	The target for this indicator is no late night activity uses outside of the late night activity zone (LNAZ).  In 2017/19, one application for a late night use was permitted outside of the LNAZ. This comprised 46m² at Gonzos on London Street for the creation of a roof top bar for a temporary period. Whilst, strictly, the target has not been met, it should be noted that the creation of the rooftop bar forms part of an existing late night premises and is very close to the boundary of the late night activity zone, as well a number of other late night uses located along Queen Street.  This permission was renewed for a further temporary period within 2018/19.

Policy	Indicator	2017/18	2018/19	Commentary
DM24	Floor space (m <sup>2</sup> ) for A5 uses within: a) district centres	a) 125	a) 0	There is no target for this indicator.
	b) local centres c) elsewhere	b) 96	b) 0	The purpose of this indicator is to monitor whether A5 hot food takeaway floorspace is being directed to defined
	c) eisewhere	c) 0	c) 0	centres to minimise their impacts on residential amenity and on highway and pedestrian safety.
				The 2017/18 monitoring period saw more A5 floorspace approved overall than the 2018/19 period. This consisted of two permissions within district centres at Aylsham Road (85m²) and Plumstead Road 40m²). Interestingly, no new A5 floorspace was recorded in the 2018/19 period.
	No refusals on grounds of amenity	0	0	There is no target for this indicator.
				There were no refusals on ground of amenity for A5 uses within either of the monitoring periods.
DM25	Number of approvals and refusals to vary conditions on retail warehousing	0	0	There is no target for this indicator.
	and other retail premises			There were no applications to vary conditions on retail warehousing and other retail premises within either the 2017/18 or 2018/19 monitoring periods.
DM26	Progress on the implementation of the UEA Masterplan	-	-	The strategic masterplan for the UEA is embodied in the UEA Development Framework Strategy, November 2010 (the DFS) which identified three areas for development; Earlham Hall, the Blackdale School site and land between Suffolk Walk and Bluebell Road. Each of these has been

Policy	Indicator	2017/18	2018/19	Commentary
				allocated in the adopted Norwich Site Allocations Local Plan: respectively sites R39, R40 and R41.
				The UEA current projections are for an incremental increase in overall student numbers of 22% from 2016/17 (17,195 total full and part-time students) to 2035/36 (22,000 total students). Progress has been made on a new DFS, which has been reported to Cabinet in summer 2019, and will be subject to public consultation in early 2020 as part of the evidence base for the Greater Norwich Local Plan.  Notable permissions at the University across the last two
				monitoring periods include 17/01296/F for 7150m <sup>2</sup> of new academic floorspace on Chancellors Drive, which was complete and occupied at the start of the academic year 2019/20. An application has been submitted for Sky House 19/01427/F 15,757m <sup>2</sup> of academic floor space, which is currently pending determination.
DM27	Progress on the implementation of the Airport masterplan	-	-	Work continued on the production of a masterplan for the Airport, being led by the Airport itself in discussion with Norwich City and Broadland District councils. The draft masterplan was published for consultation in July 2017. The masterplan was endorsed by Norwich City Council cabinet and scrutiny committee on 17th October 2019. This was endorsed with the provision that a Sustainable Access Strategy (SAS) is provided within 12 months of the endorsement date, which will help to

Policy	Indicator	2017/18	2018/19	Commentary
				inform site specific allocations and other strategic policy for the Airport in the emerging Greater Norwich Local Plan.
	Relevant applications	-	-	During 2017/18, there were no significant permissions for new development within the airport operational area during the monitoring year.  During 2018/19, 17/01555/O was approved for a vehicle hire business at land and premises opposite 153 Holt Road. This site is not within the airport operational boundary but is nearby.  A planning application (18/01621/VC) was submitted in late 2018 to vary conditions on an earlier consent (16/00965/VC). This has been revised to allow the development of 50% of the application site for aviation uses and 50% for general employment uses in accordance with the airport masterplan. A decision on this application is pending.
DM28	Site specific obligations for transport improvements	0	0	There is no target for this indicator.  No new planning obligations were raised for transport improvements within either monitoring periods.
	Walking and cycling levels at each main cordon	No data	No data	There is no target for this indicator.  Due to time and resource constraints, it has not been possible to monitor this indicator for either the 2017/18 or the 2018/19 monitoring periods.

Policy	Indicator	2017/18	2018/19	Commentary
	CIL spending on Reg 123 List	0	0	There is no target for this monitoring indicator.
				During both 2017/18 and 2018/19 monitoring periods, there was no spend of commuted sums for transport improvements.
	Enhancements to strategic cycle network	-	-	There is no target for this indicator.
	Hetwork			The Council was awarded Government funding to spend on cycle safety schemes within the city in 2018. In 2019, work was completed to upgrade both the Fiveways and Guardian Road roundabout junctions as well as the implementation of the Earlham road cycle lane. The yellow and blue pedalways were largely completed and the implementation of city centre accessibility schemes including contraflow cycle lanes (such as Prince of Wales road) commenced.
	Progression of introduction of Bus Rapid Transport System scheme	-	-	There is no target for this indicator.
				In early to mid-2018, the council submitted bids to
				Transforming Cities for the Bus Rapid Transport System.
				The Council were successful in their bid and were
				awarded funding to implement the cross-city network of
				busses infrastructure plan. The first part of the scheme
				has been underway in 2019 through the implementation
				of the changes along Prince of Wales Road. Further
				information can be found at:

Policy	Indicator	2017/18	2018/19	Commentary
				www.norfolk.gov.uk/transformingcities
DM29	Number of car parking spaces lost/gain (estimated)	9793	9944	The target for this indicator is no increase in parking spaces above 10,000 spaces. The number of parking spaces has increased steadily since the adoption of the local plan but the ceiling of 10,000 spaces has not been breached. In the 2017/18 and 2018/19 monitoring periods, several permissions to use car parks for further temporary periods were given permission, including 17/01643/F – Mountergate car park and 18/01117/F – and former Eastern Electricity Board Site Duke Street.
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 onstreet 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.  The Norwich Northern Distributor Road, now formally known as Broadland North Way, was completed in 2018.

Policy	Indicator	2017/18	2018/19	Commentary
				Many of the expected benefits a have started to be realised in form of traffic congestion relief on some city roads and a consultations was held at the end of 2018 on the route of the Norwich Western Link.
DM31	No. applications refused on car parking, servicing, cycle parking grounds	2	No data	There is no target for this indicator.  During the 2017/18 monitoring period, two applications were refused on the grounds of policy DM31. These permissions include 17/01177/F - 12A Old Palace Road for 3 bungalows, which was refused on access and servicing grounds, and 15/00455/F – Legarda Court for 4 flats, which was refused on bin storage grounds.  Due to time and resource constraints, it has not been possible to monitor the number of applications refused on the grounds of DM31 for the 2018/19 monitoring period.
DM32	No. approved schemes of low car and car free housing	No data	No data	There is no target for this indicator.  Due to time and resource constraints, it has not been possible to monitor the number of approved low car and car free housing schemes.  However, 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. Such examples include, the Barn Road student

Policy	Indicator	2017/18	2018/19	Commentary
,				accommodation (car free), 4 new dwellings at Lincoln Street (car free), as well as the majority of residential schemes approved within the city centre.
DM33	N/A	N/A	N/A	Although outside of the 2018/19 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.

# Note: List of defined centres referred to in policies DM20 and DM21.

DM20 list of defined centres	DM21 list of defined district and local centres
PC01 – Gentleman's Walk	DC01 – Bowthorpe
PC02 – Castle Mall (levels 1 and 2)	DC02 – Drayton Road
PC03 – Chapelfield (main retail levels)	DC03 - Eaton centre
	DC04 - Plumstead Road
PR01 – Back of the Inns/Castle Street	DC05 - Aylsham Road/Mile Cross
PR02 – The Lanes East	DC06 - Earlham House
PRO3 – St Stephen's Street/Westlegate	DC07 - The Larkman
PR04 – Castle Meadow North	DC08 - Dereham Road/Distillery Square
PR05 – Chapelfield Plain	DC09 - Hall Road
PR06 – Timberhill/Red Lion Street	DC10 - Sprowston Road/Shipfield
SR01 – The Lanes West	
SR02 – Upper St Giles Street	LC01 - Hall Road/Trafalgar Street
SR03 – St Benedict's Street	LC02 - Hall Road/Queens Road
SR04 – Elm Hill/Wensum Street	LC03 - Hall Road/Southwell Road
SR05 – London Street East	LC04 - Grove Road
	LC05 - Suffolk Square
LD01 – Magdalen Street/Anglia Square	LC06 - Unthank Road
LD02 - Riverside	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
LC25 - Clancy Road
LC26 - UEA
LC27 - Long John Hill
LC28 - Magdalen Road/Clarke Road
LC29 - Aylsham Road/Copenhagen Way
LC30 - St Stephens Road

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Report to Sustainable development panel Item

18 March 2020

**Report of** Director of place

**Subject** Local Development Scheme 2020-2022

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#### **Purpose**

To consider the draft revised Local Development Scheme. This is the work programme for producing key planning documents, which will form part of the local plan for Norwich. The scheme is attached at Appendix 1 and covers a two-year period to 2022.

#### Recommendation

To agree the Local Development Scheme and recommend that cabinet approves it for publication under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by section 111 of the Localism Act 2011).

#### Corporate and service priorities

The report helps to meet the corporate priority a healthy organisation, great neighbourhoods, housing and environment, an inclusive economy and people living well.

#### **Financial implications**

None

Ward/s: All Wards

Cabinet member: Councillor Stonard - Sustainable and inclusive growth

#### Contact officers

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#### **Background documents**

None

# Report

- 1. The Local Development Scheme (LDS) must be prepared as part of the statutory process of plan making. It is the work programme and project plan for the preparation of the various planning policy documents making up the local plan for the city.
- 2. Preparation of an LDS is required by section 15 of the Planning and Compulsory Purchase Act, as amended by section 111 of the Localism Act 2011. The Localism Act has amended procedures for LDS production: a local planning authority has only to make a formal resolution to adopt the scheme and publish it on their website in order for it to take effect. There is no requirement to consult on the LDS prior to publication, or to submit it to the government for formal endorsement.
- 3. The legislation gives local authorities considerable leeway in the form and content of the LDS. However it requires as a minimum the local planning authority, when publishing the LDS, to make the up-to-date text of the scheme available, provide details of any amendments made to the scheme, and information on its compliance (or non-compliance) with the timetable for the preparation and revision of documents identified within it.
- 4. Given that Norwich City Council is working with South Norfolk and Broadland councils on the preparation of the Greater Norwich Local Plan, the revised LDS has been undertaken in coordination with these other authorities to ensure continuity of the GNLP major workstream timescales.
- 5. The revised LDS will run to Spring 2022 and will entirely supersede the version published in October 2018. It will be rolled forward periodically to ensure that it is as up-to-date and flexible as possible.

#### **Progress since the previous Local Development Scheme**

- 6. Since the last LDS was published in October 2018, further work has been undertaken on preparation of the Greater Norwich Local Plan (GNLP) including Regulation 18 consultation of the draft strategy and preferred sites in early 2020. In addition, the Norfolk Strategic Planning Framework (NSPF) (endorsed early 2018), is in the process of being revised and a draft document is anticipated for autumn 2020.
- 7. Other examples of progress include the adoption of the new Affordable Housing Supplementary Planning Document (SPD) (2019), the Purpose Built Student Accommodation (PBSA) in Norwich: Evidence and Best Practice Advice Note (2019), and the endorsement of the Prospect House Development Brief (2018).
- 8. Work also continues on the implementation of existing planning documents, including progression of the River Wensum Strategy to its delivery phase, and the setting up of the PBSA Working Group.

#### The revised LDS

- 9. The focus of the revised LDS is on the preparation and adoption of strategic high-level planning policies and site allocations in Norwich. This will be achieved through two key planning documents:
  - (a) The emerging Greater Norwich Local Plan (GNLP) will, once adopted, form a new statutory local plan for Broadland, Norwich and South Norfolk to update the present JCS. This will similarly set out a statement of strategic planning policy for the wider Norwich area but, unlike the JCS, will also include policies and proposals for individual sites. The GNLP will therefore supersede the current Joint Core Strategy (JCS) and the local authority site allocations plans. The regulation 18 consultation of the GNLP is currently underway. This has slipped from the timescale envisaged in the 2018 LDS, and the anticipated production timetable has been updated in this LDS accordingly. The village clusters site allocations policies for South Norfolk District will be included in a separate South Norfolk Village Clusters local plan to be prepared alongside the GNLP. Only the overall number of dwellings proposed within these settlements will be included within the GNLP itself.
  - (b) The Norfolk Strategic Planning Framework (NSPF) is a non-statutory strategic policy statement setting out broad strategic targets and priorities for the next round of statutory local plans for individual local planning authorities in Norfolk, facilitating joint working across district boundaries and helping to fulfil the statutory Duty to Co-operate. The NSPF was endorsed by the stakeholder authorities in 2018. The NSPF is currently being reviewed, to ensure that the authorities continue to work together in an ongoing and meaningful way to fulfil the Duty to Cooperate. The anticipated review timetable has been updated in the LDS accordingly.
- 10. This revised LDS also includes provision for the review of the DM Policies Plan. At the end of 2019, the Council undertook a review of the DM Polices Plan and Site Allocation Plan, in accordance with S10A of the Town and Country Planning (Local Planning) (England) Regulations 2017. This exercise set out to review whether the plans are up to date and respond to changing local needs and circumstances. The review concluded that, in general, the local plan policies are fit for purpose, however it recommends that a full review of the DM Policies Plan should commence following the Regulation 19 consultation of the GNLP (due early 2021).
- 11. Key information and timescales for the above documents in paragraphs 10a and 10b are provided within the Annex and the Key Document Profiles in section 5 of the LDS (Appendix 1).

#### **Supplementary Planning Documents and guidance**

12. Following the cessation of the Britvic/Colmans/Unilever operations at the Carrow Works site, the Council and key partners plan to identify a delivery mechanism supported by a masterplan for the East Norwich Strategic Regeneration Area, capable of being adopted as a supplementary planning document. This will aim to guide the coordinated redevelopment of the site with a focus on delivery of transformational change of this key area of Norwich and

to inform the Regulation 19 version of the GNLP. It is anticipated that this workstream will commence in mid-2020.

#### Other committed and potential workstreams

- 13. The LDS also identifies a number of other workstreams that are either committed, or potential additional workstreams required to satisfy changes to national policy and guidance, or changing local circumstances. Some of the additional workstreams are aspirational and are dependent on resources to deliver them. Members should be mindful that any change to the resourcing of the planning policy team may impact upon the deliverability of the some of the work outlined in the LDS.
- 14. Part 1 of the Brownfield Land Register for Norwich was published in December 2017. The Town and Country Planning (Brownfield Land Register) Regulations 2017 require that such registers must be updated at least annually, so this will be an ongoing commitment. Part 2 of the register is intended to include sites listed in Part 1 which are considered suitable for the granting of planning permission in principle for residential development. The council does not intend to produce a Part 2 register at this stage.
- 15. The Self-Build Register (set up in April 2016) will continue to be maintained in accordance with the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016).
- 16. The Council has committed to being the lead authority on the preparation of a new Strategic Housing Market Assessment (SHMA) with other partner authorities across Norfolk. This document will set out an assessment of future need and demand for housing, as well as identifying the need for different housing types and tenures, including affordable housing. The formal preparation of the SHMA is expected to commence in the latter part of 2020, following the introduction of a new standard methodology for assessing housing need, expected summer 2020.
- 17. Other potential work referred to in the LDS includes the provision of support for neighbourhood planning should this be required, the possibility of introducing an Article 4 Direction to combat the loss of office floorspace should this be deemed appropriate, and addressing the implications of The Environment Bill and the National Design Guide on the local policy framework as and when the need arises.

#### Conclusions

- 18. The principal challenges to meet the aims and timescales set out in the revised LDS relate to changes in national policy, availability of resources (both staff and financial), timescales surrounding the GNLP preparation process and the continued joint working with other authorities across Norfolk.
- 19. Local planning authorities are being urged through changes to national planning policy including the revised NPPF, to accelerate the delivery of housing or underused brownfield land. In addition, the formal review and preparation of a new DM Policies Plan is a significant statutory undertaking, and therefore may affect other workstream delivery timescales. Furthermore,

many other aspects of the planning policy team's workload are not included in the LDS (such as monitoring and implementation of local plan policies) which require a significant staff resource. New planning priorities may also emerge during the LDS period, which may impact upon achievement of LDS timescales.

20. Information about the workstreams identified in this LDS and any new priorities will be reported to Sustainable Development Panel as required and will be included in any future revisions to the LDS as appropriate.



# Local Development Scheme for Norwich

March 2020

#### 1. Introduction

- 1.1 A Local development scheme (LDS) must be prepared under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). It must identify the documents that will be prepared to set out the strategy for the development and use of land in the local planning authority's area collectively called development plan documents. An LDS is a project plan which identifies the documents which, when prepared, will make up the Local Plan for the area. It must be made publicly available and kept up-to-date. It allows the public and stakeholders to find out about planning policies in their area, the status of any emerging policies in the development plan, and the details of and timescales for production of all relevant documents.
- 1.2 This LDS applies only to the area of the city for which Norwich City Council is the local planning authority. It should be noted that part of the administrative area of Norwich (namely the tidal river Wensum downstream of New Mills and an area of land at Cremorne Lane) falls within the planning jurisdiction of the Broads Authority, which is subject to a separate local plan and LDS.
- 1.3 In addition to providing information about the main development plan documents in preparation, this LDS also provides detail about the preparation of Supplementary Planning Documents (SPDs) and other informal planning guidance and adopted local development documents, to provide a full account of the planning policies that will operate in Norwich. This document also refers to committed and potential workstreams contributing to documents, which may form part of the LDS.
- 1.4 This LDS replaces the previous LDS, which was published in October 2018.

#### Summary of progress since the last LDS

- 1.5 Since publication of the last LDS, significant progress has been made on the preparation of the **Greater Norwich Local Plan** (GNLP), and on the **Norfolk Strategic Planning Framework** (NSPF), which was endorsed in early 2018. Further details are set out in the main body of this document.
- 1.6 The **Statement of Community Involvement** (SCI) was revised and published in November 2016, and replaces the version published in July 2013. The SCI is the council's code of practice for involving the community in planning issues, including decisions about plan making and on planning applications. The latest version of the SCI remains in place and does not require review until 2021.
- 1.7 The **Brownfield Register** (Part 1) was last published in December 2019. This includes sites that have been assessed as being appropriate for residential development, such as sites with planning permission and allocations in local plans. The register will be updated at least once a year in accordance with Regulation 17 of the Town and Country Planning (Brownfield Land Register) Regulations 2017.
- 1.8 A **Self-build Register** for Norwich was established in 2016 to enable individuals and organisations to register their desire for land for self-build or custom-built housing. The

register will enable the council to monitor the demand for self and custom build plots. A local connection test and annual fee were introduced in 2017.

- 1.9 The River Wensum Strategy was adopted by Norwich City Council (in June 2018) and by the other partner authorities during summer 2018. The strategy development and ongoing delivery is led by Norwich City Council working in partnership with the Broads Authority, Norfolk County Council, the Environment Agency and the Wensum River Parkway Partnership. This is a non-statutory strategy aimed at facilitating change and regeneration in the river corridor by helping to change perceptions of the city as a visitor destination, and acting as an economic driver to attract investment. It promotes greater use of the river Wensum, in particular promoting improved access/signage to the river, increasing activity on the river, enhancing its function as a key piece of green infrastructure and its contribution to biodiversity, and increasing its attractiveness to tourists and visitors. The River Wensum Strategy Partnership group continue to meet and have progressed to the delivery phase of the project, setting out actions for implementation of the strategy. A number of projects identified in the strategy are underway, or have already been completed, such as the installation of canoe portages at New Mills.
- 1.10 In June 2018, the city council's Cabinet formally designated the area that was previously the subject of the Northern City Centre Area Action Plan as a neighbourhood area. This followed applications for designation of a wider area (the Cathedral, Magdalen and St Augustine's Street area CMSA) as a neighbourhood area and for designation of a forum for that area. Following a public consultation in early 2018, both applications were refused by Norwich City Council and the Broads Authority (the latter being involved as part of the River Wensum falls within the proposed area) in June 2018. The Localism Act 2011, S61G(5) states that, where a local authority refuses an application for designation of a neighbourhood area because they consider the specified area to be inappropriate as such, they must exercise their powers of designation to secure that some or all of the specified area forms part of one or more areas designated as neighbourhood area.
- 1.11 The newly designated **Northern City Centre Neighbourhood Area** is already well established as an appropriate area for planning purposes, and development of a neighbourhood plan could help to positively build on the area's significant regeneration potential. At this stage, there has been no public expression of interest by a community group in developing a neighbourhood plan for this area but this may happen during the lifetime of this LDS.
- 1.12 The **Affordable Housing SPD** was updated and adopted in July 2019. This SPD replaces the previously adopted version from 2015. The new SPD takes account of changes in the revised NPPF with a view to maximising the provision of affordable housing in the city.
- 1.13 In November 2019, the Purpose Built Student Accommodation in Norwich: Evidence and Best Practice Advice Note was adopted by cabinet. Following a significant rise in the number of applications for Purpose Built Student Accommodation (PBSA) in the past few years, the PBSA advice note was prepared to provide guidance for applicants and decision-makers in the absence of a specific policy in the Local Plan. The council has

produced the advice note with the aim of ensuring delivery of high quality PBSA in Norwich. This includes an assessment of the need for purpose-built accommodation and guidance on a range of issues including the location, scale, external and internal design and management of PBSA, and how to encourage an accommodation mix for a wide range of students. The Council plans to continue to work with local higher education institutions and their student's unions through PBSA working groups, to monitor and share information to support the provision of good quality and appropriate student accommodation.

- 1.14 A development brief was prepared for Prospect House to guide the redevelopment of this prominent city centre site and was approved by Planning Applications Committee in October 2018. This site was not allocated in the Site Allocations Plan as it was not a development opportunity at that time. The brief will be a material planning consideration in the determination of any planning application that is subsequently submitted for the site.
- 1.15 In 2019, the University of East Anglia have produced a draft **Development Framework Strategy** (DFS) in order to reflect and develop UEA's Vision 2030, and as guide to future development on the campus. The DFS is also intended to be used as part of the evidence base for the preparation of the GNLP.

# 2. Scope of the Norwich Local development scheme

2.1 The Local development scheme covers the following types of documents:

#### **Development plan documents (DPDs)**

- 2.2 Development plan documents or DPDs are the formal policy documents which make up the statutory development plan (the *local plan*) for Norwich. Once adopted, these have full legal weight in decision-making. The council's decisions to approve or refuse any development which needs planning permission must be made in accordance with the local plan unless material considerations indicate otherwise. The local plan may be either a single document or a number of separate related documents.
- 2.3 The adopted local plan for Norwich comprises the Joint Core Strategy for Broadland, Norwich and South Norfolk (the JCS) adopted in March 2011, amendments adopted January 2014; the Norwich Site Allocations and Site Specific Policies Local Plan (the Site Allocations Plan), adopted December 2014 and the Norwich Development Management Policies Local Plan (the DM Policies Plan), adopted December 2014. The Northern City Centre Area Action Plan (NCCAAP) as stated earlier no longer forms part of the local plan, although policy 11 of the JCS remains adopted and requires regeneration of the northern city centre in accordance with NCCAAP principles. Accordingly, a commitment to regenerate the northern city centre will remain a material consideration in determining planning applications in that area.
- The JCS and Site Allocations plan will be replaced by the emerging Greater Norwich Local Plan (GNLP), which will run until 2038 and is scheduled to be adopted in 2022.
- 2.5 Each document must be prepared in accordance with a nationally prescribed procedure set out in the national Local Planning Regulations for England, which were last reviewed in 2012 and in accordance with the National Planning Policy Framework. At key stages of plan-making there is an opportunity for the public to comment on emerging planning policies and proposals in the documents. At the end of the process, development plan documents must be submitted to the Secretary of State and independently examined by a government appointed inspector to assess their soundness and legal compliance before they can be *adopted* by the city council and come into force.
- 2.6 Certain other documents must be published alongside each DPD, including:
  - the sustainability appraisal (SA) report of the plan at each stage (a sustainability appraisal scoping report is prepared and consulted on at the start of the process to set out what sustainability issues and objectives the SA should cover and what evidence it will use);
  - A habitats regulations assessment (HRA) if policies and proposals in the plan are likely to have impacts on important natural and wildlife habitats protected by national and international legislation. This is also known as the "Appropriate Assessment".

- a **policies map**, setting out the DPDs policies and proposals on a map base (if relevant);
- a **statement of consultation** summarising public representations made to the plan and how they have been addressed (called the "Regulation 22(c) statement");
- copies of any representations made;
- any other supporting documents considered by the council to be relevant in preparing the plan;
- an adoption statement and environmental statement (when the plan is adopted).

#### **Supplementary planning documents (SPDs)**

- 2.7 Supplementary planning documents (SPDs) help to support and explain in more detail how the city council will implement particular policies and proposals in the Local Plan. SPDs can also take the form of master plans, detailed design briefs or development briefs for sites identified for future development ("allocated") in the plan, as well as for other emerging sites.
- 2.8 SPDs can be reviewed frequently and relatively straightforwardly to respond to change, whereas a review of the policies in the plan is a longer and more complex process.
- 2.9 National **Planning practice guidance** (PPG) states that SPDs should build upon and provide more detailed advice or guidance on the policies in the Local Plan and should not be used to add unnecessarily to the financial burdens on development. SPDs should not introduce new or include excessively detailed policy guidance, but ought to be used only where it can clarify and amplify existing policy and set out how it will help to bring forward sustainable development.
- 2.10 There are currently five adopted SPDs in place, which support the policies in the JCS and DM Policies Plan. A review of the Affordable Housing SPD (2015) is identified in this LDS. Other informal planning guidance will also be produced during the lifetime of this LDS (see below).

#### Other local plan documents

- 2.11 In addition to the progress report provided by this LDS, a number of other documents must be prepared alongside the local plan, but do not form part of it.
- 2.12 A **Statement of Community Involvement** (SCI) must show how the council intends to involve the community in plan preparation and planning decision-making. It is not a local development document but legally it must set out how documents specified in the LDS will be consulted on.
- 2.13 To ensure that plans and policies are effective, an **Annual Monitoring Report** (AMR) must also be prepared to record progress on implementing the local plan and how new development and change taking place in the previous year has contributed to achieving its targets. From 2011, the AMR for Norwich has been incorporated within a combined monitoring report for the JCS prepared jointly by Norfolk County Council and the three

district authorities covering Greater Norwich. The most recent JCS AMR, for the monitoring period April 2018 to March 2019, was published in January 2020<sup>1</sup>.

#### **Associated documents and initiatives**

- 2.14 Although not required to be published as part of the LDS programme, the following additional documents and initiatives are listed in this LDS for information, as they will inform the preparation of future statutory development plan documents and/or provide a wider context for their implementation.
  - a) Non-statutory strategic guidance including the Norfolk Strategic Planning Framework (NSPF);
  - b) Other **potential and anticipated workstreams** arising from ongoing national and local policy changes. The scope and extent of the work that may be undertaken depends on resources available to the council and (in some cases) further clarification from central government about how proposed new planning measures would operate in practice. For that reason, no detailed timescales can be specified for future informal local guidance and other work items in this category.

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<sup>&</sup>lt;sup>1</sup> https://www.greaternorwichgrowth.org.uk/planning/monitoring/

# 3. The existing local plan

- 3.1 A number of planning documents are already in place to guide the council's decisions on planning applications. Together these form the existing adopted local plan for Norwich, which has been through a formal process of consultation and independent examination before adoption. These documents include the JCS, the DM Policies Plan and the Site Allocations Plan.
- 3.2 As these documents are already in use, they are not part of the formal LDS schedule set out in the Annex, which deals in the main with the new and emerging documents that will be prepared to replace or supplement them. However, they are referred to below in order to provide a complete picture of the planning policy documents that apply in Norwich.
- 3.3 The documents making up the local plan must conform to national planning policy in the National Planning Policy Framework (NPPF), supported by national Planning Practice Guidance (PPG). In preparing its local plan, the council must show that it has met the statutory Duty to Cooperate with adjoining authorities and other relevant bodies. The Duty to Cooperate places a legal duty on local planning authorities and county councils in England to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 3.4 The local plan documents fit into a hierarchy with broad strategic policies at the top and more detailed policies interpreting the strategic approach at a district and small area level. This is illustrated in Figure 1 on page 9.
- 3.5 For the Norwich area, the adopted **JCS** is the primary document at the top of the hierarchy with which other development plan documents prepared by individual districts should conform. The JCS was adopted in March 2011, with amendments adopted in January 2014. It is a strategic planning document prepared jointly by the three constituent districts in Greater Norwich and Norfolk County Council, and provides the long-term vision, objectives and spatial strategy for development of Norwich and its surrounding area for the period to 2026. The JCS is therefore at the heart of the present local plan for Norwich.
- 3.6 The **Site Allocation Plan** identifies and sets out policies for sites in Norwich city where development is proposed or expected to occur between now and 2026. It responds to the requirement of the JCS to identify additional sites for 3000 new homes in the city by 2026 over and above existing housing commitments. It also identifies opportunities to accommodate the overall levels of growth in jobs and services anticipated over that period and to ensure that these can be delivered and located sustainably, with a particular focus on expanding office employment and retail and leisure uses in the city centre. It will also help to deliver the community facilities and green infrastructure and elements of the sustainable transport network required to support new development as it occurs, in accordance with the JCS. The Site Allocations Plan was adopted in December 2014.

- 3.7 The **DM Policies Plan sets** out a range of more detailed policies applying throughout Norwich to be used in the council's assessment of development proposals and to guide future council decisions on applications for planning permission up to 2026. Its 33 policies cover a range of topics, building on the national policy principles for sustainable development set out in the NPPF and the strategic policies and objectives of the JCS. In certain cases, the policies also set out local criteria and standards for different kinds of development. The DM Policies Plan was also adopted in December 2014.
- 3.8 The Localism Act 2011 allows for community led **neighbourhood plans** to be brought forward to complement the adopted local plan, and this is reflected in Figure 1. As stated above (paragraph 1.10), a neighbourhood area has been designated for the northern city centre. However, no neighbourhood plans have yet been proposed within the city boundary although a number of neighbourhood plans are now formally in place ("made") for the adjoining suburban parishes of Cringleford in South Norfolk, and Sprowston, Hellesdon and Old Catton in Broadland. The city council remains open to working in cooperation with community-led groups to produce neighbourhood plans where these help to promote beneficial development, regeneration or neighbourhood enhancement in accordance with the presumption in favour of sustainable development and the general principles set out in the NPPF.

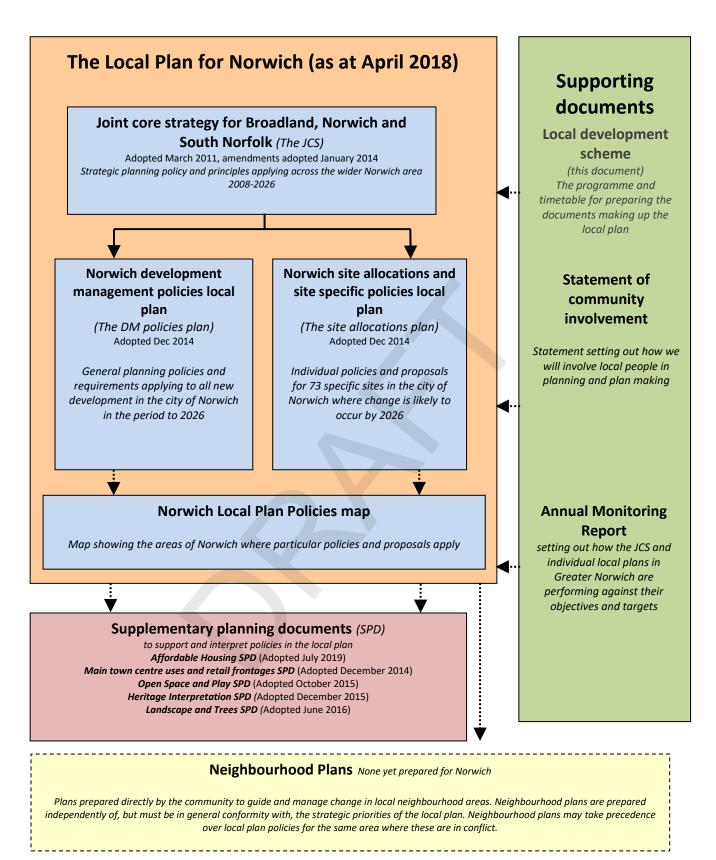


Figure 1: Hierarchy of the local policy context in Norwich

# 4. Looking forward – the emerging local plan and the 2019-22 LDS programme

- 4.1 The LDS was last reviewed in 2018. This revision of the LDS outlines the programme of documents and associated workstreams that will contribute to the replacement and review of the local plan. These will include the statutory and non-statutory planning documents detailed below.
- 4.2 Further detailed information on the GNLP and NSPF are included in the Key Document Profiles in section 5, which also includes the proposed production timetable for each document. The work programmes set out for these documents may be subject to review dependent on the extent of evidence and resources likely to be required.

#### **New Development Plan Documents**

- 4.3 The proposed Greater Norwich Local Plan<sup>2</sup> (GNLP) will be a new statutory local plan for Broadland, Norwich and South Norfolk to update the present JCS. This will similarly set out a statement of strategic planning policy for the wider Norwich area but, unlike the JCS, will also include policies and proposals for individual sites. As such, the GNLP will also replace separate site allocations plans for individual districts – in the case of Norwich, the Site Allocations plan. However, the village clusters site allocations policies for the South Norfolk District will be included in a separate South Norfolk Village Clusters local plan to be prepared alongside the GNLP. Only the overall number of dwellings proposed within these settlements will be included within the GNLP itself. The timetable for the production of the GNLP shown in this LDS has been adjusted to reflect changes in the anticipated production timetable arising from further consultations in the Regulation 18 stage.
- In accordance with paragraph 33 of the NPPF and S10A of the Town and Country Planning 4.4 (Local Planning) (England) Regulations 2017, the council undertook a review of the DM Policies Plan and the Site Allocations Plan<sup>3</sup>, to review whether the plans are up to date and respond to changing local needs and circumstances. The review was carried out in October-November 2019 and endorsed by cabinet on 13 November 2019. It concluded that, in general, the local plan policies are fit for purpose at the current time, however it recommends that a full review of the DM Policies Plan should commence following the Regulation 19 consultation of the GNLP. The Regulation 19 consultation of the GNLP is due to take place in early 2021, and therefore the formal review of the DM Policies Local Plan should take place following this consultation. The review does not recommend a further review of the Site Allocations Plan, as this has been reviewed and will be superseded by the GNLP.
- 4.5 Despite anticipating that the formal review of the DM Policies Plan will commence in 2021 following the GNLP Regulation 19 consultation, it will be necessary to begin consideration of what evidence studies and background information may need to be gathered and

<sup>2</sup> https://gnlp.oc2.uk/

<sup>&</sup>lt;sup>3</sup> https://www.norwich.gov.uk/info/20199/adopted local plan/2494/regulation 10a review of the local plan

commissioned to support the preparation of a new local plan over the coming year. A 'roadmap' to the local plan review process and timescales will be produced in due course.

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

4.6 The Norfolk Strategic Planning Framework<sup>4</sup> (NSPF) is a non-statutory strategic policy statement setting out broad strategic targets and priorities for the next round of statutory local plans for individual local planning authorities in Norfolk, facilitating joint working across district boundaries and helping to fulfil the statutory Duty to Co-operate. The NSPF was updated and endorsed by the stakeholder authorities in October 2019 to meet the new requirements of the revised NPPF, particularly in relation to the requirements set out for the Statement of Common Ground. It will continue to be reviewed regularly as the Duty to Co-operate requires authorities to work together in an ongoing and meaningful way as the Statement of Common Ground must reflect the most up to date position in terms of joint working across the area. The NSPF is currently being revised and a draft document is anticipated for Autumn 2020.

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

4.7 Following the cessation of the Britvic/Colmans/Unilever operations at the Carrow Works site, the Council and key partners plan to identify a delivery mechanism supported by a masterplan for the East Norwich Strategic Regeneration Area, capable of adoption as a Supplementary Planning Document. This will aim to guide the coordinated redevelopment of the site to focus on delivery of transformational change of this key area of Norwich and to inform the Regulation 19 version of the GNLP. It is anticipated that this workstream will commence in mid-2020.

#### Other committed and potential workstreams

4.8 The following paragraphs refer to committed and potential workstreams, which are or may be part of the Council's work programme, although in many cases the status and timescales for production of these have yet to be confirmed. None are formal development plan documents or supplementary planning documents but are included in the LDS for completeness. Subsequent revisions to the LDS would identify the need for any formal DPDs or SPDs emerging from this work.

#### Committed

- 4.9 Additional workstreams which are **committed** and form part of the planning service's work programme during this LDS period are as follows:
  - Maintenance of the Brownfield Land Register updates. The Town and Country Planning (Brownfield Land Register) Regulations 2017 require local planning authorities to maintain a statutory Brownfield Land Register. The regulations state that the Part 1 Registers must be updated at least annually so this will form an ongoing

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https://www.norwich.gov.uk/info/20022/planning\_policy/1194/emerging\_local\_plan\_and\_evidence\_documents/2

commitment. Part 2 of the register is intended to include sites listed in Part 1, which are considered suitable for the granting of planning permission in principle for residential development. There is no intention at this stage to produce a Part 2 Register.

- The **Self-Build Register** (set up in April 2016) will continue to be maintained in accordance with the Self-build and Custom Housebuilding Act 2015<sup>5</sup> (as amended by the Housing and Planning Act 2016).
- The Council has committed to being the lead authority on the preparation of a new Strategic Housing Market Assessment (SHMA) with other partner authorities across Norfolk. This document will set out an assessment of future need and demand for housing, as well as identifying the need for different housing types and tenures, including affordable housing. The formal preparation of the SHMA is expected to commence in the latter part of 2020, following introduction of a new standard methodology for assessing housing need, expected summer 2020.

#### Potential Additional Work

- 4.10 Additional workstreams which may be progressed, but which are not firm commitments in this LDS period, are:
  - Potential neighbourhood plan support following the designation of the northern city centre area as a neighbourhood area in June 2018. This will be dependent on a community group gaining designation as a neighbourhood forum, and commencing preparation of a neighbourhood plan.
  - Government published amendments to the Community Infrastructure Levy (CIL)
    regime in 2019. The current intention is that a local CIL review will be undertaken in
    parallel with the development of the Greater Norwich Local Plan (GNLP), so that a
    revised CIL is most likely to be introduced at around the same time as the adoption of
    the GNLP.
  - Over the past few years, Norwich has seen a significant reduction in office floorspace. This is largely attributed to the ability to convert offices to residential accommodation under the prior approval process, and without planning permission. The reduction in office floorspace is concerning as it results in less choice of suitable accommodation for businesses and compromises the ability of the city, and the surrounding areas, to thrive economically. In addition, there is no provision within the prior approval process to secure affordable housing on these schemes. The Council are considering the implementation of an Article 4 Direction to remove permitted development rights for the conversion of offices to residential accommodation. An office evidence study will be commissioned in 2020 to determine whether an Article 4 Direction is an appropriate response to this issue.

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

- Government is due to undertake the second reading of The Environment Bill<sup>6</sup> in the House of Commons. The current version of the Bill sets out plans and policies for improving the natural environment including waste and resource efficiency, air quality, water quality, nature and biodiversity, the regulation of chemicals etc. It is likely that the Bill will have a number of implications upon the planning system, for example, the formal introduction of Biodiversity Net Gain. Depending upon the final content of the Bill and the timescale for its implementation, the existing local plan documents will likely need to be updated to ensure compliance with the Bill. Currently, no further information is available on the timescales for the introduction of the Bill, however, the formal review of the DM Policies Plan represents an opportunity to consider the implications of the Bill on the local planning context in Norwich.
- In 2019, the Government published the first two parts of the **National Design Guide**<sup>7</sup>. This document sets out the characteristics of well-designed places and demonstrates what good design means in practice. It forms one part of Government guidance aiming to achieve enduring and successful places and forms a material consideration in the determination of planning applications. The third part of the design guide includes the provision of a National Model Design Code (anticipated in 2020), which will set a baseline standard of quality and practice across England which local planning authorities will be expected to take into account when developing local design codes and guides, and when determining planning applications. Following the publication of part 3 of the design guide, the council may consider the preparation of a local design guide, as part of the review of the existing DM Policies Plan and preparation of a new Plan. This will be dependent upon timescales and availability of resources, as well as an assessment of in-house expertise. In the absence of a local design guide, the council will be expected to defer to the National Design Guide.

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

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/84346 8/National\_Design\_Guide.pdf

# 5. Key document profiles

Document Title	Greater Norwich Local Plan (GNLP)
Role and content	To provide the strategic vision, objectives and strategy for future development of the greater Norwich area, to accommodate objectively assessed needs for growth and to identify specific sites for development in the period to 2038. The GNLP provides the strategic context for the preparation of lower level policy documents prepared by the three constituent district planning authorities.
Status	Statutory Development Plan Document (DPD)
Conformity	The document must conform with the National Planning Policy Framework (the NPPF). It should also accord with standing advice in national Planning Practice Guidance (PPG).
Geographical coverage	The three districts of Broadland, Norwich and South Norfolk, excluding the parts of those districts falling within the Broads Authority area. This will exclude village clusters in South Norfolk.
Joint working arrangements (if any)  Relationship with adopted local plan(s)	The plan is being prepared by a joint team comprising officers from Norwich, Broadland and South Norfolk district councils with the support of Norfolk County Council. Each council will make independent decisions at key stages in the plan preparation process.  The GNLP will supersede
	<ul> <li>a) the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk (adopted March 2011, amendments adopted 2014)</li> <li>a) the Norwich Site Allocations and Site Specific Policies Local Plan (adopted December 2014)</li> </ul>
Production milestones	
Commence document production	December 2015

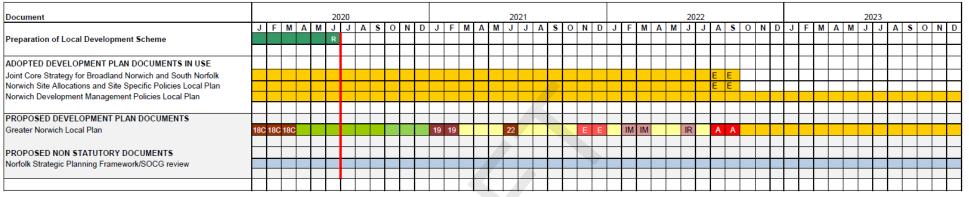
Document Title	Greater Norwich Local Plan (GNLP)
The work includes a "call for sites" (an	
invitation to put forward specific	
development sites for inclusion in the	
GNLP, held in May-July 2016); evidence	
studies; Regulation 18 stage consultation	
on issues and options and site proposals	
held January-March 2018; further	
Regulation 18 stage consultations on	
additional sites (October – December	
2018), and on a draft plan to include	
suggested policy options, growth strategy	
and site allocations (see below). For further	
details of the timetable for this work see	<u> </u>
www.gnlp.org.uk.	
Regulation 18 draft plan	January – March 2020
Publish pre-submission (Regulation 19)	January – February 2021
document	January – rebruary 2021
Formal submission of GNLP to Secretary	June 2021
Of State (Regulation 22)	
,	
Adoption of the Greater Norwich Local	August/September 2022
Plan	
	<b>Y</b>
Monitoring and review	Annual Monitoring report and five year
	housing land supply updates

The National Planning Policy Framework states that policies in local plans should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary. Such a review will need to determine whether any significant matters have arisen, for example changes to national policy or needs for development, that mean that modifications should be made to the local plan or a new replacement local plan produced. The need for a review of policies in the GNLP will be assessed in due course. As such, there is currently no commitment to review the GNLP and therefore no reference to such a review in this LDS. However, dependant on the outcome of a future assessment of the need to review GNLP policies, such a workstream may appear in a future iteration of the LDS.

Document Title	Norfolk Strategic Planning Framework
Role and content	(NSPF) review  To set out an agreement between Norfolk's local planning authorities insofar as they relate to strategic planning matters, setting out broad strategic targets and priorities to inform and provide a context for the preparation of statutory local plans for individual districts and areas within the county (including the GNLP); to facilitate joint working across district boundaries and help to fulfil the Duty to Cooperate; and to meet the NPPF's requirements in relation to a Statement of Common Ground by regular review of the NSPF.
Status	Non statutory strategic document
Geographical coverage	The administrative county of Norfolk.
Joint working arrangements (if any)	The NSPF review is being prepared jointly by the district planning authorities within Norfolk working with Norfolk County Council, the Broads Authority and with the involvement of the Greater Anglia Local Enterprise Partnership and other key stakeholders. Governance: The Duty to Cooperate member forum has been established as a non-decision making body, which officers report to. Decisions are made by the constituent authorities' cabinets or equivalents.
Conformity	As a non-statutory document there is no formal requirement for conformity with higher-level national policy statements, however the framework will need to follow the general principles of national policy and guidance.
Relationship with adopted local plan(s)	The NSPF provides a framework for the eventual formal review and replacement of existing local plans, and demonstrates how the Norfolk authorities are meeting the Duty to Cooperate.

Document Title	Norfolk Strategic Planning Framework (NSPF) review
Production milestones (provisional)	
Draft of revised NSPF/SoCG	Autumn 2020
Monitoring and Review	Ongoing

#### LOCAL DEVELOPMENT SCHEME FOR NORWICH, 2020-22 KEY DOCUMENT PROGRAMME



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LDS production/review		<u>F</u>	Previou	s Sta	iges														Evid	dence	gath	nering	and p	produc	ction	of draf	t fran	nework	K	
Resolution to bring LDS into effect	R	(	Call for	sites	May-	July 2	2016										S		Con	sultat	tion o	on draf	ft fran	newor	rk					
		F	Prepara	ation (	of issu	ies ar	nd opti	ions Re	gulat	ion 18	docu	ument	and s	suppo	rting							final fr								
Commencement of this LDS period		6	evidenc	e Ma	irch 20	016 - 1	2018																			nt Norf			3	
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Adopted development plan documents		F	Reg 18	cons	ultatio	n sta	ge (iss	sues ar	nd opt	ions/s	ite pr	oposa	ıls)				18	Α												
Adopted DPDs (local plans) in use		F	Focuss	ed co	nsulta	ation o	on add	litional	sites								18						annin	g Do	cume	ents (9	SPD)			
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Report to Sustainable Development Panel Item

18 March 2020

**Report of** Director of place

**Subject** First Homes Consultation

6

#### **Purpose**

To consider Norwich City Council's response to the First Homes Consultation.

The Ministry of Housing, Communities and Local Government is currently seeking views on the First Homes scheme. The Government states that it is committed to making home ownership a reality for everyone. The proposal is that First Homes will be sold to local people with a minimum discount of 30 per cent off the market price.

#### Recommendation

To endorse Norwich City Council's response to the First Homes Consultation.

#### Corporate and service priorities

The report helps to meet the corporate priority "A prosperous and vibrant city" and the service plan priority to implement the local plan for the city.

Financial implications: None directly

Wards: All wards

Cabinet member: Councillor Stonard – Sustainable and inclusive growth

#### Contact officer(s)

Joy Brown, Senior Planner (Policy), 01603 212543

#### **Background documents**

None

#### Report

#### Introduction

- The government has set out that more needs to be done to help people buy their own home in their local area. With affordability being the biggest barrier to home ownership, the government wants to ensure that more new homes are available at a discount to local people who would otherwise struggle to buy a home on the open market.
- 2. Previous 'discounted market sale housing' schemes have delivered very few homes nationally and the government considers that this is due to a number of factors including a lack of detail about 'discounted market sale homes'; a lack of prioritisation in the planning system and a complex design and mortgage lenders from understanding and engaging with the concept. The government understands that changes need to be made to the way discount market sales scheme operate in order to have the biggest impact and therefore they are proposing the First Homes scheme.
- 3. The Government is currently consulting on the First Homes scheme with the deadline for responses being 3 April 2020.
- 4. This report provides a summary of the First Homes proposal and provides an officer's response to the consultation. The full consultation document is available at the following link: <a href="https://www.gov.uk/government/consultations/first-homes">https://www.gov.uk/government/consultations/first-homes</a>

### The First Homes proposal

- 5. The National Planning Policy Framework currently defines discounted market sales homes as those made available at a minimum discount of 20% off full market value but the Government does not feel that this level of discount is sufficient. Therefore it is proposing that a 30% discount off market price should be the minimum level of discount under the scheme with Local Authorities having the discretion to set higher discounts on properties on a site-by-site basis.
- 6. Under the proposals, local people would get first refusal on First Homes with the definition of 'Local people' being at the discretion of the Local Authority. This could be based on either residency or work location, as appropriate and would also include serving and recent veterans of the Armed Forces. The consultation documents states that, if there are more people interested in purchasing a First Home than there are homes available under the scheme, it would be important to ensure that decisions about who is prioritised are made in a fair and transparent way which avoids price inflation through offers and counter-offers. This could be allocating on a first-come, first-served basis or using local eligibility criteria (which could include household income and assets). If units remain unsold then it is proposed that any prioritisation of local connections should be time-limited to allow for homes to be made available more widely if local buyers cannot be found.
- 7. The discounted sale price of the home will last in perpetuity so that future home buyers can access the discounts i.e. if a purchaser received a 30% discount from the market price when they bought their home, they must sell it for 30% below market price. Discounts in perpetuity will be achieved by placing restrictive

- covenants on these home. An independent valuation would need to be undertaken on the First Home property at resale.
- 8. The Government is proposing a cap on the value of properties available for this scheme and they are asking whether there should be a nationally defined price cap or regionally varied price caps. Setting a national cap would not prevent Local Authorities from introducing a more targeted, lower price cap according to local circumstances if they chose to do so.
- 9. Purchasers of First Homes will be restricted to using them as their 'sole or primary residence' but there would be some flexibility e.g. if someone needs to spend time away from home due to work commitments then they could let their properties for a period not exceeding two years. If individuals needed to let their property for more than two years then they would be required to make an application to the Local Authority.
- 10. It is proposed to amend secondary legislation to exempt First Homes from the Community Infrastructure Levy (CIL).
- 11. In terms of delivery the government is consulting on two options for supporting the delivery of First Homes through the planning system. The first is to create a new requirement for developers to deliver First Homes alongside market housing, either through changes to planning policy or legislation (setting developer contributions for First Homes) and the second is to amend the existing entry-level exception site policy to a First Home exception site policy (Delivery through exception sites). Further details of these are set out below.

#### **Setting developer contributions for First Homes**

- 12. Developer contributions are an established method for ensuring that local communities benefit from new development. In 2018-19, around 28,168 affordable homes were delivered nationally of which 17,800 were for rentincluding affordable rent and social rent and around 10,300 were for affordable home ownership (including shared ownership).
- 13. The Government wishes to ensure that more developer contributions are used to deliver homes sold at a discount. There are two broad options:
  - (a) Prescribe that a percentage of affordable homes delivered through section 106 planning obligations should be First Homes; or
  - (b) Prescribe that a percentage of all units delivered on suitable sites (over 10 units) are to be sold as First Homes.
- 14. The first option means that in some cases no First Homes could be provided as there is no legal obligation to deliver affordable housing. Within the consultation document thresholds of 40%, 60% and 80% are outlined but the consultation paper stresses that the three threshold options shown do not represent the government intentions at this stage. A set percentage of all units (option b)) would provide greater assurance of delivery of First Homes but there is the risk of impacting on the viability of specific sites which could have negative consequences for other developer contributions (such as social rent and

affordable rent housing) or may lead to developments on these site being delayed.

#### **Delivery through exception sites**

15. Exception sites are small sites brought forward outside the local plan to deliver affordable housing. There are two types set out within the National Planning Policy Framework: entry-level exception sites and rural exception sites. The rural exception policy would not be applicable to Norwich and due to Norwich having very tight boundaries it is unlikely that entry-level exception sites would come forward. The revised NPPF (2018) introduced a new exception site policy aimed at entry-level housing suitable for first-time buyers but this consultation proposes to make amendments to this to specify that the affordable homes delivered should be First Homes for local, first-time buyers and that a small proportion of market homes would be allowed where essential to ensure the development will be deliverable.

#### Norwich City Council's proposed response to the consultation

- 16. The planning policy team along with colleagues in Strategic Housing have considered the consultation document. Our proposed response is set out in the paragraphs below. The consultation document asks 28 specific questions. Whilst we are proposing to object to the principle of the First Homes proposal, we have provided answers to some of the questions as it is felt that it is important to provide our views on the detail of the First Homes proposal should it be implemented. The questions are taken from the government's consultation document.
- 17. Norwich City Council is supportive of measures to increase the number of people who are able to buy their own home. The proposals seek to increase access to home ownership by providing discounted new homes, however they do not appear to acknowledge that owner-occupation is not suitable for everyone, such as transient populations and those with insufficient incomes to afford maintenance costs. The provision of decent quality and affordable rented housing will always be a feature of a satisfactory housing market.
- 18. The proposals do not address the need for affordable housing both nationally and locally. Evidence in the 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) shows that there is a need for 38% of new homes over the period 2015 2036 to be affordable. The 2017 Strategic Housing Market Assessment (2017) however showed that the greatest affordable housing need in Norwich is for rented homes (84%, 240 dwellings per annum), compared to a need for intermediate tenures of just 16%, (38 homes per annum).
- 19. Therefore, there is very little need in Norwich for affordable home ownership, shared ownership and shared equity products. This illustrates why policy prescription is incompatible with meeting identified local housing need. To impose specific housing types and targets at a national level would be inconsistent with the requirement to assess and meet local housing need. Imposing First Homes on a market where there is limited demand for affordable home ownership could potentially distort the market for new homes.

- 20. Although the aim of the proposals is to increase access to home ownership, there is no evidence that the proposals will significantly increase the numbers of people who are able to buy. There is a significant premium for new housing stock over second hand stock. Provision of a significant discount on new stock will only result in those people who are already able to buy second hand stock having a greater choice and potentially being able to buy new homes, or giving those currently able to buy a new home the chance to buy a larger home.
- 21. In addition, the proposals are likely to discourage investment in the housing stock. The fact that someone contemplating an improvement to a First Home would only be able to capture 70% of the uplift in value when the house is sold is likely to be a disincentive to invest.
- 22. The proposals will also create an unnecessary and bureaucratic regime for managing the First Homes scheme going forward.
- 23. Furthermore, the proposals are likely to reduce the number of affordable homes being built for lower income households. The provision of First Homes would impact upon development viability and therefore cut the scale of developer contributions available for social rent and other affordable housing tenures.
- 24. In summary, although Norwich City Council supports measures to extend home ownership, it is important that this is not at the expense of providing truly affordable homes for rent to meet local needs. Although the First Homes proposals will increase the choice on offer to first time buyers, they will do this at the expense of those who are in greater housing need and who have far less choice about how to meet those needs. Therefore, the council does not support the First Homes proposals and urges the government to develop a housing strategy that enables the delivery of a housing stock that is capable of meeting the needs of the population as a whole.
- 25. Notwithstanding the above, Norwich City Council has provided responses to a number of the questions asked within the consultation document. By providing a response to these questions, we are not supporting the First Homes proposal but instead we are setting out our preferred option should the First Homes proposal be implemented.

#### Q1

- a) Do you agree with a minimum discount of 30% (but with local flexibility to set a higher One)?
- b) If no, what should the minimum discount be?

i. 20%

ii. 40%

iii. Other (please specify)

Response to Q1

Norwich City Council does not support the First Homes proposal however should it be implemented the Council would prefer a minimum of 20% with

flexibility to set a higher one. Norwich City Council currently has a 25% charge on a number of shared equity properties and the 25% charge has made the properties affordable to their owners.

#### Q2

- a) Should we set a single, nationally defined price cap rather than centrally dictate local/regional price caps?
- b) If yes, what is the appropriate level to set this price cap?
  - i. £600,000
  - ii. £550.000
  - iii. £500.000
  - iv. £450,000
  - v. Other (please specify)

#### Response to Q2

Norwich City Council does not support the First Homes proposal however should it be implemented the Council's view is that Local Authorities should retain the discretion to determine their own price caps based on local evidence, as is the case with shared ownership products.

#### Q3

- a) If you disagree with a national price cap, should central Government set price caps which vary by region instead?
- b) If price caps should be set by the Government, what is the best approach to these regional caps?
  - i. London and nationwide
  - ii. London, London surrounding local authorities and nationwide
  - iii. Separate caps for each of the regions in England
  - iv. Separate caps for each county or metropolitan area
  - v. Other (please specify)

#### Response to Q3

Norwich City Council does not support the First Homes proposal however should it be implemented the Council would provide the following response to question 3.

- a) No. Regional and county areas are too broad. There are marked differences in housing markets across Norfolk and the East region, e.g. between Cambridge and Fenland or Great Yarmouth and Saffron Walden.
- b) v. Local authorities should be able to determine their own price caps, based on local evidence, e.g. SHMA.

#### Q4

Do you agree that, within any central price caps, Local Authorities should be able to impose their own caps to reflect their local housing market?

#### Response to Q4

No. The Council does not support the First Homes proposal however should it be implemented the Local authorities should be able to determine their own price caps, based on local evidence, e.g. SHMA.

#### Q5

Do you agree that Local Authorities are best place to decide upon the detail of local connection restrictions on First Homes?

#### Response to Q5

The Council does not support the First Homes proposal however should it be implemented the view of the Council is that the Local Authority is best placed to decide upon the detail of local connection restrictions. Local connection is an important criterion in determining eligibility for affordable housing of all tenures, including intermediate products such as shared ownership and shared equity.

#### Q6

When should local connection restrictions fall away if a buyer for First Home cannot be found?

- i. Less than 3 months
- ii. 3-6 months
- iii. Longer than 6 months
- iv. Left to the Local Authority discretion

#### Response to Q6

Norwich City Council does not support the First Homes proposal; however should it be implemented, the local authority is best placed to decide whether or not to waive the local connection criterion on a case by case basis, as is the case with eligibility rules on exception sites.

#### Q7

*In which circumstances should the first-time buyer prioritisation be waived?* 

#### Response to Q7

Norwich City Council does not support the First Homes proposal however should it be implemented, we consider that intermediate tenure homes should be available to all households provided they satisfy locally determined criteria. This includes older and disabled applicants, for example, or single parents who have experienced relationship breakdown and have a capital sum towards buying a new home.

#### Q8

- a) Should there be a national income cap for purchasers of First Homes?
- b) If yes, at what level should the cap be set?
- c) Do you agree that Local Authorities should have the ability to consider people's income and assets when needed to target First Homes?

#### Response to Q8

Norwich City Council does not support the First Homes proposal however should it be implemented, our response to question 8 is as follows:

- a) Yes. Experience from Help to Buy schemes has shown that operating the scheme without an income cap could potentially distort the market and inflate already high house prices (National Audit Office 2019).
- b) The current income threshold for shared ownership for authorities outside of London is £80,000 and this should be replicated for First Homes.
- c) Yes. Norwich is committed to meeting local housing need by offering a range of housing solutions including intermediate tenure housing. As part of the Housing Options assessment, checks are made on the applicant's income, existing assets and local connection.

#### Q9)

Are there any other eligibility restrictions which should apply to the First Homes scheme?

Response to Q9

Norwich City Council does not support the First Homes proposal however should it be implemented the Council is of the view that First Homes should only be available to first time buyer applicants who:

- have registered with the local authority for housing
- have not previously benefited from a publicly funded home ownership scheme including local authority supported schemes.

#### Q10

Are Local Authorities best place to oversee that discounts on First Homes are offered in perpetuity?

Response to Q10

Norwich City Council does not support the First Homes proposal however should it be implemented the Council does not feel that Local Authorities should carry out this role. Local authorities have a role in determining eligibility and income levels for their area based on local knowledge. However, ensuring homes remain affordable in perpetuity is an administrative function that can be performed by an external, Government appointed agency with regular reports to the local authority.

#### Q11

How can First Homes and oversight of restrictive covenants be managed as part of Local Authorities' existing affordable homes administration service?

Response to Q11

The Council does not support the First Homes proposal however should it be implemented administration of the scheme should be managed as per the existing Help to Buy scheme via a dedicated Government appointed agency.

#### Q12

How could costs to Local Authorities be minimised?

Response to Q12

The Council does not support the First Homes proposal however should it be implemented the role of the local authorities should be minimised e.g. by limiting it to existing functions such as determining local affordability criteria and carrying out housing options assessments.

#### Q13

Do you agree that we should develop a standardised First Home model with local discretion in appropriate areas to support mortgage lending?

Norwich City Council does not propose providing a response to this question.

#### Q14

Do you agree that it is appropriate to include a mortgage protection clause to provide additional assurance to lenders?

Response to Q14

The Council does not support the First Homes proposal however should it be implemented the Council does not agree with a mortgage protection clause. In the event of default on the mortgage, we consider the same objective can be achieved by inserting the mortgage possession clause that is currently used in existing shared equity and shared ownership schemes, i.e. that the property must be offered to an RSL in the first instance. In that way, the mortgage is redeemed and the home remains affordable in perpetuity.

#### Q15

For how long should people be able to move out of their First Home and let it out (so it is not their main or only residence) without seeking permission from the Local Authority?

- i. Never
- ii. Up to 6 months

- iii. 6-12 months
- iv. Up to 2 years
- v. Longer than 2 years
- vi. Other (please specify)

#### Response to Q15

Norwich City Council does not support the First Homes proposal however should it be implemented the Council feels that letting should not be permitted; the property should be the owner's principal home. This is consistent with the Council's charge on shared equity properties.

#### Q16

Under what circumstances should households be able to move out of their First Home and let it for a longer time period?

Response to Q16

Norwich City Council does not support the First Homes proposal however if exceptions are to be permitted, it should be in cases of redundancy, relationship breakdown, caring responsibilities and armed forces deployment only and limited to a period of one year.

#### Q17

Do you agree that serving members and recent veterans of the Armed Forces should be able to purchase of First Home in the location of their choice without having to meet local connections criteria?

Response to Q17

Norwich City Council does not support the First Homes proposal however if implemented Norwich would signed up to the Armed Forces Covenant.

#### Q18

What is the appropriate length of time after leaving the Armed Forces for which veterans should be eligible for this exemption?

- i. 1 year
- ii. 2 years
- iii. 3-5 years
- iv. Longer than 5 years

#### Response to Q18

Norwich City Council does not support the First Homes proposal however if implemented an appropriate length of time would be up to two years.

#### Q19

Are there any other ways we can support members of the Armed Forces and recent veterans in their ability to benefit from the First Homes scheme?

Norwich City Council does not propose providing a response to this question.

#### **Q20**

Which mechanism is most appropriate to deliver First Homes

- i. Planning policy through changes to the National Planning Policy Framework and guidance
- ii. Primary legislation supported by planning policy changes

#### Response to Q20

Norwich City Council does not support the First Homes proposal however if implemented it should be bought in through changes to the National Planning Policy Framework. Any policy should allow for Local Authorities to respond to local circumstances as Local authorities are best placed to analyse their local housing market and formulate policies that are sensitive to local need, taking account of national policies and guidance.

#### **Q21**

Which do you think is the most appropriate way to deliver First Homes?

- i. As a percentage of section 106 affordable housing through developer contributions
- ii. As a percentage of all units delivered on suitable sites

#### Response to Q21

Norwich City Council does not support the First Homes proposal however if implemented, First Homes should be a percentage of section 106 affordable housing and this should be set at the Local Authority level. Local authorities are best placed to analyse their local housing market and formulate policies that are sensitive to local need, taking account of national policies and guidance. It is considered that both options (i) and (ii) will affect viability and reduce the number of social and affordable rent homes being delivered for lower income households; however option (i) is more likely to allow for some social rent properties to be built alongside First Homes whereas option (ii) would prioritise the delivery of First Homes over other forms of affordable housing.

#### **Q22**

What is the appropriate level of ambition for First Home delivery?

- i. 40% of section 106
- ii. 60% of section 106
- iii. 80% of section 106
- iv. Other (please specify)

#### Response to Q22

Norwich City Council does not support the First Homes proposal however if implemented, Local Authorities should be able to set the proportion of affordable housing that should be First Homes. Local authorities are best placed to analyse their local housing market and formulate policies that are sensitive to local need, taking account of national policies and guidance. To impose specific housing types and targets at a national level would be inconsistent with the requirement to assess and meet local housing need. The most recent Strategic Housing Market Assessment (2017) showed that the greatest affordable housing need in Norwich is for rented homes (84%, 240 units per annum), compared to a need for intermediate tenures of just 16%, (38 homes per annum). This starkly illustrates why policy prescription is incompatible with meeting identified local housing need.

Imposing First Homes on a market where there is no demand could perversely have a negative impact on sale prices which in turn could affect the supply of new private sector schemes coming forward and would impact upon the delivery of other forms of affordable housing. Policy prescription is incompatible with identified local need for affordable rented homes in Norwich with evidence over the last 5 years showing that just 21 (6.91%) of 304 affordable homes delivered through s.106 agreements were intermediate tenure.

#### **Q23**

Do you agree with these proposals to amend the entry-level exception site policy to a more focused and ambitious First Homes exception site policy?

Norwich City Council does not propose providing a response to this question.

#### **Q24**

- a) Do you think there are rare circumstances where Local Authorities should have the flexibility to pursue other forms of affordable housing on entry-level exception sites, because otherwise the site would be unviable?
- b) If yes, what would be an appropriate approach for Local Authorities to demonstrate the need for flexibility to allow other forms of affordable housing on a specific entry-level exception site?

#### Response to Q24

Norwich City council does not support the First Homes proposal however if implemented other forms of affordable housing should be allowed on entry-level exception sites in order to best meet need. Norwich's most recent Strategic Housing Market Assessment (2017) showed that the greatest

affordable housing need in Norwich is for rented homes (84%, 240 per annum), compared to a need for intermediate tenures of just 16%, (38 homes per annum). Imposing First Homes on a market where there is no demand could perversely have a negative impact on sale prices which in turn could affect the supply of new private sector schemes coming forward and will impact upon the delivery of other forms of affordable housing.

#### **Q25**

What more could the Government do to encourage the use of the existing rural exception site policy?

Norwich City Council does not propose providing a response to this question.

#### **Q26**

What further steps could the Government take to boost First Homes delivery?

Norwich City Council does not propose providing a response to this question.

#### **Q27**

Do you agree that the proposal to exempt First Homes from the Community Infrastructure Levy would increase the delivery of these homes?

Norwich City Council does not propose providing a response to this question.

#### **Q28**

Do you think the Government should take steps to prevent Community Infrastructure Levy rates being set at a level which would reduce the level of affordable housing delivered through section 106 obligations?

Norwich City Council does not propose providing a response to this question.

#### **Q29**

- a) What equality impacts do you think the First Homes scheme will have on protected groups?
- b) What steps can the Government take through other programmes to minimise the impact on protected groups?

Response to Q29

Norwich City Council does not support the First Homes proposal however if implemented the scheme should ensure they are accessible to people with physical disabilities. The First Homes should also meet Nationally Described Space Standards.