

Report to	Sustainable development panel 25 September 2019	Item
Report of	Interim director of regeneration and development	4
Subject	Greater Norwich Development Partnership Annual Monitoring Report 2017-18	

Purpose

To present the 2017-18 Greater Norwich Development Partnership (GNDP) Annual Monitoring Report for Broadland, Norwich and South Norfolk.

Recommendation

To note the contents of the 2017-18 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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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 2017-18.
2. In addition to monitoring the JCS objectives, the AMR outlines the housing land supply position (in Appendix A of the AMR). It also contains details of CIL receipts received over the monitoring period (Appendix B) and action taken under the Duty to Cooperate (Appendix C). The AMR also updates the Sustainability Appraisal baseline (Appendix D) and includes a section on the implementation of each local authority's policies from their local plans (Appendices E and F).
3. The full AMR report is a very lengthy, detailed and technical document overall it runs to just over 340 pages. For this reason only the main body of the AMR and the appendix concerning housing land supply are reproduced in appendix 1 to this report. The full AMR is available to inspect:
<http://www.greaternorwichgrowth.org.uk/planning/monitoring/>
4. The length and complexity of the AMR alongside the other work pressures (notably the production of Greater Norwich Local Plan) and the need to co-ordinate activities across three different council's accounts for the delay in publication of the AMR. It is recognised that to publish monitoring information in September 2019 that covers a monitoring period ending in March 2018 is entirely unacceptable. For this reason discussions are continuing about how to deliver a simplified monitoring regime that will result in the publication of meaningful data in a much more timely manner in future years.
5. The AMR would normally include a separate monitoring appendix for Norwich, monitoring policies in the Development Management Policies Local Plan adopted in December 2014. It has not been possible to prepare the Norwich Appendix for 2017-18 due to resource issues. Instead, the council will produce a Norwich appendix covering a two year period 2017-2019 for inclusion in the next AMR report.

Overview of the AMR

6. The AMR's key findings are set out in the Executive Summary which is attached in appendix 1 to this report.
7. The AMR demonstrates that progress is being made on a number of indicators: for example it shows an increase in the number of new employees, an increase in affordable housing completions across Greater Norwich to a 5 year high, and shows that Norwich has maintained its 13th position in the national retail rankings.
8. In relation to the JCS's environmental objectives the AMR shows a slight decline in CO2 emissions for Norwich for 2017-18. A topic paper will be available as part of the GNLP Regulation 18 consultation with more information on this subject. The AMR also notes a slight decrease in the proportion of

household waste recycled compared to the previous year (25% as opposed to 27% in 2016-17). In addition it reports that, while pollution levels in most parts of Greater Norwich are well below the recommended maximum, there are hotspots in Norwich at Castle Meadow and St Stephen's Street where the concentration of nitrogen dioxide has been high. The city council is working on measures to address this including traffic management, enforcement of Castle Meadow's Low Emission Zone, and through investment in public and sustainable forms of transport (through the Transforming Cities Fund for example). The council is also developing a new Environmental Strategy to address the challenges of climate change and reduce the council's own carbon footprint. It is expected that the draft Environmental Strategy for 2019-2024 will be reported to members in the autumn. This will include targets and performance measures to mitigate and reduce the impact of climate change and will address some of the areas for improvement identified by the AMR including the need to reduce waste and increase re-use and recycling, for example.

9. In relation to objectives to ensure sufficient housing and affordable housing completions against JCS requirements, some targets are not being met for a number of indicators. For housing delivery, there has been a slight dip in delivery for Greater Norwich as a whole in 2017-18 (2,034 units) from the previous year (2,251), although this is nevertheless the second highest level of housing completions across the Greater Norwich area since 2009. Housing delivery for the Norwich Policy Area shows a similar pattern with a relatively high level of delivery in 2017-18 (1,685 units) which is down slightly from the previous year (1,810 units). However housing delivery over the whole plan period to date is below target for both Greater Norwich and the NPA as delivery has not kept up with the annual targets (2,046 units per annum for Greater Norwich and 1,825 units pa for the NPA) over a number of years and the implications of this are considered further below in paragraphs 13 to 20.
10. Housing delivery for Norwich in 2017-18 was 237 units, down from the previous year's figure of 445. The housing completion survey for 2018-19 is complete and will be reported on in the next AMR however it is relevant to note, as context, that delivery has greatly increased in 2018-19, with 1,084 units of housing delivered that year. Of these, approximately 85% (927 units) were C3 housing and the remaining 15% (157 units) C2 residential or student accommodation. A significant proportion of the delivery in 2018-19 was through the prior approval process on schemes for office to residential conversion including 199 units at Sentinel House and 72 at Grosvenor House. Development delivered through the prior approval process is exempt from providing affordable housing.
11. Affordable housing completions remain below the current target for Greater Norwich of 561 completions per year, although for 2017-18 completions were at 95% of the target as opposed to 40% of the target in 2015/16. Norwich's affordable housing completions have increased in 2017/18 to 56 units in 2018-19 from a low base of 44 in the previous year. As context, affordable housing delivery in Norwich in 2018-19 shows a significant increase (137 units) and again will be reported on in more detail in the next AMR. The council recently adopted a revised supplementary planning document for affordable housing (July 2019) which seeks to maximise delivery of affordable housing and which is anticipated will contribute to increased rates of delivery in future years.

12. In relation to economic growth indicators, the AMR reports that the trend for the loss of office floorspace in Norwich continues, with a net loss of 40,205 square metres of office use class (B1a) floorspace in 2017/18, an increase of approximately 16,000 sq m on the loss of the previous year. The net overall reduction in office floorspace since the start of the plan period (2008/9) amounts to over 90,000 sq m, or around 25.8% of the total stock in 2008. Much of the floorspace lost in recent years has or is being developed into residential properties, as noted above, and schools. There remains no planning control over such changes of use, however the council will consider options for resisting the loss of office floorspace as part of the forthcoming review of Development Management Policies.

Housing Land Supply issues

13. In relation to the five year land supply, calculations are included in Appendix A of the AMR (included within appendix 1 to this report). However, it should be noted that methodological changes have caused significant change to the figures and there is a danger that these can obscure changes on year from year basis. For this reason land supply figures calculated on a similar approach to previous years are also attached as appendix 2 to this report. These are not included within the AMR itself as there is no agreement with partners as to their relevance although technically they have been agreed.
14. In previous years the AMR has presented the housing land supply assessment against the policy targets that were established in policy JCS4. This meant that housing land supply concerning Norwich was measured over the area of the Norwich Policy Area (covering all of Norwich of approx. 50 parishes in the districts of South Norfolk and Broadland). The previous AMR has reported that the land supply in April 2017 across the NPA was 4.61 years. If a similar approach is used for April 2018 data (see appendix 2, Liverpool approach¹ with a 20% buffer) the outcome is that land supply has reduced to 3.94 years.
15. However, policy JCS4, which was adopted by the Council in January 2014 was identical to that which had been previously adopted in March 2011. The overall housing targets contained within it for the Norwich Policy Area remain as proposed in the submission draft version of the document from November 2009 which were originally informed by a Strategic Housing Market Assessment of 2007 and prepared in general conformity with the Regional Spatial Strategy of May 2008.
16. Policy JCS4 requires 36,820 homes to be delivered over the 18 year plan period 2008-2026. The policy does not specify annual averages but this equates to 2,046pa (per annum) across the plan area, of which 32,847 (1,825pa) are required in the NPA. Between 1st April 2008 and 31st March 2018 a total of 15,472 new homes (1,547pa) had been delivered across the plan area of which 11,617 (1,162pa) had been delivered in the NPA. The result was that there remained 21,348 homes (2,669pa) in the plan area and 21,230 in the NPA (2,654pa) by 2026 to be delivered to meet the plan requirements.

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

17. The delivery of the targets set out in the JCS now appears unrealistic. It would require delivery at an average of 2,669pa between 2018 and 2026 whereas rates have fluctuated between 1,168 and 2,251 homes pa between 2008 and 2018. Within the NPA the situation is even more extreme with the plan targets requiring delivery at an average of 2,654 homes pa between 2018 and 2026 when actual delivery between 2008 and 2018 has fluctuated between 882 and 1,810 homes pa.
18. In the circumstances city council officers have concluded that the targets set in JCS4 are undeliverable, the policy has effectively been overtaken by events and can no longer be considered up to date. Furthermore, other aspects of policy JCS4 are now at odds with various aspects of government policy, notably with regard to the provision of low cost home ownership and the requirement for affordable housing provision on smaller sites.
19. The new AMR no longer uses the JCS as the basis for the land supply calculation. Whilst it does not acknowledge that JCS4 is out of date (the City Council view on this matter is not shared by officers' in South Norfolk and Broadland) in accordance with the NPPF it uses the local housing need figure calculated using the standard methodology set out in national guidance as the plan is over 5 years old. This methodology can only be used at the level of the whole district and therefore it is no longer possible to calculate supply using the methodology across the NPA. The AMR presents supply as at April 2018 using the methodology at both the level of the individual district and the entirety of Greater Norwich. 6.54 years supply can be demonstrated across Greater Norwich and 6.82 years across the city.
20. This situation may have implications for the determinations of planning applications going forward. Notwithstanding the existence of a five year land supply as measured by the standard methodology, officers are of the view that the evidence suggests that the extent to which further new housing is needed to meet actual housing need evident in the locality and deliver against commitments in the City Deal is at least as great as it was when the previous monitoring report was published and so great weight should continue to be given to this issue on relevant applications.

