NORWICH City Council

Sustainable development panel

Date: **Wednesday, 25 September 2019**
Time: **09:30**
Venue: **Council chamber, City Hall, St Peters Street, Norwich, NR2 1NH**

Committee members:*

Councillors:
Stonard (chair)
Maguire (vice chair)
Carlo
Davis
Giles
Grahame
Lubbock
Maxwell
Stutely

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Agenda

Date of publication**: Tuesday, 17 September 2019**

NORWICH
City Council

MINUTES

Sustainable Development Panel

09:30 to 10:45 **17 July 2019**

Present: Councillors Stonard (chair), Maguire (vice chair), Carlo, Davis, Giles, Grahame, Maxwell and Stutely

Apologies: Councillor Lubbock

1. Declarations of Interest

There were no declarations of interest.

2. Minutes

RESOLVED to approve the accuracy of the minutes of the meeting held on 19 June 2019.

3. Development Framework Strategy for UEA

(James Aflatt, Bidwells (consultant) attended the meeting for this item.)

The chair by way of introduction, explained that members of the cabinet had received a presentation on the draft development framework strategy (DFS) for the UEA. He introduced the consultant and said that he had been invited to attend the panel to contribute to the discussion.

The planning policy planner presented the report. (A copy of the presentation was circulated at the meeting.) He explained that refresh of the DFS for the UEA took account of the university's planned future growth and would form part of the evidence base for the Greater Norwich Local Plan (GNLP). Members were advised that the proposed development of Sky House, subject to planning permission, on the site of the security lodge, to provide additional teaching space and an entrance and arrival point to the university site, was not a proposal of the DFS but was included in its baseline. The purpose of the new building would be to act as a decamp facility during the refurbishment of the 1960's Lasdun Teaching Wall. Therefore this additional academic floor space would not be available during the period of this DFS (2020 to 2036) but would be available for future DFSs going forward.

The chair explained the process for the consultation as part of the Greater Norwich Local Plan (GNLP) evidence base and that the outcome of the consultation would be considered at future meetings of the panel and cabinet. In reply to a member's question, the head of planning services said that the DFS for the UEA was one of several evidence based documents that would support the emerging local plan and it should not receive greater resources or priority than these other documents. The university had commissioned the DFS and might consider holding an independent consultation on the document. In reply to a member's question, the consultant confirmed that all the proposed growth sites shown on the plan (circulated at the meeting) had been put forward for site allocation under the GNLP. Members were advised that the sites shown in green were being proposed.

During discussion members commented on the proposals. A member commented on the proposed loss of the Old Sports Hall (now Congregation Hall) which had been one of the original campus buildings. The head of planning services explained that one of the solutions to accommodate the university's projected growth was to make better use of the existing campus. The UEA was committed to containing its academic teaching on one campus. The chair asked the panel to look at the draft DFS in the context of the wider brief of the beneficial impact that the university had on the local and regional economy and balancing this with sustainable development for its projected growth.

Discussion ensued on the extension of the university campus. Some members expressed concern about development by the broad and that it would result in further loss of green space along the Yare Valley. The head of planning services pointed out that public access to the river valley had been improved as a result of previous developments. The chair said that the ziggurats were set back from the broad and, in the original plans for the university campus, it had been intended to build out to be far closer to the broad. He explained that that some sites around the campus had been discounted for expansion, such the area adjacent to the SportsPark, because it would encroach on to Earlham Park. A two campus model would undermine the university's intention of having all the academic facilities on one compact site. The consultant said that some of the proposed development sites shown on the plan had been approved under the current LP and that the proposed expansion of the campus was less than 10 per cent of the existing campus boundary. A cabinet member pointed out that the proposed development on the grounds depot site would open up the site, creating a park like setting. There was no intention to enclose the broad with buildings. It was noted that the shared path and cycle way was used for recreational use and that most people stayed close to the broad. A member commented that many people were attracted to the broad and the wide open space of the meadow.

The head of planning services explained that the development of the walled garden and former nursery site would be low rise and sensitive to Earlham Hall's listed building status and setting. Discussion ensued on the proposed redevelopment of the existing campus to accommodate the projected growth as set out in the draft DFS. This included consideration of the university's accommodation needs and that an additional 990 units would be required. This was expected to be provided in the city centre as purpose built accommodation and would benefit the local population by relieving the pressure on the housing market as student HMOs were either family homes or provided accommodation for young professionals or young people, particularly in the light of benefit changes for single people under 35.

Discussion ensued on the increasing urbanisation of green spaces and the impact that this had on climate change. The chair said that there should be a balanced approach to the development of the city and that the draft DFS supported the sustainable development of the UEA. During discussion members commented that development needs changed over time and that, originally, the UEA broad had a meadow. The consultant said that the UEA was a world leader in research into Climate Change and that the buildings would be the most sustainable. Two members expressed concern that the proposals would increase the footprint of the campus and suggesting that the large surface car park could be developed. A member commented that, on balance, improved public green space is often provided when sites are re-developed referencing postwar Manchester and London and providing the Mile Cross Depot as an example of an area for opportunity in Norwich. The head of planning services referred to the draft DFS and said that the university's travel plan was exemplary and that carbon reduction was integral to its development; including good use of public transport, reduction in car journeys and the provision of accommodation on campus. He explained that the university had not implemented the car park element of the district heating planning consent. The university had reduced its carbon footprint by reducing car journeys and would be seeking planning permission to develop part of the surface car park. This was separate to the DFS because it was on the existing campus.

RESOLVED to note the emerging Development Framework Strategy for the University of East Anglia (2019) that will form part of the evidence base for the Greater Norwich Local Plan, which will be publicly consulted upon as part of the Regulation 18 consultation expected later in 2019.

CHAIR

Report to	Sustainable development panel	**Item**
	25 September 2019	
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

Graham Nelson, interim director of regeneration and development	01603 212225
Judith Davison, planning policy team leader	01603 212529

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 CO_2 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 2018-18 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 approach[1] 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.

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

Appendix 1

GNDP AMR 2017-18 (extract):

Sections 1 – 3 and Appendix A

1. Executive Summary

1.1 This Annual Monitoring Report (AMR) assesses how the Greater Norwich area performed for 2017/18 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 new employee jobs have increased this year;
- The number of Lower Super Output areas among the most deprived 20% nationally has shown a relative reduction since 2009/10;
- The number of affordable housing completions has increased to its highest level in the last 5 years;
- The proportion of workers employed in higher occupations have increased;
- The level of 16-18 year olds who are not in education, employment or training has reduced from last monitoring year;
- The proportion of 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;
- CO_2 emissions per capita have decreased; and
- The number of people who were killed or seriously injured on roads has decreased in the Greater Norwich Area;

1.3 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. There are however some indicators which are perhaps less influenced by external factors and these are the areas where the overall focus of action should be placed:

- Although housing delivery has improved in recent years, the number of completions remain below target for the whole plan period;
- The composting and recycling rates have both decreased;
- Affordable housing completions are below target in both percentage and absolute terms;
- Some of the economic indicators are not on target – particularly the office floorspace, and city centre retail floorspace are not growing as envisaged;
- The continued loss of office space in Norwich City, and the growth of office space in other areas is noteworthy, continuing previous years' trends;
- The total crime level has increased this year;

1.4 Similarly, 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 Crime rates and road accidents are among several "contextual" indicators in the AMR. The JCS has, a limited impact on these indicators.

1.6 A 5 year land supply can be demonstrated for this monitoring year. Greater Norwich Authorities can demonstrate 6.54 years of housing supply.

Conclusion and next steps

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 LEP 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 Long Stratton bypass and better public transport including "Transforming cities"
- engagement in skills initiatives to improve the match between labour supply and demand.

1.9 The LPAs are reviewing and rolling forward the JCS to produce the Greater Norwich Local Plan (GNLP), scheduled to be adopted in 2022. The AMR will inform and be informed by this process.

2. Introduction

Context

2.1 The Joint Core Strategy (JCS) for the three districts of Broadland District Council, Norwich City Council and South Norfolk Council (excluding the Broads Authority) 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. 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 Sustainability Appraisal (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). For 2017-18, there will be no separate monitoring report from Norwich City Council. It intends to publish a combined 2 year monitoring report in 2018-19.

2.6 The Localism Act (2011) requires this report to include action taken under the Duty to Cooperate. This can be found at 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.

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 Joint Core Strategy's 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 framework has been carried out. As a result, a number of indicators have been updated or revised for the 2015/16 monitoring year.

3.7 Datasets for the indicators monitored are set out in detail in tables on 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 2017 and 31st March 2018.**

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.

For 2017/18 monitoring period, Norwich City Council is not intending to produce its own monitoring report. A joint 2 yearly report will be produced instead in 2019/20.

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

The following table sets out indicators measured by the Joint Core Strategy monitoring framework

Indicator	Target	SOURCE	Location	11/12	12/13	13/14	14/15	15/16	16/17	17/18	RAG[1] status
Total CO2 emissions per capita	Decrease	DECC	Broadland	7.5	7.3	7.2	6.6	6.4	6.0	5.5	
			Norwich	5.1	5.4	5.2	4.5	4.3	3.9	3.8	
			South Norfolk	8.0	8.1	7.8	7.2	6.9	6.3	6.2	
Total CO2 emissions per capita for each sector	Decrease	DECC	See Table 3.9								
Sustainable and Renewable energy capacity permitted by type	Year-on-year mega watts capacity permitted increase	LPA	See Table 3.10								
Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality	Zero	LPA	Greater Norwich area	0	0	No data	0	0	1	0	
			Broadland	0	0	No data	0	0	0	0	
			Norwich	0	0	0	0	0	0	0	
			South Norfolk	0	0	0	0	0	1	0	
All new housing schemes to achieve water efficiency standard of 110L/Person/Day	All new housing schemes to achieve water efficiency of 110LPD	LPA	Broadland Norwich South Norfolk	All housing developments have to show they will meet this standard therefore 100% compliance will be assumed as permission will not be granted without this assurance.							
Percentage of household waste that is a) recycled and b) composted	No Reduction	LPA	Greater Norwich area	47%	49%	45%	48%	51%	51%	49%	
			Broadland	a) 27%	a) 23%	a) 23%	a) 25%	a)26%	a)25%	a)24%	
				b) 22%	b) 21%	b) 22%	b) 22%	b)25%	b)26%	b)26%	
			Norwich	38%	a) 38%	a) 23%	a) 29%	a)32%	a)27%	a)25%	
					b) 8%	b) 11%	b) 9%	b)7%	b)13%	b)13%	
			South Norfolk	a) 42%	a) 41%	a) 40%	a) 42%	a)44%	a)44%	a)42%	
				b) 13%	b) 15%	b) 15%	b) 18%	b)18%	b)19%	b)18%	

[1] RAG = Red, Amber and Green status

3.8 **Total CO^2 emissions per capita**

CO^2 emissions per capita decreased in each of the local authority areas in the Greater Norwich area between 2017 and 2018, the latest year in which figures are available.

3.9 **Total CO^2 emissions per capita for each sector**

Location	Sector	12/13	13/14	14/15	15/16	16/17	17/18	RAG status
Broadland	Ind & Com	2.9	2.9	2.6	2.5	2.4	2.0	
	Domestic	2.2	2.2	1.8	1.8	1.7	1.6	
	Transport	1.9	1.9	1.9	1.9	1.9	2.0	
Norwich	Ind & Com	2.5	2.4	2.0	1.8	1.5	1.5	
	Domestic	1.9	1.8	1.5	1.4	1.4	1.3	
	Transport	1.0	1.0	1.0	1.0	0.9	1.0	
S Norfolk	Ind & Com	2.4	2.2	2.0	2.8	1.6	1.5	
	Domestic	2.3	2.2	1.9	1.7	1.7	1.5	
	Transport	3.2	3.2	3.1	3.2	3.2	3.3	

CO^2 emissions per capita across the Industrial and commercial sector in the Greater Norwich area have decreased between 2017 and 2018, while domestic and Transport sectors have increased.

3.10 **Sustainable and Renewable energy capacity permitted by type**

Location	**Type**	**12/13**	**13/14**	**14/15**	**15/16**	**16/17**	**17/18**	**RAG**
Broadland	TOTAL	59 MW	18MW	13.36MW	13.94MW	17.5kW	8.67MW	
	Wind	9 MW	0.1MW	0.01MW	0MW	0MW	0 MW	
	Solar PV	49 MW	10MW	10.17MW	11.14MW	2.5kW	8.67 MW	
	Hydro	0 MW	0MW	0MW	0MW	0MW	0 MW	
	Biomass	1 MW	8MW	3.18MW	2.8MW	15kW	0 MW	
Norwich		No schemes submitted	No schemes submitted	No schemes submitted	Solar PV - 355.03 kW (0.36MW) (six schemes)	Solar PV 1.9MW (1750 mW per year)	No schemes submitted	
South Norfolk	TOTAL	37kW	140kW	8.0MW	39.45MW	0MW	17 MW	
	Wind	11 kW	110 kW	0MW	0MW	0MW	0 MW	
	Solar PV	25 kW	30 kW	7.5MW	37MW	0MW	17 MW	
	Sewerage	0 MW	0 MW	0MW	0MW	0MW	0 MW	
	Biomass	-	0 MW	0.5MW	2.45MW	2.0MW	0 MW	
	Air	8 kW	0 MW	0MW	0MW	0MW	0 MW	

3.11 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.

3.12 Solar energy capacity approved has increased 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.

3.13 **Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality**
No planning permission has been granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality this year.

3.14 **Water efficiency**
All New housing to meet the optional higher Building Regulations water efficiency requirement of 110 Litres per person per day, other development to maximise water efficiency.
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 recent Building Regulations part 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.

3.18 **Percentage of household waste that is a) recycled and b) composted**
The indicator for this year has changed slightly to monitor the percentage of household waste that is recycled and composted only. The percentage has remained the same from last year and has therefore has achieved its target.

3.19 Within the City of Norwich, the composting and recycling rates have both decreased. Increasing recycling rates remains difficult as the amount of newspapers and magazines continues to decline with people switching to digital means and recyclable items being increasingly made using less material (the effect known as "light weighting"). The 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	11/12	12/13	13/14	14/15	15/16	16/17	17/18	RAG status
Net housing completions	NPA – 1,825 per annum	LPA	NPA	915	882	992	1140	1164	1810	1685	
	Greater Norwich area – 2,046 pa		Greater Norwich area	1,182	1,214	1,241	1,681	1,728	2251	2034	
	Broadland NPA – 617 pa		Broadland - NPA	157	56	217	217	340	410	449	
	Broadland RPA – 89 pa		Broadland - RPA	70	111	139	188	258	234	230	
	Norwich – 477 pa		Norwich	280	377	210	249	365	445	237	
	South Norfolk NPA – 731pa		South Norfolk - NPA	478	419	565	674	459	955	999	
	South Norfolk RPA – 132 pa		South Norfolk - RPA	197	251	110	353	306	207	119	
Affordable housing completions	Affordable housing target of 561 per year (just number, no % required for 15/16)	LPA	Greater Norwich area	394 33%	407 34%	245 20%	243 14%	222	456	531	
			Broadland	44 19%	67 41%	74 23%	98 24%	107	237	177	
			Norwich	171 61%	145 38%	32 15%	50 20%	25	44	56	
			South Norfolk	179 27%	195 24%	139 21%	95 9%	90	175	298	
(Gross)New house completions by bedroom number, based on the proportions set out in the most recent Sub-Regional Housing Market Assessment	New Target 1 bedroom – 7% 2 bedrooms – 23% 3 bedrooms – 52% 4+ bedrooms – 18%	LPA		see table in Para 3.31							
Provision of Gypsy and Traveller pitches to meet local plan requirements	To meet GT Norwich GTAA targets:18 pitches in total (8 from 2015-18, further 10 to2026)	LPA	Greater Norwich area	7	7	8	3	4	4	0	
			Broadland	2	1	2	1	1	4	0	
			Norwich	3	0	0	0	0	0	0	
			South Norfolk	2	6	6	2	3	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	96.9%	96.2%	96.6%	94.6%	92.5%	58.7%	67.3%	

3.20 **Net housing completions**

Housing delivery in 2017/18 has slightly dipped from the previous year, it is nevertheless the second highest level of housing completion across the Greater Norwich Area since 2007/8. The level of delivery in 2017/18 is only slightly below the JCS annual housing target of 2046. Housing delivery in Norwich Policy Area (NPA) part of South Norfolk has been particularly high for second year in succession. Housing delivery rates in the NPA part of Broadland have continued to rise. The rates of delivery in rural areas of Broadland and South Norfolk remain significantly above target levels. The rural areas of Broadland and South Norfolk are on course to exceed their JCS target during 2018/19, 7 years ahead of the end of the JCS plan period. Rates of delivery in rural areas overall remain significantly above target levels.

3.21 Despite these recent successes and the strength of delivery in the rural areas, housing delivery overall has fallen 4988 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 6,633 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 2,654 homes per year in 2018. 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 The housing delivery shortfall in the NPA is the result of a number of factors including: the JCS NPA target was 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. The impact of these factors was intensified due to the JCS's dependence on large, strategic scale, growth, in particular the Broadland Growth Triangle and the challenge presented by the redevelopment of complex brownfield sites in the urban area.

3.23 Despite these challenges, the Greater Norwich Councils' have now delivered a commitment (the sum of planning permissions and site allocations) of 35,015. This is significantly 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.

3.24 The Greater Norwich area Housing Land Supply Assessment 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.

3.25 **Affordable housing completions**
Although affordable housing completions remains below the current target of 561 completions per year, delivery this year, where 95% of the target has been achieved, has been a significant improvement from 2015/16 were just 40% of the target completions was achieved. This marks the highest level of delivery of last 7 years. The under delivery partly reflects the fact that overall completions are below target but also that the government has changed the planning system to mean that affordable housing cannot be required in certain circumstances due to the vacant building credit and the prior approval of office conversions (measures which have a particular impact in the City). Another reason for this under- delivery is because flexibility in housing policy allows developers and the councils to negotiate on affordable housing numbers if it can be proved development would not otherwise be viable. Several developers have demonstrated this to be the case on a number of schemes, therefore reducing overall delivery of affordable housing. However, many section 106 agreements have a "claw back" provision which may mean that additional affordable housing will be delivered at a later date if viability improves.

3.26 **Provision of Gypsy and Traveler pitches**
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. Norwich City Council has secured central government funding for 13 additional pitches in the city and has recently entered a joint venture with Broadland Housing to deliver the project on a site at Swanton Road.

3.27 Looking to the future , a Caravan and Houseboats Accomomdation 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 Caravans and Houseboats Accomodation Needs Assessment categorised the need for residential caravans , Travelling Showpeople and residential boat dwellers.

3.28 The need for residential caravans was studies specifically for those of Gypsy and Traveler heritage. A distinction was also drawn between Gypsy and Traveler households who have not cased to travel permanently (option 1) and those who only travel for work purposes (Option 2). In summary the need for Greater Norwich identified was:

3.29 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 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	-2	11	11	11	**31**
Travelling Showpeople	25	6	7	8	**46**
Residential boat dwellers	0	0	0	0	**0**

Residential caravan dwellers	91	5	5	5	**106**

There is no requirement for local authorities to demonstrate a five-year supply of sites for Travelling Show people, 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 *PPfTS*). The expectation is for then ongoing requirement for Gypsy and Traveler pitches to be met through a combination of "windfall" sites and allocated pitches in the GNLP.

3.30 **Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900)**[2]
This indicator has shown a significant reduction in accessibility during the 2016/17 monitoring year. The dramatic fall in percentage term is mainly the result by the change in the way data is provided to the modelling software that produces the calculation. The bus service provision in the County has remained relatively unaffected since the last review.

3.31 **(Gross) new house completions by bedroom number, based on the proportions set out in the most recent Sub-Regional Housing Market Assessment**
Since we do not have data for Norwich, it is not clear whether this indicator has achieved its target this year (see objective 2 on page 13).

Location	**12/13**	**13/14**	**14/15**	**15/16**	**16/17**	**17/18**
Greater Norwich area	1 bed – 111 2 bed – 253 3 bed – 399 4+ bed –307	1 bed – 138 2 bed – 356 3 bed – 400 4+ bed – 296 Unknown – 12	No data	No data	No data	No data
Broadland[3]	1 bed – 38 2 bed – 34 3 bed – 42 4+ bed – 67	1 bed – 20 2 bed – 92 3 bed – 95 4+ bed – 107	1 bed – 50 2 bed – 115 3 bed – 174 4+ bed – 112Unknown –	1 bed – 26 2 bed – 133 3 bed – 221 4+ bed – 241	1 bed – 57 2 bed – 146 3 bed – 217 4+ bed – 233	1 bed – 27 2 bed – 205 3 bed – 234 4+ bed – 228
Norwich[4]	1 bed – 51 2 bed – 113 3 bed – 33 4+ bed – 20	1 bed – 58 2 bed – 106 3 bed – 27 4+ bed – 19	No data collected	No data collected	No data collected	No data collected
South Norfolk	1 bed – 22 2 bed – 106 3 bed – 324 4+ bed –218	1 bed – 58 2 bed – 158 3 bed – 278 4+ bed – 169 Unknown – 12	1 bed – 56 2 bed – 257 3 bed – 461 4+ bed – 240 Unknown – 13	1 bed – 70 2 bed – 173 3 bed – 263 4+ bed – 248 Unknown – 11	1 bed – 94 2 bed – 251 3 bed – 435 4+ bed – 375 Unknown – 7	1 bed – 121 2 bed – 230 3 bed – 396 4+ bed – 335 Unknown – 36

[2] Results from September: 2015/16 figures from September 2016
[3] Gross completions
[4] 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	13/14	14/15	15/16	16/17	17/18	RAG status
Permitted amount of floorspace and land by employment type	B1 – 118 hectares/ 295,000m2 B2/8 – 111 hectares 2008 – 2026	LPA	Greater Norwich area Broadland Norwich South Norfolk	See Table at Para 3.32					
Amount of permitted floor space	100,000m² Norwich City Centre	LPA	Norwich City Centre	-2024m2	-29122m2	-7774m2	-24370m2	-40205m2	
	100,000m² Norwich Research Park (NRP)		NRP	2504m2	1797m2	1512m2	0m2		
	50,000m² Broadland Business Park (BBP)		BBP	No data	0	No data	No data	No data	
			Elsewhere	S.Norfolk 3866m2	S.Norfolk - 78m2	S.Norfolk 1288m2	S.Norfolk 443m2	S.Norfolk 7465.70m2	
Annual count of employee jobs by BRES across plan area	2222 per annum increase	ABI/BRES(nomis)	Greater Norwich area	175,500	177,100	183,000	187,000	192,000	
			Broadland	44,100	43,700	45,000	46,000	48,000	
			Norwich	84,700	85,300	88,000	90,000	92,000	
			South Norfolk	46,700	48,100	50,000	51,000	52,000	
Employment rate of economically active population	Increase	Annual Population Survey (nomis)	Greater Norwich area	74.10%	72.90%	79.20%	80.50%	75.40%	
			Broadland	75.60%	78.10%	80.90%	80.50%	84.30%	
			Norwich	70.10%	69.10%	77.10%	78.30%	68.50%	
			South Norfolk	77.60%	72.40%	80.30%	83.20%	75.60%	
Percentage of workforce employed in higher occupations	Annual increase of 1%	Nomis	Greater Norwich area	47%	41%	41%	43%	50%	
			Broadland	46%	36%	43%	50%	41%	
			Norwich	49%	44%	37%	37%	51%	
			South Norfolk	46%	46%	44%	45%	60%	
National retail ranking	Maintain top 20 ranking	Venuescore	Norwich	14th	13th	13th	13th	13th	
Net change in retail floorspace in city centre	No decrease in retail floor space	LPA	Norwich	+544sqm	-859sqm	+225 sqm	No data	-217 sqm	
Percentage of permitted town centre uses in defined centres and strategic growth locations	100%	LPA	Broadland	A1 = 94% A2 = 0% B1a = 76% D2 = 0%	A1 = 0% A2 = 0% B1a = 15% D2 = 13%	A1 = 18% A2 = 0% B1a = 19% D2 = 0%	A1 = 23% A2 = 100% B1a = 28% D2 = 15%	A1 = 42% A2 = 100% B1a = 20% D2 = 33%	
			Norwich	No data	No data	A1 = 28% A2 = 100% B1a = 100% D2 = 73%	A1=38.9% A2 =43.1% B1a = 0% D2 = 0%	A1=6% A2=100% B1a = 0% D2 = 3%	
			South Norfolk	A1=81% A2=0% B1a = 63% D2 = 40%	A1=63% A2=50% B1a = 41% D2 = 0%	A2 = 100% B1a = 100% D2 =73% D2=56%	A1= 21.7% A2 = 25% B1a =50% D2=67%	A1= 70% A2 = 0% B1a =75% D2=71%	

3.32 **Permitted amount of floor space and land by employment type**[5]
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.

		13/14	14/15	15/16	16/17	17/18	RAG status
B1	Greater Norwich area (floorspace in sqm)	46,639	-30,694	26,617	34,284	41,259	
B2		33,243	724	2035	2453	3722	
B8		35,021	819	13,194	20,781	10,338	
B1	Greater Norwich area (hectares)	18.7	-12.2	10.6	13.7	16.5	
B2		8.2	0.2	0.5	0.6	0.9	
B8		23.5	0.5	8.8	13.9	6.9	
B2/B8		-	0.7	9.3	14.5	8.8	
B1	Broadland (sqm)	3,576	2,861	28,923	53,451	80,109	
B2		2,989	2389	1,364	6,197	8,566	
B8		1,704	552	105	376	17,531	
B1	Norwich (sqm)[6]	B1a -2024 B1b 16,926 B1c 19,129	B1a -31063 B1b -785 B1c -3940	B1a -8881 (net loss) B1b -None B1c -8562 (net loss)	B1a-24449(net loss) B1b-None B1c - 1119 (net loss)	B1a -40205 (net loss) B1b 113.8 (net gain) B1c -217.7 (net loss)	
B2		23,648	-3051	B2 +1498 (net gain)	-5003 (net loss)	-8068 (net loss)	
B8		21,780	-214	B8 -1968 (net loss)	3254(net gain)	-7633 (net loss)	
B1	South Norfolk (sqm)	21,704	2233	15,157	7401	1459	
B2		6,606	1386	-827	1259	3224	
B8		11,537	481	15,057	17,151	440	

[5] Calculated using figures from the Greater Norwich Employment Growth and Employment Sites and Premises Study 2008
[6] Data updated from 2015 information from Norwich City Council and different from previous years

3.33 **Office space developed**
There was a net loss of 40,205 sqm of office floor space (use class B1a) in Norwich this monitoring year, predominantly in the city centre. There is currently very limited commercial impetus to develop new office space in the city centre due to relatively low rental values making speculative development unviable. Most of the spaces lost are being developed into residential properties and schools. There remains no planning control over the loss of office space when converted to these uses.

3.34 Data published by the VOA (Business Floorspace (Experimental Statistics), Valuation Office Agency, 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.

3.35 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 2018, derived from planning permissions and completions records. In 2017/18, the city has experienced an increase net loss of office space, in comparison to 2016/17. From 2008 to 2018, the overall net reduction in the office floor space equates to around 25.8%. 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.

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
Total actual/potential office floorspace change Norwich city; April 2008-March 2018:	**-93,656 sq. m net loss (-25.8%)**

3.36 **Annual count of employee jobs**[7]
5000 new jobs were created according to this dataset in the last year. This means the annual target for this monitoring year has been achieved. The biggest sectors that have contributed to the job growth in Greater Norwich area are Health, Professional, Scientific & Technical, Transport and Storage and Wholesale. In Professional, Scientific and Technical sectors, there has been 18% percent increase in job numbers from the previous year, most of the increase is concentrated in the city of Norwich. In absolute terms, the Health sector has had the greatest number of job increase.

3.37 **Employment rate of economically active population**
Employment rates have decreased over the past year. However, it is important to note that this dataset is based on sample surveys and fluctuates between surveys.

3.38 **Percentage of workforce employed in higher occupations**
In contrast to the decline between 2013 and 2016, the percentage of workforce employed in higher occupations across the Greater Norwich area has increased significantly in this monitoring year.

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

3.40 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.

3.41 **Net change in retail floor space in the city centre**
It has not been possible to report on this indicator in the absence of the annual shop survey. However, in terms of permissions granted for non-retail floor space, the expectation is that there will have been some further net loss of retail floor space to other uses.

3.42 In recent years, retail investment in the city centre has concentrated on improvements and enhancements to existing stock, for example the ongoing programme of refurbishment to Castle Mall, the emerging new proposals for Anglia Square, and the approved extension of Primark.

3.43 ***Previous Years***
The trend evident since April 2008 is for a continued slow reduction in retail floor space at the expense of other uses. Recent 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.

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[7] 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.

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.

3.44 Although a reduction in retail floor space runs counter to the aim of Policy 11of 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 during the recession and in times of increased internet shopping.

3.45 **Percentage of completed town centre uses in defined centres and strategic growth locations**

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	10/11	14/15	15/16	16/17	17/18	RAG
Number of Lower Super Output[8] Areas in national most deprived 20%	Reduction by 50% in plan period (28 out of 242 in 2007)	IMD (DCLG)	Greater Norwich area Broadland Norwich South Norfolk	23 0 23 0	17 0 17 0	No data	No data	No data	
The amount of land on brownfield register that has been developed	Increase the amount of completions for housing on land identified in brown field register in % form	LPA	Broadland Norwich South Norfolk	Data not yet collected					

3.46 **Number of Lower Super Output Areas in national most deprived 20%**
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. Index of Multiple Deprivation data since the base data of the plan has shown a relative[9] improvement from previous results, though no recent data is available. Across the districts, all the deprived LSOAs in this regard are in Norwich.

3.47 By 2026 the target is for half as many LSOAs in the national most deprived 20%. Given that a relative reduction of 11 LSOAs has been observed since 2007, despite an increase in the total number of LSOAS in the Greater Norwich Area, it is

[8] The number of Lower Super Output Areas (LSOAs) in Greater Norwich area has increased to 248 for 2014/15 data
[9] Relative to all other LSOAs in England

reasonable to say this indicator is currently on track to meet its target as a pro rata reduction of 0.8 LSOAs per annum is required.

3.48 **The amount of land on the brownfield register that has been developed**
This is a new indicator introduced in this year's monitoring report. Its purpose is to aim for 90% of suitable brownfield site have planning permission for housing by 2020. The three Greater Norwich districts have produced and published a joint brown field register.

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	13/14	14/15	15/16	16/17	17/18	RAG status
School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades including Maths and English	Year-on-year increase from 2007 value of53%	Norfolk County Council	Greater Norwich area	56.54%	57.14%	65.00%	Data not yet released	Data not yet released	
			Broadland	61.08%	59.41%	68.80%			
			Norwich	43.79%	45.52%	54.30%			
			South Norfolk	62.48%	64.47%	69.30%			
16 to 18 year olds who are not in education, employment or training	Year-on-year reduction from 2006 value of6%	Norfolk County Council	Central	No data	No data	No data	No data	Data not yet released	
			Greater Norwich area	5.30%	5.10%	5.30%	3.40%		
			Broadland	3.30%	3.60%	3.50%	2.30%		
			Norwich	9.20%	9.50%	8.20%	6.10%		
			South Norfolk	3.90%	2.80%	2.80%	2.80%		
Proportion of population aged 16-64 qualified to NVQ level 4 or higher	Annual increase	Annual Population Survey	Greater Norwich area	34.80%	33.80%	34.20%	36.80%	37.10%	
			Broadland	32.50%	29.30%	31.40%	28.60%	30.50%	
			Norwich	39.00%	35.90%	39.30%	38.80%	36.80%	
			South Norfolk	31.80%	35.70%	30.80%	42.00%	43.70%	

3.49 **School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades including Maths and English**
The proportion of school leavers achieving 5 or more GCSEs at A* to C including Maths and English increased from 2014/15. The performance level has increased steadily between 2013 to 2016, however data has not yet been released for 2016 to 2018.

3.50 **16 to 18 year olds who are not in education, employment or training**
The proportion of 16 to 18 year olds not in education, employment and training has decreased significantly from 2015/16. The level has decreased steadily from 2013/14, however, data has not been released for 2017 to 2018.

3.51 **Proportion of population aged 16-64 qualified to NVQ level 4 or higher** The proportion of population aged 16-64 qualified to at least NVQ level 4 increased in the Greater Norwich as a whole over the monitoring year, though there was a slight decline in Norwich.

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

Indicator	Target	Source	Location	2010 -	14/15	2015-2018	RAG status
IMD access to service	Increase the number of LSOAs in the least deprived 50% on the IMD for access to housing and service	IMD	Greater Norwich	131	127	No data	
			Broadland	43	40		
			Norwich	54	58		
			South Norfolk	34	29		

3.52 **IMD access to Service**
This is a new indicator introduced for the 2015/16 Annual Monitoring Report. The most recent data available is from 2014/15. Compared to the 2010 data, the number decreased slightly. The progress of this indicator will be monitored when future data becomes available.

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

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

3.53 **Percentage of residents who travel to work**
The data is derived from the Census 2011 and so is only released for every10 years. In comparison with the 2001census, 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 improvement in increasing the percentage of residents travelling to work by foot or cycling. However, 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	13/14	14/15	15/16	16/17	17/18	RAG
Percentage of Conservation Areas with appraisals adopted in the last 10 years	Year-on-year increase	LPA	Broadland	76%	76%	76%	76%	70%	
			Norwich	76%	76%	76%	76%	76%	
			South Norfolk	12%	12%	12%	19%	42%	

3.54 **Percentage of Conservation Areas with appraisals adopted in the last 10 years**
The percentage of conservation areas with appraisals has increased in South Norfolk but decreased slightly for Broadland.

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

Indicator	Target	SOURCE	Location	13/14	14/15	15/16	16/17	17/18	RAG status
Net change in local sites in "Positive Conservation Management"	Year-on-year improvements	Norfolk Wildlife Trust	Greater Norwich Broadland Norwich South Norfolk	67% 69% 88% 64%	73% 75% 93% 70%	No data	73% 75% 90% 71%	73% 77% 90% 69%	
% 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	Broadland Rivers	No data	No data	4% 4% 17% 23% 100%	4% 4% 17% 23% 100%	4% 4% 17% 23% 100%	
Concentration of selected air pollutants a)NO2 b)PM10 (particulate matter)[10]	Decrease	LPA	Broadland Norwich South Norfolk	a)No data b)No data a)15 b)15	a)No data b)No data a) 14 (LF); 66 (CM) b) 16 (LF); 21 (CM) a)29 b)No data	2015 a)below 40ug b)below 40ug a) 12(LF); 55 (CM) b)15(LF); 21(CM) a)18.6µg b)No data	2016 a)below 40ug b)below 40ug a) 14 (LF); 56 (CM) b) 16 (LF); 20 (CM) a)26µg b)No data	2017 a)below 40ug b)below 40ug a) 13 (LF); 51 (CM) b) 16 (LF); 23 a)25 ug b)N/A	
Percentage of SSSIs in favourable condition or unfavourable recovering condition[11]	95% of SSSIs in 'favourable' or 'unfavourable recovering' condition	Natural England	Broadland Norwich South Norfolk	94% 75% 78%	94% 100% 93%	94% 100% 93%	94% 100% 93%	94% 100% 93%	
Number of listed buildings lost/demolished	None	LPA	Greater Norwich area Broadland Norwich South Norfolk	1 0 1 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	
Percentage of new and converted dwellings on Previously Developed Land	25%	LPA	Broadland Norwich South Norfolk	46% 96% 15%	54% 88% 28%	44% 69% 27%	46% 93% 9%	33% 81% 7%	

[10] 2014/15 figures corrected
[11] 2014/15 figures corrected

3.55 **Net change in local sites in "Positive Conservation Management"**
The level remains broadly the same for the Greater Norwich area, when compared to the previous year.

3.56 **% of river assessed as good or better**
The percentage of Broadland rivers assessed as good or better has remained the same from the previous monitoring year.

3.57 **Concentration of selected air pollutants**
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. The 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.

3.58 **Percentage of SSSIs in favourable condition or unfavourable recovering condition**
The percentage of SSSIs in favourable or unfavourable recovering condition, apart from Norwich, remains below targets across the area.

3.59 **Number of listed buildings lost/demolished**
The target was achieved as no listed building were lost or demolished this year.

3.60 **Percentage of new and converted dwellings on Previously Developed Land**
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	13/14	14/15	15/16	16/17	17/18	RAG Status
Reduction in overall crime	12/13 (pro rata)	Norfolk Police	Greater Norwich	18,769	20,363	22,403	24,431	26,981	
	BDC 3,871		Broadland	3,106	3,619	3,985	4,089	4,584	
	Norwich 14,409		Norwich	11,881	12,562	13,919	15,513	17,176	
	South Norfolk 4,033		South Norfolk	3,782	4,182	4,499	4,829	5,221	
Number of people killed or seriously injured in road traffic accidents	Year-on-year reduction in those KSI	Norfolk County Council	Greater Norwich area	193	196	173	194	177	
			Broadland	70	68	45	61	48	
			Norwich	61	65	58	63	57	
			South Norfolk	62	63	70	70	70	

3.61 **Reduction in overall crime**
There has been an increase in total crime between 2016/17 and 2017/18. The Crime Survey of England and Wales (CSEW) continues to cite the impact of improvements in crime recording processes as a reason for increases in police recorded crime.

3.62 **Number of people killed or seriously injured in road traffic accidents**
The Police and Crime Plan for Norfolk (2013-17) requires a year-on-year reduction in the number of people who are killed or seriously injured in road traffic accidents in Norfolk. This year saw a decrease in the number of people who were killed or seriously injured on roads in the Greater Norwich area.

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

Indicator	Target	Source	Location	13/14	14/15	15/16	16/17	17/18	RAG status
Percentage of working age population receiving Employment Support Allowance and incapacity benefits	In line with annual national average	DWP benefits claimants (NOMIS)	Greater Norwich area	5.50%	5.50%	5.70%	Data discontinued	Data discontinued	
			Broadland	4.50%	4.40%	4.60%			
			Norwich	7.40%	7.50%	7.80%			
			South Norfolk	4.30%	4.10%	4.20%			
Life expectancy at birth of a) males and b) females	Increase at each survey	ONS	Broadland	a)80.6 b)84.5	a)80.8 b)84.3	a)80.7 b)84.4	No data	No data	
			Norwich	a)79.7 b)83.2	a)79.6 b)82.9	a)78.9 b)82.9			
			South Norfolk	a)81.5 b)84.5	a)81.7 b)84.3	a)81.4 b)84.4			
Percentage of physically active adults	Increase percentage annually	Public Health England	Broadland	57.30%	59.60%	62.10%	No data	No data	
			Norwich	59.40%	61.10%	59.50%			
			South Norfolk	57.00%	58.70%	63.40%			
Percentage of obese adults	Decrease percentage	Public Health England	Broadland	25.60%		No data	19.90%	No data	
			Norwich	19.60%			18.20%		
			South Norfolk	23%			22.70%		
Percentage of obese children (yr 6)	Decrease percentage	Public Health England	Broadland	13.40%	14.80%	13.40%	13.90%	No data	
			Norwich	16.40%	18.60%	18.60%	19.20%		
			South Norfolk	15.30%	16.30%	15.80%	14.60%		
Health Impact Assessment	All development of 500+ dwellings to have health impact assessment	LPA	Broadland	Assume all relevant planning applications comply					
			Norwich						
			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 table in Para 3.69					

3.63 **Percentage of working age population receiving Employment Support Allowance and incapacity benefits**
The data for this indicator has been discontinued.

3.64 **Life expectancy at birth**
This is a new indicator was introduced in the 2015/16 monitoring year. The most recent prior data available is 2014/15. Life expectancy remained broadly the same as the previous year.

3.65 **Percentage of physically active adults**
This is a new indicator introduced for the 2015/16 monitoring year. The latest available data is for 2015/16. Previous years' data have been included for reference purposes. The trend from past years seem to suggest the percentage of physically active adults is generally on the increase.

3.66 **Percentage of obese/overweight adults**
This indicator was introduced in the 2015/16 monitoring year. Data is available between 2013 and 2015 and for 2016/17. The most recent data suggests the proportion of obese/overweight adults is decreasing as per the target.

3.67 **Percentage of obese children**
This indicator was introduced in the 2015/16 monitoring year. The most recent available data is 2015/16. The most recent data suggests there is slight rise in the proportion of obese children in Broadland and Norwich and a decline in South Norfolk.

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

3.69 **Accessibility of leisure and recreation facilities**
Data is not available for this monitoring year.

		13/14	14/15	15/16	16/17	17/18	RAG status
Greater Norwich area	Sports Halls Swimming Pool Indoor Bowls	No data	No data	No data	No data	No data	
Broadland	Sports Halls Swimming Pool Indoor Bowls	88% 89% 21%	No data	No data	No data	No data	
Norwich	Sports Halls Swimming Pool Indoor Bowls	No data	No data	No data	No data	No data	
South Norfolk	Sports Halls Swimming Pool Indoor Bowls	No data	No data	No data	No data	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 Community Involvement	Statement of community involvement Less than 5 years old	LPA	Broadland	Adopted 2016	
			Norwich	Adopted 2016	
			South Norfolk	Adopted 2017	

3.70 **Statement of Community Involvement/ Engagement**
The SCIs 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.

Appendix A:

Greater Norwich Area Housing Land Supply Assessment 1st April 2018

Summary

This note sets out the housing land supply position for the Greater Norwich area for the period 1 April 2018 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. 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. However, the HDT is measured jointly across all of Broadland, Norwich and South Norfolk and LHN figures are only provided on a district basis, which can be aggregated up in accordance with Planning Practice Guidance. Therefore it is not possible to produce housing land supply information as measured against LHN for the Norwich Policy area. As the 2017 SHMA indicated that the vast majority of the three districts are within the same housing market area. Consequently, it is considered appropriate to measure land supply across this area. This approach effectively replaces that of separately measuring housing land supply across the Norwich Policy Area (NPA) and Rural Policy Areas (RPA) of Broadland and South Norfolk, although these areas are still considered in the AMR in relation to monitoring objective 2.

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

- 131% (6.54 years / 3,318 home surplus)

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

- Broadland: 147% (7.33 years / 1,302 home surplus)
- Norwich: 136% (6.82 years / 1,156 home surplus)
- South Norfolk: 118% (5.90 years / 864 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, need to be identified. 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:*

     i *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

     ii *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*".

5. The following sections of this report set out the issues that relate to housing land supply across Greater Norwich.

6. Irrespective of the housing land supply situation, the Greater Norwich Authorities will continue to:

   i. take a positive approach to development proposals that complement, rather than detract from, the existing development strategy.

   ii. work closely with partners in the development sectors and the LEP, and through initiatives such as the Local Infrastructure Fund and Housing Infrastructure Fund, to stimulate delivery on committed development sites.

The Starting Point for Calculating the 5 year land supply

7. As set out in the Planning Practice Guidance:

   "Housing requirement figures identified in 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"[12].

   This echoes paragraph 73 of the NPPF.

8. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. The JCS became five years old on 10 January 2019. Although the Greater Norwich authorities have commenced work to replace the JCS, the current plan has not been reviewed in line with the PPG to demonstrate that the housing requirement does not require updating. Indeed, publication of a 2017 SHMA[13] 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 2018, the calculation of annual average household growth has been based on the period 2018 to 2028. The affordability ratios used for the purposes of calculating LHN adjustment factor were the 2018 ratios published on 28th March 2019. A summary of this calculation is set out in table 1 below:

Table 1 Summary of LHN Calculation

	10 Year Average Household 2018-2028	2018 Median Affordability Ratio	Adjustment Factor	Annual LHN 2018 Based
BDC	400.2	9.23	1.33	531
NRW	509.8	7.03	1.19	606
SNC	704.0	8.78	1.30	914
Total Local Housing Need for Greater Norwich				**2,052**

12 Paragraph 030 Reference ID:3-030-20180913
13 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*"[14].

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

12. This approach is consistent with the principles established in Zurich Assurance Ltd v Winchester City Council [2014] EWHC 758 (admin) and the specific reasoning set out in Land on East Side of Green Road, Woolpit (APP/W3520/W/18/3194926)[15].

Sources of Supply

Sites of 10 or more

13. Under the Revised NPPF glossary definition of "*Deliverable*"[16], 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 in order to establish their programme of delivery. These programmes have 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

[14] Paragraph: 011 Reference ID: 2a-11-20190220
[15] Paragraph 64, page 12.
[16] National Planning Policy Framework, February 2019, Page 66

16. Under the Revised NPPF glossary definition of "*Deliverable*"[5] all sites which do not involve major development "*should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years*".

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 self-contained 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***"[17].

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*

[17] Paragraph: 042 Reference ID: 3-042-20180913

authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework"[18].

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.*"[19]

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

[18] Paragraph: 24 Reference ID: 3-24-20140306
[19] 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.*"[20]

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***"[21].

31. Significant under delivery is measured against the Housing Delivery Test (HDT). 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.

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

[20] Planning Practice Guidance, Paragraph: 013 Reference ID:2a-013-20190220
[21] 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 2018

Greater Norwich 5 Year Housing Land Supply Assessment		**April 2018**
LHN Annual Requirement		2,052
Requirement 1 April 2018 to 31 March 2023		10,260
Adjustment for Shortfall/Surplus		n/a
Plus NPPF HDT Buffer at 5%	10,260 x 0.05	513
otal 5 year requirement 2018/19 to 2022/23	10,260 + 513	10,773
Revised Annual Requirement	**0,773 / 5 Years**	**2,155**
Supply of Housing		**14,091**
Shortfall/Surplus of Supply	4,091 – 10,773	3,318
Supply in Years	**14,091 / 2,155**	**6.54**

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.

18th June 2019

Appendix 2: land supply figures calculated on a similar approach to previous years

Title	NPA 5YR HLS Calculation JCS Based	
Version	**Description**	**Updated By**
V0.1	Draft NPA HLS for GN. 50% Assumptions used for Windfall and SNC sites less than 10 in forecast.	Paul Harris

Table 1 Completions against JCS Target

Year	Actual/Projected Completions	Required Completions	Shortfall/Surplus
2008/09	1,193	1,825	-632
2009/10	923	1,825	-902
2010/11	910	1,825	-915
2011/12	915	1,825	-910
2012/13	882	1,825	-943
2013/14	992	1,825	-833
2014/15	1,143	1,825	-682
2015/16	1,164	1,825	-661
2016/17	1,810	1,825	-15
2017/18	1,685	1,825	-140
Total 2008-17	11,617	18,250	-6,633

Table 2 NPA Housing Land Supply - JCS Based & 5% Buffer

Liverpool	5 Year Housing Land Supply Assessment, April 2018			Sedgefield
32,847	JCS Plan Requirement 2008 - 2026			32,847
1,825	JCS Annual Requirement			1,825
18,250	Requirement 1 April 2008 to 31 March 2018			18,250
11,617	Completions 1 April 2008 to 31 March 2018			11,617
- 6,633	Housing Shortfall since 1 April 2008			- 6,633
9,125	JCS 5 year requirement 2018/19 to 2022/23			9,125
4,146	6,633 / 8 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	6,633
13,271	9,125 + 4,146	Revised 5 Year Requirement	9,125 + 6,633	15,758
664	5%	Plus NPPF 2019 Buffer	5%	788
13,935	13,271 + 664	Total 5 year requirement 2018/19 to 2022/23	15,758 + 788	16,546
2,787	**13,935 / 5 years**	**Revised Annual Requirement**	**16,546 / 5 Years**	**3,309**
12,565	**Supply of Housing (NPPF 2019 Definition)**			**12,565**
-1,370	13,935 – 12,565	Shortfall/Surplus of Supply	16,546 – 12,565	-3,981
4.51	**12,565 / 2,787**	**Supply in Years**	**12,565 / 3,309**	**3.80**

Table 3 NPA Housing Land Supply - JCS Based & 20% Buffer

Liverpool	**5 Year Housing Land Supply Assessment, April 2018**			**Sedgefield**
32,847		JCS Plan Requirement 2008 - 2026		32,847
1,825		JCS Annual Requirement		1,825
18,250		Requirement 1 April 2008 to 31 March 2018		18,250
11,617		Completions 1 April 2008 to 31 March 2018		11,617
- 6,633		Housing Shortfall since 1st April 2008		- 6,633
9,125		JCS 5 year requirement 2018/19 to 2022/23		9,125
4,146	6,633 / 8 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	6,633
13,281	9,125 + 4,146	Revised 5 Year Requirement	9,125 + 6,633	15,758
2,656	20%	Plus NPPF 2012 Buffer	20%	3,152
15,937	13,281 + 2,656	Total 5 year requirement 2018/19 to 2022/23	15,758 + 3,152	18,910
3,187	**15,937 / 5 years**	**Revised Annual Requirement**	**18,910 / 5 Years**	**3,782**
12,565		**Supply of Housing (NPPF 2019 Definition)**		**12,565**
-3,372	15,937 – 12,565	Shortfall/Surplus of Supply	18,910 – 12,565	6,345
3.94	**12,565 / 3,187**	**Supply in Years**	**12,565 / 3,782**	**3.32**

Appendix A

	NPA - 2008/09 to 2025/26	Completions										Projections							
	24-May-19	**2008/09**	**2009/10**	**2010/11**	**2011/12**	**2012/13**	**2013/14**	**2014/15**	**2015/16**	**2016/17**	**2017/18**	**2018/19**	**2019/20**	**2020/21**	**2021/22**	**2022/23**	**2023/24**	**2024/25**	**2025/26**
Past Completions	**Actual Completions - Previous Years**	1,193	923	910	915	882	992	1,143	1,164	1,810									
	Acutal Completions - Reporting Year										1,685								
Future Supply	**Projected Completions - Current Year**											2,416							
	Projected Completions - Future Years Existing Sites												2,213	2,725	2,539	2,672	2,365	1,752	1,184
Requirement taking into account completions	**Managed delivery target - annual requirement taking account of past/projected completions**	1,825	1,862	1,921	1,988	2,065	2,156	2,253	2,354	2,473	2,546	2,654	2,688	2,767	2,775	2,834	2,888	3,150	4,548
	JCS allocation annualised over 18 years (2008 - 2026)	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825