



NORWICH City Council

Committee name: Sustainable development panel

Committee date: 14/11/2023

Report title: 2021/22 Annual Monitoring Report

Portfolio: Councillor Stonard, Leader of the council and cabinet member for inclusive and sustainable development

Report from: Head of planning and regulatory services

Wards: All Wards

OPEN PUBLIC ITEM

Purpose

To present the 2021/22 Greater Norwich Development Partnership (GNDP) Annual Monitoring Report for Broadland, Norwich and South Norfolk.

Recommendation:

To note the contents of the 2021/22 GNDP Annual Monitoring Report.

Policy framework

The council has five corporate priorities, which are:

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

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

This report helps to monitoring and implement the local plan for the city.

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

Report details

1. The purpose of this report is to inform members of the publication of the GNDR Annual Monitoring Report (AMR) for Broadland, Norwich and South Norfolk for the period 2021/22. This AMR is being published later than usual due to staff resource issues.
2. The development plan for Norwich includes the following documents:
 - Joint Core Strategy for Broadland, Norwich and South Norfolk (the JCS) adopted March 2011, amended January 2014
 - Norwich Site Allocations and Site Specific Policies Local Plan (the site allocations plan) adopted December 2014
 - Norwich Development Management Policies Local Plan (the DM policies plan) adopted December 2014.
3. In addition to monitoring the objectives of the JCS, the AMR outlines the housing land supply position, details of CIL receipts, actions taken under the Duty to Cooperate, updates to the Sustainability Appraisal baselines and includes a section of the implementation of each local authority's local plan policies.
4. The full AMR report is of considerable size and is a detailed technical document. Therefore, only the main body of the AMR and the appendices concerning local plan monitoring for Norwich are reproduced in Appendices 1-3 of this report. The full AMR is available at this link [AMR monitoring 2021-22 | Norwich City Council](#)¹
5. This report contains an overview of the monitoring of the JCS and the policies in the DM policies plan. Monitoring of delivery of sites in the site allocations plan is undertaken as part of the annual housing completions survey and has also been incorporated into housing forecast work for the Greater Norwich Local Plan (paragraph 6).
6. The Greater Norwich Local Plan (GNLP) has undergone public examination and is currently nearing adoption, anticipated in early 2024. Once adopted, the GNLP will replace the strategic policies in the JCS and the Norwich site allocations plan (and site allocations plans of the other Greater Norwich authorities), and will introduce a new set of monitoring indicators.
7. This AMR covers the period 1 April 2021 – 31 March 2022. The information contained within this report is accurate as of that period, however updated information has been provided for context where this is available. The city council keeps up to date records of district monitoring information and it is hoped that future AMR's can be reported more promptly. This 2021/22 monitoring period doesn't cover periods of strict Covid-19 lockdowns, however restrictions such as social distancing and mask wearing were still in place at times during this monitoring period. The effects of the pandemic are referred to below where it is considered to have impacted upon the monitoring data.

¹ The AMR is temporarily available on the city council website until it is uploaded on the GNDR website, after which the report and appendices will be found here: <https://www.greaternorwichgrowth.org.uk/reports/amr/>

8. In March 2022, Natural England sent a letter to all planning authorities in Norfolk concerning nutrient pollution in the protected habitats of the River Wensum Special Area of Conservation and the Broads Special Area of Conservation and Ramsar site. The letter advised that new development within the catchment of these habitats comprising overnight accommodation has the potential to cause adverse impacts with regard to nutrient pollution, and therefore planning permissions for overnight accommodation cannot currently be granted unless it can be demonstrated as nutrient neutral. Given that the AMR that is the subject of this report covers the period 1st March 2021- 31st April 2022, there is a limited impact on permissions that were issued during this period, however this issue has affected the forecasting of future housing delivery which is discussed in paragraphs 19-20.

Overview of the Joint Core Strategy AMR

9. The AMR's key findings are set out below and in the Executive Summary, which is included in Appendix 1 of this report. The AMR demonstrates that progress is being made on a number of indicators, however overall, a more mixed picture is represented.
10. The total CO2 emissions per capita and per sector have largely decreased across the board with only domestic emissions in Broadland and both domestic and transport emissions in Norwich remaining at previous years' levels. It should be noted that these figures are from 2020/2021 which is the latest emissions information that is currently available.
11. The percentage of household waste that is recycled and composted has generally increased however the amount of waste recycled has reduced in both Broadland and South Norfolk. However, the AMR does not explore these figures alongside total domestic waste. Although not specifically monitored, it is possible that these reductions in the amount of waste recycled could be due to a reduction in the total amount of waste produced in these areas.
12. The largest amount of solar energy generation capacity was approved since the adoption of the plan at around 72 megawatts. This approved capacity was largely from large scale solar farms in Broadland and South Norfolk. No solar power generation capacity was recorded in Norwich for this period. However, permitted development rights have been extended to allow a wide range of renewable energy schemes to be installed without planning permission, and therefore this monitoring indicator will not capture small-scale schemes which are more likely in the urban environment of Norwich.
13. Norwich maintained its 13th place position in the national retail ranking. Norwich continues to compete well against larger cities, has the largest proportion of its retailing in the city centre of any major city centre nationally and is the only centre in the East of England that ranks in the top twenty.
14. In relation to the objectives to ensure sufficient housing and affordable housing completions against JCS requirements, the latest AMR reports a mixed picture. For overall housing delivery, there has been an increase in the number of homes delivered from 1,486 in 2020/21 to 1,890 in 2021/22, although this figure is still below the JCS target of 2,046 homes per annum. Housing delivery for the Norwich Policy Area (NPA) also increased from 1,140 in 2020/21 to

1,554 in 2021/22, although again this does not meet the target for delivery in the NPA of 1,825 homes per annum. The decreased housing delivery is in part due to ongoing effects of the Covid-19 pandemic and Brexit, resulting in increased costs and pressures on the labour market.

15. Of all the housing completions recorded against this monitoring indicator in 2021/22, the only ones to meet their identified targets are the delivery of housing within the Broadland Rural Policy Area (RPA) and the South Norfolk RPA. The issue of over-delivery of housing within the RPA and under-delivery of housing in the NPA is considered further in the Housing Land Supply Issues section below.
16. Housing delivery for Norwich (as reported against the JCS) in 2021/22 was 320 dwellings which is an increase on the previous year's delivery figure of 166 homes. This figure does not include completions from C2 communal or purpose-built student accommodation and therefore does not provide the full delivery picture for Norwich. The monitoring against the local plan (para 22 onwards in this report) which does account for these accommodation types reports 316 dwellings delivered in 2021/22. This figure is lower than the figure excluding these accommodation types because there was an overall net loss of equivalent dwellings through the development of Mary Chapman Court student accommodation of Duke Street (reduction of 19 bedrooms in total). For reference the housing completions figures for Norwich for 2022/23 are contained within appendix 3).
17. Affordable housing completions have increased across the Greater Norwich area from 314 dwellings in 2020/21 to 388 dwellings in 2021/22. In Norwich, the increase was from 20 affordable dwellings in 2020/21 to 64 in 2021/22. This is the second year running that the annual affordable housing target for greater Norwich of 525 dwellings per annum has not been met, and also does not meet the target of 675 completions per annum based on the June 2021 Greater Norwich local Housing Needs Assessment. The reduction is related to the reduced total housing delivery. The provision of affordable housing continues to remain a challenge particularly given that certain types of development are not required to provide affordable housing (such as prior approval conversions of offices to residential) and that some applications seek to reduce the amount of affordable housing on viability grounds.
18. There has been further loss of office space in Norwich, although this was at a slower rate than in the previous monitoring period. The overall net reduction in office floorspace in Norwich city equates to a 31% loss in office stock from 2008/09-2021/22. Conversely, there has been a continued increase in the amount of office floorspace being developed in Broadland and South Norfolk. The AMR outlines that there is limited commercial impetus to develop new office space in the city centre due to relatively low rental values making speculative development unviable, and that most of the office floorspace losses are being developed into residential properties, which is a more viable form of development. Up until recently the majority of the office to residential conversions have been undertaken under permitted development rights meaning that the city council has had very little control over the loss of these spaces. However, in 2023 the council introduced an article 4 direction within certain parts of the city which removed these permitted development rights and office to residential conversions in these areas now require full planning permission. This allows officers to consider the development against local plan

policies seeking to protect office space in the city. The impact of the introduction of the article 4 direction on the loss of office floorspace will be monitored in future years.

Housing Land Supply Issues

19. From 10 January 2019 – 16 March 2022, the Greater Norwich authorities were able to demonstrate a five-year housing land supply. From March 2022, large parts of the Greater Norwich area were identified as being constrained by the requirement for nutrient neutrality, which has created uncertainty about the delivery of sites whilst solutions are developed. As such, for the purposes of decision making, the Greater Norwich authorities have not sought to demonstrate a five-year housing supply since March 2022 and therefore a five-year land supply statement has not been produced as part of the 2021/22 AMR. Taking account of the progress being made in respect of individual site-specific mitigation schemes and the development of the Norfolk Environmental Credits nutrient neutrality mitigation scheme, the authorities consider that there is sufficient clear evidence to demonstrate that there will be a five-year housing land supply at the point of adoption of the GNLP.
20. As a new five-year land supply statement has not been produced for this monitoring period as discussed above there are no new figures to discuss in this report. However, as part of the 2021 calculation, it was apparent that there was a trend of over-delivery of housing in the RPA and under-delivery of housing in the NPA, which has continued into the 2021/22 period, with 56% of the housing required in the NPA across the plan period delivered to date, versus 136% in the RPA. This indicates that the Greater Norwich area continues to find the distribution of new housing development in accordance with the local plan a challenging issue. Furthermore, the previous AMR report concluded that overall, there is still a significant under-delivery of housing against the target set out in the JCS, and that officers consider that the need for housing to meet local need is at least as great as it was previously and great weight should continue to be given to this issue. This remains the position, although a new five-year supply has not been calculated for 2021/22, and particularly given the additional uncertainty introduced through nutrient neutrality.

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

21. The following is a summary of the information provided in Appendix F of the AMR and set out in appendix 2 of this report. This information pertains to the Norwich City Council local planning policies only.
22. In 2019, the council undertook a review of the DM Policies Plan and Site Allocations Plan in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2017, which concluded that the local plan policies are fit for purpose at the time but that a full review of the DM policies should take place following the Regulation 19 consultation of the GNLP. The full conclusions of the Regulation 10A review can be found at the following link:
https://www.norwich.gov.uk/info/20199/adopted_local_plan/2494/regulation_10_a_review_of_the_local_plan

23. However, given that there have been numerous policy changes proposed by national government (such as those introduced in the Environment Act and those proposed in the Levelling Up Act) which could have a direct impact on local planning policy including the scope of any future DM policies plan, the intention is to commence review of the DM policies next year when there is greater clarity on proposed planning reforms and the final content of the GNLP, likely mid-2024.

24. The following is a summary of the main findings of the Norwich Appendix of the AMR 2021/22:

- DM8 - The 2021/22 period saw the largest permitted loss of designated open space since the local plan was adopted at -13,786m². One application at the Football Development Centre at Bowthorpe Park was responsible for the greatest loss (at approx. 12,300m²) for a new 3G sports pitch and associated hospitality uses. This was deemed acceptable as although the proposal included new development on open space, it largely consisted of new sports pitches and associated facilities and therefore retained the outdoor sport and recreational uses deemed appropriate for this site.
- DM11 - The measurements for air quality indicators Nitrogen Dioxide (NO₂) and airborne particulates (PM₁₀) have remained relatively stable over the 2021/22 monitoring period at both the Lakenfields and Castle Meadow monitoring stations, although a very slight reduction in both indicators has been observed at Castle Meadow. All indicators remain well below the recommended annual mean of 40 micrograms per cubic metre.
- DM12 - In 2021/22, 224 new homes were granted consent compared with 335 new homes granted consent in 2020/21. This is a trend that is being observed across England and is not unique to Norwich. Some suggested reasons for the national trends include delays in the planning system due to inadequate resourcing, inertia due to lack of clarity on government policy on housing targets and lack of motivation by national housebuilders to increase delivery rates to the detriment of profits.
- DM12 - The total housing commitment (the number of dwellings with outstanding planning permission (and unbuilt)) and those allocated for development in the local plan was 5,906 in 2021/22. Although this is a reduction on the previous two years' figures, it is still significantly greater than the figures recorded for other monitoring periods since the adoption of the local plan, as student and C2 accommodation can now count towards housing commitment.
- DM12 - Housing completions in 2021/22 were recorded at 316 dwellings (inclusive of student and C2 accommodation). This is a very slight increase on the previous year's figure (300 dwellings) but does not meet the average annual target for Norwich set by the JCS (477 dwellings). Suggested reasons for reduced delivery include longer term impacts from the Covid-19 pandemic, supply chain issues, cost of materials and labour etc. This trend has been reflected across the country and is not unique to Norwich.
- DM13 - There were no new consents granted in the 2021/22 period for student or C2 accommodation.

- DM16 - In 2021/22, there was a continued loss of office space of -2590m², albeit at a lesser rate than the previous monitoring period. The majority of applications responsible for this loss was once again the change of use to residential space under the prior approval process. It will be important to continue to monitor the changes in office floorspace particularly given the recent introduction (in February 2023) of the Article 4 Direction removing permitted development rights to change office space to residential.
- DM18 - A greater proportion of main town centre uses were permitted in out of centre locations compared to within centre locations in the 2021/22 period.
- DM20 & DM21: The city centre retail sector continued to perform well in the 2021/22 period. There were two primary and secondary retail centres that fell below their required retail thresholds within this period. However, this was largely down to change of use to a more diverse range of leisure uses that are still considered to positively contribute to the vitality and viability of the city centre. Although there was a mixture of increasing and decreasing retail floorspace across all the district and local centres in the city, overall, the number falling below their indicative retail thresholds remained relatively stable.
- DM22 - The largest amount of community facilities floorspace was approved since the adoption of the local plan at 17,787.5m². In total, seven applications were granted consent within the 2021/22 monitoring period. The application responsible for the largest increase was the approval of a temporary entertainment venue on the surface car park at Rose Lane.
- DM29 - During the 2021/22 monitoring period, seven applications were refused on the grounds of car parking, servicing, and cycle parking. This is the highest number of applications refused against DM31 since the adoption of the local plan. The refusal of these applications amounts to 12 dwellings and a 143-bedroom HMO that otherwise could have been granted consent.
- DM32 - In the 2021/22 period, one scheme was approved for low car housing (7 dwellings), and 27 schemes were approved as car free housing (90 dwellings). This is the highest number of car free housing schemes approved in a single monitoring period since the adoption of the local plan.

Consultation

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

Implications

Financial and resources

27. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.

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

Legal

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

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	No implications arising from this report
Health, social and economic impact	No implications arising from this report
Crime and disorder	No implications arising from this report
Children and adults safeguarding	No implications arising from this report
Environmental impact	No implications arising from this report

Risk management

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

Other options considered

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

Reasons for the decision/recommendation

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

Background papers:

None.

Appendices:

Appendix 1 - Greater Norwich Annual Monitoring Report (main doc) 2021-22

Appendix 2 - Norwich City Council Development Management Policies Monitoring
appendix to AMR 2021-22

Appendix 3 – Norwich City Council Housing Completions Figures 2022/23

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