

GNDP responses to Barton Willmore questions on housing

	Location within GNDP Hearing Statement	Concern	Issue	Further Information	GNDP Response
1	P2 of GNDP Hearing Statement "The Growth Triangle"	481 dwellings completed in Broadland NPA	No evidence to support this figure SoCG meeting confirmed data available up to March 2012 (AMR 2012) for 430 dwellings but not for 481 dwellings	Q. Evidence of the residual figure of 51 dwellings	The additional homes are those taken from the initial returns from the end of year monitoring for 2012/13. These are provisional figures until confirmed in the AMR. See appendix 1
2	P3 of GNDP Hearing Statement "Persimmon Delivery"	Delivery of the Site in 7-years	No evidence in the SoCG that this is the case. Both Persimmon SoCG (SCG4 and SCG7) refer to bringing forward sites sooner rather than later i.e. within the 5 year period	Q. Where is this evidence	The letter of intent from Persimmon relates to the site at Salhouse Road in Rackheath for 80 units. The SoCG relates to the Permission site at Cucumber Lane, Brundall. The reference on pg3 Persimmon Delivery relates to the site north of White House farm covered by SCG5. The indication of bringing forward this site in circa 7 years was provided separately to the council. Copy to be provided. Revised Trajectory indicates

					first completions on this site 2023/24.
3	GNDP Response to Q1.3 (pg6)	JCS para 7.11-7.18 does not set out the strategy in the event of non-delivery of the NDR.	Inspector has picked up this issue in Q6 of revised agenda to Matter 2.	Q. How will the GNDP now respond at this late stage, in what form and by when?	The Councils' response to the issue of flexibility is set out in their response to Q1.6(p7). This matter will be discussed under question 6 of the Inspector's revised agenda.
4	P7/8 of GNDP Hearing Statement "Housing Completions"	1. 419 dwellings completed in 2012/13 in SNDC	There is no evidence to support this figure	Q. Where is this evidence?	The additional homes are those taken from the initial returns from the end of year monitoring for 2012/13. These are provisional figures until confirmed in the AMR. See appendix 1
		2. 407 dwellings completed in 2012/13 in Norwich	There is no evidence to support this figure	Q. Where is this evidence?	The additional homes are those taken from the initial returns from the end of year monitoring for 2012/13. These are provisional figures until confirmed in the AMR. See appendix 1
		3. 700 dwellings granted planning permission in Norwich	There is no evidence to support this figure	Q. Where is this evidence? Are some of these dwellings reliant on only resolutions to grant consent subject to a S106 agreement? Are	The figure reported in the Councils' response to matters is incorrect. The actual number of additional planning permissions in Norwich is 415. These are provisional figures until confirmed in the AMR.

				<p>they they note actually commitments only when a decision notice has been issued; how can they be relied upon.</p>	<p>See appendix 2.</p>
		<p>The figure of 386 dwellings as the target figure for Norwich City to test completions against.</p> <p>Barton Willmore is in receipt of information provided by the GNDP prior to the original JCS Examination.</p> <p>This information was requested at that time to understand the figures contained in the Annual Delivery rates on p110 of the submitted JCS.</p> <p>It is not possible to understand the sources of supply of housing from each of the 3 authorities (i.e. the breakdown) that contribute to the overall annual figure without this additional information i.e. the JCS does not set out this information.</p> <p>By way of example, the year 2012/13 on p113 of the JCS identifies that a total of 2043 are to be delivered in the NPA.</p> <p>Of these, only 230 dwellings area to be brought forwards from new allocations.</p>			<p>386 is not the target figure for delivery in Norwich. The managed annual delivery target for Norwich in 2012/13 was 525. This is set out in Appendix A2 to the Five Year Land Supply Statement which was published as part of the 2011/12 AMR. Initial monitoring indicates that completions in Norwich in 12/13 were 407 (see answer above). This exceeded the AMR 5yr land supply forecast of 391. The 5yr land supply statement forecasts Norwich, if considered in isolation, maintains a 5 year land supply of deliverable sites.</p> <p>The new land supply information (which itself is only provisional) only became recently available.</p> <p>The five year land supply statement sets out the forecast</p>

Norwich city contributes 0 dwellings to this 230 figure with the only source of new supply being 230 dwellings from Rackheath.

1,812 commitments therefore make up the remainder of supply to achieve the 2,043 figure.

The information received from the GNDP (not subject to public release) confirms the trajectory expects the following breakdown of sites:

Broadland 520 (inc. 230 at Rackheath)

Norwich 933 dwellings

SNC: 590 dwellings

Total 2,043 dwellings

The JCS trajectory, although not explicitly set out within the document (but confirmed by the GNDP figures to support this target) requires NC to deliver 933 dwellings in 2012/13.

It only delivered 407 dwellings in 2012/13

This results in a shortfall of 526 dwellings in 2012/13 alone and not a surplus of 21 dwellings against the 386 figure quoted in the GNDP Hearing Statement (p8 matter 2).

To date, there is a shortfall of 1,251 dwellings since 2008 against the JCS

completions from exiting commitment. This varies over time depending on a range of factors. The latest complete forecasts are set out within A1 of the 11/12 land supply statement. This forecasts higher expected delivery in 2014/15 onwards when compared to the commitment line in the “annual delivery rates & requirements”.

The Councils' cannot deduce how the delivery breakdown from the 2012/13 “annual delivery rates & requirements” commitment forecast has been calculated. Consequently, the relative shortfall in 2012/13 can also not be deduced.

It is agreed that the shortfall figure relative to JCS trajectory forecasts in “annual delivery rates & requirements” is 2,904. The stated shortfall in the 5 year land supply statement was 3,483.

		<p>trajectory figures (note: these are the JCS trajectory figures not a 5-yr land supply calculation as this is based on a different methodology).</p> <p>Using the same methodology as above, there is a shortfall of 728 in Broadland and 925 in SNC, resulting in a total deficit of 2,904 dwellings against the projected JCS targets set out on p110.</p> <p>The 2012 AMR (Appendix A67 para 8) confirms the annual requirement is 1,825 per annum. In the 4yr period (2008-2012), 7,300 dwellings were required compared with an actual delivery of only 3,941 dwellings. The equates to a current deficit of 3,359 dwellings in the 4 year period (as set out within para 1.5 of BW matter 2 statement).</p>			
5	REP8 of GNDP Hearing Statement	Pre-application consultation taking place in Cringleford	Where is the evidence?	Q. Is the GNDP relying on pre-application discussions to take into consideration future delivery? IF so, please make clear and provide suitable note.	Reference is thought to be for pg8 of matter 2 response. The Councils' response provided on page 8 was in direct relation to Q1.6 of original matter 2 in regards flexibility. The pre-application consultations going on in Cringleford is used as an example of sites progressing through the system supporting delivery across the NPA. This is

				<p>part of the inherent flexibility within the JCS that allows sites in one part of the NPA to mitigate against slower than expected delivery in another part across the plan period.</p> <p>In general however, forecasting is an inexact science and ongoing developer activity and stated developer intentions is one indication of sites progressing through the planning system. See SCG supporting Revised Trajectory.</p>	
6	<p>P9 of GNDP Hearing Statement Response to Q1.8</p>	<p>Barton Willmore informed that SDJCS 14 windfall provision follows the same approach as August 2010 (EIP 70)</p> <p>N.B. Please refer to para. 13.1 of SDJCS 14 and TP10 which contradicts this position and confirms this approach is different.</p>		<p>Q. Why has SDJCS 14 in this context changed the approach to Windfalls whereas the Hearing Statement confirms this has not changed from August 2010 (EIP 70)?</p>	<p>The policies of the plan in terms of the use of Windfalls has not changed. Policy 9 of the JCS has not been amended and continues to state that allocations will be made to deliver a minimum of 21,000 new dwellings. The change to JDJCS 14 clarifies the role of windfall, making it clear that at the point of allocation any windfall that has already occurred, or has become commitment, will be taken into account when allocations are made. This is important in the context of large strategic sites coming forward ahead of the site allocations process.</p>

Appendix 1

Provisional Housing Completion Figures

Broadland

Site	Completions 2012/13
Gt & Lt Plumstead: Little Plumstead Hospital	21
Sprowston: Home Farm: Phases 2&3	15
Thorpe: 5 Yarmouth Road	1
Sites of below 5 units	18
Overall Completions	55

Norwich

Site	Completions 2012/13
Rosary Road, former Bertram Books site, the Nest	36
Wentworth Green, former Civil Service Sports Ground	75
Cremorne Lane	11
Carrow Road, Norwich City Football Club (Phase 1)	26
New Mills Yard	14
Oak Street, Spring Grove Services,	5
Dowding Road, Taylors Lane and Douglas Close, land at	23
181-5 Northumberland Street	8
Pottergate former Thorndick and Dawson site, 75-81	17
The Cumberland, 212 – 216 Thorpe Road	20
Windfalls	172
Overall completions	407

South Norfolk

Site	Completions 2012/13
Costessey: North of the River Tud/Queen's Hills	67
Costessey: Lodge Farm	52

Costessey: Former Roundwell Public House	12
Costessey: r/o Grove Avenue	5
Cringleford: North of the A11/Roundhouse Park	70
Framingham Earl: Alston's Meadow, 84 Long Lane	11
Hethersett: Lyngate Farm	5
Mulbarton: Cuckoofield Lane	15
Poringland: The Street	26
Poringland: Glebe Farm	4
Swardeston: Roadside Nurseries	2
Wymondham: Greenland Avenue/Whispering Oaks	56
Wymondham: Norwich Common/Beckett's Grove	59
Sites of below 5 units	35
Total	419

Appendix 2

Norwich housing permissions, 2012 / 13

Garages Rear Of 67 Wilberforce Road	13
Land Adjacent To Novi Sad Bridge, Wherry Road	66
Lionwood Junior School, Wellesley Avenue North	14
The Grove, Cadge Road	14
Barrack Street Development Site	200
Sites 9 dwellings and below	117
Losses	-9
Total	415