

25 September 2012
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Dear Sirs

GNDP CIL EXAMINATION – ADDITIONAL MATTERS

Further to your email of 13 September 2012 inviting us to submit new additional information that relates to our duly made representations, we wish to make the following comments:

1. We have previously stated that the proposed level of CIL will suppress development in the GNDP area and will therefore put the five year land supply and that going forward further at risk. We have prepared a current schedule of prospective sites in Norwich as an example to show the level of development that is at risk to 2017. The housing numbers shown in the schedule are taken from August 2012 Site Specific Allocations DPD for the Norwich Local Plan. We also attach the summary and the site specific detail for the Norwich Policy Area Trajectory for all three authorities within GNDP, taken from the Joint Core Strategy.

The NPA Trajectory states to include only known sites and that the Site Specific Allocations DPDs for each authority will allocate further land to make up the already recognised shortfall. It can be seen however, when comparing the August 2012 Site Specifics for Norwich to 2017 with the Norwich Trajectory that it contains fewer sites. Although it is anticipated that there will be some catch up in 2016/2017, there is a total shortfall of nearly 500 units.

All of the Norwich development sites obviously fall into Zone A and many of them are brownfield sites. Of these, a high proportion is unlikely to be occupied in the 12 months preceding a permission due to the nature of the premises. CIL is therefore likely to be charged on the full development as opposed the net gain in floor area and developers will also incur abnormal costs such as demolition, asbestos removal and site remediation. Irrespective of market conditions and funding difficulties, it is clear that CIL at the proposed level of £115 per sq m in the inner zone will make many of the sites unviable.

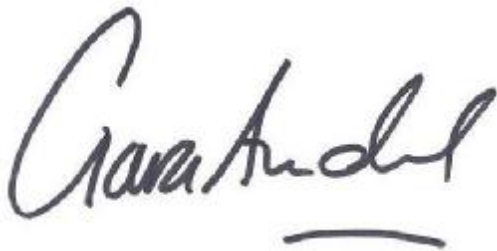
2. It is intended that CIL will replace many of the costs incurred in a Section 106 Agreement. GNDP have stated previously that they intend to cover a higher proportion of infrastructure costs through CIL than many other areas which have a lower rate, although some are substantially higher value areas. The infrastructure list does however show as many of the costs in the S106 column as the CIL column and it is clear that these can be altered going forward. This does not provide any certainty to developers going forward and could lead to significant double counting when CIL is paid. This is particularly relevant to larger sites where many of the costs will remain within the Section 106 as they relate to on-site items, including schools.

We have carried out some basic analysis to compare the existing Section 106 Costs per open market unit against the potential CIL and it is clear that the cost of CIL far outweighs the current liabilities. In



fact on nine sites in both the inner and outer zones, which are either complete or under development, the CIL cost would have been twice that of the Section 106 costs and that is not taking into account any remaining Section 106 on-site costs once CIL is adopted. For strategic sites, the implications are more significant as the nominal figure of £750 per unit estimated by GNDP as being suitable for the remaining Section 106 costs is woefully light if such items as education fall under on-site costs. There are circa 20 strategic sites in the GNDP area, all supplying over 1,000 units each and some substantially more. If the level of CIL causes even a few of these to become unviable then the housing shortfall will become critical.

Yours faithfully
For and on behalf of Savills

A handwritten signature in black ink, reading 'Ciara Arundel', with a horizontal line underneath the name.

CIARA ARUNDEL BSc (Hons) MRICS
Director, Savills (L&P) Ltd

Appendix A – Norwich Policy Area Trajectory

As noted in paragraphs 6, 9 and 10, the projected annual completions in this trajectory cover existing, known sites only, as detailed in Appendix D. Each of the local planning authorities is progressing Site Specific Policies DPDs that will allocate additional sites to increase the level of projected completions and meet the Joint Core Strategy allocation.

Norwich Policy Area - 2008/09 to 2025/26	COMPLETIONS				PROJECTIONS													
	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
1 April - 31 March																		
Actual completions - Previous Years	1193	923																
Actual Completions - Reporting Year			910															
Projected Completions - Current Year				951														
Projected Completions - Future Years					1151	1230	1403	1413	1332	1045	793	665	520	531	499	366	236	236
Managed delivery target - annual requirement taking account of past/projected completions	1825	1862	1921	1988	2062	2132	2208	2281	2368	2483	2662	2929	3307	3864	4698	6097	8963	17689
JCS allocation annualised over 18 years (2008 - 2026)	1825	1825	1825	1825	1825	1825	1825	1825	1825	1825	1825	1825	1825	1825	1825	1825	1825	1825
Broadland NPA	104	84	81	135	146	300	379	249	193	161	120	120	120	120	113	0	0	0
Norwich	527	399	377	309	312	421	575	713	726	676	588	495	350	361	366	366	236	236
South Norfolk NPA	562	440	452	507	693	509	449	451	413	208	85	50	50	50	20	0	0	0
Total NPA	1193	923	910	951	1151	1230	1403	1413	1332	1045	793	665	520	531	499	366	236	236
				Five Year Supply	1151	1230	1403	1413	1332	6529								
										3.28 YEARS								
										3,411 Unit Shortfall								

Appendix D

NORWICH POLICY AREA SITES INFORMATION

Address	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Beyond 31/03/17
BROADLAND – NORWICH POLICY AREA							
Growth Triangle – Inside NDR							
Sprowston: Home Farm Phases 2 & 3	46	18	-	-	-	-	-
Sprowston: Home Farm Phase 5	0	0	58	22	-	-	-
Sprowston: White House Farm (SPR 6)	0	40	120	120	120	120	713
Old Catton: Spixworth Road	0	0	0	40	-	-	-
Growth Triangle – Outside NDR							
Rackheath: Eco-Community Exemplar Project	0	0	58	58	58	26	-
Brundall: Vauxhall Mallards Cricket Club	0	0	0	0	0	30	-
Drayton: Littlewood House, School Road	5	-	-	-	-	-	-
Drayton: Firbanks, School Road	0	0	0	27	-	-	-
Hellesdon: NCS Depot 389 Drayton High Road	0	14	-	-	-	-	-
Horsford: Pinelands Industrial Estate, Holt Road	0	38	24	-	-	-	-
Horsford: Site south of Horsbeck Way,	0	0	0	0	0	0	35
Little Plumstead: Little Plumstead Hospital, Hospital Road	16	17	25	25	10	-	-
Rackheath: Sir Edward Stracey Road	12	-	-	-	-	-	-
Sprowston: School Lane	0	0	0	0	58	17	-
Thorpe St Andrew: 149 Yarmouth Road	0	0	0	47	-	-	-
Sites below 10 units with permissions at 01/04/11 (Discounted by 33% for non-implementation within the period to 31/03/17)	56	19	15	40	3	0	6
BROADLAND NORWICH POLICY AREA TOTAL	135	146	300	379	249	193	754
SOUTH NORFOLK – NORWICH POLICY AREA							
Costessey, Bridge Farm, Norwich Road	0	5	4	-	-	-	-
Costessey: Roundwell Works, Dereham Road	0	0	0	0	0	0	0
Costessey: Former Roundwell Public House	36	6	-	-	-	-	-
Costessey: Lodge Farm	71	52	52	32	8	-	-
Costessey: North of the River Tud/Queen's Hills	153	159	157	173	188	144	41
Cringleford: North of the A11/Roundhouse Park	35	100	100	100	100	100	135
Framingham Earl, Alston's Meadow, 84 Long Lane	8	8	6	-	-	-	-

Address	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Beyond 31/03/17
Hethersett: Lyngate Farm	5	13	-	-	-	-	-
Long Stratton: Cygnet House	0	65	-	-	-	-	-
Long Stratton: Lime Tree Avenue	5	-	-	-	-	-	-
Mulbarton: Cuckoofield Lane	24	24	7	-	-	-	-
Poringland: The Street	30	55	60	50	50	90	287
Tharston/Long Stratton: Saffron Barn	0	0	0	0	0	13	-
Wymondham: BOCM Paul, Rightup Lane	0	7	7	-	-	-	-
Wymondham: Friarscroft Lane	0	0	12	12	-	-	-
Wymondham: Greenland Avenue/Whispering Oaks	64	64	-	-	-	-	-
Wymondham: Norwich Common/Beckett's Grove	30	90	81	60	50	12	-
Wymondham: Sale Ground	0	0	0	0	32	32	-
Wymondham: Silfield Road	23	23	-	-	-	-	-
Sites below 10 units with permissions at 01/04/11 (Discounted by 33% for non-implementation within the period to 31/03/17)	23	22	23	22	23	22	-
SOUTH NORFOLK NORWICH POLICY AREA TOTAL	507	693	509	449	451	413	463
NORWICH							
All Saints Green and Queens Road, site at	0	0	0	0	10	60	-
All Saints Green, Ivory House	0	0	0	0	0	0	11
Anthony Drive/Sprowston Road	0	0	0	0	0	0	25
Anglia Square	0	0	0	0	0	50	148
Aylsham Road, land to rear of and 293-293A	0	0	0	44	44	-	-
Aylsham Road, St. Luke's Court	0	0	0	0	0	0	20
Barrack Street, 126-128	0	0	0	0	0	0	15
Barrack Street, site off	0	0	40	40	40	40	-
Beckham Place	0	0	5	5	5	5	-
Ber Street, rear of 4-8	0	0	0	0	0	0	14
Ber Street, 10-34	0	0	0	0	0	0	30
Ber Street, 60-70	0	0	0	0	0	0	15
Ber Street, Scotts Yard and 113-121	0	0	0	0	0	0	13
Ber Street, Lind BMW site 84-104	0	0	0	0	0	51	100
Bethel Street, 59	0	0	0	0	0	14	-
Bethel Street, Fire Station	0	14	-	-	-	-	-
Bishop Bridge Road, 27	0	0	0	0	0	0	24
Bishop Bridge Road, 29-31	0	0	0	0	0	0	19
Bishop Bridge Road/Egyptian Road	0	0	0	0	0	0	30

Address	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Beyond 31/03/17
Bishopbridge Road, Gas Works Site	0	0	0	0	0	0	15
Bowthorpe Road, Norwich Community Hospital Site,	0	0	0	50	50	20	-
Bowers Avenue, Garages in front of 216-246	0	15	-	-	-	-	-
Bussey Road, SE of Ives Road	16	-	-	-	-	-	-
Carrow Road, Norwich City Football Club (Phase 1)	78	24	24	24	24	-	-
Carrow Road, The Clarence Harbour Public House	0	0	0	0	0	0	8
Castle Meadow, Castle House, 7-7a	0	22	-	-	-	-	-
Crome Road/Romany Road/Branford Road, Start-Rite Shoes Ltd	3	-	-	-	-	-	-
Dereham Road, Earl Of Leicester, 238a	0	0	0	0	12	-	-
Dereham Road, land and buildings adjacent to and Including 349A and 349B	0	0	0	0	11	11	-
Dowding Road, Taylors Lane and Douglas Close, land at	0	0	0	0	25	26	-
Drayton Road, 81-93	0	0	0	0	0	0	25
Drayton Road, Land Adjoining Lime Kiln Mews,	0	0	0	0	13	13	-
Duke Street, EEB site	0	0	0	0	0	0	16
Duke Street, site of former Start-rite Shoe factory	0	0	0	0	0	0	21
Duke Street, St. Mary's Works	0	0	10	10	10	10	-
Earlham Centre, 40 Shoemaker Public House	0	0	0	18	-	-	-
Edward Street, Beckham Place	0	0	0	0	0	0	13
Edward Street, Hunters Squash Club	0	0	0	0	12	12	-
Elizabeth Fry Road/Bacon Road	0	0	0	0	0	0	3
Friars Quay/Colegate	0	0	0	0	0	10	10
Fishergate, Bulsare Warehouse	0	0	0	0	0	5	5
Greyhound Opening	0	0	0	38	38	-	-
Hall Road, Harford Place	0	0	0	0	0	0	230
Heigham Street, 231-243	0	0	0	0	25	-	-
Heigham Street, 271	0	0	0	0	0	11	-
Kerrison Road/Hardy Road, ATB Laurence Scott	0	0	0	0	0	0	8
Kerrison Road, land at	0	0	0	0	0	0	76
Kerrison Road, Norwich City Football Club,	0	0	30	30	30	30	-
King Street, 126-140	0	0	0	0	0	0	23
King Street/Hobrough Lane (131-133 King Street)	0	0	0	0	0	0	35
King Street, 144-146	0	0	0	0	0	0	12
King Street, former Flour Mills and Cannon Wharf	6	-	-	-	-	-	-
King Street, St. Anne's Wharf,	0	0	90	90	80	97	80
London Street, 13-25	0	0	0	0	0	0	20
Lower Clarence Road, Ailwyn Hall	0	0	21	-	-	-	-

Address	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Beyond 31/03/17
Lower Clarence Road, Land at	0	0	0	0	0	0	15
Magdalen Road, 118	0	0	0	0	-	11	-
Magdalen Street, 23-25	0	0	0	0	0	0	17
Magdalen Street, 67-69	0	0	0	0	0	0	10
Mary Chapman Court	0	0	0	0	0	8	32
Millers Lane, 6, 8, 10, 12 & 12A	0	0	0	0	0	0	14
Mountergate, Baltic Wharf	0	0	0	0	0	0	20
Mountergate, land at	0	0	0	0	0	0	80
Mousehold Lane, Start Rite Factory site	0	0	0	10	10	15	-
Music House Lane, Units 1-4	0	0	0	0	0	0	20
Muspole Street, land at Seymour House	0	0	0	0	0	0	57
Northumberland Street, 120-130	0	0	0	0	0	0	30
Northumberland Street, 165-175 & land at Armes Street	0	0	0	0	0	0	10
Northumberland Street, Wensum Clothing Company, 179	6	-	-	-	-	-	-
Oak Street, 123-161	0	0	0	0	30	25	-
Oak Street, Spring Grove Services,	6	15	-	-	-	-	-
Oak Street, The Talk	0	0	0	0	0	20	38
Orchard Street, Pay & Display Car Park	0	12	-	-	-	-	-
Palace Street/Bedding Lane, Bussey's Garage,	0	0	0	0	0	0	24
Pottergate/Fishers Lane	0	0	0	0	0	0	27
Pottergate, former Thorndick and Dawson site, 75-81	0	18	-	-	-	-	-
Rosary Road, former Bertram Books site, the Nest	36	35	36	35	38	-	-
Rosary Road, Chalk Hill Works	0	0	0	0	0	0	24
Rose Lane, 26 - 36	0	0	0	0	0	24	-
St Benedicts Street, 100 - 108	49	-	-	-	-	-	-
St Crispins Road/Pitt Street	0	0	7	6	6	6	-
St Saviours Lane, Hi-Tech House	0	0	7	15	15	-	-
St Stephens Road, 54-78	0	0	9	-	-	-	-
St Stephens Road, former N&N Hospital	38	-	-	-	-	-	-
Silver Road, Former Baptist Church	0	0	0	0	0	12	-
Sussex Street, 70-72	0	0	0	0	0	0	17
Sussex Street, Sussex House	0	0	0	0	0	20	-
Thorpe Road, 79	0	0	21	-	-	-	-
Thorpe Road, 212-216	0	21	-	-	-	-	-
Threescore	0	40	50	50	75	120	865
Trowse, Deal Ground	0	0	0	0	0	0	40

Address	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Beyond 31/03/17
Watling Road, The Canary PH	0	25	-	-	-	-	-
Wentworth Green, former Civil Service Sports Ground	0	0	0	39	39	-	-
Whitefriars, Smurfit Kappa	0	0	0	0	0	0	90
Sites under 10 dwellings (Discounted by 10% for non-implementation within the period to 31/03/17)	71	71	71	71	71	0	0
NORWICH TOTAL	309	312	421	575	713	726	2,494
NORWICH POLICY AREA TOTAL	951	1,151	1,230	1,403	1,413	1,332	3,711