

Part 1. Personal Details

Representations can not be considered anonymously. All representations made will be available for public inspection by appointment, and will be published on the GNDP website. However, this will exclude address, telephone number and email address of respondents which will be used for GNDP purposes¹ only and will be removed from the published representations.

1. Personal Details*

2. Agent's Details (if applicable)

*if an agent is appointed, please complete only the Title and Name boxes in below, but complete the full contact details of the agent in column 2.

Title	Mr	
First Name	Craig	
Last Name	Barnes	
Job Title (where relevant)	Graduate Policy Planner	
Organisation (where relevant)	Gladman Developments	
Address Line 1	[REDACTED]	
Line 2		
Line 3		
Line 4		
Post Code		
Telephone number		
Email address		

¹ The above personal data will be processed in accordance with the Data Protection Act 1998 and will only be used by the Greater Norwich Development Partnership, and its constituent bodies, for the purposes of contacting you about the Joint Core Strategy. It will not be passed on to any third parties.

Part 2a. Your Comments on Legal Compliance

3. Are the Main Modifications to the Joint Core Strategy for Broadland, Norwich and South Norfolk: Broadland part of the Norwich Policy Area legally compliant? (please refer to the guidance notes below for explanation)

Yes

No

No
Comment

 x

Please use the space below to provide more detailed comments:

Part 2b. Your Representation on the Schedule of Main Modifications

Please use a separate sheet for each reference number.

4. Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1). If your comment relates to the Sustainability Appraisal Addendum, HRA Addendum or the Additional (minor) Modifications please state this clearly in the box.:

MM2/MM5

Comments without the relevant reference number will not be accepted.

5. Do you consider the Main Modification you have referenced above to be 'Sound'? (please refer to the guidance notes for explanation of the term)

Yes

No

6. If you consider the Main Modification to be unsound please specify your reason below: (tick all that apply)

A. It has not been positively prepared*

B. It is not justified*

C. It is not effective*

D. It is not consistent with national policy*

* An explanation of the Tests of Soundness is provided in the guidance notes.

7. Please give details of why you consider the Main Modification is unsound. Please be as precise as possible. If you wish to support the soundness of the Main Modification, please also use this box to set out your comments.

See letter attached.

8. Please use the space below to give details of what alteration(s) to the Main Modification you consider necessary to make it sound and why. Please suggest revised wording.

See letter attached.

The Inspector will decide if further public hearing sessions are required as part of the examination process.
All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments on the Main Modifications.

9. Do you consider it necessary to participate at the oral part of the examination? (If reopening the hearing is required by the Inspector)

No, I do not wish to participate at the oral examination

✓

Yes, I do wish to participate at the oral examination

10. The Inspector may hold further examination hearings as a result of the representations. If you wish to participate at any examination hearing, please outline why you consider this to be necessary:

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11. Do you wish to be notified of the following? (please tick as appropriate)

The publication of the
Inspector's Final Report

✓

The adoption of the Joint Core
Strategy for the Broadland part of
the Norwich Policy Area

✓

Signature:	Craig Barnes	Date:	21/10/2013
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Broadland DC
Spatial Planning Team
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich

(Representations submitted by email jointcorestrategy@gndp.org.uk)

21st September 2013

Re: Joint Core Strategy Main Modifications Consultation Autumn 2013.

Summary

Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. We understand that the Councils are inviting comments on the Main Modifications to the Growth Triangle component of the Joint Core Strategy. This letter is in response to the above consultation and reflects Gladman's previous representations upon the Broadland Allocations DPD consulted upon recently by Broadland District Council.

This consultation comes as a result of a successful High Court challenge on the Growth Triangle element of the Joint Core Strategy originally examined in November 2010. The High Court challenge found that there was insufficient examination of the alternative options in the SA and SEA relating to the Growth Triangle site. Gladman understand that the Councils are only inviting comments on the Main Modifications, additional Minor Modifications, the Sustainability Appraisal Addendum and the Habitats Regulations Assessments Addendum.

Although the remainder of the Joint Core Strategy was approved and is now adopted, Gladman note that much of the national and regional policy context against which this document was originally tested in examination has since been modified or revoked. Gladman have already commented that a review of the Joint Core Strategy should be taken this context in line with government policy (see §212-215 of the Framework).

In this representation Gladman express specific significant concern regarding the housing trajectory forwarded by the Councils in MM5 (also known as Appendix 6a). Gladman outline that the adoption of which would risk a high proportion of the planned housing requirement not being delivered. This is due to overly optimistic building rates, the saturation of the housing market in a localised area, and the inflexibility of the trajectory. The representation concludes that at present the Modifications

do not meet the tests of soundness as advocated by §182 of the Framework and recommend the allocation of additional sites through the Allocations DPD currently being prepared by Broadland DC.

Main Modification 5 (MM5)

Introduction

MM5 presents a table identified as Appendix 6a that outlines the expected housing trajectory for housing delivery in the Broadland Norwich Policy Area (Broadland NPA). This table is intended to replace the table that is deleted by MM4 that illustrated the expected trajectory in 2010. MM5 expresses the Councils expectation of annual delivery at major developments sites at Rackheath, the remainder of the growth triangle, and unidentified additional small sites around the Broadland NPA. The table finds a total of 9,107 dwellings are expected to be completed between 2014/15 and 2025/26 in the Broadland NPA, producing an annual average housing delivery of 759 dwellings. The total number of annual completions in the Broadland NPA varies from a low of 195 dwellings in 2014/15, peaking at 993 dwellings in 2018/19. A copy of the table (table 1) is provided below for ease of reference.

Table 1: Broadland NPA Trajectory July 2013

	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	TOTAL	Av build
Rackheath	77	77	70	185	230	230	230	230	230	230	230	230	2249	187
Remainder of Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle (inside NDR)	20	163	234	373	435	440	515	590	530	530	530	497	4857	405
Additional small sites around Broadland NPA	98	148	161	266	328	300	225	150	150	150	25	0	2001	167
Total	195	388	465	824	993	970	970	970	910	910	785	727	9107	759

Source: pg 9, Suggested Main Modifications Consultation, GNDP 2013

Council's justification

Gladman note that the trajectory purported in the table above is supported by a GNDP paper on housing that was produced on the 21st June response to an Inspectors letter received on the 24th May 2013 following the adjournment of the initial hearings that took place at the end of May. In this report the Councils attempt to justify a peak delivery rate of 230 dwellings per year at the Rackheath Eco-town, and the use of 50 dwellings per year per outlet in the trajectory.

The report underlines that a figure of 230 dwellings per year is applied to the Eco-town at Rackheath with the rationalisation that it was previously accepted at the Joint Core Strategy Examination in November 2010, and that the length of time taken to deliver the site at 50 dwellings per annum that would result in a risk to the viability of the site due to infrastructure and land acquisition costs. This delivery rate is supported by a letter dated 20th June from Barratt Homes that confirms the deliverability of this site at this rate referring to the sites position in national policy, and the sites capacity to be developed by multiple developers at once.

Justification for the use of 50 dwellings per developer outlet per year starts in §4.2 of the aforementioned housing paper produced on the 21st June. The paper underlines that this figure was agreed on Day 2 of the Hearings to represent a reasonable amount of delivery, and also refers to evidence from the Calcutt Review of Housebuilding Delivery (CLG, 2007), a Topic Paper titled

“Strategy to Accommodate Major Housing Growth in the Norwich Policy Area” (referenced as TP8) produced by GNDP in November 2009, and references local examples of past delivery of major sites.

Evidence shortcomings

Gladman question the relevance of this evidence for a market that is emerging from a recession. Gladman note that much of the evidence used to support the figures used by the housing trajectory dates back to circa 2008/09. Indeed:

- The Calcutt Review was published by CLG in 2007.
- The Councils Strategy to accommodate major housing growth was published in 2009
- Cited National examples of large scale developments identify average completion rates up to 2007.
- Most of the local sites included in table 7 of the report identify maximum whole site delivery/individual developer delivery as taking place in 2007-2008.

2008/09 was at the end of a period of significant economic prosperity, supported by artificial credit created by over optimistic mortgage rates and dangerous levels of debt building. This enabled developers to build at a faster rate fostered by unsustainable demand. Although now in recovery, the construction industry and financial sector has not yet recovered to pre-recession levels.

A more realistic delivery would be between 25 and 35 dwellings per year per outlet. Table 7 of the Councils evidence also includes a site identified as Beckett’s Grove, Wymondham for 323 units, that outlines that two developers on site, have so far achieved a max whole site delivery of 58 (granted the proportion nor the stage of the delivery is identified), if it was assumed to be 50:50, this would produce a local individual outlet yield of 29 dpa. Although this is far from a scientific method of determining local build rates, when compared with recent trends portraying net completions in the Broadland NPA of 104 (2008/09), 84 (2009/10), 81 (2010/11), 157 (2011/12) and 55 (2012/13), this would suggest that a far lower delivery experienced in the area than the some 900 net requirement as currently set out in the housing trajectory.

What is clear is that a housing trajectory that reflects housing completions at the height of an economic boom is not a suitable basis upon which to base the delivery of the plan. Gladman would expect that the economic climate is likely to change for the better over the plan period with increasing building rates, however there is no certainty as to when and how significant this recovery will be. The housing trajectory is therefore undeliverable and present and should be considered unsound.

Trajectory shortcomings

Gladman consider that in addition to applying over optimistic build rates, the trajectory has further shortcomings that reduce the plans deliverability. The trajectory appears to fail to understand the market, specifically in accounting for the impact housing market saturation. The trajectory outlines that in some years nearly a 1,000 dwellings are expected to be completed within the Broadland Norwich Policy Area, with approximately 70% of this being delivered on sites within the Growth Triangle. The delivery of such a significant amount of dwellings in a small geographical area, on a narrow range of sites, will create enormous levels of competition for developers in the selling of completed dwellings. Due to the importance of cash flow in the development of sites, house builders will only deliver the number of dwellings that they can sell. This concentration of delivery in a single area may impact on the market to the extent that buyers may be hard to find. This could in the worst case scenario result in developments stalling due to lack of profitability, thus impacting on the delivery of the housing requirement.

Furthermore, Gladman believe there is a lack of flexibility in the housing trajectory. Gladman appreciate that housing trajectories can never be 100% certain on the rate of delivery of future sites, however it is clear from the extent of the list of infrastructure (provided in MM7) required, that there is a significant reliance for these to be delivered on time to meet the trajectory outlined. Indeed the Inspector has shown concern regarding this, requiring the Councils to outline what the impact would be on housing delivery were the improvement of the Postwick Junction and the North Norwich Distributor Road not be completed. Whilst Gladman consider the completion of these infrastructure projects to be likely, the timing remains uncertain. The enormous reliance on these projects to deliver much of the growth triangle means that any delay in the completion of infrastructure could result in a significant shortfall in the supply of housing.

Ways forward

The Councils have attempted to address any under delivery in Main Modification 2 (MM2). Whilst Gladman welcome MM2 and its provisions for the presumption in favour of sustainable development in Policy 21, the mechanism to attempt to ensure the delivery of the growth triangle in Policy 22 could prove problematic in practice. This is due to the large numbers of houses expected to be delivered annually through much of the plan period, and to inflexibility of plan making in evolutionary context of plan delivery.

It should be pointed out that Gladman do not question the approach taken in principle by the Councils in allocating the Growth Triangle. Accounting for the need to adopt the growth triangle policy, Gladman believe that a more effective method of ensuring that the plan meets the full housing need would be to allocate additional sites through the Allocations process currently ongoing in Broadland DC. This approach would enable the adoption of policies relating to the growth triangle now, recognising the areas role and strategic importance for the Norwich area, whilst ensuring that the plans needs are achievable. A broader selection of sites would reduce the reliance upon significant sites that require additional infrastructure provision to deliver much of the housing requirement. The dispersal of sites across a broader geographical area would deliver a broader and diverse range of housing sites that would promote a healthy market and allow for a wider choice for consumers. This would reduce the impacts of competition that could reduce completions in the local area.

Conclusion

The purpose of this consultation was to examine whether the modifications proposed by the Councils are sound as tested in §182 of the Framework, specifically that it is positively prepared, justified, effective and consistent with national policy. Gladman have demonstrated that the trajectory is based on build rates that reflect pre-recession evidence, is fundamentally flawed due to the operation of the housing market, lacks diversity required to ensure delivery and lacks flexibility in the expected delivery to ensure that full housing need in the local area is achieved. As such, the modifications are unsound.

Gladman recognise that the Growth Triangle has already been met by delays as a result of the legal challenge, and recommend that the housing trajectory is adjusted to reflect more realistic build rates, and further sites are allocated through the current Allocations DPD process to account for the difference in housing numbers to ensure that the plan is sound and capable of being delivered.

We hope that you have found our comments on this issue to be informative and constructive. Thank you for the opportunity to comment.

Yours faithfully

Craig Barnes
Strategic Land Team
Gladman Developments