

**Joint Core Strategy for Broadland, Norwich and South Norfolk,  
Broadland Part of Norwich Policy Area Examination**

## **AGENDA – MATTER 2**

Starting at 10.00 hours on Wednesday 22 May 2013 and continuing on Thursday 23 May 2013 at 10.00 hours at the Top of the City Conference Room, Norwich City Football Club, Carrow Road, Norwich NR1 1JE

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**Where the parties have clearly stated their respective positions on my questions and I have sufficient information, then there is no specific item on the Agenda**

*Discussion should focus on whether the Plan is sound or unsound (positively prepared, justified, effective & consistent with national policy); and if unsound, how it might be modified to achieve soundness*

1. Inspector's introduction.
2. Please note that the purpose of this part JCS Examination is to address the Judgment of Mr Justice Ouseley in *Heard v Broadland District Council, South Norfolk District Council and Norwich City Council 2012*. No other part of the adopted JCS is included – this is not a review of the whole JCS.
3. Any requests for an accompanied site visit?

### **MATTER 2 – The implementation of the submitted part JCS proposals**

*Note: I am unable to accept information on a 'confidential' restricted basis. This is a public examination and so all evidence must be publicly available.*

**Whether policy 9 and 10's proposals and associated text for employment and housing are positively prepared, justified by the evidence, consistent with national policy, and effective**

4. **Councils:** how many years housing land supply (per year) exists in the part JCS proposals: a) without Postwick Hub and the NDR; and b) with Postwick Hub but without the NDR?
5. **Councils:** is the inner orbital road links and alternative Postwick junction improvements mentioned by NNTAG and others a realistic "fall-back" provision that would allow further housing land releases in the event that the NDR and Postwick Hub did not occur? If so, what would the housing land supply forecast (per year) then be?
6. If the NEGТ failed to deliver according to schedule then swift remedial action might be necessary. I am not yet convinced that this is provided for in the part or adopted JCS (i.e. in paragraphs 7.11 to 7.18) given the changed situation since my colleagues conducted the previous Examination (i.e. the Housing Trajectory has not been fulfilled). At present, I consider that this should be achieved by monitoring any significant delays in the delivery of critical infrastructure for the NEGТ's development (for both the housing and employment allocations) and the five year housing land supply, and by providing a sensible, reasonable and timely trigger mechanism which would enable the councils to quickly allocate any further necessary land elsewhere in a future short, focussed Local Plan. Please would the **councils** and **others** separately suggest a further policy to achieve this for discussion at the hearing session? (*Note: I am not convinced that the Landstock Estates Matter 1 policy 10a is effective [e.g. only for housing]. One example might be policy CS5 in Rugby's CS, although without reference to a particular alternative location*).

7. Do participants consider that any such modified policy as above would be beyond my powers, as I queried at the Pre-Hearing Meeting (see paragraph 19 of the Meeting Notes).
8. Do participants agree with the councils' assessment of the likely housing starts and completions as set out in its Q1.2 response? If not, why not? Please would participants agree between them (time permitting) what schemes are commonly relied upon in the figures. If possible, an agreed land supply paper would be of great assistance to me.
9. Please would the **councils** verbally go through and explain the proposed changes to the Appendix 6 Housing Trajectory in its Q1.5 response. Do these affect the bar charts or any other table in Appendix 6? Are the additional (blue) site specific tables also to be included in the Trajectory? Are the councils' proposed modifications to the Housing Trajectory acceptable to participants?
10. Please would **Landstock Estates** verbally go through and explain the proposed "BW Trajectory" in its Appendix 1 by reference to the differences to that in the submitted part JCS. Do participants agree with this Housing Trajectory? If not, why not?
11. Is the **councils'** response to the figures provided in CPRE's statement, particularly its section 4, as set out in TP13?
12. Do **participants** agree with the councils' assessment of the housing need and demand forecasting as set out in the evidence base and in the council's responses to Qs 1.9 to 1.11? If not, why not? Should a 'backlog' be included? (*Please do not repeat points already made on this issue*).
13. I am not sure from the councils' response to Q1.17 that the Infrastructure Framework in Appendix 7 of the JCS reflects the current thinking of the Local Investment Plan and Programme (LIPP). Whilst I agree that it is not appropriate to update the whole of Appendix 7, it should at least be updated to reflect the infrastructure required at this time (as a 'snapshot') in this Local Plan (i.e. the part JCS). Please would the **councils** prepare an appropriate modification for the hearing session (also see the question below)?
14. What is the **council's** response to Landstock Estates and the Green Party's claims in their statements on Q1.17 that there are key items of LIPP infrastructure missing from Appendix 7, key interdependencies missing, timings that are different (more delays), costings that are different, and that some infrastructure issues indicate bottlenecks in delivery?
15. **Councils:** will the reduction in anticipated CIL monies affect the infrastructure provision necessary to deliver the NEGТ developments? If so, how?
16. **Councils:** On the Rackheath eco-town, will practicable, affordable and timely rail improvements be provided? Is it necessary for the delivery of this development? Should this be in Appendix 7?
17. **Councils:** does any of the above infrastructure concerns affect delivery times or rates of development?
18. I am doubtful that the councils' response to Q1.18 on viability is sufficient for this Examination. The GNDP CIL Examination did not deal with the financial viability of specific sites (it considered broad 'zones' and hypothetical schemes), and its context did not include the NEGТ proposals as these had been taken out of the adopted JCS by the Broadland judge. Assertions on viability made by developers are just that – assertions - unless they are backed up by robust confirmatory evidence. The "*Viability Testing*" document does not say that CIL testing is the same as, or is a substitute for, the proper viability testing of specific sites to be allocated in Local Plans (to be done as set out in its Part Two from page 19 onwards). Nor is it only about infrastructure costs. **Councils:** please provide me at the hearing with the previously requested viability information.
19. As above, this Local Plan should set out a 'snapshot' of the methodologies necessary to

deliver the proposed developments, and so the monitoring changes in the councils' response to Q1.19 should be included as main modifications. In order to be clear, the changes should specifically state that they relate only to the NEGТ. Do **participants** agree with these?

20. Any further points?

### **Closing**

21. Summary of, and production of, any further modifications suggested at the hearings, including public consultation and any requirement for Sustainability Appraisal.

22. Timescale of Inspector's Report – i.e. ETA of 'fact check' report.

23. Review of Examination – any comments?

24. Thanks from the Inspector and close.

David Vickery: 17 May 2013