

Mrs Annette Feeney
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BY EMAIL AND POST

21389/A3/AW/mg

21 March 2013

Dear Mrs Feeney

**JOINT CORE STRATEGY FOR BROADLAND, NORWICH AND SOUTH NORFOLK,
BROADLAND PART OF NORWICH POLICY AREA EXAMINATION,
REPRESENTATIONS ON BEHALF OF LANDSTOCK ESTATES LTD AND LANDOWNERS GROUP LTD**

Thank you for your letter dated 13 March 2013 enclosing the draft hearings programme and Inspector's Matters/Questions for the above Examination.

We act for Landstock Estates Ltd, the Landowners Group Ltd and United Business and Leisure (Properties) Ltd who have land development interests in north east Wymondham and north east North East Norwich and other parts of the Norwich Policy Area (NPA). We would like to confirm we will be attending the sessions on Matter 2 and will be responding to the Inspector's matters in accordance with the published procedures.

However, there are a number of matters arising in respect of the implications of the GNDP's approach in terms of the application of the JCS and the policies set out in the JCS not subject to this review. If the Inspector is agreeable, we would welcome the opportunity to explore the implications of these matters at the Pre-Hearing Meeting (PHM) on Tuesday 16th April 2013.

The matters raised by the Inspector highlight the issues of the deliverability of the proposed strategy and the timing of the release of the land for new homes. It is clear, in our view, that the rate of delivery for the Broadland part of the NPA will not be achieved leading to a shortfall in housing land supply which will need to be made up elsewhere in the NPA in order achieve the JCS minimum requirement. Whilst this is, of course, a matter for submissions at the examination, the implications of such potential conclusions need, we would suggest, be addressed in full and considered within the programme and the setting of the matters to be discussed.

Furthermore, if the conclusion is reached that the rate of delivery of housing in the Broadland area may not be achieved, then, the redistribution of the unmet housing requirement elsewhere in the NPA will need to be considered.



Currently, South Norfolk Council is seeking to bring forward its Site Allocations DPD and two Area Action Plans (for Wymondham and Long Stratton) together with a Neighbourhood Plan (for Cringleford) in response to the JCS. Broadland District Council is following a similar course with its Growth Area Triangle Options. However, if the Broadland part of the JCS is found unsound, then the housing requirements that South Norfolk Council (and the other partner Council Norwich City) will need to meet may change.

We are, of course, supportive of the GNDP's desire to adopt a robust JCS that can provide the spatial strategy for the whole of the GNDP NPA. However, this interest will not be served if the submitted plan is found unsound at a later stage. We are also wary of any conclusion that such deficiencies, if found to exist, can be adequately addressed by a commitment to an early review or the preparation of a reserve sites DPD. The Inspector may recall the example of Horsham District where deficiencies in flexibility of housing land supply were to be remedied by a reserve sites DPD. Such a DPD was never adopted and a review of the Core Strategy was not progressed. The result is that Horsham has a continuing shortfall in housing land supply with no prospect of the matter being addressed through the plan making system in the short term.

We therefore enquire as to whether the Inspector would be willing to add a further question to be explored at the forthcoming PHM and/or hearing sessions that addresses this issue i.e. 'what are the implications on the emerging Site Allocations DPDs/AAPs in South Norfolk and Norwich if the submitted spatial strategy cannot be delivered?'

In addition, having sought Counsel's advice, we consider that the conclusions on Matter 2 have a potential material impact on Inspector's questions set out in Matter 1 at Questions 1.2 to 1.4 (inclusive).

We would ask the Inspector to give consideration to moving discussions on Questions 1.2 to 1.4 following the conclusion of Matter 2.

We hope the above sets out our position clearly; but if the Inspector requires any additional material, then we will of course be happy to provide him with the relevant/requested information. We would also like to advise the Inspector that a copy of this letter will be sent to South Norfolk Council, Broadland District Council, and Norfolk County Council's Legal Department (NP Law), which acts on behalf of the GNDP authorities.

We confirm that we will be attending the PHM on 16 April 2013.

Yours sincerely



IAIN PAINTING
Senior Planning Partner

cc: South Norfolk Council (Adam Nicholls)
Broadland District Council (Phil Kirby)
NP Law (Stuart Shortman)
Peter Westhorpe (Landstock Estates)
Graham Tuddenham (Landowners Group)
Andrew Wilford (Barton Willmore)