

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	<input type="text"/>	Mr
First Name	<input type="text"/>	John
Last Name	<input type="text"/>	Long
Job Title (where relevant)	<input type="text"/>	Senior Planning Associate
Organisation (where relevant)	Hethersett Land Ltd	Bidwells (Hethersett Land Ltd)
Address Line 1	c/o Agent	16 Upper King Street
Line 2	<input type="text"/>	Norwich
Line 3	<input type="text"/>	Norfolk
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	NR3 1HA
Telephone number	<input type="text"/>	<input type="text"/>
Email address	<input type="text"/>	<input type="text"/>

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

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

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.

Hethersett Land Ltd supports the main modification MM2 (implementation and delivery within the Broadland part of the Norwich area).

In particular, Hethersett Land Ltd supports the aims of the new Policy 22: Action to ensure the delivery of housing land in the Broadland part of the Norwich Policy Area (NPA).

This new policy approach, once adopted, will be an essential tool in ensuring a continual supply of development sites within the NPA. Whilst Hethersett Land Ltd considers that the approach to be legally compliant and sound, there remains a question whether the Policy's approach is as responsive as it could be.

Hethersett Land Ltd consider that the policy could be made even more responsive to under-delivery if it required each of the GNDP Councils to identify 'Reserve Sites' in their current emerging site allocations documents, none of which have been considered by an Inspector and/or examined.

The concern with the policy's current approach is that the process of preparing a "...short, focussed Local Plan..." to identify and allocate additional housing could take a number of years to complete, based on recent experience of site allocations/local plan preparation in the NPA. This would add to uncertainty, for the Councils, developers, landowners and the local community.

Hethersett Land Ltd suggest that each of the GNDP Councils already has the information it needs to identify and allocate 'Reserve Sites' to accommodate shortfalls/delays in delivery elsewhere in the NPA. All three Councils have consulted upon and sustainability appraised a significant number of sites around the NPA, beyond those that are required to meet existing targets and proposed to be allocated in emerging plans.

Hethersett Land Ltd accept that for emerging plans to identify and include 'Reserve Sites' to meet the new JCS Policy 22, a further consultation may be necessary, but other than Norwich City Council who's site allocations DPD is more advanced, Broadland and South Norfolk Council have yet to reach the 'Pre-Submission' consultation stage. A short delay now to enable 'Reserve Sites' to be identified and consulted upon as part of current site allocation preparation will result in a more responsive and flexible policy in the longer term.

Hethersett Land Ltd, ask whether such an approach has been considered by the Inspector and/or the GNDP.

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.

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:

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:		Date:	2 October 13
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