

**Schedule identifying Barton Willmore concerns within GNDP Hearing Statement relating to Matter 02**

	<b>Location within GNDP Hearing Statement</b>	<b>Concern</b>	<b>Issue</b>	<b>Further information</b>
1	P2 of GNDP Hearing Statement 'The Growth Triangle'	481 dwellings completed in Broadland NPA	No evidence base to support this figure. SoCG meeting confirmed data available up to March 2012 (AMR 2012) for 430 dwellings but not for 481 dwellings.	Q. Evidence for the residual figure of 51 dwellings
2	P3 of GNDP Hearing Statement 'Persimmon Delivery'	Delivery of the site in 7-years	No evidence in the SoCG that this is the case. Both Persimmon SoCG (SCG4 and SCG 7) refer to bringing forward sites sooner rather than later i.e. within the 5 year period.	Q. Where is this evidence?
3	GNDP Response to Q1.3 (P6)	JCS para 7.11-7.18 does not set out the strategy in the event of non-delivery of the NDR.	Inspector has picked up this issue in his Q6 of revised Agenda to Matter 02.	Q. How will the GNDP now respond at this late stage, in what form and by when?
4	P7/8 of GNDP Hearing Statement 'Housing Completions'	1. 419 dwellings completed in 2012/13 in SNC.	There is no evidence to support this figure?	Q. Where is the evidence?
		2. 407 dwellings completed in 2012/13 in Norwich.	There is no evidence to support this figure?	Q. Where is the evidence?
		3. 700 dwellings granted PP in 2012/13 in Norwich.	There is no evidence to support this figure?	Q. Where is the evidence? Are some of these dwellings reliant on only resolutions to grant consent subject to a S106 Agreement? Are they not actually commitments only when the Decision Notice has been issued; so how can they be relied upon?

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		<p>The figure of 386 dwellings as the target figure for Norwich City to test completions against.</p> <p>Barton Willmore is in receipt of information provided by the GNDP prior to the original JCS Examination<sup>1</sup>.</p> <p>This information was requested at that time to understand the figures contained in the Annual Delivery rates on p110 of the submitted JCS.</p> <p>It is not possible to understand the sources of the supply of housing from each of the 3 authorities (i.e. the breakdown) that contribute to the overall annual figure without this additional information i.e. the JCS does not set out this information.</p> <p>By way of example, the year 2012/13 on P113 of the JCS identifies that a total of 2,043 dwellings are to be delivered in the NPA.</p> <p>Of these, only 230 dwellings are to be brought forward from new allocations. Norwich City contributes 0 dwellings to this 230 figure with the only source of new supply being 230 dwellings from</p>	<p>There is no evidence in the submitted or adopted JCS that sets out 386 dwellings will be completed in that year. The information submitted is misleading as it suggests NC is achieving its delivery. This is not the case.</p>	<p>Q. Can the GNDP produce a HLS note detailing this information and what the numbers in the JCS were based on as a breakdown from each authority? If so, by when?</p>

<sup>1</sup> See summary table below

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		<p>Rackheath.</p> <p>1,813 commitments therefore make up the remainder of supply to achieve the 2,043 figure.</p> <p>The information received from the GNDP (not subject to public release) confirms the trajectory expects the following breakdown of sites:</p> <p>Broadland: 520 dwellings (inc. 230 at Rackheath)</p> <p>Norwich: 933 dwellings</p> <p>SNC: 590 dwellings</p> <p><b>Total: 2,043 dwellings</b></p> <p>The JCS trajectory, although not explicitly set out within the document (but confirmed in the GNDP figures to support this target) requires NC to deliver 933 dwellings in 2012/13.</p> <p>It only delivered 407 dwellings in 2012/13.</p> <p>This results in a shortfall of 526 dwellings in 2012/13 alone and not a surplus of 21 dwellings against the 386 figure quoted in the GNDP Hearing Statements (p8 matter 02).</p> <p>To date, there is a shortfall in NC of 1,251 dwellings since 2008 against the JCS</p>		

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		<p>trajectory figures (note: these are the JCS trajectory figures and not a 5-yr supply calculation as this is based on a different methodology).</p> <p>Using the same methodology as above, there is a shortfall of 728 in Broadland and 925 in SNC, resulting in a total deficit of 2,904 dwellings against the projected JCS targets set out on p110.</p> <p>The 2012 AMR (Appendix A p67 para. 8) confirms the annual JCS requirement is 1,825 per annum. In the 4yr period (2008-2012), 7,300 dwellings were required compared with an actual delivery of only 3,941 dwellings. This equates to a current deficit of 3,359 dwellings in the 4 year period (as set out in para. 1.5 of BW Matter 02 Statement).</p>		
5	REP8 of GNDP Hearing Statement	Pre-application consultation taking place in Cringleford	Where is the evidence?	Q. Is the GNDP relying on pre-application discussions to take into consideration future delivery? If so, please make clear and provide suitable note
6	P9 of GNDP Hearing Statement Response to Q1.8	<p>Barton Willmore informed that in SDJCS 14 windfall provision follows the same approach as August 2010 approach (EIP 70)</p> <p>N.B. Please refer to para. 13.1 of SDJCS 14 and TP10 which contradicts this position and confirms this approach is</p>		Q. Why has SDJCS 14 in this context changed the approach to Windfalls whereas the Hearing Statement confirms this has not changed from August 2010 (EIP 70)?

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	different.		

Based on the disclosed information the following table is our best attempt to illustrate:

**Adopted JCS Trajectories vs Actual Completions 2008/2013 (based on GNDP Background Data)**

Norwich Policy Area Part of	Row		2008/09	2009/10	2010/11	2011/12	2012/13	Total	Shortfall	Commitment 2008
Broadland	1	JCS Trajectory	100	89	54	446	520	1,209		2,099
	2	Actual Completions	104	84	81	157	55	481		
	3	Difference Row 1-2	-4	5	-27	289	465	728	60%	
Norwich	4	JCS Trajectory	564	464	611	669	933	3,241		5,592
	5	Actual Completions	527	399	377	280	407	1,990		
	6	Difference Row 4-5	37	65	234	389	526	1,251	39%	
South Norfolk	7	JCS Trajectory	606	742	701	637	590	3,276		4,156
	8	Actual Completions	562	440	452	478	419	2,351		
	9	Difference Row 7-8	44	302	249	159	171	925	28%	
Total	10	JCS Trajectory	1,270	1,295	1,366	1,752	2,043	7,726		11,847
	11	Actual Completions	1,193	923	910	915	881	4,822		
	12	Difference Row 10-11	77	372	456	837	1,162	2,904	38%	

**Barton Willmore**  
21 May 2013