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March 2021

GNLP Regulation 19 Consultation Response

CPRE Norfolk bases its submission on the following parts of paragraph 35 of the NPPF relating to the examination and soundness of local plans: that to be justified a plan must be based on proportionate evidence, and that a plan must be consistent with national policy, by enabling the delivery of sustainable development. In addition, there are some comments below which raise issues of legal compliance.

Climate Change

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: 'development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' Whilst the GNLP's Climate Change Statement states that it will 'have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks', it does not include clear evidence-based carbon reduction targets, which are needed for the GNLP to demonstrate how it will meet its legal obligations. This means that throughout the GNLP, policies should have carbon reduction at their core, which will be of great importance when considering location of development, transport planning, environmental policies, and others where sustainability is a key. Instead, the GNLP prioritises economic growth and development without putting the legal requirements of climate change front and centre. This is demonstrated by the statement at para. 158 that 'the document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038', whereas it should be stating that it meets the NPPF's primary purpose for a local plan to provide for "sustainable development".

The need to address Climate Change in line with national policies has not been fully met by the GNLP, despite the claim at para. 93 of the Reg. 19 GNLP that 'mitigating the effects of climate change within the greater Norwich area is a cornerstone of the GNLP'. On reading various historic papers of the GNLP it is clear that Climate Change is consistently put second to the apparently more important growth. For example, at 2.2 of the GNLP Papers for 6 January 2020, it is stated that further work had been undertaken 'reviewing the key messages and current thinking on climate change'. This illustrates the concern is for the message being delivered, rather than any real desire to ensure that policies within the GNLP put climate change to the fore. This is further supported by the minutes of the GNLP meeting of 26 September 2019 when it was noted that 'some key messages (such as those in respect of climate change) had failed to keep up with current thinking and needed updating', showing that it was accepted that the message on addressing climate change had to be improved, and yet there was no stated intention to see this translated into more robust policies.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNLP Board Papers that the most reasonable alternative for the location of housing in terms of the environment (e.g. minimising air, noise and light pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing biodiversity and green infrastructure; promoting the efficient use of land; respecting the variety of landscape types in the area; reducing the need to travel and promoting the use of sustainable transport modes; minimising the use of the best agricultural land; maintaining and enhancing water quality and its efficient use) is Option 1: urban concentration close to Norwich. In terms of all these and other factors taken together the least desirable option as shown on this chart is Option 4: dispersal of development. However, this opportunity to start to address climate change and other sustainability measures was not taken, with a combination of development location options being chosen instead.



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Para. 97 of the Reg. 19 GNLP states that 'policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate'. To achieve the latter in particular, excessive amounts of new housing in unsustainable locations not built to carbon neutral standards will fail to meet this requirement. The Reg. 19 GNLP Climate Change Statement when addressing the location of development states: 'the policies covering the location of development ensure that new housing will be close to everyday services and jobs' and 'growth in villages is located where there is good access to services to support their retention.' This is not always the case, with many rural housing site allocations and anticipated "windfalls" not being close to jobs or where there is good access to services, given the location of the majority of new allocated sites at the edge of settlements. Unfortunately, it is impossible to make comments about new allocation sites in South Norfolk's village clusters due to the decoupling of the policy for these from the GNLP (See below.)

To make this sound, the total number of dwellings beyond the required amount should be reduced to the necessary minimum, and the locations of much of the new development changed to reflect the needs resulting from climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in unsustainable rural locations, where there is poor access to public transport and local jobs, but instead a reliance on private cars, as well as delivery vehicles to support these new dwellings.

Housing Delivery

The GNLP aims to deliver 49,492 new dwellings to 2038: CPRE Norfolk contests this number for being unnecessarily high as it will not enable the delivery of sustainable development which should prioritise the use of brownfield over greenfield sites. It is worth noting that the Government in its response to the recent *Changes to the Planning System* consultation appears to indicate more room for divergence from the housing needs figure derived from the standard method. Aside from stating that the current standard method will be retained with additional tweaks, this response also specifies that the standard method should not be interpreted as a "target in plan making", but rather as a "starting point" which should be considered "alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development" before making "the decision on how many homes should be planned for". The response goes on to insist on the fact that the standard method "does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF (which specifically allows for a divergence from the standard method in cases where the scale of development would cause harm) or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes are most appropriately located. In doing this they should take into account their local circumstances and constraints". This suggests that there is no need to increase the number of houses to be built way beyond the number required by the standard methodology, and instead it could be used to set lower targets due to local circumstances and constraints.

Delivery of such a large number of houses would make it difficult or even impossible to meet climate change targets, including the legally binding commitment to reach net zero by 2050, particularly as these are likely to be made more stringent during the life of the plan. If climate change is going to be the priority it should be, then the number of new houses in the plan should be kept to the legally required minimum rather than inflated to the proposed levels which are far above the legal requirement or "need". Moreover, the location of any new housing should be reviewed in light of climate change targets and legislation, so that sites are allocated in the most sustainable locations, bearing in mind the importance of environmental factors in ensuring development is sustainable in the NPPF (paragraph 8), and a plan sound.

The GNLP proposes to have 'enough committed sites to accommodate 22% more homes than "need", along with a "contingency" location for growth, should they be required to offset any non-delivery. Additional opportunities will be



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provided, particularly small scale growth at villages and on small brownfield sites across Greater Norwich, through additional windfall development' (Reg. 19 GNLP Delivery Statement.) Having such a high buffer of 22% makes the GNLP unsound due to this almost certain to result in failure to meet necessary climate change targets, legislation and aspirations. The Reg. 19 GNLP at para. 53 notes that a 5% buffer is required by the NPPF, and yet a 22% buffer is being proposed.

It is important that prioritisation is given to the delivery of brownfield sites, in line with the Government's stated intentions and the need to help to address climate change. If more new allocations and windfalls outside rural settlement boundaries are permitted then it is highly likely that development will take place there rather than on urban brownfield sites, where development may not be so streamlined or cost-effective for the developer.

There is clear and compelling evidence from historic completions that windfalls are highly likely to come forward for development, with the Reg. 19 GNLP forecasting that an estimated 4,450 resulting from windfall development will come forward during the plan period, and yet only 1,296 dwellings have been included as a windfall allowance. 'As windfall delivery is likely to remain robustly high', it would be sound to include a much higher number within this allowance, thus meaning that fewer new housing allocations would be required on less sustainable greenfield rural sites. This is also further evidence that a 22% buffer is unnecessarily high.

We note the inaccuracy in Reg. 19 GNLP para. 180 which states that 1,200 new houses in the South Norfolk Village Clusters Housing Allocations Local Plan (SNVCHAHA) plus 250 in the Diss and area Neighbourhood Plan totals 1,400, instead of 1,450.

We question the inclusion of a "contingency" site or sites, such as that at Costessey (Reg. 19 para. 181) for 'around 800 homes', but which we believe should also include those identified 'to provide the opportunity and flexibility to accommodate around 5,000 additional homes to recognise that the 2018-based household projections indicate that growth may be higher than in the 2014-based projections which are used in the plan' (page 15, GNLP agenda and papers, 7 December 2020.) These include 2,000 dwellings in East Norwich and 840 from sites in Colney, Cringleford, Harleston, Wymondham, Aylsham and Acle. These additional numbers of dwellings should only be included if there is a legal need to do so, otherwise the GNLP will include even more unnecessary and "unneeded" houses. We argue that a sound way to deal with this issue would be to introduce prioritisation or phasing of delivery for these numbers of houses which are beyond what is "needed", whereby the additional or "extra" numbers are only included if actually "needed" following any revisions to that effect in the standard methodology. However, to address climate change issues more effectively, it would make more sense to include these additional sites given their more sustainable locations, particularly those in East Norwich for example, within the core GNLP, and then only add the additional numbers, consisting of housing sites in less sustainable locations if they become absolutely necessary. Given the already inflated buffer, this would mean that all new allocated sites for housing in the GNLP in village clusters in both Broadland and South Norfolk could be removed from the core plan, and only introduced if required once other more sustainable sites have been delivered. This would still allow existing allocations from the JCS to be included in the GNLP, but new sites in village clusters should be removed, along with those included to be delivered under policy 7.5, until or if such a time as a revised standard methodology requires these greater numbers.

It is important that the GNLP does not over-promise by allocating large numbers of sites for housing above and beyond what is "needed". It is clear from the current JCS that the targets set were too high, as with five years left of the JCS 31,452 commitments remain. To reach the GNLP target of 49,492 houses an average annual delivery rate of 2,458 would be required over the period 2020 – 2038. The average annual delivery rate for 2011 - 2020 was 1,841, which is significantly below what would be required as an annual average delivery-rate for the GNLP. It would be more sound to



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set a more realistic target figure, which would be more likely to be met: this would be easier and more likely to be achieved if the target is as low as can be permitted.

Building regulations are not currently stringent enough to ensure that new buildings are carbon neutral. This issue is meant to be addressed for 2025, but there is no guarantee this will happen, and it is therefore highly likely that a significant number of the planned new dwellings would be constructed to standards that contribute to climate change. To address this, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum, rather than inflated to the current proposed level. Legal challenges such as that being pursued in South Oxfordshire by Bioabundance make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council's Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes planned for the district.

The GNLP and South Norfolk Village Clusters

CPRE Norfolk challenges the decoupling of the housing allocations for the South Norfolk Village Clusters and its associated policy from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation has commenced before the South Norfolk Village Clusters Housing Allocations document (SNVCHA) has been published for its Regulation 18 consultation. This is despite the South Norfolk Local Development Scheme (accessed 18 February 2021 when it was labelled as "final") stating that the SNVCHA will be consulted on in February/March 2021. While it is reasonable for a Local Plan to comprise several separate documents, the GNLP and the SNVCHA to be sound should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This clear link is demonstrated by the GNLP setting the overall numbers of new houses to be included in the SNVCHA, and by the GNLP meeting of 10 July 2020 noting that the GNLP would 'consider whether the "minimum" reference can be amended in the Reg. 19 version of the GNLP as the SNVCHA plan progresses' (page 20, GNLP papers, 10 July 2020.) Given that the SNVCHA Regulation 18 consultation had not started when the GNLP Regulation 19 consultation had done so makes the latter unsound, as the SNVCHA had not progressed sufficiently for a potential change to the "minimum" reference be considered, nor has 'evidence been provided for the Regulation 19 version to show the sites to meet the minimum 1,200 housing requirement in SNVCHAs' (page 20, GNLP papers, 10 July 2020.) By including the "minimum" term, it is possible that the SNVCHA could include new housing allocations of a far greater number than 1,200, as that would still fall within the definition of a "minimum" number. This potential change in housing numbers within the GNLP would further increase the housing numbers beyond an already inflated number. We note that the Reg. 19 GNLP Table 6 states there will be 1,200 houses in the SNVCHA not a "minimum" of 1,200.

Moreover, the Reg. 19 GNLP states in para. 136 that: 'homes here [in our suburbs, market towns and villages] will be built at appropriate densities to respect and enhance local character and to meet the needs of all in mixed communities.' CPRE Norfolk contends that it is impossible to ensure this will take place given the independence of the SNVCHA to make its own conclusions regarding densities of new housing and its location within the village clusters. This is supported further by the Reg. 19 GNLP Climate Change Statement which states that 'growth in villages is located where there is good access to services to support their retention' It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP regarding the location of housing in village clusters in South Norfolk.

It is also worth commenting on South Norfolk District Council's Statement of Community Involvement (amended version September 2020, accessed on 18 February 2021.) Here, the emerging Local Plan is described as the GNLP (para. 39) with no reference to the SNVCHA, which is misleading and inaccurate. Also, the GNLP is described as covering the period to 2036 (para. 41), whereas it should be until 2038.



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Policy 7.5 Small Scale Windfall Housing Development

As explained above CPRE Norfolk contends that as there is no “need” for the high numbers of additional new housing, and given the generally unsustainable locations of any new housing under this policy, the policy should be considered to be unsound. Existing allocations in the JCS to be carried forward to the GNLP will allow for support of local services and the maintaining of rural vitality, without needing additional new sites within village settlement boundaries, but especially without the need for the provision of new market housing outside settlement boundaries as would be permitted under this policy. Furthermore, the very high level of current commitments, in excess of 31,000, provides developers with the flexibility that is necessary to address housing need. There can be no justification for adding in additional site options on the grounds that further flexibility is required to ensure delivery.

If, despite these concerns, the policy is included in the GNLP we feel that its wording needs to be amended to remove ambiguity and help ensure communities with greater certainty as to where new development could be permitted. This should include a clearer definition of how a proposal should “respect” the form and character of the settlement. We also suggest that developments under this policy should not be permitted where there is a made Neighbourhood Plan.

The Norwich Western Link Road

The inclusion of this proposed road is incompatible with the climate change statement and various other statements in the Reg. 19 GNLP e.g. in para. 141: ‘for journeys that are still needed there will be a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.’ Policy 4 – Strategic Infrastructure suggests that ‘a virtuous circle where clean transport is prioritised, less use is made of cars’ will partially be achieved by delivery of the Norwich Western Link road. This is unsound as the creation of this new road would lead to an increase in car and other motor vehicle use, as shown in ‘the end of the road? Challenging the road-building consensus’ (CPRE, 2017.)

Consultation

The GNDP papers and minutes for their meeting of 10 July 2020 make it very clear that more time was required to ensure soundness of the plan, as well as laying out and agreeing on the need for a further six weeks focused Reg. 18 consultation to take place from 2 November 2020 – 14 December 2020. The papers for the meeting explain that ‘this means it will be possible to undertake further focused consultation on possible changes to the plan without introducing further delay to the timetable. This is considered advantageous in reducing risks to soundness and allowing improvements to the plan’ (para. 2.2. GNDP Board papers, 10 July 2020.) However, at the subsequent GNDP meeting it was agreed not to hold this Reg. 18d consultation but instead to push on to the Reg. 19 consultation, thereby denying the opportunity for people, organisations and other stakeholders to comment on what was to be included in the Reg. 18d consultation. In particular, there has been no opportunity to comment in a consultation on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18c consultation, nor to comment on any amendments to policies made since publication of the Reg. 18c consultation documentation. It is clear that this consultation was considered to be necessary in July 2020 and yet this consultation has not taken place, making the Reg. 19 GNLP unsound.

This lack of consultation in the form of an invitation to make representations about what the local plan ought to contain with regard to these new sites and policy amendments is in the view of CPRE Norfolk contrary to provision 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, and therefore is not legally compliant. This view is further supported by the failure of the three local authorities, Broadland District Council, South Norfolk District Council and Norwich City Council to comply with their respective Statements of Community Involvement with regard to



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consultation on Local Plans, by not consulting on these significant additions and amendments to the GNLP, particularly as, unlike the current JCS, the GNLP will include policies and proposals for individual sites instead of having separate Site Allocation plans for the individual districts.

Green Belt

CPRE Norfolk contends that insufficient baseline evidence has been collected and evidence gathered to keep this under review. There has not been an examination of comprehensive and proportionate evidence for the establishment of a Green Belt for Norwich.

Para. 118 of the Reg. 19 GNLP merely states that 'Greater Norwich does not have a nationally designated Green Belt. National Policy is clear that new Green Belts should very rarely be established. Therefore this plan will need to carry forward policies for protecting our valued landscapes.' Instead, CPRE Norfolk argues that a thorough examination of the evidence for a Green Belt should have been carried out and published as, although rare, the NPPF does allow for the creation of new green belts in the right circumstances.

This is in part shown by the answer to a question from CPRE Norfolk to the GNDP for their meeting of 16 December 2020. The question was:

CPRE Norfolk notes that the GNLP Reg 19 v1.4 at paragraph 117 states that: "Greater Norwich does not have a nationally designated Green Belt. National policy is clear that new Green Belts should very rarely be established. Therefore, this plan will need to carry forward policies for protecting our valued landscapes."

We are concerned that the GNLP has reached this stage without a more thorough and detailed (at least one that is available publicly) consideration of the provision of a Green Belt for Norwich, preferably on the "green wedges" model. CPRE Norfolk would like an explanation as to why the exceptional circumstances for creation of a Green Belt for Norwich as required by the NPPF do not exist.

The wholly exceptional circumstances around the current Covid-19 crisis are just one example which demonstrates not only how essential it is to maintain and protect green spaces, but also how circumstances have changed since earlier drafts of the GNLP. Moreover, the Government's proposed changes to the planning system and housing requirements suggest that more robust protection of valued green spaces is now more pressing than ever, along with the long-term need for climate change mitigation which the provision of a Green Belt would help to guarantee.

The GNLP Officer response was:

The Green Belt issue was thoroughly addressed in the Regulation 18A consultation Growth Options document. This clearly set out the national policy requirement to demonstrate exceptional circumstances to establish a new Green Belt. All responses to the consultation are included in the Draft Statement of Consultation published in September 2018. No evidence has been provided at any stage through the Regulation 18 period that demonstrates such exceptional circumstances. The GNLP provides strong polices to protect green spaces and enhance green infrastructure.

Covid-19 is an exceptional circumstance nationally, it is not exceptional to the local plan area. The CPRE are correct to point out that the pandemic has reinforced the importance of green spaces, but in this respect the most significant need is for green space to be accessible. The function of Green Belts is not to provide accessible



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green space; this is best provided through a green infrastructure strategy. Similarly, the function of a Green Belt is not to address climate change. Indeed, because development may need to leap-frog Green Belts, they can be detrimental to climate change by extending commutes and other travel needs. The issue may need to be reconsidered in the next local plan to address any relevant requirements of the proposed new planning system and to take account of any new settlement proposals.

The response makes clear that 'no evidence has been provided at any stage through the Regulation 18 period that demonstrates such exceptional circumstances', which implies that such evidence has not been sought, and that therefore the Green Belt issue has not been thoroughly addressed by the GNDP. For the potential of a Green Belt to have been 'thoroughly addressed' as is claimed in the response, then such evidence should have been gathered for the Local Plan's body of evidence, to be considered both comprehensive and proportionate. CPRE Norfolk provides such evidence in the following section of its submission to demonstrate in part that the necessary exceptional circumstances required for an establishment of a Green Belt for Norwich, on the 'green wedges' model, do exist. It is our belief that a decision not to pursue a Green Belt for Norwich through inclusion within the draft GNLP was taken without a full assessment of the evidence having taken place, which therefore raises questions about both the legal compliance and soundness of the Plan. To address this, the evidence for a Green Belt for Norwich needs to be fully assessed and, CPRE Norfolk suggests, a Green Belt on the 'green wedges' model should be incorporated into the GNLP. This evidence is presented below in *A Green Belt for Norwich? A paper by CPRE Norfolk*.

A Green Belt for Norwich? A paper by CPRE Norfolk

1. Summary

1.1 Unlike many major cities Norwich does not have a Green Belt, and at present the draft GNLP does not have provision for one. This is explained on the GNLP website:

- Green Belts do not stop development but move that pressure from the edges of a city to surrounding 'satellite' towns;
- under Government policy, new Green Belts can only be set up in exceptional circumstances;
- in Greater Norwich, the control of development in the countryside is done through the use of countryside protection policies – backed by Government policy, known as the National Planning Policy Framework (NPPF), the use of countryside protection policies will continue in the new local plan.

1.2 This paper sets out the reasons why a Green Belt could and should instead be considered as a key planning tool for Greater Norwich, and be introduced in the next draft of the GNLP. It will show how establishing a Green Belt in Greater Norwich would meet the tests set out in the NPPF 2019.

1.3 Part of the context for this paper is the response given to a question asked by CPRE Norfolk to the GNDP at their meeting on 16 December 2021, which in part explained that "the Green Belt issue was thoroughly addressed in the Regulation 18A consultation Growth Options document", and that "no evidence has been provided at any stage through the Regulation 18 period that demonstrates such exceptional [as required by the NPPF] circumstances". If the Green Belt issue has been thoroughly addressed then CPRE Norfolk suggests that this process should have included an evidential assessment. This paper seeks to address this issue.



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1.4 Greater Norwich has experienced a substantial amount of development over the last 70 years, with further growth a key part of central and local government policy in the future. This pressure to provide large amounts of new housing and other development means that the countryside around Norwich, which is one of its greatest assets and which helps define the identity of the towns and villages across the area, is at risk from urban sprawl. The current coronavirus crisis has highlighted the importance of our countryside and green spaces, and the GNLP provides an opportunity for ensuring this remains available to all citizens in the years ahead, through implementation of a Green Belt to more securely check the sprawl of Norwich than is possible with the currently proposed GNLP draft policies.

2. National Context

National Planning Policy Framework (NPPF) 2019

2.1 The NPPF sets out the Government's policy direction on planning which has at its core the aim to promote sustainable development.

2.2 The Government's position on Green Belts is set out in Chapter 13, Protecting Green Belt Land. It has retained much of the advice of the previous version of the NPPF.

2.3 The fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF 133.)

2.4 The NPPF identifies five purposes of Green Belts (NPPF 134):

- check the unrestricted sprawl of large built-up areas;
- prevent neighbouring towns merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist in urban regeneration by encouraging the recycling of derelict land and other urban land.

2.5 New Green Belts should only be established in exceptional circumstances e.g. planning for larger-scale development such as new settlements or major urban extensions. In proposing a new Green Belt local planning authorities are advised to (NPPF 135):

- demonstrate why normal planning and development management policies would not be adequate;
- whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate necessity for the Green Belt and its consistency with local plans for adjoining areas; and
- show how the Green Belt would meet other objectives of the Framework.

2.6 When drawing up Green Belt boundaries the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences of channeling development towards



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urban areas inside the boundary, towards towns and villages within the Green Belt or towards locations beyond the outer boundary (NPPF 138.)

2.7 When defining boundaries plans should satisfy six criteria (NPPF 139):

- ensure consistency with the development plan's strategy for meeting the identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary identify areas of safeguarded land between the urban area and the Green Belt in order to meet longer-term development needs stretching beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time and permission should only be granted following an update to a plan;
- demonstrate that the boundaries will not need to be altered at the end of the plan period; and
- define boundaries clearly using physical features that are readily recognizable and likely to be permanent.

2.8 Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use: such as looking for opportunities to provide access, to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity or to improve damaged and derelict land (NPPF 141.)

3. Greater Norwich Context

3.1 Development in Greater Norwich over the last 70 years has been significant with further substantial development proposed by 2038, currently consisting of a GNLP target (Total Housing Potential) for 49,492 houses to be built during the period 2018-2038.

3.2 The location and scale of development that has already taken place has produced considerable negative impacts on the countryside around Norwich. Existing settlements such as Wymondham, Aylsham, Acle, Loddon and Wroxham have experienced substantial growth in addition to large-scale development on the edges of Norwich. In effect, new communities have been developed including those within the north-east Growth Triangle. The areas of countryside between the settlements which play such an important part in framing their character and identity have been significantly diminished.

3.3 To accommodate future development in Greater Norwich the local planning authorities are having to consider land in sensitive locations which is likely to have further significant impacts on the existing settlement pattern. For example, major site allocations are proposed at Easton, Hethersett, Cringleford, Thorpe Marriot and Hellesdon.

3.4 With high levels of further growth being planned there is a strong risk of urban sprawl and excessive encroachment into the countryside.

4. The Planning Case for a Green Belt for Norwich

4.1 The NPPF is very clear in setting out the approach to the establishment of new Green Belts. It identifies five purposes for Green Belts and five tests to be satisfied for designation in strategic plans (see 2.4 and 2.5 above.) This section of the



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paper sets out how in CPRE Norfolk's view these tests can be met and that the GNDP authorities can and should support the principle of establishing a Green Belt and develop a detailed programme for defining a boundary.

Why normal planning and development management policies are not adequate.

4.2 In Greater Norwich the policy approach to protecting the settlement pattern and character of the area has been based on the designation of strategic gaps and landscape protection zones around the Norwich southern bypass, the protection of river valleys and other countryside protection policies such as the Joint Core Strategy's Policy 1: addressing climate change and protecting environmental assets. Whilst these policies recognise the importance of maintaining the separation of settlements, they have not been sufficiently robust in preventing the loss of land between settlements resulting in the planned virtual coalescence of for example, Hethersett and Wymondham, Hellesdon and Drayton, and Colney and Cringleford. The GNLP currently looks to continue and expand upon these policies e.g. by enhancing green infrastructure.

4.3 In the decision-making process, particularly when there has been a shortfall in the supply of housing land, the weight of decision favours the use of land for development. Where there is a shortfall in housing land supply, Inspectors at Section 78 appeals have granted permission for development on land within these 'protected' areas (e.g. Planning Inspectorate references: APP/L2630/W/15/3007004; APP/L2630/W/16/3145810; APP/L2630/W/16/3145810.)

4.4 This suggests that the current and proposed draft GNLP policies which seek to protect the gaps between settlements are failing in their objective to prevent coalescence and sprawl.

4.5 Planning policies which seek to retain settlement character and the setting of settlements and promote green infrastructure do not carry the same status or weight as a Green Belt designation, i.e. very special circumstances do not have to be demonstrated. The designation of a Green Belt would introduce that test to protect against 'inappropriate development'.

Major changes in circumstances have made the adoption of this exceptional measure necessary

4.6 The recent months of the Coronavirus crisis have shown the importance of our green spaces, as has been demonstrated by various reports and surveys e.g. a CPRE and Women's Institute commissioned poll on attitudes to green spaces and community spirit during the lockdown (results at <https://bit.ly/3c6Yc1U>); the Wildlife Trusts' five-year review of '30 Days Wild'; a YouGov survey commissioned by CPRE and the HomeOwners Alliance (results at <https://bit.ly/36Gm1Md>.) The importance of wildlife, nature and the countryside are widely acknowledged as being beneficial to mental and even physical health, with access to green spaces being important to all. Therefore, the need to retain green spaces around Norwich and to maintain gaps between various settlements is clear, whilst acknowledging that Green Belts *per se* are not intended to provide better access to green spaces.

4.7 England's Green Belts were largely established in the aftermath of the Second World War when the need to stop urban sprawl and the merging of settlements was recognised, along with the need to preserve the character of historic towns and to encourage development to be within existing built-up areas. The current crisis, combined with the pressing demands of climate change are an exceptional set of circumstances that should lead to a re-calibration of priorities, with the GNLP providing the opportunity for maintaining a green setting for the historic city of Norwich and protection of important green corridors from harmful development, whilst enabling necessary development and economic growth to take place, as well as providing the opportunity for securing better access to countryside.



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4.8 The pressure for development is significant. The Greater Norwich authorities are planning for 49,492 new homes by 2038 (GNLP Reg. 19), along with similarly ambitious plans to grow the economy, jobs and infrastructure. Such growth is at a historically exceptional level. The fact that 49,492 homes are being proposed for inclusion in the GNLP shows exceptionalism, due to the fact that this number is 22% above the figure for housing need: if this figure was kept to the legal requirement of 40,541 plus a 5% buffer, giving a total of 42,568, this particular exceptional factor would be removed.

The consequences of the proposal for sustainable development

4.9 A Green Belt would be central to the development of a robust strategy for delivering sustainable development in Greater Norwich. The NPPF identifies three elements/objectives of sustainable development.

Economic objective

4.10 Planning should help build a strong, responsive and competitive economy. A Green Belt would form part of a strategic approach which would provide for new development opportunities. It would support the economic development of Greater Norwich by supporting the retention and enhancement of its natural environment and landscape.

Social objective

4.11 Planning should support strong and vibrant communities by providing homes in a well-designed and safe environment with accessible open spaces that promote their health, social and cultural well-being. A Green Belt would retain areas of countryside close to Norwich and other settlements, providing opportunities for recreation and promoting access to it. It would retain the identity of settlements that are highly valued by residents and support the continued regeneration of existing urban areas.

4.12 The countryside around cities and towns has a particular role to play in encouraging healthy lifestyles and wellbeing. Green Belts provide a breath of fresh air for at least 30 million people who currently live in areas surrounded by Green Belts. The particularly strong planning controls provided by Green Belt policy provide a clear visual distinction between city/town and country on the edge of England's largest and most historic cities, and contribute to a good quality of life within them.

Environmental objective

4.13 Planning should protect and enhance the natural environment to help improve biodiversity and mitigate and adapt to climate change. A Green Belt designation would complement initiatives such as the Green Infrastructure Plan and Corridors.

4.14 Current planning policies exercise very little control over the management of land leading to a poor quality of environment. A Green Belt designation would provide a robust and long-term framework for developing proposals for a proactive approach to land management which could enhance the quality of the environment around Greater Norwich for the benefit of residents.

Necessity for the Green Belt and its consistency with the strategic local plans for adjoining areas

4.15 The case for the Green Belt has been outlined in the paragraphs above. Its designation around Norwich would be consistent with the planning policies of surrounding planning authorities as they seek to manage the impact of development adjoining their boundaries in line with their own plans.



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4.16 The NPPF identifies three geographic issues in respect of achieving sustainable development.

4.17 In drawing up a boundary the consequences of channelling development towards urban areas inside the boundary needs to be considered. A Green Belt could act as a positive stimulus to investment in such areas and support the delivery of brownfield sites and the regeneration of existing residential development.

4.18 The impact on towns and villages within a defined boundary should also be considered. A Green Belt would first of all maintain a distinction between settlements. It would also not preclude some additional development to meet local housing needs but would inform decisions as to the most appropriate locations in terms of avoiding coalescence rather than as a result of ad hoc decisions.

4.19 The third issue is the impact on locations beyond the outer boundary, often referred to as leap-frogging. The nature of the proposed Green Belt on a 'green wedges' model would prevent the majority of concerns regarding leap-frogging, whilst designation would inform any discussions on which locations might be appropriate for consideration and those which would not. If the total housing potential was set at the legal requirement of 40,541 plus a 5% buffer, given the delivery already achieved 2018-20 (5,240 dwellings) and the current commitment of 31,452, the balance of 5,876 houses could be provided by a combination of windfalls and through the development of Brownfield sites in Norwich. The leapfrogging of development outwards over the green belt would not be a problem in these circumstances in fact the opposite trend would be evident with development leapfrogging in to Norwich aided by the increasing availability of redundant office and retail space in the city centre together with the availability of other large-scale sites in East Norwich and Anglia Square. Concentrating development in Norwich minimises climate change impacts and will help revitalise the city centre – an issue that will be increasingly significant over the coming years.

4.20 In the event that a Green Belt was designated for Greater Norwich and there was a need to release land to meet housing needs one would anticipate an assessment based on seeking to achieve sustainable development. In that context rather than identify sites further away from where the need arose which would generate journeys of potentially considerable length, a sequential approach would be applied i.e. by first developing existing identified brownfield sites in Norwich as suggested in 4.19 and by making use of redundant office and retail space for residential use.

How the Green Belt would meet other objectives of the Framework

4.21 The focus of the NPPF is the delivery of sustainable development. It comprises economic, social and environmental objectives that have been addressed in the paragraphs above.

5. Practical Considerations

5.1 CPRE Norfolk recognises that designating a Green Belt for Greater Norwich will be challenging in terms of the time and resources required to assess where its boundaries should be and the formal process of designation through the review of the area's local plan.

5.2 The designation of a Green Belt will need to be undertaken in the context of addressing the scale and location of development to support the economy of Greater Norwich and meeting the housing needs of the area. CPRE Norfolk recognises the need to make provision for new development in bringing forward a Green Belt.

5.3 To achieve a Green Belt boundary that performs its intended functions and purposes and has the confidence and support of the public, it will be important to ensure that it is robust and can stand the test of time. How land within the Green Belt is managed will also be important. This could be achieved by making the best use of land within the existing



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built-up areas, identifying and safeguarding greenfield sites for development in the future and having a positive approach to the use of land within the Green Belt.

5.4 The 'green wedges' model is an important tool in providing the benefits of a Green Belt, but without restricting the required level of growth. The boundaries of such 'wedges' could be tailored: to check the unrestricted sprawl of the margins of Norwich and its connected villages; to prevent neighbouring settlements merging into one another, such as Wymondham and Hethersett; to assist in safeguarding the countryside from encroachment, leaving it available in part as a green resource for the population; to preserve the setting and special character of historic settlements; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban, brownfield land within Norwich.

6. Conclusion

CPRE Norfolk's view, having considered the requirements set out in the current NPPF, is that there is a strong planning justification for the designation of a new Green Belt on the 'green wedges' model in Greater Norwich and that the practical considerations of delivering it can and should be addressed. The intention of such a Green Belt would not be to prevent development, but to ensure the location of such development also enables protection and enhancement of green spaces and countryside for the benefit of all. A thorough assessment of the evidence for a Green Belt should have been included as part of the production of the GNLP: as the Officer reply to the CPRE Norfolk question above makes clear, this evaluation of the evidence has not been carried out.

Future-proofing the GNLP

The GNLP is planning for the period up to 2038 and as such should be making greater attempts to plan for the likely more demanding laws and regulations regarding climate change, which will be introduced during the life of the plan. These may come as a result of COP26 being held in November 2021, as well as the Government's increasingly loudly stated commitments around the environment and climate change, as well as a focus on utilising brownfield land as in Robert Jenrick's statement on the 'right to regenerate' made on 16 January 2021. In addition, the NPPF is due to be revised, with an interim revision already being consulted on to end on 27 March 2021. This interim revision looks to implement policy changes in response to the 'Building Better Building Beautiful Commission "Living with Beauty" report', and will also take the opportunity to make a number of environment-related changes including amendments on flood risk and climate change. The direction of travel is clear from this and to future-proof the GNLP we urge the GNLP to take this into account to ensure the soundness of the plan. While the Reg. 19 GNLP states at para. 165 that 'this local plan also provides a "direction of travel"', this is concerned with how to identify further opportunities for growth, rather than identifying opportunities for meeting current and future demands resulting from climate change targets.

This emphasis on the environment is made clear from the suggested revision to para. 8c) of the NPPF, where instead of the current descriptor for the environmental objective as being 'to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy', the suggested revision is 'to protect and enhance our natural built and historic environment; including making effective use of land, improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'. This is worth quoting in full as it illustrates the subtle yet clear way the Government intends and expects planning to prioritise environmental protection and enhancement. This is carried through in the suggested revision to para. 11a) where instead of positively seeking



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'opportunities to meet the development needs of their area', plan-making will be expected to 'promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects', if the proposed revisions are adopted. This should be taken into account in the GNLP, particularly regarding the number of new housing allocations, the location of new housing and the benefits from a Green Belt.

It is noted that the Reg. 19 GNLP states that: 'While the GNLP sets out plans for the additional growth needed to 2038 and identifies the best ways for establishing long-term growth, we also need to take account of the Government's commitment to simplified rules based local plans and increasing housing supply, particularly in areas with high affordability pressures, which will assist in increasing home ownership and providing for affordable rents. The GNLP does this by setting a strategy that can be sustainably added to, providing locations that can be zoned for growth, renewal and protection in the longer term, and by providing for sufficient growth to both meet currently established needs and to set us on the path to meeting the higher long-term housing needs Government aims to provide for' (para. 26.) This appears to have been added in response to the Government's proposed changes to the planning system and the recent Planning White Paper, which assumes that the required housing numbers will be increased by the new "housing algorithm", when in fact they may be reduced from the numbers required by the initial forecasts. We feel it would be more sound to wait to see what the legally required minimum in terms of housing numbers will be, rather than adding large numbers of what are currently unneeded houses in an attempt to satisfy future unknowns.

Instead, CPRE Norfolk argues that the GNLP would be better future-proofed by more clearly recognising the need to tackle climate change throughout the life of the plan through a reduction in the total number of houses to the minimum required, along with more serious consideration on environmental grounds as to the best location for this housing. This would be a more sound and responsible approach than that currently suggested in the Reg. 19 GNLP, which is to go far beyond what is "needed", by allocating sites for anticipated additional housing which may not be necessary.

In summary a sound 'future proofed' sustainable way forward that best protects the environment (nature and the landscape) and mitigates the impact of Climate Change should involve:

- Setting the total housing potential at the minimum level required through the application of the government's standard methodology plus a 5% buffer – i.e. $40,541 + 2,027 = 42,568$
- Planning for the provision of the additional 5,876 houses that would be required if the minimum level was applied i.e. $42,568 - 36,692$ (31,452 current commitments plus 5,240 already built) through concentration of development in Norwich using Brownfield sites and by converting redundant city centre retail and office space into residential usage, thereby aiding city centre regeneration. Windfalls could also make a greater contribution than currently allowed for in the draft plan (the NPPF allows for evidence-based windfalls to be included)
- Dropping policies 7.4 Village Clusters and 7.5 Small Scale Windfall Housing Development and plans to disperse development widely over large areas of countryside from the GNLP – none of these climate threatening options are needed if the minimum housing requirement is chosen, and removing them would secure the integrity of existing settlement development boundaries, whilst still allowing for some growth where there are existing JCS allocated sites.
- Providing a Green Belt on the Green Wedges model to protect the countryside around Norwich from urban sprawl.



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- Prioritising the provision of affordable social housing – this can best be achieved in rural areas via the use of exemption sites allocated where local housing association surveys identify a need, and should be provided by those housing associations working together with parish and town councils
- Accepting that the phasing of development is the best way to offer the opportunity for a further 5,000 houses in the GNLP; housing that would only be needed if the 2018-based ONS household projections (which indicate that growth may be higher than predicted by the standard methodology 2014-based projections) prove to be correct. The phasing of sites is the sensible and sound way forward – sites would be made available if needed but otherwise remain undeveloped. If historic build rates are a reliable indicator of future trends it seems highly unlikely that these extra sites will be required.
- Prioritising sites for development as part of a phased delivery plan. The use of current allocations and urban Brownfield sites, together with the conversion of redundant office and retail space for residential purposes should take precedence over development on Greenfield sites. As part of this phased delivery Brownfield sites, identified in the list of sites to accommodate the extra 5,000 houses, such as sites for 2,000 houses in East Norwich, should be scheduled for development before sites in village clusters and elsewhere in the countryside. There is no sound reason why the composition of the sites allocated to accommodate the potential for an additional 5,000 houses cannot be altered with Greenfield sites (e.g. all the new village cluster sites) being moved in to the phased 5,000 list (to be developed only if needed) with their place in the plan taken by identified Brownfield sites.

There is no need for all sites to be made available for development at the start of the plan. The 31,452 current allocations already provide plenty of flexibility and developer choice and there is little evidence to suggest that increasing the level of allocations leads to an increase in the delivery of new housing – it is far more likely to lead to an escalation in the number of land-banked sites and would encourage developers to “cherry pick” more attractive, cheaper to develop rural sites ahead of the more sustainable, climate-friendly urban Brownfield options.

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