



The countryside charity  
Norfolk

15 Pigg Lane  
Norwich  
NR3 1RS

Telephone: 01603 761660  
Email:  
planning@cprenorfolk.org.uk

[www.cprenorfolk.org.uk](http://www.cprenorfolk.org.uk)

Working locally and nationally to promote, protect and enhance a beautiful and thriving countryside for everyone's benefit.

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### **GNLP Regulation 19 – a summary of CPRE Norfolk's consultation response**

CPRE Norfolk's submission is based 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 which raise issues of legal compliance.

- **Climate Change.** This should be at the front and centre of the GNLP to ensure that it complies with Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 which 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.' The GNLP does not include clear evidence-based carbon reduction targets, other than broad intentions to help meet national greenhouse gas emissions to net zero by 2050. 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.
- 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 by 2038. CPRE Norfolk contests this number as unnecessarily high. Sites for 5,000 additional houses, included in the plan in response to 2018 ONS household projections may not be required, and should only be developed if needed. Phasing of development should also prioritise the use of sustainable Brownfield sites over Greenfield. A lower target, set at 42,568 to cover local housing need (40,541) plus a 5% buffer (2,027), could be met by current Joint Core Strategy commitments (31,452) combined with housing completions 2018-2020 (5,240) along with new prioritised brownfield allocations e.g. East Norwich, and windfalls, without the need for new allocations in less sustainable rural locations.
- Delivery of almost 50,000 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, and the plan sound.

- The GNLN 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 provided, particularly small-scale growth at villages and on small brownfield sites across Greater Norwich, through additional windfall development’ (Reg. 19 GNLN Delivery Statement.) Having such a high buffer of 22% makes the GNLN unsound due to this almost certain to result in failure to meet necessary climate change targets, legislation and aspirations. The Reg. 19 GNLN at para. 53 notes that a 5% buffer is required by the NPPF, and yet a 22% buffer is being proposed.
- There is clear and compelling evidence from historic completions that windfalls are highly likely to come forward for development, with the Reg. 19 GNLN 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.
- **The GNLN 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 GNLN as being unsound. The GNLN 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 GNLN 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.
- **Policy 7.5 Small Scale Windfall Housing Development.** 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 GNLN 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.
- **The Norwich Western Link Road.** The inclusion of this proposed road is incompatible with the climate change statement and its inclusion is therefore unsound.
- **Consultation.** The cancellation of the Reg. 18d consultation has meant that new sites and amended policies have not been as open to public scrutiny as the GNDP had proposed and accepted as being necessary.
- **Green Belt.** Insufficient baseline evidence for the establishment of a green belt has been collected, assessed and examined.
- **Future-proofing the GNLN.** The GNLN 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 GNLN we urge the GNDP to take this into account to ensure the soundness of the plan.

**Please note this is a summary: the full GNLN Reg. 19 consultation submission is available from CPRE Norfolk**