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

Further Written Statement for GNLP Public Examination – CPRE Norfolk

Matter 3, Issue 6: Preparing for new settlements

Q1 Policy 7.6 does not relate to provision in this Plan and as paragraph 395 states this Plan identifies enough sites to meet current needs. On this basis, is Policy 7.6 justified? What justification is there for any reference at all to proposals which may or may not form part of a future plan?

Q2 The supporting text to Policy 7.6 indicates that, whilst there are enough sites to meet needs in this plan period, the delivery of new settlements may occur from 2026 onwards. This is only 4 years from the adoption of this Plan. Does the evidence support that delivery could really be that soon after adoption of this plan? What effect would this have on land supply in the plan period given that a significant buffer has already been included in the housing provision in the Local Plan including a contingency site?

Given the unnecessarily large buffer of 10% in the draft GNLP, plus a 12% “flexibility” allowance, plus the Costessey contingency site, plus additional expected windfalls on top of those included in the housing numbers, plus the possibility of further houses to the *minimum* 1,200 in the SNVCHAP, there is absolutely no justification for a policy to add further numbers. Instead, given the allocated sites in the draft GNLP have been assessed for their deliverability, steps should be taken to ensure this happens during the life of the Plan to 2038, making further additions unnecessary. Given there are 31,452 current allocations from the existing Local Plan, these already provide plenty of flexibility and developer choice, and should be developed before other sources of new housing are considered. It is of great concern that new settlements should be included as policy before there has been any detailed consultation about their need or their locations. To include Policy 7.6 implies predetermination for new settlements at a later date on the part of the three Local Authorities.

To ensure soundness, this policy should be removed from the GNLP.