

February 2020

CPRE NORFOLK response to Stage C Regulation 18 Draft Strategy and Site Allocations Consultation – Greater Norwich Local Plan

Q1 Please comment on or highlight any inaccuracies within the introduction

Please see our more detailed responses to the questions below, which make our concerns clear. In particular we have a major concern with the Draft Strategy as it makes no mention of using phasing for the delivery of new housing. We consider that any new sites allocated in the GNLP should be phased by being placed on a reserve list, and under phased development only built out when most of the existing JCS sites have been used. Inclusion of all the sites for immediate development will lead to developers “cherry-picking” the most profitable sites and newly allocated green field sites in less sustainable locations will be developed first, with even more land banking of currently allocated sites. In short, deliver the already allocated 82% of the 44,500 new homes, before giving permissions on the remaining 18%.

The current Local Plan, the Joint Core Strategy (JCS) was adopted in March 2011 with amendments adopted in January 2014: it has been in place for just over 6 years. When adopted, it was considered to be the blueprint for development in Norwich, Broadland and South Norfolk until 2026, and in doing so provided clear signals about where growth should and should not take place. In the introduction to the current consultation document it is stated that housing, jobs, services and infrastructure needs to be provided at the right time ‘and in the right places’. CPRE Norfolk questions how the response to this has changed so markedly since adoption of the JCS and well before that Local Plan was due to expire. In particular, the construction of the Broadland Northway (NDR) (noted in paragraph 7 of the introduction) was largely intended to help the distribution of traffic to and from new housing built inside its length and in the northeast growth triangle. Moreover, there was a clear focus for housing and other growth to be in and close to Norwich, with minimal new development to be permitted in the rural policy areas of Broadland and South Norfolk. The GNLP strategy seems to be contradicting the direction of travel envisaged in the JCS and appears to undermine the planning process. A great strength of the JCS is the protection it gave to the rural areas: this seems to be sacrificed in the GNLP Draft Plan.

Paragraph 6 of the Introduction is clear that ‘the GNLP must also assist the move to a post-carbon economy and protect and enhance our many environmental assets.’ It will be difficult if not impossible to meet these targets if new housing to the scale proposed in the draft strategy is dispersed across the rural areas of Broadland and South Norfolk. The main justification for this appears to be the availability of primary school places in the “village clusters”, whereas there are more important measures for sustainability which should be taken into account, including the number of car journeys and journeys by delivery vehicles to new housing, along with the associated congestion such vehicles will result in.

The introduction mentions in paragraph 25 that South Norfolk District Council will draw up its own South Norfolk Village Clusters Housing Site Allocations document. CPRE Norfolk is very concerned that by adopting such an approach this allocations document will not receive the same level of scrutiny as the main draft strategy document. We are also very concerned that the number of additional dwellings on top of the existing commitment of 1,349 houses is given as ‘a **minimum** of 1,200’. The use of the word ‘minimum’ is unnecessary and potentially very alarming, as in effect this gives no limit to the maximum number of houses which could be allocated in those “village clusters”. Given the draft plan provides enough committed sites ‘to accommodate 9%

more homes than “need”, along with two “contingency” locations for growth’ (page 37) and does not include windfall developments in its housing totals, the word “minimum” should be replaced with “maximum” or “up to” as is the case with the figures for Broadland’s “village clusters”. Why is there this discrepancy in language between two authorities which are part of the same Local Plan: it appears to be inconsistent and illogical.

Q3 Please comment on or highlight any inaccuracies within the spatial profile.

Paragraph 41 states that ‘this GNLP needs to plan for additional housing needs above and beyond existing commitments based on the most up-to date evidence’. However, the calculations of housing need are based on the 2014 National Household Projections, which are not the most up-to date statistics, nor are they sufficiently robust to be used for such an important and far-reaching strategy. CPRE Norfolk admits that the 2014 figures are those which central Government expects to be used. However, several Local Planning Authorities, including North Norfolk District Council, are challenging the use of the 2014 figures, instead suggesting that the more up-to date 2016 National Household Projections should be used. CPRE Norfolk agrees that the GNLP needs to be based on the most up-to date evidence, and therefore requests the GNLP insists on using the 2016 National Household Projections. If the most recent ONS statistics had been used, current commitments are sufficient to cover housing needs to 2038.

Q6 Do you support or object to the vision and objectives for Greater Norwich?

A major concern is that the draft plan largely consists of a wish list, but lacks real targets or actions, particularly on the environment and climate change. For example, our environment is lauded but the draft plan notes in paragraph 37 that life expectancy for men in Norwich is 10.9 years lower in the most deprived areas compared to the least deprived. We cannot see any specifics within the draft plan as to how this shocking fact is to be addressed.

Paragraph 120 stresses the need for ‘good access to services and facilities’ for ‘our suburbs, towns and villages’. While this is provided in the first two categories of settlement there is insufficient provision or access to services in many of the settlements within the “village clusters”. The decision to allocate additional new housing beyond what is already allocated within the JCS is based almost solely on the existence of a primary school with available places or potential for expansion within the “cluster”. This does not amount to the provision of ‘good access to services and facilities’ and therefore this level of new housing in “village clusters” should not be permitted within the GNLP.

Paragraph 125 is perhaps the strongest argument for not allocating additional housing to “village clusters” within the GNLP. Clearly, there will be a major need for journeys from and to work for many of those living in any such new housing, in addition to additional journeys by delivery vehicles to this new housing. This paragraph states the need for ‘a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.’ For the majority of the plan period it is highly wishful thinking to think that ‘electric vehicles will predominate throughout Greater Norwich’. These additional journeys will not only add to the “carbon footprint” but will also add to congestion on the road network, affecting air quality and the wellbeing of residents. If the intention of the GNLP is to locate housing close to jobs, which we agree should be a major aim, then any additional allocations of housing should be located in or close to Norwich, where there are realistic opportunities to walk or cycle to work and to services, or to use public transport to do so. The existing allocations of housing within the JCS and to be carried forward to the GNLP will provide sufficient new accommodation close to other places of work in main towns and key service centres.

Paragraph 129 states: 'greater efficiency in water and energy usage will have minimised the need for new infrastructure, and further reductions in carbon emissions will be delivered through the increased use of sustainable energy sources. New water efficient buildings will have also contributed to the protection of our water resources and water quality, helping to ensure the protection of our rivers, the Broads and our other wetland habitats.' We strongly feel that it is imperative that Per Capita Consumption (PCC) of water is further reduced to below the Government's prescribed 110 litres per person per day in order to deliver this statement in paragraph 129. East Anglia is the driest region in the UK: our aquifers, rivers and wetlands are already at breaking point, as are many of the region's farmers, who are seeing their abstraction licences reduced or revoked. If more demanding standards to reduce PCC water consumption are not set as part of the GNL, this will further adversely impact upon the environment, impacting on the Broads and wetlands, which in turn will impact the region's aspirational growth for tourism and will severely impact the regional agricultural economy. To ensure that the water-supply to existing users is not compromised it is sensible to restrict the number of new houses to a level that realistically covers actual need, and this fact reinforces our case for phasing of housing and our questioning of the need for a higher than necessary buffer.

Paragraph 132 makes the claim that new quality development will be located to minimise the loss of green-field land. CPRE Norfolk strongly suggests that the best way to achieve this is not to allocate additional sites for housing in "village clusters". Indeed, there are already sufficient allocated sites for housing in the JCS being proposed to be carried forward to the GNL in the Norwich fringe parishes, main towns and key service centres to keep pace with the likely build rates of development. The exception to this should be any brownfield sites, particularly those within Norwich, which should be prioritised into a "brownfield first" policy. This should form part of a phased approach to new housing, so that existing allocations from the JCS and any brownfield sites should be developed before permitting any additional allocated sites to be built-out.

One effective way to prevent the unnecessary loss of much greenfield land would be to institute a green belt on the "green wedges" model around Norwich, as requested by 84 respondents and 1,912 petition signatories (currently at 2,200 signatures) calling for this according to the draft statement of consultation, September 2018, for the Stage A Regulation 18 Site Proposals and Growth Options consultation. CPRE Norfolk is very concerned that this proposal or option has been removed from the current consultation.

In conclusion for this question, we find that the vision and objectives contain serious flaws, especially in regard to the way in which they conflict with policies within the current Local Plan, which withstood the rigorous inspection process.

Q9 Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?

This states that 'this plan also provides choice and flexibility by ensuring there are enough committed sites to accommodate 9% more homes than "need".' CPRE Norfolk disagrees that such a high level of sites should be provided within the GNL. As a starting point please refer to our response to Q3 where we argue that the insistence of the Government to use the 2014 National Household Projections should be challenged to ensure that the most up-to date figures are used instead. In addition, by proposing not to include windfalls in the buffer the over-allocation of unnecessary housing will be compounded further.

It is very disappointing that there is no mention of phasing as an option within the Draft Plan and Housing Delivery Statement, as this would help to prevent the worst excesses of unnecessary development. 69 Parish and

Town Councils in Broadland and South Norfolk (over 38%) have supported CPRE Norfolk on this issue and have signed a pledge to this effect. With this groundswell of grassroots opinion making such a strong case, we urge the GNDP in producing the GNLP to consider phasing seriously as the most reasonable way forward.

Q12 Do you support, object, or have any comments relating to the Climate Change Statement?

Given the stated measures in the Climate Change Statement, it is impossible to see how the proposed additional allocation of sites for housing in “village clusters” can be justified. Furthermore, it is stated that ‘growth in villages is located where there is good access to services to support their retention’, when this is rarely the case beyond providing a primary school with sufficient places or room for expansion. Many services are simply not located within the “village clusters” with many additional vehicle journeys being an inevitable consequence of such housing allocations. Therefore, these would be contrary to measures 2 and 3 of the Climate Change Statement.

By locating additional housing in “village clusters” there would be an increased need to travel, particularly by private car, due to the lack of viable and clean public transport. If Climate Change is seriously going to be addressed then it is unacceptable to allocate additional sites for housing in rural areas which are not at all, or poorly served by public transport. New housing must be located where jobs and a wide range of services are or can be provided.

In addition CPRE Norfolk is concerned by the lack of any detailed policy on the design of new housing in the draft Plan document, other than a brief mention in the ‘Design of development’ in the Climate Change Statement. Detailed requirements to insist that new houses are built to the highest possible environmental standards beyond the Government’s minimum standards are needed, if serious steps are to be taken towards addressing Climate Change issues.

Q13 Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

We supported the continuation of the settlement hierarchy as defined in the JCS. We wonder why and where the concept of “village clusters” has been introduced into the planning process. For many reasons they appear to be a flawed unsustainable concept. A real strength of the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and therefore we are very disappointed that this distinction has been abolished. The Rural Policy Areas gave real protection to the countryside: this is threatened by the introduction of the village cluster approach. This is another example of how the Draft GNLP contradicts the existing agreed Local Plan.

As noted above in our response to Q1 CPRE Norfolk has serious misgivings about the separation of the sites and allocations for new housing in the South Norfolk Village Clusters from the rest of the GNLP and its current consultation. In addition, we strongly object to the use of the open-ended statement that these South Norfolk “village clusters” will be allocated a ‘minimum’ of 1,200 houses, rather than giving a maximum number as is the case for the Broadland “village clusters”. If the reason for this separation is, as was given at the recent GNDP meeting of 6th January 2020, the lack of suitable sites coming forward in these South Norfolk “village clusters”, then this gives another good reason why the delivery of housing should be phased. Clearly the sites included in the JCS have undergone rigorous assessment and their inclusion in the Local Plan is an acknowledgement of their suitability for development. It makes absolute sense that these suitable sites should be developed first especially given the fact that any new sites coming forward are deemed to be unsuitable.

Paragraph 163d states that the strategy for location of growth ‘focusses reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy’, before suggesting that the approach to “village clusters” is ‘innovative’. The claim that providing new housing in such locations will support services is, we contend, largely illusory. Instead, additional new housing will lead to more car and delivery vehicle journeys, with residents travelling longer journeys to access the services they require such as health services and a supermarket. Given that the majority of any such new houses will be larger “family” homes, with children just or more likely to be of secondary or tertiary school or college age than of primary school age. This will have further impacts on carbon reduction due to the additional journeys needed to secondary schools or colleges.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNPD Board Papers that the most reasonable option for the distribution 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; ensuring that everyone has good quality housing of the right size; maintaining and improving the quality of life; reducing deprivation; promoting access to health facilities and healthy lifestyles; reducing crime and the fear of crime; promoting access to education and skills; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes; conserving and enhancing the historic environment and heritage assets; minimising waste generation; promoting recycling; 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 factors taken together the least desirable option as shown on this chart is Option 4: dispersal. We therefore strongly support urban concentration in and close to Norwich as the way forward, because it is best for the environment, minimising climate change and the well-being of residents.

There is very little economic evidence to suggest that cementing new housing estates on the edges of villages will bring any boost to local services, but rather they will put a strain on these services, where they exist.

We cannot understand why the table showing the same set of factors in the Interim Sustainability Appraisal for the GNLP on page 42 shows some different results from the table on page 80 of the 23 June 2017 GNPD Board Papers. While the most recent table confirms that overall urban concentration is a better option than dispersal, it is even clearer in the earlier version. The table on page 42 shows that urban concentration is better than dispersal in terms of: 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; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes. However, in terms of some of the other factors it seems that changes have been made to the table so that several options appear to be equal in terms of impacts, instead of showing what the earlier table demonstrated, which is that concentration was the best option and dispersal the least reasonable option.

Given the clear benefits and advantages from these documents for the environment, climate change and other areas, as well as other reservations around lack of sustainability and issues of delivery, we strongly urge the GNPD to remove the requirement for additional new sites for housing in the “village clusters” from the GNLP.

Q14 Do you support, object, or wish to comment on the approach for housing numbers and delivery?

Paragraph 145 claims that the strategy 'is informed by consultation feedback', yet chooses to ignore much from previous consultations even where such feedback was significantly in favour of a particular approach. An example of this is the position taken towards windfalls. Responses to the Stage A Regulation 18 Site Proposals and Growth Options consultation were significantly against (110 to 45) counting windfalls in addition to the additional (at that point 7,200) housing, and yet this has been ignored in the current draft plan consultation. By not counting windfalls in the calculation for housing numbers in table 6, there will be a resulting over-supply of houses, particularly if the out-of-date 2014 National Housing Projections are used. Windfalls are acknowledged as a reliable source of new housing and many Local Authorities do count them towards their housing targets: their contribution towards housing targets in the GNLP should lead to a reduction in the number of new sites which are allocated.

CPRE Norfolk also has specific concerns about the approach for housing numbers in the South Norfolk Village Clusters, as there is no total figure given for this new housing, but instead an open-ended 'minimum of 1,200 homes'. This use of the word "minimum" needs to be removed and replaced by a "maximum" total, so that further potential over-supply is avoided. At best, the actual delivery of new housing in the plan area has just exceeded 2,000 dwellings per annum, with 1,500 being more typical. At this build-rate, current commitments cover actual housing need to 2038.

CPRE Norfolk wants to see sites allocated for housing in the existing plan (JCS) developed before any new sites that are likely to be added in to the emerging GNLP are built out. Although we understand that it will not be possible to prevent new sites being included in the plan, we are asking that these extra land allocations for housing are treated as phased development and that building should not occur on these sites until the current JCS sites have been used up. We think this is a sensible approach because not only does it protect the countryside, but also at current rates of house building there is enough land already allocated in the JCS to cater for the building that is likely to occur over the new Plan period.

There is very little evidence to show that increasing the amount of land on which houses can be built actually increases the rate at which they are built. All that happens is that developers 'cherry-pick' the most profitable sites, which are likely to be the newly allocated green field sites and that this will lead to even more land banking of currently allocated sites. This will also mean that many less sustainable (or as CPRE Norfolk would argue, unsustainable) sites for housing are developed rather than those with more sustainable locations. This would result in more pollution and congestion, with the negative consequences for the climate and climate change. It also means that expensive infrastructure which has been provided to facilitate new housing in the existing plan, could end up being an irrelevant and embarrassing white elephant.

It is disappointing that there is no mention of phasing as an option within the consultation document, as this would help to prevent the worst excesses of unnecessary development. 69 Parish and Town Councils in Broadland and South Norfolk (over 38%) have supported CPRE Norfolk on this issue and have signed a pledge to this effect, which was included in the previous consultation, but ignored in the current draft Plan. With this groundswell of grassroots opinion making such a strong case, we urge the GNLP in producing the GNLP to consider phasing seriously as the most reasonable way forward. Clearly there is a democratic deficit: meaningful consultation should not ignore this volume of common-sense opinion.

Q18 Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?

Commenting on Policy 2 – Sustainable Communities, CPRE Norfolk questions the use of the words “as appropriate” in the policy’s introduction, as this means the requirements would be far too open to interpretation as to what is “appropriate” and therefore opportunities to ensure that ‘mitigating and adapting to climate change, [and] assisting in meeting national greenhouse gas emissions targets’ will be missed.

This concern is particularly relevant when considering how new housing development in the “village clusters” will fulfil the first requirement to ‘ensure safe, convenient and sustainable access to on-site and local services and facilities including schools, health care, shops, leisure/community/faith facilities and libraries.’ The rationale behind these “village clusters” appears to be mainly based on the availability and accessibility of a primary school. However, safe, convenient and sustainable access to the other features on this list are equally important. Adequate health care and shops simply are not available in these ways to many of the preferred new sites for housing in the “village clusters”, therefore giving further reasons why such sites should not be included in the GNLP.

There is a worrying disconnect between the aspirations in point 6 with the need to ‘manage travel demand and promote public transport and active travel within a clearly legible public realm’, and the imposition of additional new housing in “village clusters”. It is difficult if not impossible to see how residents of the majority of this new housing will be able to use active travel or public transport, due to the likely distances from workplaces and the lack of suitable public transport.

If additional new housing is developed in “village clusters” most of the working residents will not have ‘good access to services and local job opportunities’. Instead there will be an unsustainable increase in the number of journeys to and from work using private vehicles, which will not be electric-powered certainly for the majority of the plan period. It is very doubtful if additional housing will provide enough business to keep a village shop open, but they will definitely increase the number of journeys made for delivery and service vehicles, making this housing even more unsustainable.

If communities are to ‘minimise pollution’ as required to do so by point 8, it is imperative that no additional new housing is allocated to “village clusters”, as this would lead to an increase in petrol and diesel-powered vehicle journeys to and from such housing. This, along with the resultant increase in congestion, makes this additional housing highly undesirable.

Q19 Do you support, object or have any comments relating to the specific requirements of the policy?

We comment on various aspects of Table 8 relating to Policy 2.

Point 3, Green Infrastructure. The opening statement is: ‘Developments are required to provide on-site green infrastructure appropriate to their scale and location’. The three main benefits listed are biodiversity gain, promotion of active travel and the reduction of flood risk, which are key NPPF priorities.

The NPPF is also supportive of biodiversity on a more strategic scale, and the importance of ecological networks and Nature Recovery Networks. While Green Infrastructure is useful, and can play a role in these, it clearly has limitations in a wider role across the wider countryside, and in linking high designated nature conservation sites.

Point 5, Landscape, should recognise that valued landscapes often sit with good wildlife habitats. This is particularly the case for river valleys and the Broads. A strong message from the Environment Plan and the recommendations from the recent Landscapes Review is to make links between landscapes and wildlife, and not consider them in isolation. This is covered more fully in our response to Q21.

Point 9, Water. In our view it needs to be recognised that SUDS is not a silver bullet when dealing with flood risk. Areas of low-lying land with a high water-table can present a problem in 'getting the water way', and if it does manage to do that existing settlements can be put at risk.

A high level of growth puts a greater pressure on the capacity of Waste Water Treatment Works, both on the discharge of effluent into river systems, and on flood risk with foul water. This will be exacerbated by under or lagging investment in WWTW. Although not the responsibility of the Greater Norwich Authorities, their Annual Monitoring Reports (AMRs) should record and monitor incidents.

The statement in Point 9, Water - Key issues addressed by policy 2 states that: 'Government policy expects local planning authorities to adopt proactive strategies to adapt to climate change, taking into account water supply and demand considerations. It allows local plans to set a higher standard of water efficiency than the Building Regulations where evidence justifies it. For housing development, only the higher Building Regulations standard for water prescribed by Government (110 litres per person per day) can [be] applied through local plans and more demanding standards cannot be set. If the potential to set more demanding standards locally is established by the Government in the future, these will be applied in Greater Norwich.' The closing note at the bottom of the wording states: 'Implementation of the standards for water efficiency will be supported by an updated advice note.'

We comment that it is imperative that Per Capita Consumption (PCC) of water is further reduced below the Government's prescribed 110 litres per person per day in order to deliver the statement made in Section 3, paragraph 129 which states: 'Greater efficiency in water and energy usage will have minimised the need for new infrastructure, and further reductions in carbon emissions will be delivered through the increased use of sustainable local energy sources. New water efficient buildings will have also contributed to the protection of our water resources and water quality, helping to ensure the protection of our rivers, the Broads and our other wetland habitats.' East Anglia is the driest region of the UK, our aquifers, rivers and wetlands are already at breaking point, as are many of the regions farmers who are seeing their abstraction licences reduced or revoked. If more demanding standards to reduce PPC water consumption are not set as part of the local plan, this will further adversely impact upon the environment, impacting upon the Broads and wetlands, which in turn will impact the regions aspirational growth for tourism and will severely impact the regional agricultural economy.

These pressures are further evidence as to why the amount of new housing should be tightly controlled.

Q21 Do you support, object or have any comments relating to the approach to the natural environment?

CPRE Norfolk supports further 'development of a multi-functional green infrastructure network'. However, we have major concerns about how biodiversity net gain will be evaluated, assessed and measured, although it is

recognised that at this point it is unclear as to what the legal requirements of this policy will be given the current progress of the Environment Bill.

Paragraphs 183 and 184 talk about the great weight placed on protecting the natural environment in Greater Norwich, but then there are no clear details on how this will be achieved. Provision of a Green Belt on a 'green wedges' model would go some way to addressing this.

This draft Plan takes a very narrow view on the NPPF and 25-Year Plan on policies for the natural environment, namely that strategy, aims and policies are restricted to considering only gain as seen through the prism of development. There is a duty to cooperate between Councils, and that should automatically happen. While implementation may be less direct, there should be a wider strategic vision that does support policies of the NPPF. CPRE Norfolk has a proposal for a Nature Recovery Network from the North Norfolk Coast to the east coast (including parts of the Broadland DC area), by the enhancement of the ecological network provided by our river systems, and supported by the environmental land management scheme. This includes a detailed planning and land management document for landscapes and wildlife relating to a Nature Recovery Network, which also include an AONB extension to the Norfolk Coast AONB into the full catchments of the twin North Norfolk rivers Glaven and Stiffkey.

Q22 Are there any topics which have not been covered that you believe should have been?

Yes, the decision to remove a possible green belt for Norwich on the green wedges (or other) model from the draft Local Plan is, in the opinion of CPRE Norfolk, unjustified, particularly bearing in mind the large degree of support it received in the earlier Stage A Regulation 18 Site Proposals and Growth Options consultation.

Q23 Do you support, object or have any comments relating to [the] approach to transport?

CPRE Norfolk supports the provision of new railway stations at Rackheath and especially Dussindale as outlined in paragraph 206.

We note the contradiction in the Transport for Norwich Strategy as reflected in Policy 4 – Strategic Infrastructure, when it aims 'to promote modal shift' by having 'significant improvements to the bus, cycling and walking network' on the one hand, but promotes 'delivery of the Norwich Western Link road' on the other. CPRE Norfolk fully supports the former set of aims while opposing the latter.

CPRE Norfolk supports 'protection of the function of strategic transport routes (corridors of movement)', and as part of this strongly suggests that no industrial development should be permitted on unallocated sites along such corridors of movement.

The desire to support 'the growth and regional significance of Norwich Airport for both leisure and business travel to destinations across the UK and beyond' surely contradicts the aspirations for addressing climate change stated within Section 4 of the draft GNLP?

Public transport provision needs to be improved and made affordable, not only between main towns and key service centres, but to and from smaller settlements. This is essential even without any further growth of these settlements, as many areas of rural Norfolk have become public transport deserts.

Q27 Do you support, object or have any comments to [the] approach to affordable homes?

CPRE Norfolk supports the affordable housing policy within Policy 5 – Homes. It is essential that the requirements of this policy are followed when progressing applications for housing on sites of 10 dwellings or more. Any policy which encourages the building of a greater proportion of affordable homes should be adopted. It is to be hoped that government policy will change further regarding viability tests so they become more transparent, so that it would be less easy for developers to evade their responsibilities to deliver affordable homes. More central government intervention is required if these needed homes are to be built. Ideally, affordable and social housing should be provided where needed as a stand-alone provision, and not be connected to private developers' housing targets. Lessons must be learned from the history of poor delivery of affordable homes, to ensure that the policy to provide 28% or 33% affordable houses must be enforced. We support rural exception sites as a means of supplying needed local affordable and social housing. An approach based on the provision of stand-alone sites such as these, in our opinion is a far better method for addressing affordable and social housing needs.

Q34 Do you support, object or have any comments relating to the approach to employment land?

CPRE Norfolk while not agreeing with the allocation of so much green-field land for employment/economic use, it is essential that any such allocated sites are adhered to. This means that no exceptions should be made, particularly for larger businesses, to develop sites outside these allocated areas. If any such un-planned growth were to be permitted this would lead to further erosion of the area's landscape and environment, along with issues regarding the sustainability of any such sites. A large amount of the land allocated in the JCS for employment use remains for use. The development of these sites should be prioritised before any new sites are added.

Q45 Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.

"Village Clusters" appear to be an artificial concept, invented to justify the dispersal of housing into the countryside. It is difficult to understand the justification for changing the current settlement hierarchy within the JCS to that proposed in this draft plan, in particular by eliminating the JCS categories of Service Villages, Other Villages, smaller rural communities and the countryside, which provided opportunities for a more nuanced approach to housing allocation, appropriate to each category of community/settlement within their own setting, landscape and context. The "village cluster" approach is a relatively crude one, with much more of a 'one size fits all' approach. CPRE Norfolk is particularly disappointed to see that the current JCS settlement hierarchy is not even offered as an 'alternative approach' in the draft GNLP, and wishes to see this rectified.

Even if the "village clusters" are adopted it would still be important to limit these to the area within their settlement boundaries and to designate the remaining largely rural areas as "countryside", which would then require a further policy similar to the current JCS policy 17: smaller rural communities and the countryside. It is a great regret that the Rural Policy Areas of the JCS will be eliminated in the GNLP, as these provided effective protection of the countryside from unnecessary development.

The different approach for "village clusters" in Broadland compared to those in South Norfolk is not acceptable given the emphasis on the GNLP being a strategic plan for the whole of Greater Norwich. The "village clusters" in Broadland and South Norfolk should be treated in the same way if they are to be included in the final GNLP. This

means that a maximum number of new housing for both areas should be included in the GNLP rather than the current different approach/wording, by having Broadland's "village clusters" providing 'up to 480' whereas South Norfolk is to provide 'a minimum of 1,200': both areas should have the same wording i.e. 'up to ...'. We are concerned that all of the "village clusters" in South Norfolk will not be scrutinised to the same degree as those in Broadland due to the separate South Norfolk Village Clusters Housing Site Allocations document.

CPRE Norfolk is concerned by the use of primary school catchments acting as 'a proxy for social sustainability', with apparently no other sustainability measures being taken into account when decided on the amount and location of housing within "village clusters". This does not make the proposed allocated housing within "village clusters" sustainable as required by the NPPF. Other measures should be taken into account within the social, economic and environmental spheres.

Q46 Do you support or object or wish to comment on the approach for specific village clusters? Please identify particular issues.

We are concerned that all of the "village clusters" in South Norfolk will not be scrutinised to the same degree as those in Broadland due to the separate South Norfolk Village Clusters Housing Site Allocations document.

Q47 Do you support or object or wish to comment on the overall approach for Small Scale Windfall Housing Development? Please identify particular issues.

CPRE Norfolk feels that windfall development should be restricted to sites within settlement boundaries. Housing need is already catered for by other policies in the Plan. Windfall developments should also count towards overall housing targets.

Q48 Do you support or object or wish to comment [on] any other aspect of the draft plan not covered in other questions? This includes the appendices below. Please identify particular issues.

CPRE Norfolk does not understand why there has been a major change in direction and policy as to where new development should be allocated in the GNLP compared to the current JCS. The JCS was only finally fully adopted in January 2014, just over 6 years ago. In the JCS housing concentrated in and close to Norwich was agreed and supported by hugely expensive infrastructure projects, in particular the Northern Distributor Road (now known as the Broadland Northway), which was primarily constructed to distribute traffic from and to new housing developments on the northern fringes of Norwich and in the North-east Growth Triangle. It would be a massive and costly folly to change that policy to one which allowed for the dispersal of much housing across the rural areas of Broadland and South Norfolk, where there is insufficient infrastructure, services and public transport, which would mean such development would be unsustainable. This would only lead to more congestion and pollution, leading to problems in meeting carbon-reduction targets.

CPRE Norfolk wants to see sites allocated for housing in the existing plan (the JCS) developed before any new sites that are likely to be added in to the emerging GNLP are built on. Although we understand that it will not be possible to prevent new sites being included in the plan, we are asking that these extra land allocations for housing are treated as phased development and that building should not occur on these sites until the current JCS sites have been used up.

There is very little evidence to show that increasing the amount of land on which houses can be built actually increases the rate at which they are built. All that happens is that developers 'cherry-pick' the most profitable sites, which are likely to be the newly allocated green field sites and that this will lead to even more land banking of currently allocated sites.

It is very disappointing that there is no mention of phasing as an option within the consultation document, as this would help to prevent the worst excesses of unnecessary development. 69 Parish and Town Councils in Broadland and South Norfolk (over 38%) have supported CPRE Norfolk on this issue and have signed a pledge to this effect. With this groundswell of grassroots opinion making such a strong case, we urge the GNLP in producing the GNLP to consider phasing seriously as the most reasonable way forward.

We question the relevance of a plan whose horizon is 2038, which is likely to be reviewed and replaced on at least three occasions before its end-date, and we fear that on each of these occasions more unsustainable housing will be crammed in at the expense of the countryside. What is perhaps most disturbing is that so many people living in the area are not aware of the current JCS let alone the emerging GNLP, and that where citizens are engaged in the process seem to have their views discounted. For example, this is clear where the views of over 38% of the Broadland and South Norfolk Parish and Town Councils regarding the phasing of housing development are apparently ignored. Current consultation processes are not reaching the majority of people: perhaps a Citizens' Assembly approach would be a means which would enable more people to be involved.

Submitted on behalf of CPRE Norfolk

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