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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 GNLN Public Examination – CPRE Norfolk

### Matter 3, Issue 5: Small scale windfall housing development

#### **Q2 Would Policy 7.5 encourage new dwellings to be constructed in locations that are poorly served by public transport, services, and facilities? Would it be consistent with national policy in this regard?**

This policy is not positively prepared as it sets an arbitrary figure for housing to be provided by it, without examining site suitability or the sustainability as required for example by NPPF paragraph 11a. Housing delivered under this policy would not have been subjected to the rigorous site assessment process as for any allocated sites, and yet their location would mostly be in more sensitive, as well as less sustainable, greenfield locations. These developments would see the extension of settlement boundaries in an unplanned and unregulated way, which is clearly contrary to the NPPF and the requirement that plans should be positively prepared.

#### **Q4 Is the policy effective in the way in which it would work? Is it justified that the policy allows 100% market housing?**

We have a major concern that, if this policy is included in the GNLN, it would have an adverse effect on the provision of (much needed) affordable housing across the affected area. This is due to the likelihood that landowners, agents and developers would be more likely to develop sites adjacent to settlement boundaries for market housing under policy 7.5, rather than enabling affordable housing to be delivered as rural exception sites in similar locations, due to the difference in potential land values and profit margins on completed developments. From conversations with SNDC officers it appears that this issue has already been acknowledged with landowners being reluctant to put sites forward for affordable housing, as there is the hope and expectation for the more profitable policy 7.5 to be adopted. Therefore, this policy would have the undoubted unintended consequence of removing a major source of supply of affordable rural housing.

To make this matter sound Policy 7.5 should be removed from the GNLN. The additional housing this policy would deliver is unnecessary and unneeded, particularly as it would be likely to be located in unsustainable locations, and would be likely to prevent the delivery of much needed affordable homes on rural exception sites. As in our written statement for Matter 2, if the “flexibility allowance” (and all or most of the buffer) is removed, there would be no requirement for these additional windfalls.

**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 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.