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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 15: Housing provision

Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy? In particular:

Q3 Is it justified to identify contingency sites within the Plan?

The clear answer to this is it is clearly not justified to include contingency sites within the Plan.

CPRE Norfolk makes the following four particular headline points:

- (1) Given the excessive allocation based on the “housing potential” – not need - identified by the Partnership, there cannot possibly be any basis for a further contingency site “policy” (not that there is in fact a specific policy addressing contingency.)
- (2) There is no justification for a single site approach as opposed to a phasing/reserve strategy.
- (3) The approach adopted by the Partnership to its contingency sites here is contrary to the NPPF and PPG
- (4) The Plan is in any event entirely unclear on how and when the trigger for contingency sites will be met.

These points are addressed in detail below, but at the outset, it should be noted that CPRE Norfolk's concern about the uncontrolled, excessive and uncertain approach involving a flexibility allowance plus “contingency” allowance is a concern shared by 161 parish and town councils across the whole of Norfolk (including 72 in Broadland and South Norfolk). These councils have signed our pledge asking that existing allocated sites are built out first. Significant weight ought to be attached to the huge groundswell of opinion regarding this approach.

(1) No need for contingency sites due to pre-existing excessive allocation

Given that the housing requirement is met by the allocated sites and extra capacity is available from projected windfalls not included in the Total Housing Potential there is no need for additional contingency sites. This position is supported further by the fact that even before contingency sites should be considered, there is a 10% buffer included in the plan, plus a 12% “flexibility allowance”. That is ample – in fact excessive “contingency” particularly given the modification proposed at the hearing on Matter 2, Issue 2 making its housing target of approx. 40,000 units its “requirement”. All of this means there is no justification whatsoever for a further contingency site.

The justification for this “contingency” site within the Plan is completely insufficient. The only mention of this in the Partnership’s Topic Paper on its Growth Strategy **D.3.1** is as follows (at para. 117):

“A contingency site for 800 homes at Costessey has been retained in the GNLP but is not included in the overall housing numbers. The contingency of 1,000 homes in Wymondham in the Regulation 18C draft plan was not included in the Regulation 19 strategy due to consultation feedback, the intention to retain strategic gaps between settlements and the high existing commitment in the town. Along with the significant buffer, the contingency helps to ensure that housing needs will be met through the plan”

The only further justification that is given is at para 182, page 83 of the Appendices to that Paper (**D.3.2**):

“To provide additional flexibility to ensure housing need can be met, a contingency site at Costessey for around 800 homes is included in this plan should this prove to be required due to low delivery of allocated housing sites”.

Two points to note here:

- Para. 117 of the Topic Paper is one of a number of internally contradictory assertions in the Plan and the evidence base regarding the way in which the Partnership’s “overall housing numbers” have been calculated. Ensuring that housing needs will be met (when that housing need has been identified at 40,000, i.e. almost 9,000 units less than the threshold to trigger the “contingency site” being brought forward, is plainly misconceived.
- The extract in the Appendices referred to is just a straight “lift” from the Plan at paragraph 182 page 50. Mere recital of the Plan is not sufficient evidence as to why its approach is justified.

(2) No justification for a single contingency site approach as opposed to a phasing/reserve strategy

If, despite CPRE Norfolk’s position that any buffer beyond 5% is unsound and unjustified a higher number of dwellings is still included in the GNLP, CPRE Norfolk contends that the additional sites needed to accommodate the so-called “flexibility allowance” of 5,000 dwellings should all in effect be designated contingency sites and only be built-out if required (and on the basis of very clear criteria as to how the trigger for their release should be met). This can be dealt with via a phasing strategy.

The GNDP admits that they have only been included to ‘*allow for higher household and economic growth **should they be required***’ (our emphasis) (page 17, Step C, Doc. D3.2.) The partnership’s position is explained further in paragraph 115 of the Topic Paper: Policy 1 Growth Strategy (Doc. D3.1.) in the statement: ‘*the housing provision figure for the plan provides for a delivery buffer to address fallout plus additional flexibility to allow for higher levels of growth. It is a “**potential**” figure as illustrated in the housing trajectory in appendix 4 of this topic paper. If the market for these additional homes does not materialise, they will not be provided*’.

Therefore, the Partnership has clearly said these additional houses may not be needed and if they are not required they will not be provided.

An entirely logical consequence to this line of reasoning is that the sites identified to provide this additional provision within the settlement hierarchy should be placed on a reserve list as contingency sites only to be developed if needed (and with very clear criteria as to how that should be triggered.) If this does not happen, the sites that make up this flexibility allowance will be equally available for development with all the other sites from the date the Plan is adopted. Developers will inevitably “cherry-pick” the most attractive and profitable sites. Many of these are likely to be in more rural locations which will be in less sustainable locations than the allocated sites.

Phasing development in this way (or at least considering phasing – there is no evidence that this was considered) at least would provide some protection from significant unnecessary greenfield development.

A corollary of this point, is the complete lack of justification for the Costessey site to be singled out and included as opposed to another allocation (or combinations thereof). To this extent, CPRE Norfolk shares the concern of the promoter of that site (Terra Nova) as set out in its Matter 2 Position Statement.

(3) Contingency sites approach is contrary to the NPPF and the PPG

According to PPG, low delivery is the rationale for a buffer. Nowhere in national guidance or the NPPF is there any support for the use of contingency sites in the way that the Partnership has used them in this draft plan.

(4) The “policy” – such as there is – is in any event unclear and therefore ineffective.

Policy 7.1 (Norwich Urban Area) refers to the Costessey site at the very end. It merely states that:

“In addition, a large contingency site is identified in Costessey to be brought forward if delivery of housing in the GNLP area does not meet local plan targets”.

There is no certainty at all as to the trigger for this site to be brought forward. Part of this is the complete confusion on the part of the Partnership regarding whether its housing numbers are targets/requirements or need. By changing the word “target” to requirement (the proposed modification mooted by Mr. Morris on Day 2 of the examination) it remains entirely unclear whether the “trigger” for the Costessey site is simply when the 40,000 requirement is not met. Nor is it clear at what stage during the plan period is this assessment to be made.

The flaw with the inclusion of a contingency site is clear when its practical consequences are examined. The identification of sites, such as the Costessey contingency site, has encouraged the developer(s) of this site to publicly state, through the Eastern Daily Press, that they intend to apply for planning permission as soon as the GNLP is adopted. If the Costessey contingency site is not included any such planning application would clearly carry less weight. The lack of clarity in terms of the application of this policy and when this site should be brought forward will only serve to embroil the LPA and no doubt an Inspector on appeal in difficult and protracted debate regarding when and if the site should be brought forward.

Q5 Are the assumptions for homes to be delivered on existing commitments justified? Will 31,452 homes be delivered on these sites between April 2020 and 2038?

Yes.

The draft GNLP and topic papers D3.1, Policy 1 Growth Strategy and D3.2, Policy 1 Growth Strategy – Appendices in particular provide evidence to support these assumptions. Through not carrying forward all of the existing Joint Core Strategy (JCS) allocations and carrying out assessments on all sites to be allocated in the GNLP, we should be confident that all proposed sites in the GNLP are either “*deliverable*” or “*developable*” according to NPPF definitions and planning practice guidance. These assumptions are given further weight through the inclusion in the Delivery Statement that: “*Where delivery cannot be demonstrated to be in accordance with agreed delivery plans for individual sites, the authorities will, as appropriate, make use of their legal powers to bring about strategically significant development, including compulsory purchase.*”

It is reasonable to question why so many sites have not been delivered during the current Plan, the Joint Core Strategy (JCS.) This is self-evidently largely a question of demand, not other obstacles to delivery (contrary to the strident assertions of certain participants on Day 2 of the Examination hearings, which entirely the missed point that a huge number of sites have been carried over into this plan. Patently, if there was a greater level of demand then developers would have delivered more sites – the sites were available. This is not to say that there isn’t a significant level of demand – of course there is. But the point is the available supply is more than adequate to meet that demand. If this was not the case there would not be such a big carry over of existing allocations to the new plan. Moreover, the PPG for Housing and Economic Needs Assessment (Para. 011) is clear that when the standard method for assessing local housing need is used, there is not a requirement to address under-delivery separately as this will already have been addressed through using the affordability adjustment.

Adding in a larger number of houses to the GNLP beyond the minimum requirement will actually inhibit the likelihood of existing sites being developed. All it will lead to is the “cherry-picking” of the most attractive and profitable sites. It will not produce higher delivery rates. Existing sites will simply remain in land banks. It has already been pointed out during the course of this Examination how proposals for a major increase in new housing provision via the construction of a new settlement could impede the development of important existing allocations such as the North East growth triangle. Any significant increase in housing numbers via an enlarged buffer or a flexibility allowance would surely have a similar impact. The argument that a large buffer is necessary to facilitate delivery is fallacious. A large buffer or flexibility allowance merely leads to changes in the location of development, not the quantity of new building.

CPRE Norfolk’s call for phased development, which would require currently allocated sites to be built-out first, would ensure that existing commitments were developed during the plan period. This solution has not been properly considered by the Partnership who during Matter 2 had no clear answer to this as an alternative way forward. As already mentioned, this approach is supported by 161 parish and town councils in Norfolk and several of these have expressed their backing for phasing at various points in the consultation process on the GNLP.

In conclusion, because the existing commitments have been properly assessed and the authorities have legal powers to bring about strategically significant developments, CPRE Norfolk is reasonably certain that these allocations will be delivered during the plan period. The adoption of a phased approach would absolutely ensure delivery and not prejudice it.

Q7 Is there compelling evidence that the proposed windfall allowance (of 1,296 dwellings) will provide a reliable source of supply?

Given the evidence that around 4,450 homes will be provided during the course of the plan as windfalls, and that “windfall is likely to remain robustly high” (page 33, Topic Policy Paper 1, Growth Strategy), it is almost certain that the amount of windfalls which will be delivered will be much higher than the 1,296 being included in the draft plan as a windfall allowance.

CPRE Norfolk argues that this higher realistic actual figure in effect makes the buffer higher than the stated 22%. Instead, a higher number for the windfall allowance should be included in the Plan, resulting in a reduction of the housing being provided by other means i.e. new allocations including those in the SNVCHAP, and homes delivered through policy 7.5.

This under-estimation of the contribution made by windfalls to housing delivery is partly illustrated by Table 4, Housing trajectory 2018/19 to 2037/38 (page 22, Topic Policy Paper 1, Growth Strategy – appendices) as the unrealistic and inaccurate figure of 0 windfalls is given for years 2018/19; 2019/20; 2020/21; 2021/22; 2022/23; 2023/24; 2024/25. In addition, historic windfall figures for recent years suggest higher numbers of windfalls will be forthcoming. Here, appendix D1, windfall assessment summary of the Joint Core Strategy for Broadland, Norwich and South Norfolk (pages 119-121, Appendices, January 2020) evidences with a year-by-year breakdown for the three authorities for 2008 to 2018 that the annual average of windfalls for sites of 9 or fewer excluding garden plots is for South Norfolk 98, for Broadland 61 and for Norwich 185. This gives an annual average of 344 windfalls in these categories: far in excess of the c.100 pa windfalls included in the housing figures for the draft GNLP.

Q8 What confidence is there that the South Norfolk Village Clusters Plan will identify sites for a minimum of 1,200 homes and that these sites can be delivered by 2038? Is it appropriate for this to be a minimum requirement?

CPRE Norfolk has questioned earlier in this Examination the assumptions in relation to the South Norfolk Village Clusters Plan (SNVCP), and in particular the soundness of a strategy of relying on this plan whilst not capping its requirement. We repeat that if it is to be included the figure of 1,200 should be a maximum rather than a minimum requirement.

This would enable the inconsistency between the approach of Broadland, where village clusters are to provide 482 homes, and South Norfolk, where village clusters are to “provide a minimum of 1,200 homes” to be resolved. By including it as a “minimum” figure there is the possibility that it could end up being a much larger figure, thereby further increasing the theoretical housing figure (already significantly enlarged by the inclusion of the Costessey contingency site and the likelihood of a more productive flow of windfalls) beyond the 10% buffer, plus the 12% flexibility allowance.

Without prejudice to that position, in terms of the confidence that it will bring forward at least 1,200 homes, due to the fact that this allocation policy is not being brought forward in tandem with this Plan this examination has absolutely no evidence before it that this Plan (which has not actually reached Reg 19 consultation yet) will deliver – in line with the Partnership’s housing trajectory – that number of housing and indeed the timing of it. The examination of this plan should be paused and both Plans examined concurrently as these plans are dependent on each other.

In assessing the impacts of the new allocations directed to Village Clusters it is important to bear in mind that the total amount of new housing proposed for rural areas is far higher than the new

allocations figure. There are 2,538 existing commitments in Village Clusters (1,146 in Broadland plus 1,392 in SNC), which when added to the 800 houses resulting from Policy 7.5 and a large number of windfalls represents a very significant amount of Greenfield development. Furthermore, a large proportion of the existing commitment that is not scheduled for village clusters is nevertheless earmarked for greenfield sites, many of which are adjacent to Village Clusters and will therefore have almost as much impact on those clusters as if the development was actually taking place inside the cluster. For example, the 1,800 houses proposed largely to the east of Long Stratton will be built on land alongside the very attractive small rural hamlets of Fritton, Morningthorpe, Stratton Wood Green and Stratton St Michael and will produce many unwanted impacts on those communities.

Overall conclusion on Matter 15

In summary, the key issue under Matter 15: Housing Provision is whether the prepared strategy for the supply of housing is justified. For the reasons given above and elsewhere (see CPRE Norfolk's written statement to Matter 2, Issue 2 and our Reg. 19 consultation response) CPRE Norfolk considers it is not justified to include a large buffer of 22%, which in practice is much bigger (30% plus), which is due to these specific failings of the Plan:

- (a) The inclusion of the Costessey contingency site is not justified and
- (b) the South Norfolk Village Clusters allocation is expressed as a minimum figure
- (c) There is a failure to count all likely windfalls in the Total Housing Potential.

CPRE Norfolk makes these final comments which go to the heart of Matter 15 in relation to whether the strategy for the supply of housing, as currently prepared and set out, is justified.

Constructing all 49,492 dwellings in the Total Housing Potential would:

- **Potentially cause a population increase in the plan area of 118,781 people (2.4 x 49,492 = 118,781)**

NB UK average household size in 2020 was 2.4 – source ONS Families and Households in the UK: 2020)

- **Probably cause a 65,000 plus increase in the number of cars and vans in the plan area (1.35 x 49,492 = 66,814)**

NB In the East of England the average number of cars / vans per household in 2020 was 1.35 – source National Transport Survey / Department of Transport Statistics - National: Travel Survey Table NTS9902

- **Cause a huge increase in CO₂ emissions**

While the carbon footprint of building a new house varies according to materials and construction techniques most estimates indicate that at least 50 tonnes of CO₂ is emitted during construction. Over the lifetime of that house (projected as 50 years) a similar or larger amount of emissions will be produced. Therefore, using a conservative estimate of a total of 100 tonnes of CO₂ emissions per house the building of all 49,492 houses would increase CO₂ emissions by almost 5 million tonnes.

- **Cause a significant loss of countryside and impact negatively on rural tranquility, air pollution, dark skies and dark landscapes**

CPRE Norfolk questions whether these outcomes, which would result from the projected level of housing supply, are justified and has the plan rigorously evaluated these consequences. Post COP 26 this cannot be a sound way forward.

CPRE Norfolk does not believe that these outcomes are justified or desirable and we do not consider that the impacts detailed above have been properly assessed. It is therefore not a sound strategy. Our view is supported by 72 parish and town councils across Broadland and South Norfolk and numerous individuals and other groups that have responded to the Regulation 19 and earlier consultations. Significant weight should be attached to this level of local opinion.

We consider that reducing the Total Housing Potential to the local housing need figure (40,541 in the plan but currently less, at just under 40,000 dwellings) together with the employment of a much-reduced buffer (maximum of 5%) would:

- Adequately address housing need in the plan area to 2038
- Restrict the level of population growth considerably – potentially by as much as 20,000 people
- Reduce the impacts on traffic congestion and air quality by restricting the increase in the number of additional vehicles
- Reduce the carbon footprint of new development considerably. Building 40,000 new houses will still come with a large carbon footprint of at least 4 million tonnes but that is around one million tonnes less than the total produced by 50,000 dwellings. Surely since COP26 we must take in to account the impact of volume house building on emissions?
- Help protect the countryside and limit impacts on rural tranquility and light pollution by restricting the amount of new building taking place on Greenfield sites. In fact, if the excessive and unnecessary housing potential of nearly 50,000 is reduced to a lower more sustainable figure closer to 40,000 and if all likely windfalls are counted, this lower potential could be met by: existing commitments (31,452); the delivery that has taken place since 2018/19 (5240) and windfalls (4,450). There would be no need for any new allocations including those proposed for Village Clusters and those projected under policy 7.5. New development would therefore be concentrated in or near to existing larger settlements with consequent benefits in terms of climate change objectives.

The level of housing supply we are advocating is much more justifiable than the current Total Housing Potential.

It is important that the Partnership does not repeat the mistake made in the current plan (JCS) of setting a grossly inflated housing target which developers failed to deliver resulting in a very large carry over of existing commitments in to the new plan.