

**Further Written Statement for GNLP Public Examination for Wednesday 22 March 2023 –
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:

With regard to the September 2022 housing trajectory update (Document D3.2D Topic Paper) and housing forecast (Document D3.2E Topic Paper):

Q2 Taken as a whole, do any alterations to the site specific delivery assumptions (arising under previous matters) significantly alter the overall housing land supply position?

No. The overall position of the housing land supply remains essentially unchanged. The housing requirement is met by the allocated sites, together with the inclusion of other means of supply. The latter includes windfalls, albeit with a different projection than previously submitted, although CPRE Norfolk is strongly of the opinion that the total number of windfalls across the Plan period is still significantly underestimated. Also included are dwellings to be provided by policy 7.5, which as previously stated are felt to be unjustified and unnecessary. The buffer/flexibility allowance remains well in excess of that deemed necessary by the NPPF, as it is at over 14% according to the figures in Figure 1: Summary of Housing Trajectory (Document D3.2D Topic Paper.) Even without inclusion of housing under policy 7.5 there would still be a more than adequate buffer of over 12% (45,584 houses against the housing requirement of 40,541.)

We remain concerned that all sites in the GNLP and the SNVCHAP will be available for development during the Plan period, yet a potentially large number of these sites will not be required. If this is the case, which we contend will be likely, then 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. Therefore, if a higher than 10% buffer is included in the Plan it is surely logical to designate these additional sites forming what is termed the flexibility allowance as contingency sites, which would only be allowed to be brought forwards if higher household and economic growth requires such higher numbers of housing.