



The countryside charity
Norfolk



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

To: housebuilding@cma.gov.uk

29th November 2023

Planning and Land Banks – consultation response

CPRE Norfolk wishes to make the following comments relating to the consultation on the Planning and land banks working papers, due to close on 6th December 2023.

There are large numbers of unbuilt houses which have been allocated in Local Plans throughout Norfolk, yet additional sites are added as these Plans are reviewed. We call for phasing of housing, to ensure that these already allocated sites are built-out before additional sites are allocated. This would help to ensure that sites which are in more sustainable locations would be more likely to be developed before less sustainable ones, as the more appropriate sites tend to have been allocated earlier rather than later.

For example, the Greater Norwich Local Plan, currently at the Main Modifications consultation stage, which is the Local Plan for three Norfolk LPAs: Broadland, Norwich and South Norfolk, has 34,668 houses already allocated and carried forward from the previous Local Plan, the Joint Core Strategy. This is a hugely significant percentage of the local housing requirement figure of 40,541. Rather than adding new sites to reach this figure, the existing commitments should be developed first. Similar percentages are also found across the other Norfolk LPAs.

This request for phasing of housing delivery as described above is supported by a large number of Parish and Town Councils across Norfolk: 161 out of 523, or 30.8%. This is even higher in the Greater Norwich area, where the figures are 72 out of 181 parishes which have signed our pledge to this effect, or 39.8%.

If these measures were adopted by the planning system they would help to prevent unnecessary land-banking, prevent 'cherry-picking' of greenfield, less sustainable sites, and encourage developers to build-out commitments/allocations. The latter would also be more likely to occur if some form of penalisation was introduced to the planning system, e.g. where planning permissions are lost if not completed within a set time period; developers are not given further allocations in Local Plans while existing allocations remain without planning permission having been sought for sites already allocated in earlier Plans.

Thank-you for considering this submission.

Yours faithfully,

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