

1) Specific points:

There are already sufficient allocated sites for housing proposed in the JCS to be carried forward to the GNLP in the Norwich fringe parishes, main towns, and key service centres to keep pace with the predicted rates of development. The exceptions should be brownfield sites, particularly those within Norwich, which should be prioritised in a "brownfield first" policy.

Any additional sites for new housing should be in and close to Norwich, where they will be more sustainable, being closer to jobs and infrastructure, will help keep employment development on already allocated sites, and will have a less negative effect on climate change.

Existing allocated sites for housing in the JCS should be developed before any newly allocated sites in the GNLP are built on (phasing). If they are not, developers will use the most profitable sites, including newly allocated greenfield sites, which would be directly contrary to the GNLP's environmental/sustainability goals and would mean that the land bank of currently allocated sites will grow even larger.

The existing settlement hierarchy should be maintained. The concept of "village clusters" works against the GNLP's stated environmental goals, since it is based on flimsy or non-existent infrastructure - often only on the availability of a few primary school places - and would therefore have a much greater negative environmental impact by, for example, creating many more vehicle movements.

This "new GNLP" seems to have moved the focus for a lot of the new housing away from the NDR (Broadland Northway) and its corridor.

The exorbitantly high environmental and financial cost of the NDR's construction was justified, in large part, by the supposed needs of traffic to and from housing development on the northern edges of Norwich and in the N.E. "Growth Triangle". Encouraging dispersal of housing across other rural areas would mean such development would be unsustainable given the lack of infrastructure, services, and public transport.

## 2) General points:

While there is a genuine need for affordable housing, there is no demonstrable need for the scale and category of housing which development of the sites proposed in the GNLP would result in.

Whitehall's projections, on which the GNLP 2038 housing 'need' is based, are highly questionable and will tend to create the wrong category of housing in the wrong locations, not least because the developers' drive for profitable, often greenfield, sites will hold sway over local authorities' ability to regulate.

The effect of existing regulations means most developers start projects in the certain knowledge that they cannot be made to fulfil even the modest quotas set for the less profitable affordable houses, and they regularly play the 'viability' card to avoid building them. What is actually happening with many of the developments is a damaging kind of social engineering, which this GNLP would encourage. Developers have scant regard for local need, knowing their prime targets are buyers with deeper 'equity release' pockets who relocate from London, Birmingham, Manchester and other conurbations and for whom greenfield locations are particularly attractive.

There remains a very considerable disconnect between the developers' objectives and community needs, while the need to protect the rural environment receives only the slightest recognition. Many of the sites in these documents fail the basic environmental and sustainability tests.

Meanwhile, those without the means to afford most of the housing on these new developments, who in the main are younger, local and without a foot already on the housing ladder continue to be locked out, which weakens communities.

It's long overdue for policymakers, local and national, to stop supporting the cynical game the developers play and instead push for strong regulatory reform that will actually deliver the affordable housing that's needed and, importantly, do so on sites where it's supported by sufficient infrastructure.

Very little in the current plan suggests it can achieve what's needed, which also means the environmental and sustainability objectives of the plan might as well

not exist. Indeed, much of this 'Greater Norwich' concept seems set to weaken existing communities, create more dormitory estates, force more commuter journeys, depress the rural economy, reduce quality of life, and have a negative effect on climate change.