

16/02/2009

Comments

Core Strategy and Development Control Policies Proposed Submission Document (05/01/09 to 16/02/09)

Comment by Mr John Salisbury
Comment ID CSDC265
Date submitted 15/02/2009 21:20
Consultation name 2.31 Paragraph
Do you consider the Core Strategy and Development Control Policies Document to be: Unsound (You think the document needs changing)

If you consider the document to be unsound, to which test of soundness does your representation apply to: (The first 5 tests relate to legal and conformity requirements, the last 3 tests relate to soundness requirements)

- . Is the plan justified?
- . Is the plan effective?

Have you raised this issue before during previous consultations? Yes at Preferred Options (January 2008)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The Spatial Vision is unsound in a number of respects: - It makes little reference to climate change as an over-arching theme (eg. the emphasis on the A11 as a corridor of growth; and the more specific example of the hopes pinned on REV-1) - Predicted growth for both housing and jobs is unrealistic; there is a lack of balance in type for both, and they will not be well related in terms of location. - There is an excessive reliance on the A11 corridor in the southern third of the district for supporting much of the housing and jobs, raising concerns over the return of old-style ribbon development and over the erosion of open space and landscape value. Furthermore, this reliance is at the expense of a more organic and sustainable growth in other parts of Breckland, notably in established market towns such as Dereham, Watton and Swaffham; and in a different context, in Attleborough. - There is undue reliance on motor engineering research and development and logistics employment at Snetterton. - It seeks an exceptional level of growth in Attleborough, as well as planning to increase the housing stock in Thetford by some 50%. - It is unduly dependent on the highway network and on movement by private car, making little or no attempt to encourage more sustainable modes of movement, eg public transport, cycling, walking - an omission which can only cut across the objective "to deliver self-contained settlements reducing the need to travel". The Vision will fail to deliver on: - Self-contained settlements across the District which provide facilities that maximise on what is appropriate for their position in the settlement hierarchy, and reduce the need to travel. - The provision of planned new housing, and within that the certain failure to meet the targets set for affordable housing (40%) and the proportion of housing on previously developed land (25%). - Robustness in aiming for a high and stable level of employment through re-structuring the local economy, and providing 6,000 new jobs in the period 2001-2021. - The ambition to develop and retain a flexible and highly skilled workforce through training (NB: flexibility and high skills are

not always compatible). - The requirement under RSS objective 2.2 (i) re effecting a major shift away from car use (ref also SO18, RTS T1, T2, T5, T7, and T8).

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? No, my representations can only be suitably dealt with by appearing at the Examination in Public

If you wish to attend the Examination in Public, please outline why you consider this to be necessary

CPRE is a long-established national and local organisation with a focus on planning and how it affects the countryside and those that live and visit there. The presence of CPRE at the E-i-P would contribute to the broadening of the discussion beyond the interests of developers and those with a single and specific issue.

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment by Mr John Salisbury

Comment ID CSDC267

Date submitted 15/02/2009 21:36

Consultation name Policy SS 1

Do you consider the Core Strategy and Development Control Policies Document to be: Unsound (You think the document needs changing)

If you consider the document to be unsound, to which test of soundness does your representation apply to: (The first 5 tests relate to legal and conformity requirements, the last 3 tests relate to soundness requirements)

- . Is the plan justified?
- . Is the plan effective?

Have you raised this issue before during previous consultations? Yes at Preferred Options (January 2008)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Spatial Strategy Policy SS1. There is a need to comprehensively re-think SS1 to: - Recast the allocation of jobs and housing within and across the tiers of settlement strategy. In this there is a need to remove Attleborough as a Market town of Substantial Growth, and revert to the same status as the other market towns. - Aim for a higher degree of self-containment within all settlements down to the Village Service Centres (and possibly expand the number of these). - Self-containment means maximising on the ability to serve the town/village and the rural hinterland with basic services in relation to what is appropriate to its size; and in doing so allocate a balanced and appropriate level of new housing and job growth. - Review the REV-1 fixation, and the wider undue emphasis on roads infrastructure and movements against the requirements of PPS1 and its Supplement on Climate Change. Our detailed comments and objections are as follows: Thetford - As proposed, Thetford will further develop as a car-based commuter town and housing growth will outstrip job growth. - The 'local' jobs will too heavily focused on the A11, especially at Snetterton. - The 'up to 5,000 net new jobs' at 2021 lacks credibility on current evidence. - Apart from commuters, much of the housing uptake is likely to be by the 'non-economically active', ie. retirees from London and the greater South East, thereby affecting the social balance and health and care requirements. - A total food and non-food retailing floorspace of 9,400sqm is excessive, and will be very largely taken by the major supermarkets, thereby damaging the vitality and viability of the town centre. Attleborough is planned to take 4,500 new homes, on a greenfield site (as for the 6,000 for Thetford). It has the same deficiencies, and in addition it starts from a smaller base than Thetford, and a greater lack of existing hard and soft infrastructure. The two towns will be in direct competition as regards the provision of infrastructure, employment prospects, a community dormitory town and a retirement zone. Attleborough should remain as a 'normal' market town, and some of the planned housing growth be re-distributed to the other market towns, and to a lesser extent, the Local Service Centre Villages. Dereham - Dereham is in a strategic position to serve a large rural hinterland

with a wide range of services. - The planned housing and job growth are modest and in decline compared with recent years; it is not matching the potential for self containment in the future. - It is not valid to restrict the potential, as is proposed here, due to educational constraints; this is selective compared with other infrastructure constraints mentioned elsewhere (eg electricity at Snetterton) that can be overcome. - The acceptance of the above is at odds with the stated district-wide aim of an up-skilling of the workforce. - The argument on behalf of major national retailers that more supermarket space in the town centre aids self-containment has been uncritically accepted. Dereham already has a Tesco, Morrisons, Lidl, Somerfield and Iceland supermarket. The Tesco store has been expanded to gross 6,688sqm and 'net' 4,722sqm, and about one third of the latter is comparison goods. Predicted rates of growth for both convenience and comparison goods need to be re-evaluated as regards pre-2008 baseline projections. Swaffham and Watton - Like Dereham, but at a lower hierarchy level, both Swaffham and Watton serve both the town and a substantial rural hinterland. Similarly both are set for a relative decline as regards housing and job growth. - The same criticism of an apparent reluctance to unlock an educational constraint also applies to these two towns. - In addition the narrow concept of seeing self containment as being defined by the amount of growth in supermarket retailing. - This is of course at the expense of local small shops, and the local suppliers and trades that service them; and where local expenditure circulates for some time in the local economy, as opposed to immediately going somewhere else. - The reference in SS1 to congestion in both these towns is odd; traffic levels in both towns remain low by national standards. Local Service Centre Villages There are 14 Service Centre Villages, of which four (Harling, Narborough, Shipdam and Swanton Morley) will receive some modest housing allocation. Again, looking to tiers of self-containment, this is too limited in supporting these 14 villages, and could also look to a wider geographical spread. Apart from providing more support to the named four centres, consideration could be given to including others. Snetterton Heath Employment Area. This is largely dependent on a single and narrow employment base, with a degree of uncertainty reflected in new job growth of between '500 and 1,500 jobs' up to 2021. Where is the evidence to support such figures, and can these be justified in the light of the current economic downturn? Unlike education constraints (see above), electricity capacity constraints here 'can be realistically overcome to release the potential of the area'. We would question such priorities. Summary: There is a need to comprehensively re-think SS1 to: - Recast the allocation of jobs and housing within and across the tiers of settlement strategy. In this there is a need to remove Attleborough as a Market town of Substantial Growth, and revert to the same status as the other market towns. - Aim for a higher degree of self-containment within all settlements, down to the Village Service Centres (and possibly expand the number of these). - Self-containment means maximising on the ability to serve the town/village and the rural hinterland with basic services in relation to what is appropriate to its size; and in doing so, allocate a balanced and appropriate level of new housing and job growth. - Review the REV-1 fixation, and the wider undue emphasis on roads infrastructure and movements against the requirements of PPS1 and its Supplement on Climate Change.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? No, my representations can only be suitably dealt with by appearing at the Examination in Public

If you wish to attend the Examination in Public, please outline why you consider this to be necessary

CPRE is a long-established national and local organisation with a focus on planning and how it affects the countryside and those that live and visit there. The presence of CPRE at the E-i-P would contribute to the broadening of the discussion beyond the interests of developers and those with a single and specific issue.

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment by	Mr John Salisbury
Comment ID	CSDC268
Date submitted	15/02/2009 21:48
Consultation name	Policy CP 1 Housing
Do you consider the Core Strategy and Development Control Policies Document to be:	Unsound (You think the document needs changing)

If you consider the document to be unsound, to which test of soundness does your representation apply to: (The first 5 tests relate to legal and conformity requirements, the last 3 tests relate to soundness requirements)

Is the plan justified?
Is the plan effective?

Have you raised this issue before during previous consultations?

Yes at Preferred Options (January 2008)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Comments on Policy CP1 (Housing): Our comment and objections on the housing policy as follows: 1. PPS3 does not require the specific allocation of housing in the final five years of a 15 year supply of land; just the confidence that it can be done. 2. The Core Strategy and Policies would be better to plan to the same stage as the lifespan of the RSS, ie. to 2021 and not 2026. The Core Strategy (CS) could then be brought in line once the current review of the RSS, covering the period 2021 to 2031, is completed. 3. This is particularly necessary in that the RSS and this CS were based on economic and social assumptions that do not bear up well in the light of the current recession (for example, that population growth should be projected from a five-year historic high for net international in-migration). 4. This assumption is particularly relevant to Breckland on two counts. Much of the recent job growth in Breckland was attributed to immigrant labour; and at the E-i-P of the RSS, Breckland upped the district allocation from 11,200 to 15,200 new dwellings for the period 2001 to 2021. Although accepted within the RSS, the evidence base appeared to be restricted to the need to provide more affordable housing, largely through the planning gain from the build of private housing. 5. In our view, the misconceived changes in the pattern of settlement growth in the District is shown by looking at the average annual build rate to date (April 2001 to April 2008), and comparing this with the planned average build rate between April 2008 and April 2026. The figures (past 7 years/future 18 years) are as follows for dwellings per annum (dpa) in the market towns: Attleborough 66dpa/227dpa Dereham 151dpa/51dpa Swaffham 31dpa/14 or 42dpa Thetford 143dpa/380dpa Watton 52dpa/30dpa 6. With so much growth planned on greenfield sites the chance of success in achieving the District's target of 25% build on previously developed land - itself greatly reduced from the RSS pdl target of 60% - is low. This is further the case in a recession, and developers can cherry-pick from a large allocation of land in relation to the level of building being progressed. In addition to now being in recession, this was not helped by the late decision of the council to increase their total provision by 4,000 dwellings, as pointed out in 4 above. Furthermore, it is not clear that the District has carried out a comprehensive survey of potential brownfield sites or that there is a presumption that these should be exhausted before greenfield sites are considered. 7. The planned housing trajectories (Figure 3.1) always looked optimistic against the capacity and skilled workforce available within the construction industry. They now look unachievable over the next years of first, recession, and then a slow recovery of confidence. These planned levels of build need to be revised, and time scales for current planned build to be extended. 8. Housing need with a mix of housing sizes, types, and tenures will, within a reduced build rate, also be affected. This is particularly true of affordable housing. The policy requirement (Policy DC 4) that 40% of the total number of housing provided will be affordable housing is excessively optimistic, especially when considered against a historical level of 10-25% and in view of the caveats made under DC 4 (ie the last 2 paras) regarding physical constraints and off-site in lieu contributions. In the present situation, developers will build few houses, in small groups, and where they do seek to build on a larger site, will only do so with a planning obligation that provides a proportion of affordable houses at a figure far less than the 40% figure. No evidence is provided to ensure that the higher figure can be met, with the planning densities given under DC 2 making this objective even less likely to be attained. 9. In addition to 'the 19,100 houses strategically planned for the policy', it is estimated that some 3,000 housing units will be developed on rural windfall sites. The pressures put upon water resource and other natural resources (eg minerals) through housing growth, and an estimated population growth from 128,000 people to 161,000 (25.8%), are not convincingly discussed by the CS. Plus there is also the needs of the associated developments, and the impact of increased levels of tourism. 10. Again the CS leaves aside climate change considerations. As regards water resource it needs to be noted that the public water supply is very heavily dependent on the aquifers, either directly from boreholes or river surface abstraction; that some 'Breckland' water resources goes to the Cambridge area; and farming in the district already has a high dependency level for spray irrigation, especially for vegetable crops; and that much of the EU designated sites of nature conservation are dependent on water levels in the aquifer, and also the wider countryside landscapes and wildlife. Summary: Policy CP 1 requires a major revision to: 1. Planning housing provision at this stage to 2021, not 2026. 2. Revise the housing trajectories to reflect the current realities, and extend the timescales for the housing provision planned to 2021 (15,200

dwellings for 2001-2021) through reducing annual build rates over the next five years and beyond. 3. Radically revise the settlement strategy, with Attleborough reverting to a 'normal' market town status and level of growth. 4. Look for a more balanced and organic growth of housing (and jobs) across all four market towns, and village service centres, with the aim of maximising the level of self containment appropriate to their position in the settlement hierarchy. 5. Set targets for affordable housing as a proportion of total build to a realistic figure, and not leave at an aspiration which cannot possibly be achieved under the current economic situation and Government policies and priorities. 6. Review the target level of 25% for previously developed land; with the above changes it may become feasible.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? No, my representations can only be suitably dealt with by appearing at the Examination in Public

If you wish to attend the Examination in Public, please outline why you consider this to be necessary

CPRE is a long-established national and local organisation with a focus on planning and how it affects the countryside and those that live and visit there. The presence of CPRE at the E-i-P would contribute to the broadening of the discussion beyond the interests of developers and those with a single and specific issue.

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment by Mr John Salisbury

Comment ID CSDC269

Date submitted 15/02/2009 22:16

Consultation name Policy CP 3 Employment

Do you consider the Core Strategy and Development Control Policies Document to be: Unsound (You think the document needs changing)

If you consider the document to be unsound, to which test of soundness does your representation apply to: (The first 5 tests relate to legal and conformity requirements, the last 3 tests relate to soundness requirements)

- . Is the plan justified?
- . Is the plan effective?

Have you raised this issue before during previous consultations? Yes at Preferred Options (January 2008)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

POLICY CP 3. EMPLOYMENT We make comments and objections as follows: 1. There is no evidence from the justification that the type of development proposals "will contribute to the creation of a wide range of jobs, educational and re-skilling opportunities". Most of the job growth appears to be 'more of the same' and restricted in type: namely, in tourism and other service industries, retailing (for supermarkets), warehousing and distribution, and carers for the elderly. The one high tech area mentioned, sports motor car engineering, is in danger of going seriously out of fashion. With production currently being cut back to marry with sales, it is highly unlikely that any manufacturer will risk capital for such a venture in the short or mid-term future and in any case the future viability of this activity must be called into question given concerns over fuel economy, green agenda etc. Its promotion cuts across 2. The allocation of employment land reflects the fixation of placing the major employment sites along the A11 or, failing that, the A47. On the A11 there are 30-40 hectares planned at Thetford; 20 hectares at Snetterton Heath; and 10 hectares at Attleborough. For the A47 there are at least 5-10 hectares at Dereham, and at least 5 hectares at Swaffham. Only the last two make sense in the context of the levels of growth we see as being appropriate for their place in the hierarchy and the size of the rural hinterland. 3. In terms of job numbers, there appears to be a high degree of uncertainty in some places. Excluding Thetford with its fixed number of 5,000 new jobs, the range for the remainder is 4,650 to 7,700. This contrasts with the 'certainties' of the housing provision, and is important in that it implies

that there might be much more housing built with a lack of matching jobs. 4. If the 5,000 jobs are not delivered at Thetford, then we will see an even higher level of commuting by car up and down the A11. Taking 6,175 jobs as the mean for the range for the 'remainder' of the locations at 4,650 to 7,700, then we have, including Thetford, a total number of 11,175 new jobs to 2021. This amounts to 45% of all planned new jobs in the District being in Thetford. 5. There is no reasoned justification for new jobs in rural areas amounting to 1,200-1,500. Many jobs in rural areas in recent years have been taken by migrant workers. As the spatial portrait points out, 'migrant workers from the European Union have become established as a significant new community with numbers estimated between 6,000 and 15,000' (Page 14). 6. Discussing the economy more generally, and the growth in the working age population, the comment is that "this has been driven to a significant extent by high levels of in-migration from overseas". The commentary then makes the general statement that "the number of people with higher level qualifications is low". "Wages are relatively low in comparison with regional and national levels". "Many higher qualified workers are travelling out of the District" to access higher paid and higher skilled work' (Paragraphs 2.6, 2.7). 7. The Core Strategy does not address the issues of up-skilling the population in the jobs strategy; or the retention of the higher skilled workers, unless in the dubious sector of sports motor engineering (see comments in 1 above). 8. The Strategy lacks ambition, as it is predicated on a simple extension of the current mix of low skill/low paid jobs. Furthermore, it starts from a baseline that is no longer with us. "Job growth has been very high at 23.1% for the period from 1991 to 2004 compared with Norfolk at 11.3%"; "It will be significant challenge to continue this rate over the plan period, with at least 6,000 net new jobs forecast for the District up to 2021". It seems to us to be highly unlikely that this number will be achieved, and certainly not with a desirable rebalancing away from low skill/low pay jobs. Summary: 1. We conclude that the net new job numbers are extremely over-optimistic. The "at least" 6,000 jobs in the District to 2021 show a distribution and range by location of between 9,650 and 12,700 new jobs. The magnitude and variance (about 3-6,000 jobs inherent in the 'at least' factor) does not engender confidence in what is being sought or will be achieved; or how it relates to housing provision. 2. The Strategy shows little convincing signs of seeking a re-balancing of new jobs to a higher skill/higher pay category; it represents an inflated continuance of a range of jobs characterised by relatively low skills and poor pay. 3. The planned distribution of jobs is very heavily skewed to the A11. Within this, to Thetford in particular, with 45% of all new jobs in the District. Thetford, Attleborough and Snetterton together account for between 7,000 and 8,500 of new jobs; on mid-range figures this represents 69% of the total. 4. The distribution of housing as regards numbers and phasing is wrong, and the strategy for jobs unsatisfactory.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? No, my representations can only be suitably dealt with by appearing at the Examination in Public

If you wish to attend the Examination in Public, please outline why you consider this to be necessary

CPRE is a long-established national and local organisation with a focus on planning and how it affects the countryside and those that live and visit there. The presence of CPRE at the E-i-P would contribute to the broadening of the discussion beyond the interests of developers and those with a single and specific issue.

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment by	Mr John Salisbury
Comment ID	CSDC270
Date submitted	15/02/2009 22:36
Consultation name	Policy CP 7 Town Centres
Do you consider the Core Strategy and Development Control Policies Document to be:	Unsound (You think the document needs changing)
If you consider the document to be unsound, to which test of soundness does your representation apply to: (The first 5 tests relate to legal and conformity requirements, the last 3 tests relate to soundness requirements)	<ul style="list-style-type: none"> . Is the plan justified? . Is the plan effective?

Have you raised this issue before during previous consultations? . Yes at Preferred Options (January 2008)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

POLICY CP 7 TOWN CENTRES. Our comments and objections are as follows: 1. The general philosophy is geared to providing an excessive amount of floorspace for the major supermarket chains. The result will be to further reduce the vitality and viability of town centres with the progressive elimination of those small businesses selling food and other convenience products, and an increasing impact on those selling comparison goods and other services. 2. The loss of local independent traders will see a reduction of footfall in town centres, a change in character to high streets to make them more clone-like; a loss of local distinctiveness and consumer choice; and adversely affect the wider rural economy through the loss of jobs of local suppliers and the trades which service both the retailers and suppliers. 3. The retail consultant studies were carried out in 2004, with a 2007 update. Estimated growth rates in sales would have been based on a figure of around 1.9% per annum for convenience goods, a market which is becoming saturated, and for comparison goods around 4.6%. These were pre-recession, and will now need to be revised. In addition, it is unlikely that Breckland will see a continuation in high population growth, which would further lower the figures for requirements of additional retail floorspace. 4. Dereham is already heavily blanketed with supermarkets. It has a Tesco, Morrisons, Lidl, Somerfield and Iceland. The Tesco was expanded in 2001 to a gross floorspace of 6,688sqm, net 4,722sqm. About one-third of the retail floorspace looks to be comparison products. Although these have a lower sales density (annual turnover per sqm of floorspace) than convenience products, the profit margins are higher and the potential for growth is greater, plus that for the future diversion of sales from local independent shops. 5. Although Dereham is planned to grow at a slower rate than in past years, the need is seen for a further 2,000-2,500sqm of net convenience floorspace, and 7,750-8,500sqm of comparison goods, in the period to 2017-18. New housing in Attleborough will be phased to later in the plan period, but is still seen as needing 1,750-2,250sqm of convenience space in the period 2007 to 2018, and 2,250 to 2,750sqm of comparison space. 6. The net convenience floorspace requirement for the District 2007-2008 is given as 5,750-7,250sqm, and 18,250-20,750sqm for net comparison goods. While it is a pity that the growth of jobs cannot be estimated with such an apparent degree of accuracy and similarly 'tightness' of range, the figures are in fact greatly over-inflated. There is, as often the case for retail consultants whose client list rests largely with the major multiples, some special pleading. 7. This often relates to an excessive concern on preventing 'leakage' from their defined catchment area for a specific town, and a significant level of consumer expenditure of the catchment going elsewhere. In the case of Dereham there is stated to be significant retail and leisure expenditure to other, higher order, town centres outside the District, including Norwich, Bury St Edmunds and Kings Lynn (paragraph 3.49). A similar point is made with regards to 'growing' Thetford. 8. The case for competing with higher order settlements is based on a self-containment argument, namely that consumers do not have to drive so far, in particular for their 'main shop'. The inference is also made that it helps to keep local expenditure in the catchment. 9. The points not made are that the consumer miles saved are modest compared with the global sourcing of food and goods made by the multiples; money spent in a supermarket in Dereham no more circulates within and supports the local economy than money spent in supermarkets outside the catchment area; that excessive supermarket presence will progressively remove local independent businesses; with that, local based opportunities and skills. The end point of a narrow concern on leakage is that all lower order settlements expand to compete with town centres of region significance, and approach their 'offer'. 10. In summary, the policy greatly exceeds that which would be appropriate for the District between 2007 and 2018. There are flawed growth expectations in consumer spending and in population levels. These are also predicated on a massive expansion of housing in two locations (and within what we would consider to be a badly flawed settlement strategy). They do not take account of the recession, or that it may hit particularly hard on the expenditure of those in poorly paid jobs, or the unemployed. The policy takes no account of the loss of small independent shops and consequent reduction in footfall; the excessive dominance of large retailers that will result, almost all attracting car-borne shoppers; and claims, with no evidence, that vitality and viability will be improved by pedestrianisation of the town centres.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public?

No, my representations can only be suitably dealt with by appearing at the Examination in Public

If you wish to attend the Examination in Public, please outline why you consider this to be necessary

CPRE is a long-established national and local organisation with a focus on planning and how it affects the countryside and those that live and visit there. The presence of CPRE at the E-i-P would contribute to the broadening of the discussion beyond the interests of developers and those with a single and specific issue.

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment by Mr John Salisbury

Comment ID CSDC271

Date submitted 15/02/2009 22:44

Consultation name Policy DC 8 Tourism Related Development

Do you consider the Core Strategy and Development Control Policies Document to be: Unsound (You think the document needs changing)

If you consider the document to be unsound, to which test of soundness does your representation apply to: (The first 5 tests relate to legal and conformity requirements, the last 3 tests relate to soundness requirements)

- . Is the plan justified?
- . Is the plan effective?

Have you raised this issue before during previous consultations? Yes at Preferred Options (January 2008)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

POLICY DC 8. TOURISM RELATED DEVELOPMENT. Our comments and objections are as follows: 1. There are no Development Control policies which link to the constraints made in Core Policy CP 10 on the Natural Environment, or to Core Policy 11 on the Protection and Enhancement of the Landscape (albeit Policy DC 12 deals with the narrow issue of protected trees and hedgerows). 2. This is particularly a concern in relation to DC 8 on Tourism Related Development and Tourist Accommodation. This gives the impression of being set apart from landscape and wildlife considerations. The only mention comes under one of five 'welcoming' criteria for proposals to be permitted; this states where 'There are no significant effects on European habitats or species'. If it were permitted, it would contravene EU law. There are, however, many other restraints mentioned by CP 10 and CP 11 which are relevant to tourism-related development; and some specifics which are not, in particular light pollution, which can be a major issue with tourism (and sports and leisure) development - see separate comments on CP 11 and DC 1. 3. Similarly, tourist accommodation located in the countryside will be encouraged where it meets one or more of five criteria, but none of these relate to landscape or nature conservation constraints, or deal with the scale of the proposal, whether a small development or another 'Center Parcs'. 4. Policy DC 8 appears to be wide open to the potential for much damaging development in the countryside being deemed acceptable. The only constraint appears to be (paragraph 4.39) that it should not have an adverse effect on the Breckland environment "which attracts tourist activity". This implies that there is no regard for the intrinsic quality of landscape or nature conservation, only that it should not be so bad as to deter other tourists and in that way impact on the tourist economy.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? No, my representations can only be suitably dealt with by appearing at the Examination in Public

If you wish to attend the Examination in Public, please outline why you consider this to be necessary

CPRE is a long-established national and local organisation with a focus on planning and how it affects the countryside and those that live and visit there. The presence of CPRE at the E-i-P would contribute to the broadening of the discussion beyond the interests of developers and those with a single and specific issue.

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations

Comment by Mr John Salisbury

Comment ID CSDC276

Date submitted 16/02/2009 09:41

Consultation name 4.122 Paragraph

Do you consider the Core Strategy and Development Control Policies Document to be: Unsound (You think the document needs changing)

If you consider the document to be unsound, to which test of soundness does your representation apply to: (The first 5 tests relate to legal and conformity requirements, the last 3 tests relate to soundness requirements) . Is the plan justified?

Have you raised this issue before during previous consultations? . Yes at Preferred Options (January 2008)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

The presumption against direct access onto corridors of movement should be made absolute; where there is a loophole, such as DC22 contains, experience makes clear that developers will push for exemptions to be made.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? No, my representations can only be suitably dealt with by appearing at the Examination in Public

If you wish to attend the Examination in Public, please outline why you consider this to be necessary

CPRE is a long-established national and local organisation with a focus on planning and how it affects the countryside and those that live and visit there. The presence of CPRE at the E-i-P would contribute to the broadening of the discussion beyond the interests of developers and those with a single and specific issue.

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment by Mr John Salisbury

Comment ID CSDC286

Date submitted 16/02/2009 10:53

Consultation name Policy DC 1 Protection of Amenity

Do you consider the Core Strategy and Development Control Policies Document to be: Unsound (You think the document needs changing)

If you consider the document to be unsound, to which test of soundness does your representation apply to: (The first 5 tests relate to legal and conformity requirements, the last 3 tests relate to soundness requirements) . Is the plan justified?
 . Is the plan effective?

Have you raised this issue before during previous consultations? . Yes at Preferred Options (January 2008)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Re DC1 point (d) regarding light pollution: There should be specific proposals on how existing levels of light pollution can be reduced and minimised in the case of future development, both residential and commercial. The District should explicitly acknowledge the existence of Norfolk County Council's Environmental Lighting Zones Policy and consider its adoption. Much of Breckland falls within the policy's 'Rural Dark Landscape' category and at the very least the District should adopt the policy's recommendation for the use of full cut-off flat glass lighting in the rural landscape.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? No, my representations can only be suitably dealt with by appearing at the Examination in Public

If you wish to attend the Examination in Public, please outline why you consider this to be necessary

CPRE is a long-established national and local organisation with a focus on planning and how it affects the countryside and those that live and visit there. The presence of CPRE at the E-i-P would contribute to the broadening of the discussion beyond the interests of developers and those with a single and specific issue. CPRE also has particular expertise in the field of light pollution.

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption

Comment by	Mr John Salisbury
Comment ID	CSDC303
Date submitted	16/02/2009 13:15
Consultation name	Policy CP 11 Protection and Enhancement of the Landscape
Do you consider the Core Strategy and Development Control Policies Document to be:	Unsound (You think the document needs changing)
If you consider the document to be unsound, to which test of soundness does your representation apply to: (The first 5 tests relate to legal and conformity requirements, the last 3 tests relate to soundness requirements)	<ul style="list-style-type: none">. Is the plan justified?. Is the plan effective?
Have you raised this issue before during previous consultations?	. Yes at Preferred Options (January 2008)

If you feel the plan is unsound, please use the following box to summarise why you feel the plan is unsound and explain any changes you believe are needed to make the plan sound.

Comments re CP 11 Protection & Enhancement of the Landscape para 5: the District should require (not 'expect') all development to be of the highest design quality. No specific reference is made to the use of traditional/vernacular design motifs or building materials, nor is the reference to "good practice in urban design" appropriate to a rural area such as this. There is no mention of the issue of light pollution, a major factor with new development in terms of landscape enhancement and impact on the aesthetic qualities referred to in para 1 of CP 11. This aspect should be explicitly acknowledged (especially in the light of Norfolk County Council's Environmental Lighting Zones Policy) - see also comments on DC1.

Can your representation be considered by this written representation or do you consider it necessary to attend the Examination in Public? No, my representations can only be suitably dealt with by appearing at the Examination in Public

If you wish to attend the Examination in Public, please outline why you consider this to be necessary

CPRE is a long-established national and local organisation with a focus on planning and how it affects the countryside and those that live and visit there. The presence of CPRE at the E-i-P would contribute to the broadening of the discussion beyond the interests of developers and those with a single and specific issue.

Do you wish to be:

- . Notified of the Submission
- . Notified of the Inspectors Recommendations
- . Notified of the Adoption