

THE EAST OF ENGLAND PLAN

Consultation Response by CPRE Norfolk

CPRE Norfolk set out their views on the Region Plan in two parts.

The first is an overview on the key issues affecting the county over the 20 year time scale of the Plan, which we believe is relevant to all readers.

The second part consists of specific observations on some of the numbered policies, or a key paragraph in the support text, directed at planning specialists or those with an interest in the detail. Most of these observations, which may take the form of a suggested change in wording of a policy, are mainly directed to seek to address the interests of the wider countryside and rural issues, which we think receive insufficient attention in the Plan.

The key issues surrounding the Plan are:

- Who makes the major strategic decisions?
- Consultation at the Region and Sub-Region levels.
- The Impact of the Sub-Region Proposals on Norfolk.
- The Proposed Housing and Job Growth by County.
- Housing and Affordable Housing.
- Infrastructure.
- Countryside and Environmental Issues.

KEY ISSUES FOR NORFOLK.

1. Who makes the major strategic decisions?

The Plan is central Government driven as regards the very heavy emphasis on economic growth, including the designation of three of the four national growth areas that are to be wholly or in part in the East of England region. These arose from the Government's "Sustainability Communities Plan". To quote the independent Sustainability Appraisal Report of the Region Plan:

The growth pressures are largely results of national policies and economic and demographic pressures outside the region's control. Often the most the RSS (Region Plan) can do is to mitigate or palliate the anti-sustainable consequences of these decisions and pressures (page 19 of the summary of the Report).

Other statements with major implications for the region and county are:

The baseline assessment shows that a number of aspects of the environment are already seriously stressed by human impacts on water resources, biodiversity, tranquillity, air quality, recreational access and congestion. The larger the volume of development the harder it will be to avoid increased flood risk, erosion of the quality and distinctiveness of settlements and the built environment, and landscape (page17).

The RSS lacks the powers to ensure that development meets true sustainability standards. The scale and pace of growth envisaged is likely to be highly environmentally damaging unless planning controls are combined with other measures to ensure that new development achieves a step change improvement in resource intensity, including approaching zero net climate change impacts, piped water demand, road traffic generation and loss of wildlife habitat (page 29).

These comments reflect our concern that while most policies in the Plan are admirable in concept, the pressures are such that the outcomes will be much less satisfactory in practice.

2. Consultation at Region and Sub-Region Levels.

Sub-regions have an important role as they represent a policy layer between the Region Plan and its 20 year time span and the Local Development Framework prepared by our District and City/Borough Councils. With the Region Plan itself, in spite of the considerable efforts of the Regional Assembly, **there are major inherent difficulties for public consultation in a large and diverse region; these are reflected in the need to have a Plan which runs to 301 pages.**

These difficulties run through to the sub-region level. Norfolk as a county is split in more ways than anywhere else, with three sub-regions and two sub-areas, with cross-cutting not only between districts but also counties. The sub-regions are based on Norwich, Kings Lynn, and Yarmouth-Lowestoft; the sub-areas the Norfolk and Suffolk Broads, and Thetford.

A further difficulty is presented by constraints on time-scales at all stages of the Region Plan process. The proposals now made for the Norwich sub-region first appeared on the Regional Assembly web site in week before the 5th November meeting, with no prior public discussion. Consultation on the objectives of sub-regions, and their policies, will continue to be a problem in the future.

3. The Impact of the Sub-Region Proposals in Norfolk.

We have had from the outset reservations on the sub-region concept. These have increased with the progression of the draft Plan. Our concern is that the **sub-region principle will be focussed on major urban and business growth interests and influence, to the extent that the interests of rural areas and the wider countryside will be submerged;** this will happen whether the countryside areas are within (treated as a “resource”) or without (suffering from a neglect in priorities) the sub-region.

The Norwich sub-region now encompasses a very considerable area, a totally different proposition from the old Norwich Policy Area, and includes the market towns of Stalham, North Walsham, Aylsham, Dereham, Attleborough, Wyndmondham, Harleston and Diss; bringing in parts of North Norfolk and Breckland as well as Norwich, and much extended Broadland and South Norfolk. The practical long term impact of the proposal is that the market towns will become largely dormitory settlements for the sub-region focus. Clearly Norwich has a strong natural pull as a substantial town in a relatively dispersed population, and there is a need to selectively develop growth, in particular in science based industries. But to add to this the ambition to make Norwich a major **regional** growth centre will mean that it will be difficult for the market towns to compete with jobs and facilities. In turn the rural hinterland of these towns will also suffer. There will also be induced many more traffic movements and over longer distances. **It will run against the important Plan policy to nurture our market towns and the key role they must play locally.**

There will be similar problems with the proposed Kings Lynn sub-region. One danger is an over-heavy emphasis on the Kings Lynn Millennium regeneration programme, important though this is, in the thinking of the sub-region. If there is to be significant district and public involvement, how effective and complete will it be for an area which includes King’s Lynn, Fakenham, Swaffham, Wisbech and Sutton Bridge, and their rural hinterlands; and how well policy outcomes will be monitored.

On the concept of sub-regions, it is necessary to question what are the objectives, what is it hoped they will deliver, and how might this compare with the likely outcome in practice. Within this, what are the criteria for defining the boundaries of a sub-region, something more meaningful (and preferably more environmentally friendly) than within a half hour drive of Norwich for example.

4. Region Housing and Job Growth by County.

The proposed number of new jobs to be created in the region between 2001 and 2021 is 421,000; and the number of new dwellings 478,000. It is of interest to compare by county the number of jobs in relation to the number of houses, which are stated in the Plan to be “broadly” in accord; it is extremely broad in the case of Norfolk, see the Table below, drawn from data in Chapters 6 and 7. The Plan states:

In Norfolk, the dwelling figures are seen as sustainable given the attractiveness of parts of the county for retirement in-migrants and related historically low levels of people who are economically active. This is likely to continue to constrain the potential labour supply that can be achieved from additional housing...” (para 7.11).

Table. Relationship of New House and Job Numbers; a Comparison by County.

<u>County.</u>	<u>Jobs.</u>	<u>Houses.</u>	<u>Houses/Job.</u>	<u>Deviation.</u>
Bedfordshire.	53,000	54,700	1.03	- 8.8%
Cambridgeshire.	92,900	89,300	0.96	- 15.0%
Essex.	116,000	123,400	1.06	- 6.2%
Hertfordshire.	64,700	79,600	1.23	+ 8.8%
Norfolk.	42,600	72,600	1.70	+ 50.4%
Suffolk.	51,900	58,600	1.13	0%
Region (Total).	421,000	478,000	1.13	none, by definition

The dwelling figures for Norfolk are only “sustainable” in the context of the number of jobs planned to come to Norfolk and a low level of people from high in-migration that will be seeking a job. **They do not take account of social and environmental factors.** The Plan says we can expect a continuation or increase of past trends which sees the county as a retirement zone. A major growth area in many parts of Norfolk will be for residential homes and carers for the elderly.

We do look for economic growth in Norfolk. But this should be selective and tuned as far as possible to more variety and a larger proportion of highly skilled jobs, and provide a good range of opportunities. There is a need for both more jobs of this type and less market housing. We do not want to see an extension of the developments in agriculture and horticulture, with their dependence on badly paid jobs; or in some sectors of tourism or services where similar problems can occur, and seasonality is a factor. Carers could be the next example. These jobs are of course very necessary, but it is a matter of balance in the total mix of jobs at a local level. **Further a local economy based on poorly paid jobs will bring further pressures on the need for affordable housing.**

5. Housing and Affordable Housing.

The “footloose” demand for market housing in Norfolk will remain high because of the retirement and second home pressures; and these pressures are most acute in the coastal and other very attractive areas, where the environmental and countryside considerations are particularly important. This demand however should be contained, more so than the Region Plan proposes. The issue of **local need** in housing should be more fully addressed.

Region studies find that 4 of the 7 “affordable” districts are in Norfolk, based it appears on a study which compared **local** house prices against average **regional** salaries. **This is mis-leading on two counts.** First local salaries are lower in Norfolk than say Essex, Herts and Cambridgeshire, and lower than the regional average, which affects the true ratio of salary to house prices. Secondly the approach does not take account of the position and number of people in social need and/or an income bracket which will never permit them to buy a property.

The pressing need for more “affordable” housing is widely established and accepted in the county (and it is a national problem), and as such is a main priority in the Community Strategies; but so is our natural environment. **The crux of the problem, in Norfolk as well as elsewhere, lies in how affordable housing is to be funded, who pays for the necessary subsidies, and what are the mechanisms for achieving the subsidy. Here the heavy reliance on planning gain (planning obligations, secured in the context of granting consent) from private housing bears down heavily on all, but particularly in those rural areas where the need for social rented and shared equity housing, is most acute; but large scale development for market housing is not desirable and conflicts with other policies.**

As the system stands at present, in an effort to go even a very modest way to meeting local affordable housing needs, a rural authority is pushed to building too much private housing, in too large blocs, taking too much greenfield land. It is difficult to meet the requirements of small settlements, or utilise the availability of small plots for affordable housing on previously developed land, whether in town or country. **There is clearly an overwhelming need for much more Government money, a big step change, to fund Housing Association provision. Otherwise the problem will continue to worsen as it has done for decades; or we will destroy the character and environment of the county by providing a surfeit of footloose private housing in an unsuccessful effort to solve the problem.** We have already seen Breckland increase its provision for annual average build for housing by 200 units to

760 a year. North Norfolk has now also decided to increase its allocation in an effort to raise the finance to build more affordable housing through planning obligations.

The over-reliance on planning gain, and deficiency in direct Government funding, may be further aggravated by a priority for Government cash going to the national high economic growth areas, the Thames Gateway, M11 Peterborough to London corridor, and the Milton Keynes area, and further compounded by the desire to ensure the supply of public sector key workers to these areas.

Against this background, we would suggest that increases in Breckland and North Norfolk on the overall provision for new housing should aimed for the next five years or so, say to 2011 to relate to the previous planning system. It should not be a higher commitment all the way through to 2021. This would be in accord with plan-monitor-manage principles. More importantly, local authorities should **not take on a long term commitment based on an extension of past and current Governments' policies, funding constraints and priorities for affordable housing over many years, particularly social rented housing for local need. These are inadequate and unsatisfactory and should be changed.** Apart from an overall national major increase in state funding, policies should not necessarily be a case of "one cap fits all". Policies should take account of variations in local needs and circumstances, and how as a nation we value our countryside and environment (intrinsically and as an economic asset).

There may other changes that could help the planning system to deliver more affordable housing and be promoted by the Region Plan. These could include figures within the total housing provision of how much is affordable and how much private; within the affordable, how much is social rented, some type of equity share, and sub-market price (if this has any significance for local people). Further whether some control can be exerted on the type of private housing; for example a skew to 1 and 2 bedroom properties which may be of help as local "starter" homes, and less attractive to footloose in-migrants. And finally, whether on small rural sites a 50% share of affordable housing can be obtained as promised by the Rural White Paper of 2000.

6. Infrastructure.

The Regional Transport Strategy makes reasoned statements and overall advances a number of environmentally sound policies for the Region Plan. However elsewhere the Plan makes a number of references to an "infrastructure deficit" throughout the Region; most usually expressed as a need for more road infrastructure because this is already congested, and/or there will be a good deal more growth, economic plus the associated housing. The total wish-list bill must be staggering.

The Plan does not say too much on the priorities for various road schemes, more on status; that is whether in the Government programme, or some stage towards this aim. However in the Regional Transport Strategy chapter, the Northern Distributor Road (NDR) proposal is rated priority C by the region.

The Region was a late convert to inclusion of the NDR, and does so now on the basis of (for one of five schemes) *they enable the release of development land identified for meeting the growth area housing targets.* The housing policy for the Norwich sub-

region calls for reallocation of housing from districts provision such that the new build is 45,500 dwellings in the sub-region as against 29,500 in the old Norwich Policy Area, “linked to major transport improvements”. The Plan states that the allocations will include a major urban expansion in the north east sector, with “the core development masterplanned to provide a coherent new urban village”.

A dual carriageway NDR (or a single) would undoubtedly much improve road access to north east Norfolk, both locally and from much further away, to the London area. The debate lies on what the impact would be, apart from the environmental damage, and ignoring other approaches to improving local access. We argue that it will add to further pressures for housing development, not least retirees and second homes; and on the economy will lead to “suck-out” of local based jobs rather than “pull-in”. The latter is always a danger, particularly so in a geographically peripheral area. For tourism, we may see more day trips rather than the more profitable and more environmentally friendly longer stay visits. It will also induce more and longer local road based trips, especially through commuting. **A coalition of wildlife and conservation groups has condemned all NDR route options as unacceptable**

7. Countryside and Environmental Issues.

In addition to a number of specific changes to a number of policies, we consider that the environmental Principles listed in box 9.1 should in fact be ENV1, and as such form the lead “umbrella” policy for the natural, built and historic environment. We also make some broader points where there are deficiencies, while recognising that central Government has the greater responsibility in some cases. These are:

- **An adequate regard for water resource, not only for the increase in demand in Norfolk, but the take-off for elsewhere in the region. This against the background on national and international designated sites of nature conservation which depend on the aquatic environment.**
- The absence of any significant mention of coastal erosion problems and the human (and blight) aspects of a managed retreat in lightly populated areas.
- An undue reliance on wind as a source of renewable energy, and an over-optimistic assessment of the contribution that might be made from this source.
- **The continued over-reliance on fossil fuel transport**, including that of the major global supermarkets (plus the degeneration of the local rural economy).
- **The lack of an over-arching climate change policy context for issues such as the above.**
- **Insufficient consideration for the social and service needs for rural populations** (in addition to social rented housing in the appropriate locations, as discussed above). There is a need for a more rigorous “rural proofing” for policies.
- The UK practice of the co-disposal of hazardous waste is now banned, and in the region there are currently no landfill sites that have planning permission to take hazardous waste. The growth agenda for the region includes the development of large areas of previously developed land which will require specialist disposal. There needs to more analysis than the statement that “This issue may have the potential to compromise the delivery of planned growth in the East of England”.

OBSERVATIONS ON SELECTED PLAN POLICIES/PARAGRAPHS.

1. Chapter 2: Background Context.

Para 2.6. Sustainable development. **Support.**

But: the Plan can not deliver. Economic growth will subsume the effective protection of the environment and prudent use of natural resources.

Para 2.12. Mean household size.

If extra homes are built based on the assumption of a continuing further fall in household size from 2.38 to 2.24 they will be taken up; but as another driver for continuing large scale net in-migration.

Para 2.14. In-migration.

The net in-flow from London is likely to be higher, with the capital being the major centre of international in-migration, and “knock-on” displacement to the region. The Government policy of re-profiling (and increasing) the population by introducing a young worker intake is not sustainable. The young also get old.

Para 2.21. “Polycentric” settlement pattern.

The ideological commitment to a large settlement in every area will result in large urban centres where they may not be necessary or desirable, and in time will eliminate any “remoteness” and a sense of a rural area and open countryside. It will further entrench an urban perspective and overall influence.

2. Chapter 4: Core Spatial Strategy.

Policy SS1. Achieving sustainable development. **Support.**

But: The level of growth will negate environmental considerations. The whole chapter and its policies are devoted to new development, where it will go and how it might be done. **There is nothing here, and little elsewhere, on making existing settlements more sustainable. In particular this means little is said about rural areas and the countryside, and the trend for them to become less sustainable; less and more dispersed services, less affordable housing for local need in the right locations, the laying waste of the local rural economy by the major global retailers, the increasing dependence on the car.**

Policy SS2. Overall approach to the spatial strategy.

The number of growth centres, and the overall degree of growth planned, is too large. We are not happy with the sub-region concept, urban and growth dominated, which will see insufficient attention and priority given to countryside and environmental issues. The Norwich and King’s Lynn sub-regions are large, and sub-region policies are being put in place, without public consultation on the principle or the detail.

Policy SS3. Development in and adjoining urban areas.

We support the first requirement as not to affect the need to maximise on the use of previously developed land. However when greenfield land is taken it is not possible to have “avoidance of adverse impact on environmental assets such as nature conservation and landscape character, historic features, mineral resources, water resources and air quality”.

Policy SS4. Use of previously used land and buildings. **Support.**

But: rural areas will fall below the region target of 60% of new development on previously developed land (PDL). Further they will be pushed into greenfield building as a means of financing affordable housing through planning gain. The region target

on use of PDL should have a “reality check” in light of paragraph 9.65 (the new regulations on the disposal of hazardous waste).

Policy SS5. Town centres. **Support.**

But: The sub-region arrangement and Government retail policies will convert our market towns into dormitories for the large urban centres and a branch of Tesco plc; in the process the local rural economy and rural hinterlands will also suffer.

Policy SS6. Transport Strategy. **Support.**

But: These policies reflect much of Chapter 8 on the Regional Transport Strategy, which we broadly support. The reality is the pressures for a huge roads programme (code “infrastructure deficit”) to support unsustainable economic growth rates.

Policy SS8. Land in the urban fringe. **Support.**

But: The policy will need more specific guidance to get a substantial improvements over the edge-of-town “large shed” architecture and level and type of associated lighting for these and the street lighting.

Policy SS9. Development in rural areas. **(Support).**

But: Add a sentence. *All development in rural areas should be assessed against landscape character considerations. These should include a detailed assessment of the local landscape character and how it is valued.*

Policy SS10. The regional economy. **Object.**

Too much of the national growth is focussed in one region, and will have an unacceptable impact on the natural environment and resources.

Policy SS11. Priority areas for regeneration.

The first priority for rural areas is to avoid national policies - or the lack of them - which lead to their degeneration in the first place. In general though we would question the extent to which the rural areas of Norfolk suffer from weak economic performance, or even high deprivation; and this should not be used as a basis for footloose development in the countryside, and any mission to make them less “remote” which is restricted to new road infrastructure.

Policy SS13. Overall housing provision. **Object.**

The overall housing provision is predicated on assumptions about net inward migration and decreases in household size (in Norfolk, the “natural” change in the existing population is one of decline). **These assumptions should be made explicit.**

The region plan should contain an appendix which gives a detailed breakout of how the numbers are derived. This should be done by county.

Policy SS14/5. Development and flood risk/The coast. **Support.**

But: Coastal erosion is not discussed, and the associated issues of housing and businesses loss or blight. Sustainable development in the Shoreline Management Plans proposes continuing to defend the more heavily populated areas, but not lightly populated ones, where the drift of the sediment produced aids the protection of the coastline elsewhere. There is a strong case for compensation in pursuing this policy.

Policy SS16. Quality in the built environment. **Support.**

But: The principles are good. But the planning system has had limited influence except in the case of making better use of land. What is different now, especially as the pressure to get planning obligation funding for affordable housing will see developers plead financial pressures, with at times some justification.

3. Chapter 5: Sub-regional and sub-area policies.

Para 5.1. Need for sub-region. **Object,** in absence of meaningful consultation.

The sub-region concept arises in part from the dismantling of the county Structure Plan system. They have been set up as an additional policy layer between central Government/region and the district and borough local authorities. But also added is an emphasis on urban and business interests, and inevitably they will “lose” those of the wider countryside and rural interests.

Para 5.3. Sub-regions identified. **Object**, in absence of consultation.

There are five sub-regions/sub areas affecting Norfolk, more than any other county. They are the Norwich, King’s Lynn, Great Yarmouth/Lowestoft sub-regions; and the Norfolk and Suffolk Broads, and Thetford sub-areas. The boundaries crossing districts and counties will weaken county identity in time and work against effective public participation; the need for much more cross-border local authority involvement will be more time demanding and less effective in practice. It will put pressure on the priorities and interests, and resource needs, of the wide areas of countryside that are not part of a sub-region.

Para 5.47. Norwich sub-region (NSR).

The proposed Norwich sub-region, revealed by the Assembly agenda papers for the 5th November 2004, has expanded greatly and in purpose from the old Norwich Policy Area. There are no criteria for the new boundaries other than the environmental unsustainable one of being within a half-hour drive of Norwich. Particularly with a D2 Northern Distributor Road it will create a mini-London effect, with the market towns in danger of being relegated to satellite population centres.

Para 5.53. NSR. Poor road “infrastructure”.

There is a powerful lobby which promotes this argument, and that more infrastructure equates to more jobs and economic growth. This route takes us on to the spiral of non-sustainability, with the main outcome being more footloose development, particularly housing, more and longer distance car journeys, and “suck-out” of local economy interests. The main beneficiaries will be housing and road construction, and their associated industries.

Policy NSR1. Promoting clusters and strategic sites. **Support.**

We support targeted “high-skill” growth, both for their contribution to the local economy, and for obtaining a better balance of job types and opportunities. But it does not necessitate a sub-region arrangement to drive this; nor should it be assumed they are per se on (road) transport corridors as opposed to good access by public transport.

Policy NSR2. Promoting the tourism sector. **Support.**

But: the emphasis should be on more environmentally sustainable tourism, with a higher economic return per visitor, rather than a growth in numbers. This could include a higher level of longer-stay continental visitors. The term “gateway” should not be code for a roads infrastructure agenda. At a lower but still very important level, current levels of signage are more than sufficient. Signage should **not** be used as a means of advertising in the countryside, there is no case for an increase.

Policy NSR3. Retail, culture, leisure, and education. **(Support).**

But: There has and will remain a very strong county role for Norwich for these needs. However, given the geographical location, and population level and pattern around it, to make it a **regional** centre will promote more and longer car based journeys and over-shadow and diminish the role of the market towns in the NSR and beyond.

Policy NSR4. Housing. **Object.**

A driver for the Norwich Policy Area was to improve the balance and use of PDL between the City Council and the adjacent rural areas of South Norfolk and Broadland Councils; not for promoting urban or market led business interests. This is more

fundamental than the re-allocation of housing from 29,500 in the old NPA to 45,500 in the proposed NSR.

Para 5.62. NSR, Major urban expansion north east of city. **Object.**

We object to a major urban expansion in the north east sector of the urban fringe, and the link to major transport improvements. This will be development on greenfield land, linked to developer contributions to a Northern Distributor Road. In addition, it is unlikely in that event there will even be any substantial planning obligation finance left over for Housing Association new dwelling provision.

Policy NSR5. Transport infrastructure. **(Support).**

There are a number of public transport approvals in the policy which we warmly support. We would specifically add that these should include improvements between key centres in and around Norwich. This includes the rail and bus stations, the airport, main retail centres, the UEA, the Science Park, the Norfolk and Norwich Hospital.

But: We object to the total dualling of the A47 between the A1, Norwich and Great Yarmouth, and the Northern Distributor Road proposal.

Policy NSR6. Environmental assets. **Support.**

We support the proposal that the historic setting of the city be protected. Also that inappropriate development will be prevented in river valleys, areas of important landscape character and nature conservation value; this in our views rules out the construction of the NDR, particularly on the western half of all proposed route options.

Policy GYL1. Economy and regeneration. **Support.**

We particularly welcome the proposals for a more diverse and environment based tourism sector, and urban renaissance using brownfield land development.

Policy GYL2. Housing.

We welcome the priority given brownfield sites to aid urban renaissance. The total housing provision looks to be too high in that the priority has to bring more jobs to the existing population rather than ship extra population in.

Policy GYL3. Infrastructure and transport policy.

We **support** selected A47 improvements between Yarmouth and Norwich, but **object** to the dualling of the Acle Straight. We **support** measures to relieve congestion on the eastern end of the A47, at the Vauxhall Road roundabout. We **object** to an A47/A149 Link Road (nb the text typo says A147). We **support** the various public transport measures; and an investigation/benefits analysis of a third river road crossing, on the basis that it could potentially separate commercial dock traffic from other vehicles, and release some previously developed land.

Policy GYL4. Implementation.

The development of policies, and their implementation through a partnership of Local Authorities, regional agencies, and local bodies does not require a sub-region arrangement.

Policy NSB1. The Norfolk and Suffolk Broads.

We **support** the broad overall strategy for the Broads. But we question the appropriateness of promoting as the “green heart” of the north east of the region. We think Norfolk as a whole fulfils this role, and long may it continue. A “waterscape” description might be more apt for the Broads themselves. We reiterate the point that the concept of Norwich, Yarmouth, Lowestoft and surrounding market towns as a “gateway” should imply improved access by a variety of travel modes and not major road developments.

Policy TH1. Thetford sub-area.

We do not welcome the roads-economy A11 corridor concept and links to London.

Para 5.175. King's Lynn sub-region.

We consider that the proposed sub-region not only has the generic problems of the sub-region concept, but to be unworkable in the number of players involved.

Policy KL1. The King's Lynn sub-region. **Support.**

We support the economic aims which form the bulk of this policy, and the access to local higher education facilities.

Policy KL2. Exploring growth in the urban area.

The potential for step change in housing delivery needs to be targeted on affordable housing as far as possible within the constraints of over-reliance on planning gain funding, and combined with lobbying for more direct Government funding. The prime need is for further jobs for the existing population, so that in the context of job growth the overall provision of housing is balanced to meet and not exceed this.

Policy KL3. Regeneration of King's Lynn urban area. **Support.**

We support the regeneration of the King's Lynn urban area. **We look to see the South Lynn Millennium project (NORA) become a flagship project for the efficient use of previously developed land, high housing density combined with quality design encompassing sustainability principles, techniques and materials.** To this and we supported the construction of the Nar-Ouse Regeneration Road as releasing brownfield land and access for NORA.

Policy KL4. Transport infrastructure.

We **oppose** the dualling of the A47 throughout its length; and have major reservations on bypassing Middleton/East Winch and West Winch on this road, and the A148 Rudhams bypass.

4. Chapter 6 Economic Development, Retail and Tourism.

Policy E2. Job growth. **Object.**

The job growth targets are likely to be over-optimistic as well as entail an unsustainable rate of economic growth, and likely to be housing led. In Norfolk there is a severe imbalance between the level of housing provision and the number of jobs that are planned. See our comments on H1 and the table in part 1, Key Issues.

Policy E10. Retail Strategy.

There needs to be more specific criteria and guidance on the interpretation on new retail development being in scale with the size and character of a market town; and the consideration of a formal assessment of the impact on the local rural economy. The interpretation of national guidance favours the major global retailers, and the continuation of their expansion into the centres of market towns will destroy them. **The region should lobby at national level for other measures, such as an extension of the climate change levy to cover "food miles", and also the implications of the level of packaging used, which will see the costs of their food chain carried internally, and help to promote the local economy.**

Para 6.45. Development in sensitive areas. **Support.**

We note and support the need for the Heritage Coast to be protected from significant growth in tourist numbers. This is difficult to achieve in practice; and dualling of the A47 and a Norwich Distributor Road would inevitably bring huge pressures, much of it from day trip visitors.

Policy E14. Regional Airports.

The modest expansion quoted for Norwich Airport should be primarily focussed on serving business passenger needs rather than package tour holiday flights.

5. Chapter 7. Housing.

Policy H1. Distribution of dwelling provision 2001-2021. **Object.**

The comparison by county of the level of new housing proposed to new job growth shows a severe imbalance. This continues and exacerbates the footloose large net inward migration making the county a retirement zone. **The level of in-migration, and the holiday/second homes factor, is at the expense of local need for housing.**

Policy H2. Affordable housing and mix of housing types.

The major infrastructure need in Norfolk is for affordable homes for local needs. The very large and historic backlogs of need will not be remedied without very substantial increases in funding to Housing Associations. **The current heavy over-reliance on funds from planning gain from private build will deliver a surfeit of the latter while at best making only limited progress on the core problem.**

Policy H3. Phasing of housing development. **Support.**

We strongly support the phasing and release of housing sites to promote the use of previously developed land. **However**, the great need for affordable housing will push councils, through planning gain, towards the use of greenfield sites, in overly large blocks of land, and perhaps also in the wrong location; and undermine the use of previously developed land, contrary to the principles of phased development.

6. Chapter 9. Environmental Resources.

Para 9.3, Box 9.1. Principles for the management of the natural, built and historic environment. **Support**, but see comments below.

Firstly we believe that the insertion of the word “protection” is necessary here:

“The management and protection of the natural, built and historic environment.”

Secondly, the principles set out here should be ENV1, that is the broad “lead” environmental policy. There is however the need for an additional principle, at number 5. *Light pollution should be actively discouraged in town and country, and attention paid to noise pollution.*

Policy ENV1. Environmental infrastructure.

This should not be policy 1, it should feature lower in the level of policy number list. It appears the policy is directed mainly at existing major urbanised areas, and those to come with the delivery of the Sustainable Communities Plan. While we agree that it is vital that such developments need to be provided with linked “green infrastructure”, it loses sight of the wider perspective that the greater part of the region has a natural “green infrastructure” called the countryside, which it is essential to protect and enhance for a whole range of reasons.

Policy ENV 2. Landscape character. **Support.**

This is an important policy, but requires some modifications:

- a) There is no need set long term goals for landscape change unless related to large specific land allocations, such as urban extensions, or in the most extreme case the SCP growth areas.
- b) **Landscape character assessments should be informed by detailed local studies, including an assessment of landscape quality as well as type, and local value.**
- c) Before the mitigation stage, consider whether the development is appropriate to the site, or can be relocated, rather than damage to a landscape being assessed as “unavoidable”.

Policy ENV3. Biodiversity and earth heritage. (Support).

The policy is right but too limited in scope. It is an absolute requirement that national and international designated sites are given the “strongest level of protection”. **There also needs to also be a reference to the need for the strong protection of the wider countryside.** We would suggest an insert in the second sentence: “The regions biodiversity, earth heritage and natural resources *in designated sites and the wider countryside* will be protected and enriched through conservation, restoration and re-establishment of key resources by:”

Policy ENV4. Woodlands. Support.

We suggest that a reference might be made to the value of hedgerows as a wildlife link through the countryside to woodlands.

Policy ENV5. The historic environment. Support.

Local Authorities be given more power to control changes and alterations to buildings in conservation areas, for example the use of materials and design issues. The article 4 approach to withdrawing permitted development rights in conservation areas should be made the standard rather than the exception to the rule.

Policy ENV6. Agriculture, land and soils. Support.

Add to the point on reduction of diffuse pollution under agri-environment schemes:

- “reduce diffuse pollution *and water borne soil erosion*”.

The latter is a very great problem in many arable areas damaging the ecology of rivers and exacerbating flood risks.

Policy ENV7. Air Quality. Support.

But: Road infrastructure implications, and economic growth imperatives (especially along road corridors), will negate the aim to “reduce and reverse the growth of motor traffic”.

Policy ENV8. Renewable energy and energy efficiency. (Support).

But: The first priority is the reduction of energy demand and consumption, not shown in the policy. The correct hierarchy is shown in appendix C, paragraph 2.1.

The policy guidance for onshore wind turbines is only made clear in appendix C, and shows very little discrimination. Appendix C, paragraph 4.6 just says that “large groups of turbines should be permitted in non designated landscapes”, with the only constraint as “minimal effect on settlements or individual buildings through noise or immediate visual intrusion”.

We **object** to this narrow guidance, and argue that that it must contain the area based criteria referred to in paragraph 3.1 in appendix C, in particular ENV2 on landscape; as is implied for designated landscapes by the statement that “small groups or individual turbines may be permitted in all types of landscapes (see area based criteria above)”. Further, we are not happy with the implication behind the further statement small groups and individual turbines “may benefit individual farms/dwellings in remoter areas”. **The outcome of these statements would be the potential to impose wind farms over the whole of the countryside of the region, and an “everywhere you see” scenario, with little regard to landscape considerations.**

Para 9.34, Table 9.2. The contribution of wind energy to electricity generation and reduction of ghg emissions is widely over-estimated on three factors. These are over-optimistic figures on the load factor, that is the average output as a percentage of the rated MW (maximum) output; too low a figure for the average household consumption of electricity; the comparison with the “worst case” fossil fuel power plants, namely coal, which has been overtaken by the much lower ghg emission gas plants; and no allowance for the fact that such plants have to work at reduced

efficiency when having to “chase” not only consumer demand but a varying input from wind energy sources.

This over-optimism on what wind power can produce on electricity generation, and leaving aside the total consumption of fossil fuel for wider energy uses, carries through to the region targets for the renewable energy (table 9.2). A target of 44% by 2020 of total electricity consumption implies within it 27% from off-shore wind, and it would appear maybe 10% from on-shore wind, is not realistic. It could only be so if a breakthrough in the ability to store electricity was achieved; or the region output is both on the national grid and other regions have very low targets for wind and other variable output sources of renewable energy. Denmark, often quoted as an exemplar for wind generation is unique. It achieves the 20% equivalent generation in West Denmark by exporting electricity to Norway and Sweden, who produce large amounts of hydro power, and where the “power tap” can be turned down (contrast the fossil fuel system where the plant has to keep on working, but on a lower efficiency and still producing carbon dioxide).

The core of our message here is that wind energy has limitations which ought to be recognised and taken into account in an overall energy policy which set out the need for reductions in use; but that within the renewable energy sector there is scope for a much more discriminating approach to the location of on-shore wind turbines and respect for our landscapes.

Para 9.38. Biomass and biofuels. **Support.**

But: Biofuels and biomass represent an opportunity only if the plant facilities can be supported by crop materials from a relatively “tight” catchment area. Fossil fuel input is required to grow oil seed rape, wheat and sugar beet. Long haul transport of materials will worsen the energy balance and diminish a contribution to the reduction of ghg emission objectives. We also give our support to this from of renewable energy as in principle it can buffer agriculture against existing financial problems. However, if the business develops as the food business has done, with major global businesses controlling the whole chain, then the benefits to the local rural economy will not be realised, nor will the ghg aims.

Policy ENV9. Water supply, management and drainage. **Object.**

We object because while the policies read well in stated intent; **but the aims are not achievable given the fundamental growth objectives of the Plan.**

The 478,000 new dwelling proposed equates to an extra 462,900 households and estimated extra 648,000 population; an increase of around 12% on the current population of near 5.5 million. This from a base shown in figure 9.4, for indicative summer surface water availability, that around a quarter of the region has an unsustainable or unacceptable abstraction regime, and the remainder has no additional water available.

We have to view this against other considerations also. The demand for water peaks in summer; for residents, for tourism and for agriculture (the later very heavily concentrated then), i.e. two important sectors of the Norfolk economy. The natural environment, including many national and international sites of nature conservation, is vulnerable to stress in the summer period because of these demands. Effectively everything depends ultimately on the state of levels of groundwater in the aquifers; for rivers, wetlands, the ecology of our estuaries, surface water sources for human needs. There is little in the way of groundwater resource left in the region either, which forms the larger part of the region water resource by direct removal, without inflicting unacceptable damage to the natural environment. **All this is compounded by the predictions of climate change; which will see drier summers and greater**

demand, more wind and more evaporation from surface waters, and more rain falling in storm events and less prospect for capture as groundwater.

Finally, the energy implications of pumping water resource from other regions as a new source (para 9.2) does not appear to have been thought through. On a lesser but still important note, the potential for more agricultural winter storage reservoirs is already becoming limited in much of Norfolk; and they are unlikely to have much wildlife or recreation value.

Policy ENV10: Waste management. **Support.**

But: On the first bullet point, the encouragement of waste minimisation will require on-going “educational” input by local authorities to the general public on the sources of waste, e.g. food packaging, and the chances of reusing (other than by incineration).

Policy ENV11. Management of wastes arising within the East of England. **Support.**

Policy ENV12. Regional self-sufficiency.

But: The implication is that after 2015 London will be incinerating its waste after re-use, recycling, composting. An unlikely scenario given the density of population, plus on the way to another 700,000 population in the London Plan.

Policy ENV13,14. Hazardous waste; Regional Waste Management Strategy. **Support.**

Policy ENV15. Overall minerals supply and transportation.

How specific is “location” in the context of “indicate locations and policy criteria within which mineral workings would be acceptable or not acceptable”? It should not be drawn so as to compromise the outcome of a site specific planning application.

Policy ENV 16. Minerals recycling/reprocessing sites. **Support.**

But: the identification of sites should not compromise the planning application.

Policy ENV17. Overall minerals management. **Support.**

We welcome the restoration of sites, particularly for nature conservation use (and with some public access if appropriate). We also welcome the use of recycled aggregates, particularly for developments that might be close to the processing area.

Policy ENV18. Sustainable approach to minerals planning. **Support.**

Welcome the requirement that new development show the resource implications.

Policy ENV19. Minerals monitoring. **Support.**

The stakeholders involvement in this regional process should include environmental and conservation interests.

7. Chapter 10. Culture.

Policy C2. Provision and location of strategic leisure, sport, recreation, arts or tourism facilities.

We suggest the addition to the proposals list: *and take effective measures to avoid light pollution.*

8. Chapter 11. Implementation and delivery.

Policy IMP3. Establishment of local delivery vehicles (LDVs).

There should be a full consultation on the setting up, remit and powers of an LDV for the Great Yarmouth and Lowestoft sub-region, not just within the sub-region but within other parts of the county(s).