

Draft Planning Policy Statement - Eco-Towns Consultation

Comments on the Greater Norwich Sustainability Appraisal from CPRE Norfolk

CPRE Norfolk is the county branch of the national charity Campaign to Protect Rural England (CPRE). CPRE exists to promote the beauty, tranquillity and diversity of rural England by promoting the sustainable use of natural resources in town and country.

CPRE Norfolk is a membership network, a registered charity and a voluntary organisation. We operate as a network with five local groups, a branch office in Norwich and over 1,400 members and supporters living in the cities, towns, villages and countryside of Norfolk. CPRE Norfolk works alongside CPRE nationally and regionally, and we make our voice heard through effective local action and strong national campaigning.

You will have received comments from CPRE National Office and CPRE East of England on CPRE's national and regional views on the eco-towns draft planning policy statement. CPRE Norfolk wishes to endorse these responses and give further comment on the Sustainability Appraisal for Greater Norwich (Rackheath), with reference to the wider plans for housing expansion in the area and the associated Local Development Frameworks.

Q6. Do you have any comments on the issues identified in the Sustainability Appraisal/Habitats Regulations Assessment of the locations for eco-towns (Q6.11 Greater Norwich)?

SUMMARY

CPRE Norfolk welcomes the high standards that underpin the eco-town concept but are not convinced that building major new settlements are the only way to achieve reductions in CO2 emissions and changes in lifestyle.

The Rackheath eco-town is a largely greenfield site in the Broadland countryside. This scale of development in the countryside and the resulting loss of rural character is not considered acceptable.

The site is dependent on delivery of the proposed Northern Distributor Route. This completely discredits the carbon cutting credentials of the scheme and undermines the requirement for 50% of journeys to be made by non-car means.

Similarly, the location of the site does not relate well to employment development locations for the Greater Norwich area.

Further comment on issues follow.

Housing Numbers

The East of England Regional Plan was adopted in May 2008 and allocated councils in Norfolk a minimum of 78,700 new homes to build by 2026. A development at Rackheath has been proposed for some while as part of the 47,500 new homes being delivered by the councils of Norwich, South Norfolk and Broadland through the Greater Norwich Development Partnership's (GNDP) Joint Core Strategy, in line with the Regional Plan.

Firstly, CPRE Norfolk is not in favour of this huge planned expansion of housing in Norfolk, believing it to be unsustainable on many levels. We have consistently objected to these housing numbers throughout the regional plan process, working with CPRE East. Although the 6,000 new homes at Rackheath are being prepared to the highest environmental standards, many thousands more will not. An eco-town will not make the plans for house building in Norfolk sustainable.

Secondly, it is our view that the level of growth proposed in the Regional Plan was conceived in a very different economic environment and that planned levels and rates of growth must now be reviewed. It neither helps the delivery of objectives, or the credibility of the planning system, to continue with housing and job number targets which are clearly not viable given the current economic and social conditions. We question whether the scale of development proposed at Rackheath is now relevant.

Locational Aspects

Although the Coltishall proposal was conceived as a brownfield site on MOD land, the Rackheath site is largely greenfield. It is important to remember that the eco-town will be a brand new settlement larger than most other towns in Norfolk and will expand to house a population of over 25,000 people. This suburbanisation of the countryside and its impact on existing rural communities, will be considerable and irretrievable. The resulting loss of tranquillity and rural character in this part of the county, with its proximity to the region's National Park - The Broads, is simply too great for CPRE Norfolk to accept.

The target of 40% of land as 'green infrastructure' does not compensate for the loss of ordinary countryside. It is not desirable to create a pseudo-countryside within a housing estate. Although CPRE Norfolk supports the provision of allotments for local food production and some recreational space within built up areas, this should not be at the expense of access to the wider landscape.

Although it is recognised that local councils must allocate new homes, CPRE Norfolk would prefer smaller sites and a much greater commitment to urban regeneration and brownfield development. A more realistic approach to housing delivery rates will help councils make best use of previously developed land in urban areas as it becomes available. Government criteria for eco-towns currently requires them to be stand-alone new settlements yet there is a compelling case for schemes to be integral parts of urban regeneration.

There is also a mismatch between the eco-town (to the North-East of Norwich) and the centre of gravity for major new employment opportunities (in the South-West of Norwich) as proposed in the GNDP's draft Core Strategy. CPRE Norfolk consider this a key weakness of the spatial strategy for the area and it will undermine the requirement of the eco-town to reduce the need to travel by car.

Energy Efficient Standards

CPRE Norfolk is in support of measures to conserve energy from buildings and recognises that exemplar sites are sorely needed, especially those that provide more than 'one off' models. The Rackheath eco-community uses many of the principles that CPRE Norfolk have been campaigning about for many years and it is a welcome relief to see such principles being applied in a market housing setting.

While we support this aspect of the proposal, we would prefer the zero-carbon principle be applied to the entire footprint of the scheme, both to buildings and transport. The scheme is dependent on the delivery of a four lane highway which will intersect the settlement and surely negate any savings of carbon emissions.

We would also question why the same energy efficient standards could not be applied to other housing proposals in the area - do we really need to build a new town to achieve reductions in CO2 emissions and changes in lifestyle? Indeed, since 70% of today's homes will still be with us in 2050 the gains to be achieved from improving the environmental performance of existing housing are arguably greater than building new settlements.

Transport

As noted above, the scheme as proposed by the GNDP and outlined in the Sustainability Appraisal, is dependent on the implementation of the Northern Distributor Route (NDR) - a proposed £150m four lane highway that will split the eco-town into two. In CPRE Norfolk's view, if the NDR is an integral part of the scheme, as the Sustainability Appraisal suggests, it is essential that it be included in that appraisal of sustainability.

CPRE Norfolk considers the NDR a highly unsustainable proposal that will have far reaching impacts on the natural environment. The NDR will embed a high car dependency in the eco-town and surrounding areas, generate more pressure on the radial routes into Norwich, and divert necessary investment away from public transport. If the eco-town is to be genuinely treated as an 'exemplar' of sustainable living it cannot be dependent on a new four lane highway.

We recognise the efforts that the Rackheath proposal makes to improve bus and cycle access to this part of the city and connect the site with major employment locations. This commitment would be better reflected in and supported by a review of the Norwich Area Transportation Strategy to refocus priorities on a high grade, efficient public transport system for the whole of the Norwich Policy Area.

Affordable Housing

CPRE Norfolk has campaigned for many years to encourage the provision of affordable housing in rural and urban areas. A much greater injection of Government subsidy is needed to support housing associations and local authorities to deliver affordable housing in Norfolk where there is an established need.

We recognise that the ambitious quotas of affordable housing on the Rackheath site will make an important contribution to solving housing needs in Norfolk. Yet it would be dangerous to rely on the eco-town principle or developer subsidy as the only way to ensure affordable housing in the Rackheath area, especially as the 'planning gain' approach is dependent on a rising housing market.

Planning and Delivery

In the Regulation 25 public consultation on the GNDP's Joint Core Strategy, four options were given for development in Rackheath, all ranging from 6,000 to 7,000 new homes. The Government has also stated that development at Rackheath is generally suitable for an eco-town and afforded it a Grade A status. With this in mind, CPRE Norfolk is greatly concerned as to how the local planning system will be able to treat an eco-town application in the normal democratic way or how local communities could have influence on the outcomes. The extent to which eco-towns will undergo public consultation, or be subject to full scrutiny and robust testing of evidence is unclear.

Finally, we consider it essential that all predicted standards should be closely monitored before, during and after build, especially if the Rackheath eco-town is to be promoted as an 'exemplar' scheme for the rest of Norfolk and the UK. It is not yet clear how standards at the Rackheath eco-community will be monitored and how true accountability will be achieved.

END

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