

## **GNDP JOINT CORE STRATEGY SUBMISSION CONSULTATION** **COMMENTS ON SELECTED POLICIES FROM CPRE NORFOLK**

sent to: jointcorestrategy@gndp.org.uk on 11<sup>th</sup> December 2009  
From: CPRE Norfolk (The Norfolk branch of the Campaign to Protect Rural England)  
- info@cprenorfolk.org.uk.

### **INTRODUCTION. PARAGRAPH 2.3: Unsound/not justified**

#### Reason

The statement is made that 'The JCS cannot be delivered without the implementation of the Norwich Area Transportation Strategy including the Northern Distributor Road'. CPRE consider that it would be more accurate to say that the Joint Core Strategy (JCS) was devised to justify the Northern Distributor Road (NDR) and certainly as regards a 'growth triangle' and associated development in the north east sector.

We make two further points. Firstly, the 'updated' Norwich Area Transportation Strategy (NATS) is essentially the original document written in 2004, with the only up-dating appearing to be the replacement of a full bypass route with a three-quarter route in September 2005. Secondly, the Transport for Norwich consultation which ended on the 27<sup>th</sup> November made no attempt to update the NATS and included the statement (page 12 of the consultation booklet) that 'the NDR is the key piece of major infrastructure required to enable the implementation of the agreed NATS'.

We ask in what way is this NATS4 'agreed', and by who. At the time the consultation opened the Department of Transport were awaiting further information to satisfy them on programme entry requirements, and had been for many months. It was a risk to proceed with this JCS consultation, which ends about the same time as the decision on programme entry of the NDR is expected to be made. If the decision is made against programme entry then the whole spatial strategy needs to be re-considered; and if the decision is further delayed, then the JCS process must be delayed until it is resolved.

#### Changes

The priorities of the JCS should be recast to produce a cross-cutting strategy that will reduce carbon emissions, prioritise affordable housing and support public transport improvements.

### **INTRODUCTION. PARAGRAPH 2.10: Unsound/not justified.**

#### Reason.

In taking the JCS to 2026, this pre-empts the outcome of the review of the Regional Spatial Strategy (RSS) to 2031 and is not due for completion until 2011. It is stated that this review 'may result in upward pressure on housing targets but at this stage cannot be assessed with certainty' and 'the JCS may require early review to deal with

changes to growth rate specified in the revised East of England Plan'. The case for an extension to 2026 relies on an interpretation of PPS 3 and the forward provision of land supply. We argue that the last five year period asks for an assurance that this can be done, rather than firm allocations of land that have to be made 15 years ahead.

The JCS is clearly working on the assumption that housing provision will be maintained at current RSS levels, or be higher. If this were to be the case, then in a pragmatic view, the pre-emption would do no harm. However, if the Review decides on a lower rate of build for the period 2011 to 2031, then even an 'early review' of a JCS would not be able to address the problems created. An over-allocation of land supply to 2026 would result in cherry-picking of sites by developers, not just on location, but perhaps on size. In particular it would see a lowered utilisation of previously developed land in Norwich, and a set pattern of 'greenfield first' for many years. Also the size of sites/numbers of houses selected might be minimised in terms of section 106 commitments. It would also create difficulties for 'master planning' for the provision of hard and soft infrastructure priorities and timescale to provision.

The RSS Review consultation which ended on the 24<sup>th</sup> November presented four scenarios for housing and economic growth, of which the lowest of the four was a continuing RSS level, a 'roll-over'. Both Norfolk County Council and CPRE Norfolk argued that a lower growth scenario should have been included, albeit with some differences in reason and emphasis. CPRE East of England made a representation for a lower scenario, and it is likely that other Norfolk local authorities did as well.

### Change

In conclusion, in our view, the submission JCS should be withdrawn and re-submitted when the Review of RSS is complete; or firm allocations of a housing numbers distribution can be restricted to the numbers planned for 2021, but the period extended to 2026. In this case, an early review would be an appropriate course to take.

## **THE SPATIAL VISION. PAGES 22-28: Unsound/Not Justified/Not effective**

### Reason

In many places, the spatial vision is disconnected from past experience and realistic future expectations. These thread through social, economic and environmental issues. We restrict our comments to the introductory statements, the Climate Change and Sustainability section, and objective 9. Other points can be dealt with around specific policies.

### Introductory Comments: Not justified

1. There is little post-recession evidence to support the assertion that 27,000 new jobs will be created, particularly if 'new' is taken to mean 'additional'. Further there must be a significant time lag before job numbers increase, which affects the growth trajectory and the necessary restructuring of the Norfolk economy to an increased proportion of higher skilled jobs.

2. It is highly unlikely that 36,740 new homes can be built given the economic outlook, and the state of the housing market and construction industry; and if they are, there would be severe deficiencies across the range of hard and soft infrastructure.

3. Unless there is a radical change in Government priorities and policies, the gap between need and provision of affordable housing will get ever wider. In the period 2001-08, which saw strong growth, delivery of affordable housing within all housing provision was 22% for Greater Norwich, compared to the RSS target of around 35% (provision was even lower in the North and Yarmouth Sub-areas).

4. It is seriously misleading to say 'Growth will be focussed on brownfield land in the Norwich urban area and in a very large mixed use urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle'. The latter is essentially greenfield. Of the further allocations proposed to be made in the NPA to 2026, only 3,000 out of 21,000 (of which 7,000 in the growth triangle, rising to 10,000 later) will be in Norwich. There should have been data presented for the Norwich Policy Area showing brownfield/greenfield number for the completions in the period 2001-08; similarly for allocations already made; and estimates for the further proposed allocations.

#### Climate Change and Sustainability; Not justified/Not effective

The wording of the policy in several places is weak to the point of having little meaning, for example the statements 'minimising the use of global resources', 'maximising the use of brownfield land' and 'people will use less water'.

The domestic consumption of water across the region is 157 litres per person per day. The Environment Agency state that this should be reduced to 110-120 litres per person per day, with a target of 8% reduction in existing households and 25% in new build. It is unlikely that these targets will be achieved. The additional infrastructure required for dealing with waste water is costly and has a long timescale.

The issue of transport is conspicuous by its absence, particularly considering its high contribution to domestic output of carbon dioxide emissions. Appendix 8 shows an extensive list for roads infrastructure, and indirectly the consumption of mineral resource. This section and Policy 1 require a comprehensive re-consideration to bring them in line with the Climate Change Bill and the Planning and Climate Change Supplement to Planning Policy Statement 1.

#### Objective 9

The objectives are in many cases in a direct conflict, one with another. We comment on Objective 9, a particular concern of CPRE. We are supportive of the general aim of this objective, which is 'To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value'. However, our view is that little weight can be attached to this.

The objective and the supporting text have been written with little regard to the level and rate of development proposed within the Norwich Policy Area, and its actual

impact. In our view, there would be a dramatic and unprecedented change in the whole area, with a major loss and suburbanisation of countryside, huge pressures on natural resources, and a radical change to the setting and character of Norwich itself.

The first half of the support text describes what we have now. The second half of the text states 'It is a priority to maintain and improve these special qualities...'. It then evades the issues with some 'warm', but not justified, statements such as 'the use of previously developed land will be prioritised to minimise the loss of agricultural land and the countryside', 'biodiversity and locally distinctive landscapes will be protected and enhanced' and 'efficient use will be made of minerals, energy and water resources, and the production of waste will be minimised'. In practice, these statements are essentially about seeking the levels of growth proposed and putting the protection of the natural environment as, at best, a damage limitation task.

Specifically, this growth would have a number of significant outcomes. Norwich will change in character with a planned increase in housing stock of some 30% by 2021, and a continuation of these growth rates to 2026 or 2031. This 'fine city' will become encased and lost in an extensive suburbia, especially in the north east 'growth triangle'. The same effect will happen with some of the towns and villages in the south west, especially Wymondham.

Further, there will be an extensive loss of productive countryside to other types of development associated with the housing growth, and the proposed road infrastructure. Inevitably this will be accompanied with additional light pollution, with an impact going far beyond the confines of the Norwich Policy Area. Although some EU water dependent sites of nature conservation might receive adequate protection, but those in the wider countryside will not, affecting both landscape and biodiversity. In turn the level of mineral extraction required for this rate of development across the county will cause further collateral damage.

### Change

The policy needs recasting to reflect the validity of the issues raised.

## **POLICY 1. Addressing Climate Change and protecting environmental assets.**

### **Page 32**

### **Unsound/not effective/not justified**

### Reason

The policy lacks any framework which sets out the contribution made by various sectors to carbon dioxide emissions, and thereby can make no evaluation as to what measures might best be adopted for each sector to seek reductions in levels. The basic information is available, and has been discussed in the context of an eco-town at Rackheath. It should now be applied to existing as well as new development. Although the JCS uses words such as 'minimise' and 'efficient', this is not a replacement for a coherent and targeted approach that relates to the size of the problem in each sector and how it is addressed.

Instead of this coherent approach, much of the text relates to protecting environmental assets and much of that carries an obligation irrespective of climate change. In one case, the fragmentation of habitats, it becomes yet more critical with the advent of climate change. Water resource, also a critical issue, gets only one mention, with the hope that the JCS will ‘minimise water use and protect ground water resources’.

### Change

We suggest that this policy should be split in two. Policy 1 deals with addressing climate change in a structured and more quantitative manner. Policy 2 deals with protecting environmental assets.

Specifically, green infrastructure should be considered in two ways. Firstly in its role as an ecological network which links habitat areas; and secondly as a means of access by the public to open spaces. On the second, it would be more effective to improve access to the wider countryside, rather than lose agricultural use to unnecessarily high levels of green infrastructure, in particular 40% in the eco-town.

### **POLICY 3. ENERGY AND WATER. Pages 38,39. Unsound/Not justified/Not effective**

#### Reason: Energy

We question the conclusion (paragraph 5.15) of the Greater Norwich Energy Study that renewable energy resource within the area can amply meet the energy demands of the planned new development; and that the technical potential represents over 160% of the area’s current energy consumption.

No information is given about the estimated investment costs to achieve the claims and the timescale of delivery, although these are likely to be barriers to the claim. We also question what level of efficiency would there need to be to provide a consistency of supply to meet demand.

If the claims are achievable, then it is not clear why Policy 3 restrict the ambitions for 100% renewable energy to major development (more than 500 dwellings or 50,000sqm for non-residential development).

The policy states that ‘Provision will be made for strategic enhancement of the electricity and gas supply networks to support housing and employment growth’ The County Council response to the RSS Review (appendix 3) on cost and timescales does not lend encouragement to this view.

#### Reason: Water

The 2006 Catchment Abstraction Management Strategy for the Broadland Rivers showed major problems, with many of the sub-catchments designated as over-abstracted (eg in the north east sector), and the remainder as over-licensed. The catchment includes a large concentration of water dependent EU sites of nature

conservation. Against this background we make the following points which the policy does not address.

The phrase 'with no significant detriment to areas of environmental importance' lacks clarity and effectiveness. Does this mean just EU sites, or does it apply to the wider countryside (as it should do)? In either case, it obscures the fact that it is difficult to assess detriment and it might take a number of years for significant detriments to be recognised and measurable.

The need for agricultural irrigation is important to the efficiency of production of crops, and moreso if predicted future climate change weather patterns occur. Further, some EU sites depend on the wider countryside for their status, for example the Broadland rivers which run into the Broads.

There is also the issue of waste water management. The response of Norfolk County Council to the RSS Review (paragraph 2.2, appendix 3, water cycle) sets out the major infrastructure costs and long timescales required to respond to planned levels of growth. Thus, to avoid unacceptable and significant damage being inflicted on the ecology of the natural environment, this growth must be downscapes or timescales extended.

#### Change

The policy needs recasting to reflect the validity of the issues raised.

### **POLICY 4. HOUSING DELIVERY. Pages 41, 42 Unsound: Not justified/effective**

#### Reason: Not justified

The JCS is not being compliant in extending the timescale for housing site allocations beyond 2021, to 2026. This pre-empts the RSS Review, not due for completion until 2011. All indications are that an additional and lower scenario for housing and economic growth should be considered in the process, not least for the implications of the recession and longer term economic outlook, for a plan that was progressed and adopted in the boom period of 2001-08.

The allocation of housing to 2026 has been 'justified' on the grounds of what PPS3 says on forward allocation of land for 5, 10 and 15 year periods. The last five years does not require a firm allocation, only an indication that it can be done through the JCS review. Even then, the land supply 'shelf-life' should be determined with the existing and likely forward rate of building, and not exaggerated by an unachievable target figure. Most bodies accept that RSS targets will not be met for various reasons, including the depressed state of the construction industry, the fall in land values, and developers waiting for the housing market to improve.

#### Reason: Not effective

The GNDP strapline for the JCS is 'Jobs, homes, prosperity for local people'. The stated need for the JCS is that upwards of 40% of all housing provided should be affordable housing, and the RSS target is 35% across the region. The period 2001-08 saw an improvement over previous years, but for the Greater Norwich area it averaged out at 22% (Norwich 28%, South Norfolk 18%, and Broadland 15%). The relatively high level in Norwich might come in part from a boom of buy-to-let flats, and direct subsidy as a Growth Point. For the rest of Norfolk, the North Sub-area averaged at 7%, with 12% in the final year; and for Yarmouth, 6% reaching 7% in the final year. For the region as a whole the average was 18%.

The figures show a very poor delivery record for affordable housing in relation to need and the region target. As regards the housing that is built, it is not local people who are the main beneficiaries. The GNDP are setting an overall target of 40% in an effort to improve the situation and declare that 'Where viability is an issue financial support via public subsidy will be sought, such as through the Homes and Communities Agency (HCA)'. Given that the problem is national as well as regional and considering the Strategy's present priorities and policies, as well as the current economic outlook, it seems that once again there will be a very large gap between 'sought' and 'received'.

We note in the affordable housing approach, in an effort to raise the level, the number set for a contribution is taken as five houses instead of 15 stated by PPS3. This is laudable in trying to make some progress within the existing system, particularly for rural areas, albeit that the 15 year land supply PPS 3 is taken too rigidly.

Throughout the JCS, references are made to 'maximising' or 'giving priority' to the use of brownfield over greenfield land. As such, the statements should be supported by providing the total numbers of each within the NPA for the 9,681 dwellings completed with the period 2001-08, the 11,847 committed at 2008, the 11,472 allocated to 2021 (based on current proposals) and the 8,800 extra allocations from 2021 to 2026 (based on current proposals). A similar breakout should be shown for the rural parts of Broadland and South Norfolk (the 'Outside NPA' figures). This data would help to gauge the effectiveness of the policy in practice.

Finally, the housing trajectory in Appendix 6 requires at least some justification as to how the annual estimates for the period 2008/09 to 2025/26 are derived, and the assumptions which underpin them.

### Change

The JCS should follow a Plan-Monitor-Plan approach based on a more integrated approach to housing growth, job growth, hard and soft infrastructure needs and timescales to delivery, taking account of short and long term impacts of the recession, and environmental impacts. This should be at a much lower level of growth than is planned now.

In the NPA we should be looking for very significant reductions in the north east 'growth triangle'; at Wymondham and Long Stratton; and in the villages in Broadland and South Norfolk. There should be a major review and regular monitoring of previously developed land in Norwich, with the aim of increasing the amount of the

total NPA housing that can be accommodated in the city. The initiation of this could be through the City Council Site Allocations Plan, which aims to identify potential development sites in Norwich.

**POLICY 5. THE ECONOMY. Pages 46, 47. Unsound: Not justified.**

Reason

CPRE are supportive of the broad policy aims, but have concern over whether these can be achieved. There is an over-reliance on the continuing strength and growth in finance, commerce and retail in the NPA, sectors in which jobs may be vulnerable. Unduly high allocations of land for office space will impact on options for alternative uses for housing.

Within the Greater Norwich Area as a whole there is a balance to be struck between continuing growth of tourism and major loss of amenity to local residents, pressure on infrastructure (water, transport); and changes in the character in towns and villages.

The planned level of expansion at Broadland Gate Business Park cannot be justified; It is a large scale out-of-town retail and commercial development which will encourage car dependency and compete with Norwich City centre.

Change

The policy needs recasting to reflect the validity of the issues raised.

**POLICY 6. ACCESS AND TRANSPORTATION. Page 49. Not legally compliant; Unsound: Not justified/Effective**

Reason. Legally compliant

The policy will not achieve the requirement of the RSS, which seeks to 'achieve a major shift in emphasis across the NPA towards travel by public transport, cycling and walking'. It would also be contrary to the binding UK target to cut emissions, as set out in the Climate Change Act 2008, by 26% on 1990 levels by 2020 or to the PPS 1 Supplement, Planning and Climate Change.

Reason. Unsound: not justified

The lynchpin of the Norwich Area Transport Strategy (NATS) is the Northern Distributor Route (NDR). The NDR shapes the whole JCS as regards spatial strategy and the locations and levels of housing. This was further magnified with the addition of the 'growth triangle', which was proposed earlier this year in the Regulation 25 consultation.

No attempt has been made to evaluate and develop a public transport led system for access within the Norwich Policy Area (NPA) between the city centre, major existing and expanding settlements, and the strategic sites of employment. As it now stands,

we have proposals for an investment-heavy roads infrastructure programme which will lead, by some years, a relatively modest investment programme in Bus Rapid Transit and rail.

In our view, the large scale development in the north east sector does not meet with spatial requirements but is proposed as a means of seeking to establish the need for the road.

#### Reason. Unsound: not effective

An NDR would have a number of adverse impacts. It would reinforce car dependency by introducing a roads programme some years ahead of modest public transport measures. It would create orbital travel movements in linking to the A47 Southern Bypass, inducing travel to employment sites distant from the north east area. It would produce an extra 25,000 tonnes of CO2 emissions a year, and as such contribute to the estimated 33% increase in the region between 2006 and 2031 in a Business as Usual scenario.

The NDR Business Case data shows that the new road would marginally increase (not decrease as claimed) traffic across Norwich; and increase traffic by a substantial amount on the radial roads running through the north east sector. Road infrastructure costs are high; £110m for the NDR; £25m for the Postwick Hub, an integral part of the NDR; £60m for two junction improvements on the A47 bypass; and £35m for a Long Stratton bypass.

Contrary to the benefits claimed for the road, it will not remove traffic from the northern suburbs and surrounding villages linked to the growth triangle but rather increase traffic levels in these areas. It will not improve the economic prospects for north east Norfolk through improved access but rather produce a competing effect from the growth triangle which will see businesses relocate there, and residents commuting down to jobs in that area. And it will not create more space for public transport improvements but rather generate more traffic on the radial roads into Norwich by embedding car dependency in the strategy's phased delivery approach.

#### Change

A sustainable transport package could include a number of measures such as a phased implementation of a Bus Rapid Transit scheme for linking up major employment centres and the city centre, new local rail halts in the north east sector, workplace plans for reducing single car occupancy, traffic management initiatives, additional park and ride capacity, and modest new road infrastructure as identified in the Broadland Local Plan (Replacement) 2006. These measures would give a much better alignment with regional and local spatial requirements than a strategy centred around an NDR.

### **POLICY 9. Strategy for growth in the Norwich Policy Area. Unsound: Not justified.**

#### Reason

The JCS is not being compliant with the RSS Review in the timescale for housing allocations beyond 2021 to 2026. Furthermore, all indications point to a lower scenario for housing and economic growth than the RSS 'roll-over'. Particularly, the overall levels of growth are too high for the north east sector - 'the growth triangle' and out of alignment with the locations of strategic employment growth and the prospects of new jobs in this area.

The housing numbers proposed for Wymondham and Long Stratton are greater than can be assimilated without radically changing the character of the settlements.

The NDR will not improve the quality of life in the north east sector, or reduce traffic congestion. It does not support sustainable growth or 'make space' for public transport. It will embed car dependency, increase traffic on the radial roads, and increase CO2 emissions. It will not improve job prospects in the north east of the county but pull away businesses seeking proximity to Norwich. The NDR also sits very poorly with the concept of an eco-town, which would account for half the housing growth in the sector to 2026.

The overall office space of 250,000sqm in the City Centre, Norwich Research Park and Broadland Business Park is difficult to justify with a recession that is affecting finance and commerce. Proposed expansion at Broadland Gate will become a large out-of-town competitor to the City Centre and is not desirable.

Housing completions for the year 2001-2008 showed a sharp lift in the years 2006/07 and 2007/08, as shown by the housing trajectory in appendix 6. The trajectory figures post-boom have no solid evidence base and will not, in the present uncertainty.

A major but little discussed issue is the level of affordable housing as a proportion of all housing. Data accompanying the RSS Review showed this to be 22% for the Greater Norwich Area. Although about three times better than for rural areas, as well as Yarmouth and Waveney, it falls a long way short of the region overall target of 35%, even in the times of strong housing growth.

### Change

There is a need for a scaling back of housing numbers to what is both more feasible in the current economic climate and better aligned with job growth and infrastructure delivery. Within the housing provided, there needs to be a radical step change in the delivery of affordable housing to meet the needs of local people.

Transport policy trends need to be reversed, with public transport measures having priority over, and leading, any road infrastructure improvements. Bus Rapid Transit and rail improvements should be front loaded into the system and the JCS should reflect this. Instead, the proposals for road infrastructure amounts to near £200m; the NDR at £110m, Postwick Hub at £25m, two junction improvements on the A47 (A11 and A1074) at £60m and £35m for the Long Stratton bypass.

**POLICY 10. Locations for major new or expanded communities in the Norwich Policy Area. Unsound: Not justified**

Reason

The major development locations will just not see a major shift away from car dependency. Instead the JCS priority in cost and timescale to delivery is highly weighted in favour of road programmes and use of the car. We would prefer a much clearer strategic approach to encourage walking and cycling for local journeys and public transport for longer journeys.

The level and rate of housing growth is not feasible, as well as not being desirable in relation to jobs and infrastructure (hard and soft). The key dependencies summarised in paragraphs 6.18, 6.19 and 6.22 are simply not deliverable. This is illustrated by the data in appendix 7 for water (potable and waste), electricity, gas and transportation. Norfolk County Council also point this out forcefully in their response to EERA for the recent RSS Review (2011 to 2031).

Change

The policy needs recasting to reflect the validity of the issues raised.

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Submission by:

CPRE Norfolk  
42-46 Bethel Street, Norwich, NR2 1NR.  
01603 761660  
info@cprenorfolk.org.uk

Contact: James Frost, Director.

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