

JOINT CORE STRATEGY ISSUES AND OPTIONS CONSULTATION

Response from CPRE Norfolk (The Norfolk Branch of the Campaign to Protect Rural England)

03 DRAFT SPATIAL VISION AND OBJECTIVES

Q 1 Does the draft spatial vision to 2026 reflect the quality of life that you would like to have from the area?

Response: No.

Comment

While the spatial vision includes some laudable aims, e.g. “there will be a working and tranquil countryside which retains its distinctive Norfolk character, looking to the Broads and to other enhanced habitats suitable for biodiversity and wildlife” – the level of growth (population/housing/jobs) envisaged by 2026 is incompatible with the green objectives of the strategy.

CPRE Norfolk believes that 50,000 additional people, 35,000 additional jobs and 23,000 new homes, between now and 2026, in the Norwich area cannot be accommodated without serious damage being caused to the rural environment. The Joint Core Strategy strikes at the heart of rural Norfolk’s character and at the lives of those who live and work there, who value its rural environment and atmosphere.

Recently published visual intrusion maps, copies enclosed, reveal the extent to which urban intrusion has encroached upon the countryside in the last 47 years. The level of development envisaged in the strategy will seriously accelerate the urbanising trend identified on these maps.

Furthermore the failure of the consultation document to include a question offering the respondent a chance to give an opinion on whether the high level of growth envisaged is desirable or not means that opposition to this amount of growth will not be measured as part of the consultation process. Presumably, therefore, all responses to the option questions will be taken as a tacit acceptance of the growth assumptions that underpin the strategy – clearly not so in the case of CPRE Norfolk neither, we suspect, in the case of many other respondents who will likewise be horrified by the amount of development planned.

The fact that the level of growth is dictated by central government and the regional assembly (proposed to be replaced by an unelected regional development agency) and that it appears to be non negotiable, does not make it desirable or wanted.

Q 2 Are these the right objectives for getting to where we want to be by 2026?

Response: No

Comment

This question raises the issue of where we want to be in 2026 and as CPRE Norfolk clearly does not want the area to be where the strategy document envisages it will be it is impossible to agree with those objectives which acknowledge an acceptance of high levels of development – particularly Objective 4.

While some other objectives make all the “right noises” about protecting the environment, in the opinion of CPRE Norfolk they will not be attainable in the high growth scenario outlined in the strategy.

04 SETTLEMENT HIERARCHY

Q3 Do you agree with this hierarchy for growth and development?

Response: No

Comment

As CPRE Norfolk does not wish to see the level of growth and development envisaged in the strategy and it is difficult to approve a settlement hierarchy classification that is designed to accommodate such growth.

However, as a general principle, we wish to see brownfield sites, not greenfield sites, developed and would prefer that any new development associated with this strategy is concentrated within the urban area of Norwich. Market towns and rural settlements (particularly those defined as secondary rural settlements) should not be swamped by new housing developments that will destroy their character. We agree that the most rural places should be very tightly protected.

Q 4 Do you agree with the approach to sites in and around Norwich?

Response: No.

Comment

It is desirable that development is concentrated in and around the city centre on brownfield sites and that it is limited to the existing urban boundaries of the city. It is especially important to protect the rural areas that surround Norwich. CPRE Norfolk believes that with the implied level of growth this is impossible.

Q 5 Do you agree with this definition of market towns?

Response: Yes

Comment

The strategy seems to have named the market towns in the area correctly but this does not mean that CPRE Norfolk would approve excessive levels of development in any of these settlements should the core strategy identify one or more of these places as being suitable for large scale growth.

Q 6 Is this the right way to define key service centres?

Response: Yes

Comment

The definition of key service centres is appropriate but acceptance of this does not mean that CPRE Norfolk approves of large scale development in any such settlements.

Q 7 For the list of suggested services to help define a 'secondary rural settlement' please say whether the services are essential, desirable or not actually necessary

Response: See completed tick box response.

Q 8 Could a group of secondary rural settlements collectively form a key service centre? If so, which places could this apply to?

CPRE Norfolk would not wish to see a group of secondary rural settlements in the same area being classified as a key service centre. This would invariably lead to infill development between these settlements should the newly created key service centre be selected for large scale development with the strategy.

Q 9 This approach is consistent with government policy. Is there any reason why we should have a departure from this?

CPRE Norfolk supports the stated policy i.e. that "development in the countryside will be strictly controlled in line with government policy".

05 PLACES FOR STRATEGIC GROWTH

Q 10 Are these principles equally important?

Comment

CPRE Norfolk does not support the level of growth envisaged in the strategy document and is unwilling to prioritise principles related to assessing the appropriateness of a greenfield site for development. We would prefer that all development takes place on brownfield sites, not 80% on greenfield sites.

Q 11 Which option for the overall approach to growth in the Norwich policy area do you prefer?

Comment

Each of the options would involve large scale destruction of countryside and a huge amount of development on greenfield sites. Options A and B could see an urban infill of the countryside that currently separates many settlements. Option C is especially unwelcome because it involves the construction of large new settlements in areas that are currently open countryside. CPRE Norfolk would prefer that growth be concentrated in the urban area of Norwich.

Q 12 (a and b) Do you have any comments on the possible broad locations for major growth highlighted in Appendix 4? You might consider the scale of growth that could be appropriate. Are there other broad locations that should be investigated for possible major growth?

All of the areas outlined as having the potential for major growth would involve the large scale loss of countryside and by extension the suburbanisation of existing rural settlements. CPRE Norfolk particularly objects to proposals that would lead to the development of new settlements in open countryside. As previously stated we would like to see growth concentrated on the urban area of Norwich. Large scale urban expansions in Broadland and South Norfolk are particularly unwelcome.

Q 13 Which option for growth outside the city do you prefer?

Comment

We strongly oppose any large scale growth outside the city.

06 HOUSING

Q14 Affordable Housing: Which of these approaches do you support?

Comment

None in isolation, they are all variations in the planning gain approach. The inadequacy of this has been amply demonstrated in the experience of the past ten years as regards a continuing annual shortfall of provision over need. If the Government is committed to the delivery of affordable housing then it should inject large sums of central grant aid and avoid the over-reliance on planning gain. Even within the planning gain system it is not realistic to think that changing the rules and, for example, taking a 'cut' on much lower numbers of dwellings on a site solves the problems. Developers who have land bought on the assumption that there will be no call for affordable housing will simply hold off from building both open market and affordable on the site, particularly after years in a rising market which 'carried' the approach and now we move into a falling market.

Q15, 16, 17, 18 Gypsies, Travellers and Show People

Comment

We are not qualified to answer the specific questions asked. While not denying the needs of this group of people, we suggest that asking four questions on this topic and just one on affordable housing, shows an odd sense of balance and priorities at some level of Government.

07 ECONOMY

Q19 Is there any one of these options that you don't support, and if so why not?

We strongly support all three options. However the supporting text and the questions posed do not acknowledge some key requirements. The consultants Roger Tym and

Partners made it clear that the quality of jobs is more important than the numbers and that a major restructuring of the Norfolk economy is required (indicator: 40,000 more graduate jobs), accompanied by an upskilling of the workforce as a whole. There is a failure to take account of the timescale to achieve this. This will result in housing-led growth, with a worsening balance for the quality of jobs factor.

Q20 Options for small scale and local employment opportunities

We support all three options. The potential in our view is A), C) and B) as regards to total numbers. B) is still important and redundant buildings in rural areas should be used for this purpose, with a presumption against residential conversion.

Q 21 Options for large scale office development

Response: A

Q 22 Locations for employment growth: strategic locations

Response: B

Q23 What priority factors should be taken into account?

Comment

There should be an absolute presumption against usurping such sites by permitting hungry retail and leisure planning applications being approved on them. We strongly oppose changes of use of this nature.

Q 24 Which option do you prefer?

Response: A

Q 25 Do you agree with the proposed hierarchy of centres?

Response: Yes

Q 26 Which option do you prefer?

Comment

We do not accept the premise of ever increasing continuous growth, based on the views of retail consultants, and without some wider independent expert analysis.

Q 27 Are there any major new facilities or attractions that should be promoted in the Joint Core Strategy?

CPRE Norfolk suggests including a policy for supporting small independent retailers rather than a Norwich city centre exclusively serviced by major national chains. We

would like to see this principle also apply to market towns. Why not seek to maintain some choice and diversity for residents and visitors alike?

We also believe that large numbers of visitors to Norfolk are attracted by the tranquil rural nature of Broadland and South Norfolk, which is threatened by the level of growth proposed.

08 ENVIRONMENT

Q 28 Do you agree with this approach?

Response: Yes

General Comment

Broadly speaking CPRE Norfolk would agree with the statements but the wording is confusing and insufficiently comprehensive to cover the assumed aims of the strategy. Really, this is a damage limitation exercise for an unacceptable level of growth. CPRE Norfolk would like to see that growth is directed away from nationally and locally designated landscape and nature conservation sites, and that appropriate assessments are made of the environmental and ecological value of all proposed development sites before schemes are approved.

Water resource is poorly and inadequately discussed and we object that there is no question raised on this issue.

Q 29 Which approach do you think the Strategy should adopt?

Response: 1

Comment

30% of our energy supply is used up by the domestic sector and this sector accounts for around 28% of UK carbon emissions. Bearing in mind that a significant proportion of our housing stock will never even approach current requirements for energy and reduction in carbon emissions, it is essential that very high standards are set for all new housing.

A number of options are available in addition to those included in this section of the Strategy. Prominent organisations in the conservation sector were very disappointed that the Code for Sustainable Homes was only voluntary and did not consider the standards were sufficiently demanding.

CPRE Norfolk considers that only the first of these 4 options approaches the standard required – providing the application of the Code in Norfolk is made mandatory, and an appropriate level is set for the minimum level to be achieved (e.g. Level 6).

To ensure these standards are achieved, quality assessment staff will need to be trained and made available to support a programme of design inspection.

The aim to bring housing developments towards zero carbon status by 2016 is a challenging one. It will mean that new houses should by then have little or no requirement for space heating and all household equipment and appliances should receive their power from a renewable energy source.

Q 30 Should all types of new development, including businesses and housing, be required to incorporate an element of sustainable energy, where feasible?

Response: Yes

Comment

The requirement to incorporate an 'element' of sustainable energy is insufficient as it does not quantify the requirement. Equally important is the need to reduce the energy requirement and carbon emissions from building developments. It is suggested that a phased approach to this element of the Strategy could be adopted that works towards a target of: (no carbon) + (very low energy requirement all of which comes from renewable sources) by 2016. An intermediate target for say 2012 might be: 50% reduction in carbon emissions and energy requirements of comparable current buildings + 50% of power requirements from renewable sources.

The incorporation of sustainable energy into new development should not be at the expense of the visual enjoyment of the countryside.

Q 31 Would a requirement for each new development to meet at least 20% of energy requirements from renewable sources be a reasonable target?

Response: No

Comment

A better target would be to reduce the overall consumption per capita. Percentage targets do not control overall use.

09 TRANSPORTATION

Q 32 Should the Joint Core Strategy promote major mixed use growth at Long Stratton to improve that section of the A140?

Response: No.

Comment

There are better locations for development. There is no railway at Long Stratton, unlike along A11 corridor and it does not relate well to any of the key employment strategies.

Q 33 Which option do you prefer?

Response: B

Comment

CPRE Norfolk support park and ride schemes and would support suitable new one in the south east city between the existing Harford (A140) and Postwick sites. We would also support more bus lanes and an aim to reduce traffic crossing the outer and inner ring roads.

Q 34 Which option do you prefer?

Response: B

Comment

CPRE Norfolk ask the Partnership to develop strategies that allow greater use of walking, cycling and public transport.

Q 35 Which option do you prefer?

Response: A

Q 36 Which option do you prefer?

Response: A

Comment

CPRE Norfolk supports a plan, monitor and manage approach to freight transport.

10 COMMUNITY LIFE AND CULTURE

Q 37 Is providing dedicated community workers the best way to support new communities?

No comment – outside the scope of CPRE Norfolk.

Q 38 Which option do you prefer?

Comment

Rural areas are different from urban areas precisely because they lack certain facilities/services that are available only in the urban environment. Any attempt to equally provide all services to all people in all areas is unaffordable and undesirable and would simply lead to a further suburbanisation of rural areas.

However certain key services should be readily available to rural dwellers without requiring a lengthy journey, namely: primary education, primary healthcare, post office and local shop, and adequate public transport links to an urban area offering higher order facilities.

The core strategy needs to recognise key differences between rural and urban and not align itself to current trends which offer the same solution to both town and country. For example, para 10.3 (p.64) mentions the role of design as a consideration for community safety. This should not mean that the same approach to this issue be followed in both urban and rural areas.

As an example, street lighting is considered appropriate to urban areas but this does not mean that it should be included on all developments in rural areas. CPRE Norfolk has surveyed every parish council in Norfolk and has found that the vast majority of councils (and their residents) treasure dark landscapes and dark skies and therefore choose not to have street lights – this view should be recognised and

respected in the core strategy. Instead the issue of light pollution is not mentioned at all in the core strategy document even though the massive population expansion envisaged would lead to a huge increase in the problem. Large scale population growth could destroy one of Norfolk's key assets, as recognised in Norfolk County Council's Environmental Lighting Zones Policy, namely its glorious dark landscapes and star filled skies.

11 CITY CENTRE

Q 39 Which of these options is most appropriate to accommodate the retail growth in the city centre (tick all that apply)

Response: A

Q 40 Which option(s) do you prefer (tick all that apply)

Response: B only

12 NORWICH POLICY AREA

Q 41 Do you agree that housing need which would best be met in the city of Norwich, but which for practical reasons cannot be, should be met in the Norwich policy area?

Response: Yes

Comment

CPRE Norfolk agrees with the statement given that sprawl in the countryside is the alternative. The proposed Northern Distributor Route means that the majority of development is bound to be in the Broadland suburbs once the Norwich Policy Area (NPA) brownfield sites are used up.

Q 42 Should we focus our efforts on area wide improvements in any part of the existing built up area?

Response: Yes

Comment

Too many properties have poor carbon footprints. To the layman this means houses are costly to heat and draughty. In the poorer areas of GNDP, most of all, improvements to the energy efficiency of homes is very important, both new and existing.

Q 43 Do you see any reason to amend the NPA?

Response: No

We would not want the area extended any further.

13 RURAL TOWNS AND VILLAGES

Q44. Which option do you prefer?

Response: Option C

Q45. Which option do you prefer?

Response: Option A

Q46. Which option do you prefer?

Response: Option B

Comment

We would give a priority order to local residents from the village, then neighbouring villages, and then the wider locality. The same priorities should hold when the original resident moves away.

Q47. Which option do you prefer?

Response: Option B

14 IMPLEMENTATION AND MONITORING

Q48. Which approach do you favour?

Response: Option A

Comment

A site by site basis gives less "wriggle room" for developers, and relates better to the needs of an individual site. A two tier system would be complex; and who decides the share within overall infrastructure needs: roads, footpaths, water supplies, public transport, medical facilities, schools, open space and affordable housing. The system is iniquitous as it encourages housing growth as a means to obtaining infrastructure, not always necessary, such as the NDR.

Q49. If a tariff approach is adopted, do you think it should be based upon an area wide assessment or a specific sector?

Comment

We do not support a tariff approach for the reasons outlined above, Plus it places a higher burden on first time buyers because developers will pass on to the private houses price at least some of the cost of the contributions they make. It may well be that equity rich in-migrants can afford this, but local people on local salaries will not.

Q50. If a tariff approach is adopted, would it be appropriate for public bodies to fund infrastructure early in the life of a development and recoup it via the tariff as development progresses?

Response: No

Comment

There would be a mismatch between the initial funding provided and the recouped tariff as the development progresses; a shortfall.

Q51. Are there any other comments you wish to make on this issue?

See comments on Q48 and Q49.

Q52. Do you have any views on how funds derived from a tariff, if adopted, would best be managed?

No.

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