

To: William Nunn, Leader of Breckland District Council – by email

Copies to:

Breckland District Council Councillors - by email to Rory Ringer, Breckland District Council

Phil Mileham, Strategic Planning Manager, Breckland District Council – by email

John Lee, Leader of North Norfolk District Council – by email

George Freeman MP – by email

Charlie Robinson, Chairman, Mid Norfolk Railway – by email

Chris Starkie, Chief Executive, New Anglia LEP – by email

Matt Tracey, Infrastructure Development Manager, Norfolk County Council – by email

Parish Council Clerks of Bawdeswell, Billingford, Bintree, Foxley, Hoe & Worthing and North Elmham – by email

18th October 2018

Mid Norfolk Garden Town – proposal by Lanpro Services Ltd.

Dear Mr Nunn,

CPRE Norfolk is deeply concerned by the speculative plans led by Lanpro Services Ltd. into the possibility of developing a new garden settlement of up to 10,000 homes between the villages of Billingford, Bintree and North Elmham. We strongly feel that the site suggested between Billingford, Bintree and North Elmham, bounded by the A1067, B1145 and the River Wensum is unsuitable for large-scale development.

CPRE Norfolk is strongly opposed to this proposal for many reasons, not least due to the unnecessary loss of productive countryside such a development would bring. Unnecessary, as Breckland Council has worked hard over the last months and years to form a new Local Plan which will provide planned and sufficient growth to 2036, as well as securing its 5 year land supply for housing. During that process the possibility of a new settlement was considered but not included in the final submitted Plan. This emerging Local Plan, which has been put out to widespread public consultation, will hopefully be adopted shortly. Therefore, this alone should be enough to persuade Breckland Council to decide not to support plans for a proposal for a new garden settlement which has not been put to the local communities for consultation, or been submitted for formal inspection or comment. Moreover, it appears to be the case from reports in the *Eastern Daily Press* on 15th and 25th September 2018, that Lanpro Services Ltd. have met with the Minister of State for Housing, Communities and Local Government to lobby for changes to the Government's process for applying for a new Garden Community, instead of following the rules laid down in the August 2018 prospectus, *Garden Communities*. Such a flagrant attempt to circumvent local democracy and due process should be strongly resisted.

As the prospectus for Garden Communities makes clear, "all proposals should have the backing of the local authorities in which they are situated", and that "proposals should set out how the local community is being, or will be, engaged and involved at an early stage, and strategies for continued community engagement and involvement." It goes on to make clear that "proposals submitted by private sector partners must be expressly supported by the local authority". Moreover, the revised NPPF reinforces this in paragraph 72 when it states: "working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development" [new settlements or significant extensions to existing villages and towns]. Therefore, we would ask that Breckland District Council agree not to give any support for a new settlement on this site.

This point is important as CPRE Norfolk appreciates that it is possible that no firm proposal has been or will be submitted by Lanpro to Breckland District Council for consideration before the Full Council Meeting on 25th October 2018. Therefore, we ask that Council considers whether the suggested site is a suitable one for a new garden settlement (either town, village or city) at present and in the future while the current factors still exist, and votes on this issue whether there is a firm proposal from Lanpro or not. There are many reasons why the site is unsuitable for a new settlement. These are summarised below, although many of the specific issues relating to Lanpro's *Mid Norfolk Garden Town Proposal, summary document* (November, 2017) have not been included.

- The local roads are unable to cope with the extra traffic generated by any new settlement of 1,500 houses or more. The A1067 has long stretches below the national speed limit, especially the 30 mph section through Lenwade. The B1145 through Billingford is already a bottleneck, whilst there would be further issues with traffic volume and speed in North Elmham. The B1110 would see major problems, both through the narrow 20 mph section through North Elmham and problems with increased congestion in Dereham in particular.
- The Mid Norfolk Railway is a heritage line and surely unsuitable to continue as such if the line ran a commuter service. This is likely to be unacceptable to the Mid Norfolk Railway. A maximum speed of 25 mph for a heritage line demonstrates why it would take too long for it to be worthwhile for commuter use. The line does not run to the main Norwich to Ely line at Wymondham, nor to Fakenham or beyond. The track-bed at Great Ryburgh is blocked by buildings belonging to Crisp Maltings. Traffic in Dereham would be held up beyond what is reasonable if commuter trains crossed the already very busy road under the A47 flyover. Accessing stations at County School and North Elmham would cause several problems, including an unacceptable increase in traffic. The cost of making the necessary upgrades, even if these were acceptable to the MNR, would be prohibitive.
- There are many environmental concerns for any new settlement in this area, in particular the impacts on the precious SSSI River Wensum and its valley, e.g. bridging the Wensum between the new settlement and County School. Further concerns relate to the potential despoiling of good quality agricultural land and Bintree Woods, and the effects this would have on habitats and (possibly protected) species.
- For any new settlement to be developed on this site, significant road upgrades would be needed, particularly given the unrealistic possibility of using the Mid Norfolk Railway as a major transport option. It is unlikely to say the least, as well as being undesirable, that Norfolk County Council (and Highways England if the roads were to be categorised as trunk roads or higher status) would agree to any high spending on such schemes.
- The site is not in a growth corridor or growth location highlighted and funded through the New Anglia LEP's Economic Strategy. This demonstrates the site is unsuitable as it is not part of the region's strategic plans. It is interesting to note that Lanpro Services Ltd. stress the importance of having housing growth "closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan", when they argue for a new garden village near Hethel, as part of their GNLP Regulation 18 Consultation response.
- The economic generation of Dereham and Fakenham would suffer as a result of a new settlement on this site. Investment and funding which otherwise could go to these market towns could instead go to the new settlement, especially as any garden or new community/settlement is expected to "create a variety of new jobs" (*Garden Communities*, August 2018), and to have "sufficient access to services and employment opportunities within the development itself" (*NPPF*, paragraph 72b, July 2018.) This is not a site where large numbers of new jobs are likely to be created, given the lack of good transport infrastructure, the lack of available space for sufficient employment opportunities and it not being identified as a growth area.

When looking at the sites which have been successful in gaining Local Authority and then Central Government backing to date, one can see that the site in Mid Norfolk does not have the necessary level of transport infrastructure to and from the site. Currently 23 places out of over 50 submitted with Local Authority backing have been supported by Central Government to become new garden settlements. Some are also effectively urban extensions which have a range of local infrastructure which would not be available at a more remote rural site. The table below shows a summary of their connectivity to major road infrastructure, including some upgrades as part of the relevant garden settlement development.

New Settlement	Location – major transport infrastructure close to settlement
Aylesbury – town	A418(T); A41(T); A413(T); rail to London; HS2 rail
Basingstoke – town, including “Manydown” village	A339(T); on edge of Basingstoke; rail to London
Bicester - town	Ring road; M40; A41(T); rail to London & Oxford
Didcot - town	A34(T) dualled
Ebbsfleet – town/city?	A2(T) dualled; M25
Harlow & Gilston – town	Upgraded M11 junction; rail to London & Cambridge
North Northamptonshire – town	A group of various garden communities with numerous A(T) road links
Otterpool Park, Kent - town	M20 J11; rail
Taunton Deane – town	M5; Northern Inner Distributor Road; A358 commitment to dual to A303(T); rail to Bristol & London; likely BRT system
Bailrigg, Lancaster – village	M6; A6
Culm, Mid Devon – village	M5 J28 improvements; town centre relief road
Deenethorpe/Tresham - village	A43(T); A427; potential link road between A427 & A43
Dunton Hills, Brentwood – village	M25 J29; A127(T) dualled; A128; rail
Halsnead in Knowsley – village	M62/M57 Junction; rail
Infinity Garden Village, Derby – village	A50(T) dualled; South Derby Integrated Transport Link, phase 1 is needed
Long Marston - village	Construction of South-Western relief road for Stratford Upon Avon
Longcross in Runnymede - village	M3; rail
North Cheshire – village	A34(T) dualled; A555(T) dualled
Oxfordshire Cotswold – village	A40(T)
St Cuthberts, Carlisle – village	M6; A595(T); New southern link road between M6 J42 and A689 is proposed
Spitalgate Heath, Lincs. – village	A52(T); A1(T) dualled
Welborne, Fareham – village	M27 J10 upgrade; BRT system
West Carclaze, Cornwall - village	A390(T) dualled, with improvements on edge of St Austell and to A391

CPRE Norfolk requests that this information and views are considered at the Full Council meeting on 25th October 2018, including the suggestion to vote on the unacceptability of this site for any major development.

Yours sincerely,

Michael Rayner

Planning Campaigns Consultant, CPRE Norfolk