

CPRE NORFOLK – MANIFESTO FOR THE NEXT GOVERNMENT

Our views on the key issues in greater detail

Housing – Solutions to fix a broken system

Excessively high centrally fixed housing targets, coupled with land-banking by developers, has led to an unnecessary loss of countryside and the linking of affordable housing provision to the building of market housing has failed to provide communities in Norfolk with genuinely affordable homes. In the countryside, the situation is particularly acute and many people are now unable to afford to live in the communities that they grew up in. In short, too many houses of the wrong type are being built in the wrong places.

To fix the broken housing system, we are calling on the next government to:

A) Ensure that targets for market housing are not inflated by unnecessary buffers and are set at a level that will minimise the loss of countryside.

Good planning should not just involve responding to trends but should enable the establishment of new and better ways forward that may well contradict current trends where they are producing bad outcomes. For example, simply basing housing targets on ONS household creation forecasts enslaves planners – these forecasts dictate the housing target.

A more enlightened approach would be to introduce a form of regional planning where the special nature of an area is recognised as possibly the most important consideration to guide the plan making process. This way the protection of the relatively few remaining parts of lowland England, such as Norfolk, that are still mainly rural in character would become a greater priority in local plans, enabling planners to set housing targets aimed at protecting this character rather than having to slavishly obey ONS forecasts.

Not everywhere has to be equally suburbanised - this is not good planning. Everyone living in densely populated England could potentially benefit if the diminishing number of places that act as the “green lungs” of the nation are properly protected from the impact of excessive housing targets.

B) Prioritise the provision of social rented housing and end the selling-off of current social rented properties.

Much of the housing defined as affordable is too expensive for those in most genuine need, therefore consider addressing waiting lists by allowing local authorities / housing associations to compulsory purchase land, including the existing land banked allocations held by developers, on which they can then build houses for social rent.

Linking the provision of affordable housing to the building of new market housing is a failed strategy. The impression is often given in local plan “headlines” and elsewhere that 1/3 of all the housing built on a new site will be affordable. Rarely, if ever, is this “target” achieved and many of the so-called affordable houses that are built are not for social rent.

A far better way to provide social housing in villages would be to support rural communities wishing to use neighbourhood planning or rural exception sites to deliver small-scale affordable housing developments on the edge of villages, in line with locally assessed need. This should include reserving land adjacent to rural settlement boundaries for affordable housing.

C) Introduce phasing of development to ensure that existing undeveloped sites in current local plans must be built out before any newer sites allocated for inclusion in new or emerging plans can be developed.

This is a very popular proposal supported by 161 parish and town councils that are members of the CPRE Norfolk Alliance. These councils are located in the following constituencies: 32 in Broadland and Fakenham; 7 in Great Yarmouth; 24 in Mid Norfolk; 18 in N Norfolk; 22 in NW Norfolk; 29 in S Norfolk and 18 in SW Norfolk; 10 in Waveney Valley and 1 in Norwich North.

Land banking is a huge problem in Norfolk. The emerging new local plan covering South Norfolk Council, Broadland DC and Norwich (GNLP) will contain a carry over of more than 30,000 un-built commitments from the current plan – i.e. sites for 30,000 houses have not been built out. This means that the housing target in the current plan was clearly set at too high a level and therefore there really is no need to add any extra sites for market housing into the newly emerging plan - current unused sites for 30,000 houses will be sufficient to cater for demand for many years to come. Unfortunately, this isn't the case and the GNLP housing target has been set at 45,041 which is considerably greater than 30,000.

Nationally, according to the CMA (Competition and Markets Authority), in November 2023 the 11 largest housebuilders own or control 1.17 million land banked plots.

D) Prioritise development on Brownfield sites.

E) Support the regeneration of inner cities by encouraging the conversion of redundant office and retail space to residential usage.

This approach has many plus points. In Norwich for example, large sites such as Debenhams could accommodate a vibrant mix of housing, including apartments for social rent. The creation of additional accommodation in the city centre also helps reduce the need for building in the countryside and more people living in town would support new local businesses and reduce the pollution that results from commuting.

F) Introduce a second home and short-term let register, with planning controls to regulate the provision of short-term lets and powers to levy extra council tax on second homes.

Parts of Norfolk have a large number of houses that are unoccupied for a considerable amount of time each year. In 2022 North Norfolk district had 7,169 second and holiday homes. If these properties were occupied more regularly, this could help reduce housing targets. There are also almost 500 empty properties in Norfolk some of which could be brought into use.

G) Secure higher quality housing by more forcefully advising local authorities and the Planning Inspectorate to reject schemes that do not live up to design aspirations set out in the National Design Code and those adopted locally.

Central Government should also require all new buildings to be carbon neutral and increase substantially the funding of schemes to increase the energy efficiency of existing buildings.

Planning

The 1947 Town and Country Planning Act gave birth to a planning system that should be regarded (alongside the creation of the NHS) as one of the major achievements of post-war Britain. It was designed to prevent urban sprawl and is still very much needed in this regard. Unfortunately planning and planners are often unfairly criticised by politicians keen to blame someone or something else for problems that they, the politicians, have created.

In Norfolk, we know that the blocking of housing development has not been caused by the planners. They have allocated large areas of land for development. It is the builders who are the blockers and are responsible for allocated sites for 30,000 houses in the Greater Norwich area not being built out.

All places should operate within the planning system. Proposals in recent years to create growth areas where planning rules would not apply must be resisted.

There is a need for regional planning to be reintroduced in Britain so that the special features of an area and the contribution they make to the nation as a whole are recognised as important considerations in the plan-making process. The relatively few remaining parts of lowland England, e.g. Norfolk, that are still mainly rural in character deserve to be better protected for the benefit of everyone.

We ask you not to indulge in planner bashing but please:

A) Support, reform and strengthen a planning system that is needed to ensure that our countryside, landscape and environment are properly protected.

B) Retain the right of the local community to play a full and meaningful part in all aspects of planning including the formulation of local plans and in planning application decision making. Please do not prevent local people from having their say on big infrastructure projects by elevating the decision making to a higher authority.

C) Avoid the temptation to create growth areas where planning laws are relaxed.

D) Lobby for the reintroduction of regional planning to better protect the rural character of places like Norfolk.

Renewables Done Well

Climate change poses a great threat and CPRE Norfolk supports de-carbonising energy production through increasing the supply of renewable energy. However, this should not be achieved at the expense of the countryside. With good planning and sensible decision making it is possible to deliver a mix of renewable energy solutions of the “right” scale and in the “right” locations.

We call on all candidates seeking election to:

A) Support the CPRE campaign for roof top solar energy production.

Our research shows that with further investment installing solar panels on existing rooftops and other developed land such as car parks, could provide 117GW of energy by 2050 - well in excess of the Climate Change Committee’s 85GW target. There really is no need to sacrifice the countryside and valuable agricultural land to accommodate ground-mounted solar farms when the

UK has a total of 250,000 hectares of south-facing commercial roof space most of which currently is not housing solar panels.

A survey of nearly 3,000 CPRE supporters shows widespread support for rooftop solar – both as a government priority and on new homes. In total, 95% of respondents felt that the government should take a rooftop-first approach when rolling out solar renewables across the country, while 97% agreed that rooftop solar should be a standard requirement on all new housing.

B) Ensure that proposed onshore wind developments do not have negative impacts on the landscape.

This can partly be achieved by the use of innovative technology to ensure that onshore wind provides a valuable contribution to the nation's energy needs, without threatening the kind of visual intrusion that has historically caused so much division and distress to residents in many parts of Norfolk whenever proposals for large scale 3 blade turbines have been put forward. An increasing number of small-scale wind harvesting machines are available to fit to houses, offices, factories etc. and when combined with solar panels they greatly increase the reliability of micro renewable energy generation – i.e. solar by day and wind potentially for 24 hours a day. Larger scale devices (that are not of the mega 3 blade design) are also finding their way onto the market. These technological developments provide good potential for developing onshore wind as a resource without creating the negative visual impacts associated with current large 3 blade turbines.

The right place for large scale turbines and wind energy production is offshore. Many existing offshore turbines are 190m tall and there are plans to go even higher. These huge structures do not fit in with the scale of the Norfolk landscape. If these mega turbines, which are much taller than most existing onshore turbines, were to become common place onshore the impact on our countryside would be very negative.

CPRE Norfolk supports proposals for smaller turbines (e.g. up to 40m) owned by the community which could produce energy for a community facility (e.g. a village hall). These smaller turbines are of a scale that fits in to the landscape and ideally would not need to be connected to the national grid thus overcoming a current major problem confronting renewable schemes – i.e. difficulty in obtaining a grid connection (* see footnote 1).

C) Commit to supporting the retention of the wording in NPPF footnotes 57 and 58 in any future revisions of the NPPF.

These footnotes require onshore wind proposals to have community support. It is crucial that those who would be most directly affected have their say. (* see footnote 2)

D) Support local councils, residents and campaign groups fighting National Grid's proposals to transmit offshore wind energy from Swardeston to Tilbury via a pylon route.

Ideally this energy should be transmitted using an offshore ring main or by burying the cables. Pylons, which will probably be a feature of the landscape for over 100 years, should not be permitted because they are the cheapest solution for a private company (i.e. National Grid)

E) Campaign for all new buildings to be designed to be carbon neutral and for substantially greater funding to be made available for schemes to increase the energy efficiency of existing buildings.

Reaching net zero cannot be achieved just by addressing the means by which energy is produced.

Footnotes

- 1) Being independent from the grid would also avoid a lot of "digging up" of the countryside which would otherwise be required for a grid connection. If every parish had its own small turbine the total amount of onshore wind energy production would increase substantially and probably exceed that which could be achieved by building collections of unsightly large turbines on farmers' fields dotted all over the countryside. These would be visible for many miles in all directions and therefore impact areas of countryside far removed from the turbines' site.
- 2) The best and most democratic method of establishing the view of the community is via a parish poll – an existing legal process which can be requested by a parish or town council and is usually provided by the relevant district council.

Access to the Countryside

CPRE Norfolk works to protect and enhance the green spaces and countryside which footpaths enable us to access and enjoy.

We call on all candidates seeking election to:

A) Support our campaign for the creation of a Green Belt for Norwich in order to protect the countryside surrounding the city, and to allow maximum public access to the important green spaces close to the city.

A Green Belt could take the form of 'green wedges' radiating from the city into the countryside. These would follow existing corridors such as river valleys, railway lines (used and disused), footpaths and cycleways.

B) Lobby for improved funding in order that public rights of way are well signed and maintained.

Our green spaces and footpaths enable local people and visitors to enjoy nature, heritage and landscape in ways that respect the environment. They also provide places where people can exercise in the countryside close to home - a great way to improve health and wellbeing.

C) Campaign to increase the number of places where people can enjoy the benefits of being in nature.

This could be achieved by designating a new generation of national, regional and country parks and should include "Other Effective area-based Conservation Measures (OECM)" for The Brecks. CPRE Norfolk considers that the special nature of the Brecks justifies a designation as a National Park or AONB.

Light Pollution and Rural Tranquility

Norfolk is fortunate in possessing some of the least light polluted countryside in England. Our survey of all parish councils in the county revealed that the dark skies and landscapes of our county are special features cherished by both locals and visitors. Norfolk is also blessed with extensive areas of tranquil rural landscape, and there is a growing body of evidence that shows just how important tranquil places are to the health of the nation.

Unfortunately, our dark skies and tranquil landscapes are threatened as never before by large scale developments, the impact of which often extends way beyond the boundaries of the sites that are built on.

Please help us to:

A) Protect the dark skies and dark landscapes of Norfolk from light pollution.

B) Conserve tranquil rural landscapes for the health and well-being of everyone.

Agriculture

Agriculture has always been a mainstay of Norfolk's rural life and has shaped our county. A viable farming community is vital for our rural economy as well as the UK. Over much of Norfolk it is farmers who create the landscape and look after the countryside.

Diverse farms, both small and large, must be viable and able to invest in their soils and in measures that protect and enhance the environment, which has never been more important. Farmers must get a fair price for their produce, all of which should be used and not wasted.

Our agricultural land must be valued for its contribution to the beauty of our county, as well as its practical benefits, such as flood alleviation.

It is important that farmers are encouraged to protect our natural resources and flora and fauna and allow access to their land for recreation and education. They also have a key role to play in helping alleviate flooding and in protecting water supplies.

Please support:

A) Policies that promote a prosperous farming industry which not only produces food, but also improves soil quality and biodiversity, including through the planting of new hedgerows and trees.

B) Improved access to farmland for leisure and education which will increase public appreciation of the value that our farming industry provides.

C) Policies that protect and prevent the loss of our agricultural land of all qualities.

Flooding

Flooding is an increasing problem in towns and villages throughout Norfolk. Natural flood management schemes are a practical way to reduce flood risk while improving the environment. They involve measures such as: tree and hedge planting; the creation of new ponds and uncultivated buffer strips. These schemes are specifically designed to address the flooding problems encountered in a particular area.

Please support policies that:

A) Provide greater financial and practical help to the Environment Agency, local councils and landowners to facilitate the widespread introduction of natural flood management schemes.

Transport

CPRE Norfolk opposes the construction of a Norwich Western Link Road (NWL) because of the harm it would cause to the landscape, environment, wildlife and ecology in the lovely River

Wensum valley. The NWL is planned to connect the Broadland Northway with the A47 and was originally opposed by Norfolk County Council because of its environmental impact. NCC now supports the scheme and a planning application is due shortly.

We would much prefer that transport problems are solved by investment in public transport rather than by building expensive and polluting new roads.

Please join with us to:

A) Oppose the construction of the Norwich Western Link road.

B) Lobby for greater investment in public transport solutions.