

Part of Norwich Green Party submission

Submitted by Councillor Stephen Little, elected in Town Close ward, south west of Norwich City Centre to both the County Council and the City Council since 2006

Part C

- L As regards Long Stratton, this remains a contentious location for development. We repeat our assertion that it is simply too far out of the city and is unlikely to support a full range of services and job opportunities in its own right. Given also that it is not accessible by rail, it cannot be considered the most sustainable location for major development. There is little new in the response to EM conclusion (EIP86) that suggests they have successfully formulated a ‘bespoke vision to achieve a degree of self containment for Long Stratton’. Development contributions from 1800 houses remains unlikely to be sufficient to support the construction of a bypass, so the likelihood of sufficient funding overall has to be questioned. There is also the other point that the bypass would be soaking up money that could otherwise be spent on more socially desirable outcomes such as education, green spaces, social housing or public transport.

- L In the document EIP86, there is plenty of reference to the effect that Long Stratton ‘did not score badly’ in the SA, or that it had ‘fewer negative effects than rejected growth locations’. At best, this merely keeps it in the bounds of possibility rather than actually explains why it has been chosen as a location. In 4.13 of this document, there is no acknowledgement of the conflict between paying for the bypass and other socially desirable outcomes such as public transport and affordable housing. Indeed, in 4.15 it states that the bypass would compromise provision of affordable housing. There are also concerns, as mentioned in 4.21, in respect of water sources and *there are doubts as to whether the water infrastructure can be delivered in time to facilitate development as planned.*

- L In summation, the notes in respect of the pre-submission appraisal of the JCS (pages 48 to 51 of EIP86) state that Long Stratton is ‘isolated from Norwich & it will not be possible to provide a Bus Rapid Transit’ service. It also talks of ‘negative effects in terms of ENV8’ and considers that ‘growth in a water stressed part of the country will lead to further pressure being placed on water resources’. There is still not adequate explanation as to why at this point the wisdom of submitting Option 2+ was not questioned.

Part B

- B4 There is a lack of evidence to demonstrate that the Northern Distributor Road (NDR) is either a cost effective and well-located option to serve planned growth areas or that it fulfils the Document’s Objectives on Sustainability, Climate Change and Use of Natural Resources

- B4 Sustainability objectives are firmly embedded in much of the wording of the strategy but there is little evidence that these aspirations can be delivered. Under the heading ‘The Grand Challenges’ on page 6, the strategy states an aspiration to make a ‘...radical cut in carbon emissions, reducing reliance and costs of energy fuelled by carbon generating sources...’ On p22 the Spatial Vision proposes that the use of global resources will be minimised and, on page 24, that there will be a reduced need for car use (**but not** a reduction in car use). Meanwhile, on page 26 Object 1 includes the aim of ‘minimising contributors to climate change’ and on page 27 Object 7 aims for a reduction in the need to travel, especially by private car, and the greater use of sustainable modes of transport.

- B4 By any objective criteria, it is difficult to see how the construction of a dual-carriageway is compatible with these aspirations. The Northern Distributor Road will encourage car use and increase CO₂ output for the city (a 6% increase on the road opening), which will significantly hinder attempts to reduce emissions in line with national carbon budgets and the strategy's objectives. Indeed, the Major Scheme Business Case for the NDR envisaged a 57% increase in traffic emissions by 2071 and it has the 4th highest emissions of any local road scheme in England. The Business Case also envisaged 90% of commuters to new developments would use the car which directly contravenes the modal shift away from car use envisaged in PPG13.
- B4 The argument in 5.44 that 'significant improvement to public transport, walking and cycling in Norwich can only be achieved with the road capacity released by the NDR' is a highly unusual one and not proven. There is no evidence base that evaluates the NDR against a no-NDR option that prioritises investment in improved public transport links from the early stages, although common sense would suggest it would do far more to reduce traffic in the north-east of the city. More particularly, the traffic model for the NDR shows the road contributing to an increase in traffic on the Wroxham Road which would be a key arterial route servicing new development. Similarly, the first route planned for an Bus Rapid Transit Route is the Dereham Road and yet the NDR does not link to this road. Indeed, traffic is likely to increase on the Dereham Road, along with the Holt/Cromer Road, Boundary Road and Sweet Briar Road, from NDR related traffic crossing the Wensum valley.
- B4 The Broadland Local Plan (Replacement) (2006) envisaged a more low-cost option of a single carriageway service road to link the Rackheath area with the Postwick hub and there is a lack of evidence to suggest why a dual carriageway, with its associated problems of permeability, would instead be a preferred solution.
- B4 The key diagram on page 29 of the proposed document illustrates well how poorly the NDR relates to new development, with most of its length from the growth triangle to the Fakenham Road being only relevant to one growth employment area at the airport which has a planned expansion of 30 hectares (out of a total 175 hectares planned employment area expansion outside the city centre). The western end of the NDR of the proposed route does not link with any growth area.
- B4 Of course, in December 2009 it was announced that funding would be considered for the road only as far as the Holt/Aylsham Road and yet the submitted document still shows the road continuing to the Fakenham Road (a further 5 miles). This raises the obvious question that, if one accepts the argument that the NDR is completely essential for the JCS to progress, can it still progress as planned with only half the road in place? If one accepts that it can, then where is the evidence to show that the retained stretch is the crucial element of the JCS? Why was it previously argued that the entire length was necessary?
- B4 The cost of even the shortened version of the NDR, together with the Postwick Hub and 2 other related A47 interchanges, would be likely to use up available regional transport funding for years. Meanwhile, completed delivery of sustainable transport measures in the Norwich area is not envisaged until 2025 with much of the details, dates of delivery and sources of funding still to be identified. This would mean that the road is far more likely to entrench car dependency and cause car-reliant patterns of development long before the effects of public transport improvements are felt.

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B4 Therefore, to disprove the argument that the construction of the NDR is not in contravention with sustainability objectives, an evidence base with thorough modelling of non-NDR alternative solutions would be necessary. Yet all the way through the process, the NDR has been treated by the GNDDP a base-line assumption and the modelling of non-NDR alternatives has been reluctant and incomplete. The Department of Transport itself revealed its frustration with this approach in a letter, dated 15 September 2009, from John Dowie, Director, Regional & Local Transport Delivery, to Mike Jackson, Director of Environment, Transport and Development at Norfolk County Council. The letter states:

‘Finally, before we would be in a position to consider Programme Entry there are two additional pieces of work which also need to be concluded:

- My colleagues would like to discuss with your team further details of non-road alternatives that you have investigated before arriving at the preferred scheme. I know this has been raised on a number of occasions previously but we will require a fuller statement of the analysis you have undertaken than what currently appears within the Business Case. ‘*

B4 Within the Core strategy, spatial planning objectives 8 and 9 concern access to the countryside and maintaining and enhancing biodiversity and the unique qualities of the area. Yet the impermeable nature of a dual carriageway would be a significant hindrance to countryside access and the road would create distinctly unattractive ‘gateways’ to the city (5.10 on page 37 states that the ‘urban edge is particularly sensitive’). Large parts of the area to the north-east of the city are characterised as ancient woodlands or historic parks and gardens and are protected under existing policy ENV10. The proposed NDR directly borders one such area (to the West of Rackheath) and goes straight through another (Beeston Park). All of this begs the question of just how protected these areas are. Policy 1 in the strategy also speaks of preserving the resilience of eco-systems and minimising the fragmentation of habitats. The NDR similarly seems to be in complete contravention of that aim.

B4 Since the announcement on 10th June 2010 from central government that funding for the NDR was under review together with the recommendation that no more preparatory work takes place on the project, the lack of an alternative strategy or transport model places the entire Joint Core Strategy under a huge and largely self-inflicted risk. This, possibly more than any other element, puts the soundness of the strategy in considerable doubt.

B5 It is also not entirely clear how the Bus Rapid Transit will effectively service all four ‘quarters’ of the proposed development.

B10 There is little reference to the density of dwellings in new developments (although 5.2 states the arguable objective that densities should ‘take account of local characteristics’). This links to the fundamental challenge with development on the periphery of urban areas in that, up till now, they have tended to concentrate on detached and semi-detached properties with low densities of dwellings per hectare. While there is undoubtedly some demand for this type of property, we would like to see far more diversity in the type of housing produced, with planning policy encouraging developers to consider higher density forms of housing, such as terraces and flats, which have hitherto been associated with more central urban settings. This would thus free up valuable land for agriculture, urban green space, allotments, wildlife corridors and renewable energy generation. It would also in practice provide a higher degree of affordable housing and open up the private market to more young first time buyers. It is also the case that demographic changes are likely to result in an increased demand for smaller one and two bedroomed properties.

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- C Many projects are intended to have been completed by 2016 and yet likely significant cuts in government funding must make their deliverability more questionable than when the document was submitted. We know this to be the case with the NNDR project and its description as Priority 1 in the context of recent government announcements reviewing its funding must be seen as a challenge to the soundness of the strategy as a whole. It is listed as dependent of growth point funding which is no longer forthcoming. Funding from Norfolk CC has also to be highly uncertain in the current climate.
- C The reclassification of projects into Priority levels 1 to 3 does little to change the fact that the strategy is reliant on their delivery. After all, Priority 2 schemes are deemed to be necessary for 'timely and sustainable' delivery and 'essential for soundness' while failure to implement Priority 3 schemes would 'still result in refusal'. The fact that the schedule of infrastructure requirements is still described as 'early work' (page 5 of EIP84) suggests that commitments are far from being certain enough for the strategy to be considered 'sound'.
- C There is also a specified need for 1200 secondary school places in South Norfolk but no stated arrangements as yet about how they are to be provided. As the report states for Wymondham, Hethersett and Easton/Costessey the issue 'remains to be resolved'. Cringleford, meanwhile, is 'reliant on a solution at Hethersett'. With the high level of pressure there is likely to be on public finances, the likelihood that all three existing schools may have to be relocated to accommodate growth would represent an unacceptably expensive solution which would either be prohibitive to viable development or divert funds from much needed capital projects elsewhere. The only alternatives would be greater use of mobile classrooms or creating one school to which pupils would travel to by bus - both options are far from ideal. The uncertainty and potentially prohibitive cost implications for this solution mean that the strategy is not compliant with Section 4.45 of PPS12.
- C In 4.36 & 4.37 of EIP86, it states that secondary provision proposals are still to be presented. The fact that the 'GNDR remains confident' that appropriate proposals will be forthcoming doesn't change the fact that, in respect of secondary school provision, the strategy is a long way from having sufficient certainty to be considered 'sound'.
- C Similarly, with public transport into the city, the strategy is almost completely reliant on Bus Rapid Transport (BRT) routes to deliver the step change necessary to effect modal shift away from car use. The document EIP86 'Response to EM Conclusion 3 – Distribution of Growth' contradicts the earlier pre-submission SA by declaring that a turn and go bus service is indeed feasible along the A11 corridor. However, the strategy itself contains no commitment regarding the frequency of buses and there has been no alteration to the level of infrastructure investment to reflect this late change so it is far from guaranteed that a 'turn up and go' service would actually be introduced. Indeed, without Quality Bus Contracts between the council and operators, the power of the council to improve services is very limited.

- C It is likely that other measures would also be needed for public transport to effectively compete with the private car. These could include refocusing local railway services to provide a more frequent service with possible line extensions, all-in bus links and/or significantly improved bus links to the Norwich Research Park area and to employment areas to the east and north-east of the city. In the south-east, such measures are not envisaged as part of the strategy and yet, without such a range of measures, the car is almost certain to remain the primary means of travel which will put further pressure on already congested roads in the south-west of the city - the B1108/Earlham Road, Unthank Road, St Stephens Road and Hall Road being prime examples which all suffer from bottlenecks when they join the inner ring road.
- C Many of the suggested public transport improvements have not been thought through. For instance, one of the suggestions for the ‘innovative use of local network’ was the introduction of tram trains. Yet, train operators have barely been consulted on this idea and there has been little floatation of the possibility of extending tracks into more central urban areas which would make the exercise a truly worthwhile one.

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- B The green links specified for the inner urban area on page 73 go through many densely developed areas - this would significantly question the deliverability of the proposed green links. More particularly, policy 10 on page 63 envisages 'stepping stones' of reclaimed heathland linking 'Mousehold Heath to the surrounding countryside'. For stepping stones to be effective, the distance between them has to be kept to an absolute minimum. There is also the point that for heathland to be self sustaining and of true biodiversity value, it needs to cover a relatively large uninterrupted area. There is already an extensive built up area between Mousehold Heath and the countryside with no such large unused open spaces. Further, recent revisions to the Strategy show a more complete joining up of development between Rackheath and the main Norwich urban area which throws into question whether the stepping stone concept, at least as a link with Mousehold Heath, is realisable.
- F3 We would like to ask why, in 5.13, does it specify that renewable energy has to be supplied from on-shore sources? 5.16 envisages use of biomass fuel, yet there are considerable question marks over the true sustainability of using land to produce fuel rather than an localised food supply.
- F6 There is no mention in the Strategy of 'Water Neutrality' which, for clarity, has been defined as '*For every new development, total water use in the region after the development must be equal to or less than total water use in the region before the development.*' (from SEERA discussion paper, 2008) This has been a concept espoused in previous Green Party submissions and Natural England and the Environment Agency, in their stakeholder statements, both recommend its adoption. This would mean not only strong water measures in new developments, but also linking the level of housing growth to the achievement of water usage savings from retrofitting water efficiency improvements in existing developments. Without such a policy, it is likely that water supply will come under particular strain in what is one of the driest counties in the UK.
- F6 In their Stakeholder Position statements, the Broads Authority and Natural England both also express concern about the concept of 'planned deterioration' of water quality. Natural England have 'significant uncertainties as to the acceptability of this approach' and, while this uncertainty exists, this could have 'significant implications for the acceptability of further growth in a number of the Norwich Policy Areas'. In theirs, the Broads Authority conclude that 'The Broads Authority remains concerned that the direct impact of the JCS would be to lead to deterioration in the water quality of the Broads and that that this would be at the expense of the considerable amount of effort that has gone into improving the water quality of the Broads in the last 20 years.'

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- A In 3.7 page 16 of the strategy it refers to the decline in relative importance of manufacturing and agriculture. Given that local production is a key aspect to sustainability, we would argue that the strategy should address this decline rather than accept it.

- A 3.8 specifically mentions ‘extensive areas of multiple deprivation in Norwich’ yet there is little in the strategy to suggest specific ways of shaping growth to directly benefit deprived urban areas. This could be in the form of improved transport links specifically between deprived residential areas and employment areas or targeted training initiatives to support new industries.

- A The strategy needs to contain more commitment on creating new jobs in sustainable industries such as renewable energy, energy efficiency in homes, repair and waste recovery, organic farming, public transport etc We also have concerns that housing could in practice become the major stimulus for growth meaning that many of the jobs created could be at the less-skilled end of the market.