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9<sup>th</sup> July 2013

Annette Feeney  
Programme Officer

Dear Annette

## 1. INTRODUCTION

- 1.1 I would like to submit the following statement on the submitted documents made by various parties for the reconvened Examination in Public (EiP) of the remitted elements of the Joint Core Strategy (JCS) as it appertains to the proposed growth in the North East Growth Triangle.
- 1.2 I make this submission as founding chair of Stop Norwich Urbanisation (SNUB) and as the Principal Management Consultant of SHManagement Ltd a local Norfolk based management consultancy specialising in carbon management. To this end I have a Post Graduate Certificate in Sustainable Business from University of Cambridge.
- 1.3 SNUB also work closely with the campaign group entitled Norfolk and Norwich Transport Action Group (NNTAG) and other local campaign groups brought together under the auspices of the local CPRE branch alliance. Details of the other organisations that are part of this Alliance can be found at: <http://www.cprenorfolk.org.uk/alliance-on-housing-2/>. This campaign alliance is against the over development of the Norwich Policy Area and the environmental harm that will undoubtedly ensue if the JCS were to proceed.
- 1.4 My points are around the economic viability of the proposals and the carbon footprint aspect as highlighted as two of the reasons for the adjournment of the original EiP.

## 2. ECONOMIC VIABILITY

- 2.1 The Greater Norwich Development Partnership (GNDP) has an agreed pooling of the anticipated Community Investment Levy (CIL) emanating from the total proposed JCS development. Broadland District Council (BDC) have agreed their CIL on 1<sup>st</sup> July 2013 however the SNDC and Norwich City local authorities have yet to do so. The CIL monies and their ability to fund crucial infrastructure improvements is a critical key to the economic viability of the JCS and in particular the NEG T.
- 2.2 The CIL set by BDC is £75 per square metre for homes in Zone A ie the majority of the NEG T. If this is extrapolated over the period of the JCS and the proposed 10,000 houses are built at an average of 1,000 square meters, although this is not the case for two and one bed roomed houses or flats, see below, than this would generate circa £75m of CIL over the period of the JCS. These funds would flow into the GNDP and then be re-distributed over the whole of the

JCS area to fund infrastructure projects over the Norwich Policy Area (NPA) and beyond. The mechanism for distributing the CIL receipts is as yet to be determined by the GNDP however I believe that there will be a “management board” set up to hear requests for funding and to approve allocations as necessary. My contention here is that the impact of the financial viability of the remitted elements of the JCS cannot be secured when the details of the other parties CIL and indeed the mechanism for future allocations have not been agreed or set up. This uncertainty, particularly as the CIL has been reduced, has already seen South Norfolk District Council call for review of critical infrastructure projects due to reduction of CIL. To date both BDC and Norwich City have not responded to calls for an explanation on how they will manage with the CIL reduction.

- 2.3 SNUB, as well as local parish councils, challenged Councillor Andrew Proctor (leader of BDC) in April 2013 and he responded in July 2013 apologising for his late response and highlighting that the CIL is not the only mechanism for infrastructure funding as the burden for this lies between a variety of sources many of which are currently unknown because they will arise in the future via new Government initiatives and other infrastructure providers’ asset management plans.
- 2.4 These two unknowns ie the methodology for allocating CIL locally and the yet to materialise compensating funding streams must alone be enough to question the future financial viability of the whole scheme.
- 2.5 What we do know however is that the local Parish Councils who complete a Neighbourhood Plan will receive 25% of CIL which at its maximum take up could see a dent of £18.75M in the £75M before any allocations to other projects. We also believe that the £40M funding gap for the proposed NDR will come from the CIL monies and that the proposed Long Stratton by pass will also receive CIL funding. This will leave precious little for the critical infrastructure in the NEGT to support the proposed 10,000 houses and there is a feeling that the development would, if it proceeds, be left without promised infrastructure as has happened in other areas within the NPA. There is nothing in the submissions from the GNDP that allay these fears and we would seek some information and reassurances on how the CIL allocations and funding gaps will be managed and how any proposals in these areas would make the financial future of these proposals secure.
- 2.6 The GNDP have also submitted figures to reflect the take up of the purchase of new homes in the NEGT however the Royal Institute of British Architects<sup>1</sup> show that the recommended square footage for a new build one bedroom flat is 50 square metres. None of the leading house builders achieve this as the table below shows Barrett’s as the lead developer for the NEGT only delivering 90% of the recommendation.

Persimmon	49 sqm	99%
Berkeley	47 sqm	94%
Taylor Wimpey	47 sqm	94%
Bellway	47 sqm	94%
Crest Nicholson	47 sqm	94%
Galliford Try	46 sqm	92%
Barratt	45 sqm	90%
Lovell Partnerships	43 sqm	86%

<sup>1</sup> First published September 2011 Royal Institute of British Architects | 66 Portland Place | London W1B 1AD  
[www.behomewise.co.uk](http://www.behomewise.co.uk)

- 2.7 They do fare slightly better when it comes to a two bedroom house where the recommendation is 95 square metres.

Berkeley	98 sqm	102%
Galliford Try	90 sqm	94%
Barratt	89 sqm	93%
Taylor Wimpey	88 sqm	92%
Persimmon	88 sqm	92%
Bellway	86 sqm	89%
Lovell Partnerships	85 sqm	89%
Crest Nicholson	84 sqm	88%

- 2.8 Not only are new homes “pig ugly” according to the Planning Minister they are also the size of a rabbit hutch and any future predictions on the propensity to purchase new homes is actually decreasing as new home buyers seek larger and more traditional homes. We would therefore question any future financial viability test based on an increase in purchases particularly as the majority of new homes will be without a garage ignoring the advice of estate agents who advise that it is much more difficult to sell a new home without a garage despite the best endeavours for developers to improve public transport links and persuade residents to go without a car! The ones in the NEGТ will also be under the flight path of an international airport and be more expensive due to the introduction of a Community Investment Levy (CIL) of £7,500 and about £25,000 due to having to be built to fulfil eco standards.
- 2.9 Perhaps the “rabbit hutch” size of these new homes explains why developers believe they can build more than the national standard however the selling of these is yet to be proven and the spectre of thousands of unsold homes looms for us all in the NEGТ just as they have done in other European countries due to the lack of finances a) to build the infrastructure and b) for buyers to want to buy small homes.

### 3. CLIMATE CHANGE

- 3.1 The first element of our letter draws on the 58-page submission that was made in the representation from SNUB to the JCS Remitted Elements consultation in October 2012, available on our website) and in particular the chapter on Climate Change and Carbon Footprint.
- 3.2 Much of the discussion on climate change is about reducing carbon dioxide emissions, but preparing for the effects of climate change is just as important. It is important whether you believe the scientific evidence or not as the changes in the Weather, climate change or not, are definitely with us.
- 3.3 The Intergovernmental Panel on Climate Change (IPCC) Special Report of November 2011, Managing the Risks of Extreme Events and Disasters to Advance Climate Change Adaptation (see <http://ipcc-g2.gov/SREX>), explains the impact that effective land use planning for adaptation can have in preparing economies and societies for the effects of climate change. The UK’s Adaptation Sub-Committee also identifies the importance of the land use planning system in adaptation.
- 3.4 Local planning authorities, like BDC and the other members of the GNDP, should consider the likely impacts of climate change and, using the available evidence, positively and

proactively plan for these impacts when considering new development as they propose in the Joint Core Strategy (JCS) and develop adaptation options for existing areas like the North East Growth Triangle (NEGT).

### 3.5 Overview of climate impacts and risks for the East of England

3.4.1 Risk involves a vulnerable element (a person, place or thing) being in contact with (or exposed to) a particular hazard (a climate-related event) to such an extent that harm or damage will occur.

3.4.2 Much of the East of England is low-lying and at risk of flooding, especially after heavy rainfall in winter as evidenced by any local residents of the NEGТ as they drive around after a downpour! We need to understand what these risks are locally and anticipate the impacts through the local planning process. Climate impacts at the countywide and local levels have been identified most commonly through Local Climate Impact Profiles (LCLIPs). For example, the Hertfordshire LCLIP identifies possible impacts, specifically flooding, on local areas in terms of the following risks:

3.4.2.1 Health: Increased road accidents and associated injuries; and injuries to individuals.

3.4.2.2 Social: Displacement of residents, including the elderly from care homes; disruption to access; and school closures and subsequent disruption to education.

3.4.2.3 Economic: Disruption to business; damage to rail infrastructure, community properties and homes; strain on council resources; and extra demand on emergency services resources.

3.4.2.4 Environmental: Flooding of parkland and fields; raw sewage leakages; and detrimental impacts on water quality.

3.4.3 We would contend that a LCLIP for the JCS would find the following:

3.4.3.1 Health: Major increases in road accidents as locals use the 11 roundabouts on the NDR through the NEGТ area. Individuals suffer more injuries as they try and cross the NDR or cycle on the inadequate or missing cycle lanes.

3.4.3.2 Social: Local residents displaced from their place of birth and forced to move to a new town that has no facilities despite the promises of the developers. Local village schools at Salhouse and Rackheath closed as pupils forced to travel to a large new foundation primary school in the middle of nowhere.

3.4.3.2 Economic: Local SME businesses close as large multinational businesses (Tesco, Weatherspoons etc) move in to the NEGТ area. The Bittern Line cannot cope with the additional passengers causing severe rail disruption. BDC resources cannot cope with the additional requirement for traditional council provided services and the already under strain East of England Ambulance service continues to fail to meet its 19 minute target for responding to 999 calls.

3.4.3.3 Environmental: Parks and common leisure ground floods, as surface rainwater is unable to drain naturally. Raw sewage floods back into residential properties as Anglian Water have not found the innovative solution to water stress as promised

3.5 Much store has been given to the Eco Town concept in terms of building homes that are carbon neutral. However at a recent Rackheath Parish Council meeting had amongst the attendees a BDC housing officer as well as a manager from a local housing association Wherry Housing. They were there to answer concerns from parish councillors and residents of Trinity Close Rackheath, the 12 sustainable, code grade 6 houses into which BDC poured

£500,000 to upgrade to code 6 and used as it's 'flag-ship' for the future of housing for the 'exemplar and the eco-town!

- 3.6 The residents are not happy, what has transpired is that the utility bills, especially the electric/ heating bills are far more expensive than the residents paid when in their old houses.  
Why? It's simple, as Wherry had accepted the 'grant' from Broadland, they were not permitted to receive any monies whatsoever from the 'feed-in' tariffs from any of the solar panels (bearing in mind, if you have solar panels installed off your own back, you receive the feed-in tariff, anything up to £700 per year to either negate your electricity bill or pay a great percentage towards your usage, this, depending on the weather etc).
- 3.7 As you may be aware, the solar panels only generate during the sunny periods (normally during the day when people are at work and not needing to use their electricity) and they then have to pay through the nose to heat their water / houses with the ground source heat pumps. It also transpires that the ground source heat pumps are very, very expensive to run.
- 3.8 So what about the residents? The Wherry manager then told the parish council that the idea of affordable housing built to grade 6 was never about cheaper bills, it was to reduce carbon! So what about the residents? The Wherry manager said it was a learning experience!
- 3.9 Needless to say, many residents are furious and some are even asking for a transfer as the bills are too high! Is this affordable housing or a 'carbon con'? We all need to reduce our carbon footprint but as local resident's stated, local people 'flocked' to apply to live there in the belief that their bills would all be lower. They also said that the laymen in the street ALL believed this myth too...this needs exposing as it is a 'white elephant' that was allowed to be built 'outside' of the Rackheath planning settlement limit by Broadland District Council using taxpayers money. Wherry Housing are now planning to build another 14 (grade 4 only this time) houses also on land outside of the settlement limit and backing onto the existing 12 houses (with the possibility of removing half of their existing garden to boot!).... we could see an 'exodus' of residents from the grade 6 expensive properties wanting to move across the garden to the cheaper to run grade 4 cheaper to run homes!
- 3.10 As we have heard from the Green Party this development depends on the construction of the Postwick Hub and the NDR. The construction of these new roads are needed to justify and access the proposed NEGТ area and they will undoubtedly lead to an increase in carbon footprint as potential residents will have no option but to use their cars to drive to work as there is no evidence of large scale employment in the NEGТ despite the empty rhetoric of the authorities that the JCS is about creating employment as well as new houses.
- 3.11 Indeed UK Government has already been criticised over poor air quality as it fails in its duty to protect UK citizens from the harmful effects of air pollution. ClientEarth cites the East of England region in a legal challenge which shows that the UK government will suffer from illegal levels of nitrogen dioxide until as late as 2025. The proposed development in the NEGТ will make the air quality even worse for existing and new residents leaving local authorities open to a legal challenge as they continually breach the EU Air Quality Directive.

#### **4. THE PRECAUTIONARY PRINCIPLE**

- 4.1 SNUB contends that there's no such thing as sustainable growth for our species, let alone for its material artifacts and there is no case at all for the GNDP's fatuous assumption that material growth in the NEGТ area may be accepted as a self-evident panacea for every economic problem. In the spirit and requirements of the European Directive any such economic considerations must not be part of the environmental risk management decision-making at all. Whether one is assessing the impact of the area's material growth on food, or land, or water, or biodiversity, or mitigating climate change or whatever other criteria of environmental sustainability, the Precautionary Principle requires the economics to be a separate and transparent political process, subsequent to all the environmental considerations.
- 4.2 The precautionary principle or precautionary approach states if an action or policy has a suspected risk of causing harm to the public or to the environment, in the absence of scientific consensus that the action or policy is harmful, the burden of proof that it is *not* harmful falls on those taking an act. We are of the view that the increase in air pollution with these proposals is harmful and the authorities have not provided the necessary proof that it will not be harmful.
- 4.3 This principle allows policy makers to make discretionary decisions in situations where there is the possibility of harm from taking a particular course or making a certain decision when extensive scientific knowledge on the matter is lacking. The principle implies that there is a social responsibility to protect the public from exposure to harm, when scientific investigation has found a plausible risk. These protections can be relaxed only if further scientific findings emerge that provide sound evidence that no harm will result. In some legal systems, as in the law of the European Union, the application of the precautionary principle has been made a statutory requirement.<sup>2</sup>

#### **5. WATER STRESS**

- 5.1 SNUB and many other community groups, including local Parish and Town councils have been questioning the stress that these plans for the NEGТ development would have on the local water supply and waste management as well as the risk of flooding as water run-off from natural soakaways has been concreted over. We have continually been "fobbed off" by some assumption that yet to be discovered innovation will solve the problem.
- 5.2 Well it seems that this is not the case as Bosses at Anglian Water<sup>3</sup> have warned that without immediate investment, Norwich and the Broads, Hunstanton and Fenland will face water shortages between 2015 and 2040. They say Greater Norwich and The Broads are expected to be in water deficit - where demand outstrips demand - of around 10 million litres per day within the next two and a half decades. Experts say the Fenland area is expected to be in a deficit of 1 million litres per day by 2040.
- 5.3 Water company chiefs are proposing that more than £32m should be spent in Norfolk and the Fens between 2015 and 2020 to keep up with the increased demand for water, with even more investment needed in the longer term. Population growth, climate change and

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2 Recuerda, Miguel A. (2006). "Risk and Reason in the European Union Law". *European Food and Feed Law Review*

3[http://www.edp24.co.uk/news/politics/warning\\_millions\\_must\\_be\\_spent\\_to\\_stave\\_off\\_norfolk\\_water\\_shortages\\_1\\_2266484](http://www.edp24.co.uk/news/politics/warning_millions_must_be_spent_to_stave_off_norfolk_water_shortages_1_2266484)

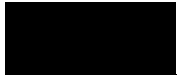
the need to protect waterways such as the River Wensum and the Norfolk Broads, is all placing a strain on resources in one of the country's driest areas, water bosses say. See report at

- 5.4 This investment requirement places another economic strain on the NEGТ development plans as we do not believe that any financial modelling has included this level of investment.

## **6. CONCLUSION**

- 6.1 SNUB does not believe that the financial viability of the NEGТ has been proven beyond reasonable doubt after several attempts by the professionals to prove otherwise.
- 6.2 SNUB does not believe that the impact of an increased carbon footprint has been fully understood and these NEGТ developments will have a detrimental impact on the carbon footprint for the area directly contravening statutory targets to reduce the carbon footprint as defined in the Climate Change Act of 2008.
- 6.3 SNUB does not believe that the remitted elements of the JCS are legally sound as they contravene EU legislation on Air Quality and on the Precautionary Principle.

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