



Campaign to Protect
Rural England
NORFOLK

6826/IC2/3

Claypit Hall
Foxearth
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20th January 2010

Dear Mr Foster

CPRE Norfolk Response to the Changes Advertised

CPRE Norfolk welcomed involvement in the Examination-in-Public of the Joint Core Strategy for Greater Norwich in November/December and welcomes the chance to make further comment.

We ask that all of our previous objections/comments to Joint Core Strategy consultations and as part of the Examination-in-Public process be taken into account in your final thinking. While we welcome some of the changes that have been made to the document during the process, we still find the overall document 'unsound'. In our view, the GNDP have not overcome the basic incompatibility between their stated wish to protect and enhance the unique rural character of the area, and their aspiration to encourage growth on such a large scale.

Nevertheless, taking the points in turn, we would like to make the following specific comments to the advertised changes.

IC1. Flexibility/resilience of the JCS

CPRE considers that the changes proposed by the GNDP in RF117 do not provide the required level of flexibility in the event of the NDR not being built. We set out an alternative statement in RF102 which indicates the changes required for Policy 10 and the supporting reasons for this proposal. This statement provides flexibility and

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resilience by having a common 'first base' for both plan A and a plan B (with no NDR) until such time as a firm decision is made on the NDR.

Policy 20 para 63 (new paragraph) discusses the uncertainty around the timing of delivery of the NDR. We would note again that timing is not the only problem and that there remains no guarantee that the road will be able to be delivered at all. While it remains easy to frame funding uncertainty in terms of timing or time delays, this is misleading somewhat.

RF117 concludes: *"If there is no possibility of the timely construction of the NDR, a complete review of the JCS would be triggered."* We would agree with this, but given the economic situation and the difficulties in making forward housing projections, we suggest an addition to this sentence: *"...assuming already not triggered by other issues identified by the monitoring process."*

As such, the monitoring process needs to examine the average annual housing completion by district against past performance and current targets, as indicated in RF99, an approach which to date is not used by the GNDP. Within this, as set out in RF99 (matter 2), the process also needs to show the level of affordable housing as both an amount and percentage of total housing provision, again by individual district, not just total NPA or Greater Norwich area.

Finally, although this change was agreed at the hearings, we would like to note the commitment to submit the growth triangle proposals to an Area Action Plan. We welcome this in Policy wording (Policy 10).

IC2/3. Energy and Water:

IC2: In principle, we support the additional wording as a move in the right direction. Nevertheless, we note that the Policy does not support the Government's commitment to a 50% reduction in CO2 emissions by 2050, against which the emissions from this new housing will eventually be measured. We also note that any carbon reductions from renewable energy sources in new housing, would be negated by the building of the new roads and bypasses that the Strategy proposes.

IC3:

Para 5.13: Support; although without a financial mechanism, such as a tariff which deters higher levels of water consumption (increased cost of units), the 8% reduction for existing households may remain aspirational.

Para 5.14: Support. The linkage between the cost of implementation of higher energy codes and the viability of affordable housing delivery is a key factor.

Para 5.15: Support.

IC4. Monitoring Framework

Support; in particular the targets for codes for water conservation.

IC5. Glossary

Support.

IC6. Affordable Housing

FC1: We welcome the addition of the sentence, "*If necessary the requirements of this policy will be formally reviewed*".

Policies FC2 and FC3: CPRE support the changes affecting FC2 and FC3 as clarifying and better defining the policies. However, we would also like to see the addition of a paragraph 5.30: "*The track record for delivering affordable housing as a proportion of total housing provision will be monitored in each district on an annual basis and registered against targets.*" (see also our comment on IC1, and in relation to Policy 20).

IC7: Green Infrastructure Diagrams

Support. These separate diagrams will clarify information in the JCS.

We would also like to make specific welcome of the Minor Change MC114 which protects Service Villages from becoming a Key Service Centre. We welcomed your support of this change at the hearing and welcome its commitment to policy.

Yours sincerely

A handwritten signature in black ink that reads "James Frost". The signature is written in a cursive, slightly stylized font.

James Frost
Director