

Louise St John Howe
Programme Officer
Claypit Hall
Foxearth
Sudbury CO10 7JD

8060/IC1

30 January 2011

**Comments by Peter Lanyon, Resident of Little Plumstead,
on Possible Changes to the Joint Core Strategy**

IC1

The term “flexibility/resilience” in this proposed change does not amount to anything approaching a Plan B. All it comprises is a hedging of bets, intended to leave the planning authorities with room in which to move without proper accountability to the public, whose money they will continue to spend on the NDR and other developments, which have not been exposed fully to public consultation.

For any draft strategy to rely upon the possibility of a “complete review” of itself after a period of time, without any alternative under discussion, is an oxymoron. What the public is entitled to expect from the draft Strategy is an honest set of alternatives on which it may give its opinions. Because the NDR is such a costly and counter-intuitive adventure, in a time of austerity and of attempts to reduce carbon emissions, we need to settle it here and now. There has been long enough for the GNDP to justify its reliance upon an NDR, and it has failed to do so, so it ought now to present a full alternative housing programme independent of the NDR.

The public consultations on the NDR in 2003 and 2004 were based by the predecessors of the GNDP upon arguments that the road would solve all sorts of traffic problems. Those claims have since been shown to be false, even by the local authorities’ own figures. Instead the GNDP now claims that the purpose of the NDR has always been to provide infrastructure for massive housing development in rural areas. This would have been very unpopular had it been declared in 2003/04; perhaps that is why it was not emphasised then. A similar lack of sincerity may lie behind the GNDP’s desire now to postpone decisions on the NDR for another five years, by which time – unless some decent public transport has been developed in the meantime – a desperate public may be more sympathetic to an NDR.

All this must breach any sensible planning rules and certainly it is contrary to the Aarhus Convention.

IC3

The proposed replacement paragraphs substantially debunk all claims that have been made up till now that the housing developments around Rackheath will be of an “ecotown” nature. All that is now promised is dependent upon DPDs and SPDs. Yet this total turn-around from all the previous publicity is nowhere declared. Again, this lacks sincerity.

There is also now even more worrying vagueness than there was before about the provision of water for the scale of development envisaged in the JCS. All Anglian Water would indicate at the EiP was that they could provide the water but that “it will cost you”. No account is shown to have been taken of this; yet – to judge by the increase already in the cost of water on my modest allotment (without the sort of major engineering that AW may have to undertake to provide for the JCS’s plans) – it could very well substantially alter calculations about things like the affordability of the housing to be built after 2016, when the going for water is expected to start getting tough.

IC7

SC2 and SC4, the map on page 69 and the proposed new maps RF25a and RF25b all still give no indication (other than an unconvincing greenwash) of how it is intended that the enormous increase in population, pollution and motor car use will be prevented from adversely affecting both the biodiversity and the aesthetic values of the area. The impact of the run-off from both the built environment and the new roads, including the NDR, is nowhere considered.

About the grand-sounding “ecological networks” that it is proposed to create, paragraph 5.7 still contains the statement that it will “take several decades to complete”. Since there is no delay at all proposed about all the development envisaged in the JCS and the inevitable damage it will do, this statement is a fatuous aspiration of no sincerity. The *oikos* will long ago have been decimated. To take one example, although the so-called ecotown impinges immediately on the Broads, there is no indication anywhere of how the one will be protected from the other.

There is no consideration of the knotty problem of where anthropogenic landscape alteration ceases to be welcomed and becomes a problem. Is the wildlife on the turf diggings that became the Broads “good”, the litter from motorists “bad”? One would suppose so; yet the JCS warmly encourages motorists with an NDR to get them to the Broads and therefore their inevitable litter too, and doesn’t directly encourage the wildlife at all. The new paragraph to be inserted after 5.8 says that a second and even grander “green infrastructure network (see map)” is supposed to “inform” more detailed policies elsewhere. That indicates that at present those policies are even less informed than the new map, which is crude in the extreme, so any detail in those elsewhere policies must be inadequate. Nowhere else in the JCS is there anything to provide the public with any confidence that the biodiversity is seriously being considered anywhere. Yet how many of the public have been guided or encouraged to penetrate the superficiality of all this verbiage in order to find out what is really planned to happen to the environment of which they are a part?

Conclusion

The JCS, the EiP and the public participation that is supposed to be involved in them have all become overwhelmed in unintelligible complexity. The JCS lack soundness, sincerity and a necessary Plan B. There is enough housing planned at present to be going on with while the JCS is scrapped and rethought, without an NDR and with the public seriously involved from the start. This ought to happen.

Peter Lanyon

3 Spencer Close
Little Plumstead
Norfolk NR13 5JE
Phone: 01603
Email: p.lanyon