

8589/IC1 and IC6

**STOP
NORWICH
URBANISATION**
the voice of the local community



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Inspector Roy Foster
C/o Programme Officer
Claypit Hall
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Dear Inspector Foster,

Joint Core Strategy for Broadland, Norwich and South Norfolk – Inspector’s Possible Changes: Flexibility and Resilience of the JCS in relation to the Norwich Northern Distributor Road (NNDR) – issued 5 January 2011

This letter covers our response to the changes, which we received in January.

The Joint Core Strategy continues to be subject to change by the GNPD and we are concerned that it may already have become invalid even before approval.

We continue to be excluded from the meetings of the Greater Norwich Development Partnership despite having made representations about it. A note on this matter is included in our submission.

You may also be interested to know that at long last BDC have published the results of their consultation held last year (August thro to October) on their plans for the Exemplar project to build 200 houses on the edge of the proposed Eco town site. An overwhelming majority of local residents (87.6%) expressed their opposition to these plans thus confirming our own polls that the overwhelming majority of local residents do not wish to see large scale development as proposed by the JCS.

Yours sincerely

**Stephen Heard¹
Chair
Stop Norwich Urbanisation**



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¹ Shortlisted as national finalist for the SMK Campaigner Awards 2010 in the Local Campaigner category www.smk.org.uk

**Town and Country Planning (Local Development)
(England) Regulations 2004 as amended
Planning and Compulsory Purchase Act (2004)**

PUBLIC EXAMINATION

**Joint Core Strategy for Broadland, Norwich and South Norfolk – Inspector’s
Possible Changes: Flexibility and Resilience of the JCS in relation to the
Norwich Northern Distributor Road (NDR) – issued 5 January 2011**

SUBMISSION BY

The Local Community Group

STOP NORWICH URBANISATION

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POLICY 10

1. The Resilience of the JCS in relation to the Northern Distributor Road

1.1 'Delivery in its entirety'

This amendment suggests that some part of the housing delivery can be provided without the Norwich Northern Distributor Road. This has never been the position of the GNDP and even at the latest meeting with the Planning Inspectors on the 9th December, the GNDP were adamant that the NNDR would be built and that it was unnecessary for there to be a Plan B. Their counter proposal was to suggest a re-scheduling of the road scheme to 2015/6.

Since that time a number of statements have been made by GNDP Principals of which the latest includes a reference to this project continuing to receive County Council funding.

1.2 The public policy has always been NO INFRASTRUCTURE – NO DEVELOPMENT, and, as described in the Key Dependencies on page 67 the NNDR is a fundamental requirement to full implementation of the JCS.

1.3 This was never fully addressed at the hearing but on the extra day developers expressed a view that some housing might be possible without the construction of the NNDR. This seemed to bring forward a concession that that as many as half the number of dwellings in the Growth Triangle (c 3000-4000) could be built without this Dual Carriageway road. That is in itself quite a leap but as can be seen other changes are planned (see new Para 7.12) which suggest that this is also the minimum to be anticipated. This is linked to and referenced in the section dealing with Housing Delivery .

1.4 There is no evidence to show that the transport demands arising of such a suggestion could be accommodated on the present road network We are not aware that any work has been carried out. 3400 houses will give rise to a significant increase in the number of private cars and 5,000 additional vehicles is not an unlikely minimum in this area. We have already drawn attention to the problems which occur at Wroxham even without further housing and this proposal will merely exacerbate the situation.

It is not logical therefore to turn an assumption into a conclusion that this would be reasonable. Our contention would be that it is not evidence based and cannot be described as sound.

Some developers challenged the need for the NNDR and pointed to the incremental improvements in the local plan as evidence that it was achievable. The issue is not that individual projects could not be accommodated but that the sum is too great to be assimilated.

1.4 The addition of this statement to the policy merely makes it less clear and raises further questions about the delivery of such a concentration of development in the Growth Triangle. The more this is

exposed to scrutiny the more obvious become the shortcomings of the strategy.

Para 6.14 states that a major urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth Triangle will provide a concentration of growth which can support local services, facilities and infrastructure. We believe that this statement has been shown to be untrue, and the growth is not sustainable.

2.1 The Postwick Hub

The proposal to rebuild the junction on the A47 at Postwick had been put forward by the GNDP in order to avoid congestion on the junction. At the same time it would create a suitable starting point for the NNDR. The way in which it was designed makes obvious that the junction was always to be the link between the Highways Agency controlled A47 and the locally funded NNDR.

In spite of this it was promoted as access to the Broadland Business Park. This allowed the Planning consent to be given by the District Council. Even a superficial examination shows that the junction makes access to the Business park and the eastern suburbs tortuous and inconvenient as confirmed by the major landowner and investor in Broadland Business Park (Lothbury Trust) at a meeting with SNUB on 26th January and expressed in local media coverage. We believe that this could only have been planned in this way for the through traffic on the NNDR.

2.2 These are not appropriate improvements to allow for development in Old Catton, Sprowston and Thorpe St Andrew' nor is there any benefit from separating the junction from the dual carriageway . The only reason for the design is to accommodate the additional traffic being generated by the NNDR. The two are indivisible and Policy 10 acknowledged that.

3.1 Area Action Plan

The GNDP sought to change the Planning Process for this area as part of the Focussed Changes on which they consulted in the summer of 2010. Their plan was to cover it with a Supplementary Planning Document under which the control of development and subsequent alterations remained firmly in their control. To do that for such an extensive area and for a period of in excess of 15 years seemed quite extraordinary as local influence would be effectively removed. The response to that consultation was overwhelmingly opposed to giving the Council such powers.

3.2 The introduction of the Localism Bill and the change of the text in Policy 10 has the impact of returning control entirely to the District Council, if this JCS is found to be sound. The subsequent DPD can only be influenced by local communities through the introduction of Neighbourhood schemes which then become incremental to the LDF. These will only go ahead if the District Council agrees. (Appendix 1)

There is no opportunity for communities to be further consulted or to reduce the scale of the development once the LDF is approved. To use the blanket expression SINGLE COORDINATED APPROACH appears only to apply the Broadland District Council Area and suggests that the Council has power to dictate the nature of the developments. This might be appropriate for some aspects of the overall strategy but the implication that Council Planners will have greater powers than they currently enjoy in the present system would be undesirable. The experience of the way in which development has been managed in the past supports this view.

3.3 If the scale of development within this Strategy is approved the whole of the Greater Norwich Planning Area will be subjected to an unprecedented and unwarranted forced expansion, largely driven by providing housing for people displaced from elsewhere.

POLICY 20

1. Implementation

1.1 Policy 20 is supported by the statement that “Studies indicate that the cost of the infrastructure will exceed all expected income”(p93). The solution being proposed by the GNDP is to rely heavily on “innovative funding” including the raising of Council Tax. The use of CIL legislation seems to be favoured, where the Council itself sets the level and the ultimate contributors are the local community. There has been no discussion on the level at which this would be set except for the valuations used by Drivas Jones. The claim that this will not jeopardise the viability of development cannot be justified. How can it be if the plan is to have a standard rate across the GNDP?

1.2 This was written when the viability of all development was on a much sounder basis. This statement suggests that the GNDP has not understood the nature of the national financial situation or the changes which have occurred since this document was prepared. If it is not viable, it is not sound.

2.1 Timely delivery

The implication in the JCS is that the development will not outstrip the provision of infrastructure and of employment. Yet the changes proposed in these amendments do permit exactly that.

What is the meaning of the word timely in this context. Does it apply to the whole of the GNDP or are we seeing the creation of an increasingly separate set of criteria for Broadland District Council. Why is the commonality of approach breaking down when a more practical eye is given to some of these concepts? Almost all the changes which have been addressed in the past six months have been as a result of trying to resolve issues arising over the Growth Triangle, whether this has been the sheer scale of the concentrated development, the shifting ground over sustainable housing, the uncertainty over infrastructure, questions over viability or the lack of transparency.

2.2 Where is the limit to what constitutes timely delivery?

Once again we note the problems which arise in the Growth Triangle. There appears to be a major contradiction between the final two paragraphs in the new Paragraph 7.12

First, the GNDP suggest that 3,400 houses can be built in advance of the NNDR but that they will investigate the potential for further growth in advance of any decision on the building of the NNDR.

They then go on to say that using the same criteria no development beyond that number would be possible without the NNDR and that would trigger a complete review of the JCS. This seems to be a delaying mechanism, which assumes the JCS, will be approved and that development can proceed without any need to justify the basic precepts.

2.3 We would suggest that we have already reached the point where a complete review of the JCS is necessary, especially for the Growth Triangle.

POLICY 4

1. Housing Delivery

1.1 Affordable Housing

The percentage of housing, which is to be provided on an affordable basis, has been reduced because at a level of 40% it was clearly unviable. In the majority of cases this was borne out by the representations made at the EiP. The question is now how many extra houses will need to be built in order to deliver the implied affordable housing at some lower percentage. The table below gives an indication.

	Affordable required	40%	33%
BROADLAND	4000	10000	12000
GNDP	16000	40000	48000

1.2 The table produced by Drivas Jones Deloitte now shows just how sensitive this is to the level of the market, where £250 psm will make a difference of 20%, that is between 45% and 66%, based on this revised figure of one third of housing being affordable. This is in a market which has recently reversed its growth trend. It is clear that none of this is sustainable without intervention.

1.3 The delivery of housing built to higher environmental standards will also have an adverse impact upon these figures. Figures produced by the Wherry Housing Association to the Planning committee at Broadland District Council indicated a cost increase from £12 psm to £18 psm for a small Code 6 estate but even given the specific nature of that project it is indicative there is no doubt that the introduction of higher building standards will be at risk.

1.4 Broadland District Council held a full Council meeting on 25th January at which a paper was presented which has an impact upon consideration of the Joint Core Strategy. An extract from this paper is attached as Appendix 3. There are a number of issues contained therein which we wish to draw your attention.

1.4.1 The GNDP maintain that the housing requirement set out in the East of England Plan is correct but since it was predicated on Affordable housing, the housing figures are wrong. (p6)

1.4.2 The GNDP continue to insist that 37,500 dwellings are required. However it is noted that individual district figures can be varied by mutual consent. It is known that South Norfolk have objected to the extent of development in their district. This allows for that to be displaced to Broadland or Norwich. (p6)

1.4.2 Notwithstanding these points the Council intend to undertake an early review of housing need and the Joint Core Strategy. This will change the tenets of the JCS and it will invalidate the version examined at the EiP. (p7)

1.4.3 The Council will improve the viability of housing developments by increasing the housing density. The propose dispensing with the maximum number of houses per hectare in the fringe parishes and increase the number of houses overall to meet the additional demand from developers, which is occasioned by the this viability issue. (p8)

1.5 The present policy in relation to Affordable Housing includes incentives like the New Homes Bonus. However, this is payable over six years and would not be available to fund

OTHER ISSUES

1. Public Access to GNDP Policy Group Meetings

1.1 At the EiP members of the Public raised objections to the secretive way in which the GNDP conducted its meetings. A request was made to for members of the public to attend the meeting on the 18th December 2010. This was refused. It was argued that they could not agree without a discussion on the subject in the meeting and it was therefore inappropriate for the public to attend.

The minutes from the meeting record the debate as follows:-

Members considered whether future GNDP Policy meetings should be held in public but also noted that the work of this body was nearing completion. The March 2011 meeting would probably be the final meeting of the GNDP Policy Group in its current format. It was however acknowledged that if a subsequent group is set up to manage the next phase of development for Greater Norwich it should establish a mechanism to allow public access to meetings.

The members accordingly, **AGREED:**

1. That the next GNDP Policy Group meeting would not be a public meeting.
2. The next phase of development for Greater Norwich would commit to open decision-making and the necessary mechanisms would be put in place at the outset to allow public access to its meetings.

1.2 The extract of the minutes for this meeting are brief and lack any detail which would indicate the nature of the debate on any of the items on the agenda.

1.3 Having been in dialogue with the GNDP you might consider whether given the terms of reference and the constitution, this body has discharged its duties in an open and democratic way and served the residents in the GNDP area in a manner appropriate for a public body.

2. Localism Bill

2.1 The Localism Bill will allow the GNDP to set the LDF and only after that will neighbourhoods or local communities be allowed to propose increments. This places all the power in the hands of the Councils and when they use that power by delegating it to a small cadre within the Cabinet all democratic input is lost. This is the situation in Broadland.

2.2 The PPS presentation given to Parish Councils is included at Appendix 1

3. The Exemplar Development

3.1 The exemplar development of 200 houses at Rackheath is not to be built to a standard which would warrant that description. All but 20 of the houses will be built to BREEAM code level 4, a level which does meet the spatial vision of zero carbon and which in Policy 3 is described as the standard to be reached by all new housing development on the adoption of the plan (see p36). Instead they are only prepared to commit to a so-called Rackheath Code. It is anticipated that this will require external means of achieving compliance.

3.2 The District Council's Place Shaping Committee have considered the draft which is at Appendix 2 and which formed the basis for the consultation.

3.3 In spite of undertakings that development would take place on brownfield land this site is on Grade 2 and 3 agricultural land.

3.4 It is on land which is outside the Development Boundary and is stated to be a stand alone project. Yet money allocated for the eco town will be used for its construction.

3.5 The Council consulted on these proposals in August last year, a consultation which closed at the end of October. These responses will help inform the content of the exemplar as it is taken forward by the design team. This is not the same as the foreword to the brochure which states that residents can influence how plans are drawn up.

3.6 The Inspectors will recollect that residents raised the issue at the hearing that no results of this consultation had so far been produced. The report has been published today (2 February 2011) in which the Council report to Committee states....

"It is evident that the majority of local residents who responded to the consultation exercise are opposed to the exemplar project and to any future eco-community at Rackheath. However, it is also clear that only a small number of residents in Rackheath and surrounding villages completed the form and so it is difficult to assess to what degree the views expressed are representative of the community as a whole. In fact it can be argued that the lack of response to the consultation exercise demonstrates a degree of local ambivalence to the proposed exemplar project."

Given the final sentence in this extract you are asked to consider under what circumstances this Council might be prepared to consider the views of the residents.

This is an issue which was raised by our organisation in response to the original soundness consultation in December 2009 where we challenged the fact that on an exceedingly small sample of residents, views had been taken as justification for proceeding with the Joint Core Strategy. In that case, of course, there was also the fact that no mandate emerged for their subsequent actions.

3.7 There were some 185 respondents to this consultation, roughly half the number who contributed to the Rule 30 Consultation on the full JCS.

3.8 The density was reported to be at an average level of 40 houses per hectare but in a paper written for the Council after the EiP finished they are intending to abolish the housing density limits for fringe parishes such as Rackheath. (See Appendix 3). From the work done by TCPA, it has been shown that densities of less than 50 /hectare are generally unsuited to SHP supply.

3.9 The Council intend to impose conditions of residence which include disincentive to car ownership, parking restriction, car pooling and penalties for those who do not meet their criteria for energy usage.

3.10 There is an existing demand for allotments in Rackheath and this is incorporated in the exemplar; yet the council have just abandoned an allotment site on Green Lane West and are using it for housing.

Appendices

Appendix 1

**Presentation to Parish Councils on the
Neighbourhood Vanguard Scheme**

Appendix 2

Exemplar Project Brief

Appendix 3

Paper on Planning prepared for Council meeting