

## **GNDP EXPLORATORY MEETING: NOTES BY THE INSPECTORS** **COMMENTS BY CPRE NORFOLK.**

CPRE Norfolk has engaged with all steps at region and local level in the development of the JCS for the GNDP. We wish to make some comment on the notes provided by the Inspectors for the Exploratory Meeting. We conclude that the Examination-in-Public should be delayed and the GNDP asked to 'think again' on a number of issues and provide policies which are internally consistent, and underpinned with a solid evidence and viability base. In doing this it will be important to take account of current and future economic reality and not continue with the assumptions and expectations of summer 2007.

We take the Inspectors' topics in turn.

### **1. Infrastructure**

Appendix 7 of the GNDP proposed Submission Document is an extremely long and expensive wish-list, described as an '*initial high level overview of the infrastructure required to deliver the strategy. All figures are indicative and are likely to vary in the light of future economic, market and policy changes*'.

There can be no confidence or credibility in what will be delivered, where it will be delivered, when it will be delivered and how it will be delivered.

In the same month that the submission document went to public consultation, the County Council as 4(4) Authority, was responding to the East of England Plan Review on scenarios for housing and economic growth (Cabinet, 9<sup>th</sup> November 2009, item No 17). The summary paper highlights issues on housing delivery, Growth Point Infrastructure Funding capacity, Transport Infrastructure and Education. In addition, flood risk, power supply, environment and jobs. Although the CS is planned to 2026 rather than 2031, the same considerations must apply.

The Council response to Q1 (see appendix 2) elaborates on some of these issues. The appendix 3 summarises the Infrastructure investment required for growth to 2031.

Although the latter covers the whole county, the larger part resides in the GNDP. Further there are competing strands. Council tax money on second homes in North Norfolk is now being diverted to the Norwich infrastructure fund, from a District which is desperately hard pressed on the provision of affordable housing (in the North sub-area of the region, the delivery of affordable housing as a proportion of all housing for the period 2001-2008 was 7%, with a peak of 12% in 2007-08).

### **2. Affordable Housing**

We dealt with housing and affordable housing in some detail in responding to Policy 4 of the draft submission. We again emphasis that the housing trajectory given in Appendix 6 requires justification on how the annual estimates for the period to 2025/26 are derived; and how these relate to the delivery of infrastructure and additional jobs delivery. In short, justification for a document which proclaims 'jobs, homes and prosperity for local people'.

For ‘local people’, the delivery of affordable homes is a crucial issue. The present system has failed in times of economic boom, and clearly is dependent on a sustained (but not sustainable) increase in land and house values, and if pursued as the main source of provision will fail more comprehensively in the future. There is no evidence to support the adoption of a 35% target for affordable housing. Developers can not be expected to provide affordable housing and in addition contribute to a wide range of infrastructure requirements in a ‘flat’ market. Nor is central Government in a position to cover the shortfall. This is part of a wider national issue, but it does not serve the public good or integrity to run with target figures which are simply not achievable on present policies, priorities and circumstances.

#### **4. The NDR; and (5) the distribution of development in relation to public transport opportunities**

November 2009 was a busy period. We also had a ‘Transport for Norwich Consultation’. Our 4 page response is on the CPRE Norfolk web site, but on the NDR we expressed a central concern:

*The consultation booklet refers to an interaction between the GNDP JCS, and the updating of NATS (Norwich Area Transportation Strategy). However, it appears that each is used to justify the other, and with this consultation, quote each other as the authoritative source for what they say. It is particularly obvious in relation to the status of the proposed Northern Distributor Road (NDR).*

As we also pointed out the ‘indicative’ timeline chart given on page 14 of the consultation does not convince that the road infrastructure expenditure, which precedes public transport measures, will lead to the latter. In our view (response to Q15), the costs and phasing are such, if the huge funding for roads was put in place, the public transport measures would not happen. This would not just be a matter of the additional funding to be found, but further embedding the car dependency culture.

#### **5. Selected sustainability issues**

Green infrastructure. From a CPRE perspective the core issue is not so much ‘green infrastructure’ but how much greenfield land will be lost to development, what should be left, and how will it be managed. One concern on the Rackheath eco-town concept is that 40% of the area should be left as green space, of which half is public space. This does not appear to be thought through on either use or management. What is clear however is that we shall see a blurring of town and countryside, and the loss by marginalisation of productive farmland.

While the JCS makes a number of statements to the effect that priority will be given to the use of brownfield land, housing numbers and location are such that the statement has little meaning. There appear to be no estimates for what the strategy entails on the loss of greenfield land, and what alternative options there might be.

Energy Efficiency. CPRE argue that energy efficiency practice is well enough established to apply the higher standards to all new build, and not just in an eco-town.

Water. Conservation of water resource is much less well established. If Rackheath is progressed as an eco-town, then the emphasis should be as a template for domestic consumption of water. There is rightly much emphasis on waste water treatment. However a major reduction in consumption of water is basic to meeting human needs. It is also critical to the wildlife and landscapes of the county, and the current and future productivity of agriculture. It does not appear to be given the weighting that is required in the strategy.

This is one of the cases where the objectives of the strategy contradict each other to the point of non-compatibility. The impact on land and natural resources that are inherent in the strategy conflicts with Objective 9: 'To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of habitat and nature conservation value'.

## **6. Strategic allocation of the North-East growth area**

The history of the large scale allocation of housing to the north east is that of 'trading' a large allocation of housing in the area for the provision of an NDR - first a complete west-east bypass; then a three quarter route to the A1067 because of the environmental consequences of crossing the Wensum valley in the west; and now a half route to the Airport in obtaining Programme Entry.

The more the NDR proposal looked to be in jeopardy, the more the housing level in the north east has increased over the course of the strategy development. The submission consultation was embarked upon with a question mark over programme entry unresolved until after the completion of the consultation. It was only when the consultation document was produced that the concept of the 'growth triangle', with the NDR running across it, was introduced.

This is a view from the sidelines, as the Policy Group of the GNDP has operated with no public access to meetings or minutes. This clearly leaves a gap in the audit trail, and the reasoning behind such key decisions.

In addition to the planning and delivery of the growth triangle, CPRE have concerns on not just the impact the scale and rate of the development proposed, but for the basic justification for the growth triangle in the spatial strategy. Also, whatever the justification for the development, what would be the outcome in practice? Without some clear and firm direction it may well be a development which competes heavily against Norwich city centre; or a retirement zone for those who wish to live between Chapelfield shopping centre and the Broads.

Ian Shepherd  
Policy Co-ordinator  
CPRE Norfolk  
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