**The Growth Strategy – Policy 1**

We support the continuation of the settlement hierarchy as defined in the JCS with the primary focus of planned development in the Norwich urban area.

However the plan supports a level of growth in rural areas ‘village clusters in South Norfolk’ – 9% of total housing growth over the plan period - which is very hard to reconcile with Section 4 – The delivery of growth and addressing climate change and Policy 7.1 -Strategy for the areas of growth, and will have impacts for infrastructure provision.’ This approach is inconsistent with the emphasis expressed in the document on addressing climate change and significantly reducing carbon emissions in the Vision and Objectives and Climate Change statement, undermining the ability of the plan to deliver sustainable growth.

In addition there is concern about achieving this 9% growth (1,200 homes) in a more difficult village setting where new housing may be resisted.

The inclusion in the plan to site the additional housing in the most rural parts of South Norfolk in ‘village clusters’ in the GNLP but at the same time excluding details of those village sites or evidence as to the justification of such a policy may leave the GNLP vulnerable to challenge on soundness grounds at the public examination stage.

For the reasons stated above we do not support Policy 7.4 Village Clusters in South Norfolk.

**Homes – Policy 5**

We believe that all new housing should be built to the highest environmental standards but the draft Plan does not have any detailed policy on the design of new housing, other than a brief mention in the ‘Design of development’ in the Climate Change statement.

However to ensure that new development is sustainable it needs to be sited in locations which are truly sustainable retaining the current Settlement Hierarchy. (see above comments)

With reference to the CPRE Norfolk Position Statement on the draft GNLP which we have had sight of, we are in agreement ‘that new sites allocated in the GNLP are phased and only built out when the vast majority of existing Joint Core Strategy allocations have been developed’. Since 68 Parish and Town Councils share this CPRE view, we would like to support their concerns. Particularly seeing the Parish of Cringleford’s growth to date which has a knock on effect on Eaton, the ward we represent.

Referencing again the CPRE’s submission ‘The evidence put forward to support this view shows that the increased housing targets are unnecessary, and increasing them further by allocating a 9% buffer seems absurd. What is more, windfalls, which are a proven, reliable source of new housing are not going to be counted towards the new targets: this is irrational.’

We also agree with CPRE that ‘phasing is a sensible method whereby the problem of land-banking can be tackled.

We support the Policy addressing the need for homes for all sectors of the community including a variety of homes in terms of tenure and cost. New homes should provide for a good quality of life in mixed and inclusive communities.

We agree the need to provide 33% affordable housing, except in Norwich City Centre where the requirement is at least 28% and the policy requirement for accessible and adaptable housing to provide 20% for major housing development.

**Strategic Infrastructure – Policy 4**

Overall we believe that Policy 4 – Strategic Infrastructure lacks ambition in supporting the transition to a low carbon future by achieving modal shift. Although the policy makes reference to achieving modal shift it does not fully recognise the need to integrate transport and land use policies. This relates to the need to embed rail and bus services over road building and the continued use of private cars.

This is evident in the promotion of the Village Clusters model. There would be an increased need to travel for work, education and to access services such as health provision, particularly by private car, due to lack of viable and clean public transport. Given the Climate Change Statement in the Plan, it is impossible to see how the proposed additional allocation of sites for housing in Village Clusters can be justified in areas where there is little or no public transport.

There is no mention of ‘mobility hubs’ as part of a sustainable transport network which are currently being developed through the Transforming Cities Programme.

We believe that improvements to bus services is the key to sustainable transport for the Greater Norwich Area. Key to delivering the climate change agenda and to ensuring the majority of the population have access to reliable, affordable public transport. Also key to achieving this is a plan for a ‘car free’ Norwich city centre. This would help fight multiple public health, environmental and ecological crises – air pollution, child obesity, mental and physical health, biodiversity and of course the climate crisis. Hopefully this ambitious target will be part of the review for Transport for Norwich through the Local Transport Plan.

At the time of writing we still do not know the outcome of the Transforming Cities Bid and the opportunity for Great Norwich to realise a multi-million pound investment in public transport. However if we are to reach a zero carbon target by 2030 the County Council as the Highways Authority must place emphasis on the development of bus services.

Without a comprehensive plan to promote bus travel, for growth of public transport in existing settlements and new developments there will not be investment from the bus companies in electric and hybrid fleets. This investment is needed to improve air quality and to improve the image of bus travel for modal shift to be effective.

The emphasis in Policy 4 is on continued road expansion including commitment to the Western Link Road following on from the completion of the Northern Distributer Road. We strongly object to this emphasis.

There is also a commitment to build a Cross Valley Bus Link between the UEA and the NNUH and the Research Park. Although this is essentially aimed at buses it still involves the building of a new, very expensive bridge to replace the existing one that currently carries cyclists and walkers. Intrusion into the Yare Valley at this point with motorised traffic is unwelcome and unnecessary. This quiet route, with its surrounding wildlife will be lost to another road building scheme. The current roads linking UEA to the NNUH and research Park are adequate. The few minutes of savings in bus times when there is congestion on these roads will be unnecessary once there is a shift to more commuters using Park & Ride and there being better connectivity by rail with a station at Thickthorn serving the Research park and the NNUH. We oppose the building of the Western Link and the Yare valley bus link.

This emphasis on road building contradicts the aim to ‘promote modal shift’ by seeking ‘improvements to the bus, cycling and walking networks,’ and contradicts the plan’s aim in Section 4 of mitigating climate change.

The support for growth of Norwich Airport again is another example of such contradiction. We do not support the growth of Norwich Airport.

With rapid economic growth and substantial new housing developments taking place it is vital that rail travel plays a substantial and sustainable role in transporting people to and from greater Norwich and improving connectivity to Cambridge. Improved Rail transport would help reach carbon reduction targets for Norwich as well as reducing congestion and improving air quality. Yet there is only one statement ‘promoting enhancement of rail services, including improved journey times and reliability to London and Cambridge, supporting the East-West Rail link and innovative use of the local rial network’. There is no detail as to how this will be achieved.

It is hoped that as a consequence of the consultation to the draft Norfolk Rail Prospectus there will be a greater commitment to rail services from the County Council and the LEP and the part they can play in economic and social development of Norfolk and Greater Norwich in particular.

We support the idea of a new station at Broadland Business Park and welcome further studies for a new station at Rackheath. We believe that the completion of the East West Rail link in the mid to late 20’s opens up opportunities for a new station at Thickthorn to serve the UEA, Research Park with its 12,000 jobs, and the NNUH. This would mean that passengers do not have to journey into Norwich and then out to these destinations which further congests and pollutes Norwich, especially to the South.

The new station, together with a Transport Hub would provide easy access by rapid bus, taxis, car club hire cars and cycle hire to travel the short distance to the UEA, Research Park and NNUH. Such a station would also serve the rapidly growing residential area South of Norwich.

We understand that one impediment to Norwich fully benefiting from the East West Rail Link would be the Trowse Swing Bridge which needs replacing with a two track bridge. We urge the County Council to work with Network rail to achieve this vital new infrastructure.

Conclusion

There are some policies in the draft GNLP which will not reduce emissions and support plans for transition to a post carbon economy. Namely housing distribution and transportation and these contradict the aspirations contained in Section 4 – the delivery of Growth and addressing Climate Change. We are very disappointed that the draft Plan is not more ambitious for Greater Norwich and that this is a lost opportunity to set in motion plans for a sustainable future for the area.

**Greater Norwich Local Plan – Preferred Sites**

We oppose the GNLP0133E – Land at the Grounds Depot Site, Bluebell Road for student accommodation in the region of 400 beds.

The site is seen by the public as being outside of the Campus, with a footpath dividing the developed area of the campus from the non-developed area of the Yare Valley. It is a prominent and sensitive river valley location and lying at a lower level than Bluebell Road any development such as a 5 or 6 storey student accommodation block would be very visible and intrusive in the landscape if developed towards the road end of the site as the lower end towards the river would be liable to flooding. We believe it should remain in its current use as a depot and greenhouses with its relatively minor intrusion in the landscape.

Judith Lubbock

City Councillor for Eaton on behalf of my City Council Colleagues Cllr Caroline Ackroyd and Cllr James Wright.