

16<sup>th</sup> March 2020

Dear Sirs,

GNLP Regulation 18 Consultation.

*Introduction*

Whilst appreciating the complication of preparing this Local Plan to 2038, regrettably I have concerns that the proposals rely on previous outdated and failed ideologies and methodologies, particularly those on transport and climate change.

As a long standing member of CPRE Norfolk, I endorse the detailed response to the consultation as it has submitted and add the following personal opinions.

Any in depth review of the 12 Objectives in annual monitoring reports published by GNGB would suggest that the previous policies are not working yet the proposals are essentially a continuation of the failing principles.

The ambition of the Plan to 2038 is stated as to achieve a sustainable growth agenda for Greater Norwich, the principles of which are set out in paragraphs 1 to 7 of the Consultation, in particular paragraph 3 which states that *"we must take a long-term view of our development needs to allow the housing, jobs, services and infrastructure we need to be provided at the right time and in the right places."*

However, the consultation proposes fundamental changes to the earlier principles of the JCS which was adopted in 2011, with amendments in 2014, covering the period up to 2026. In particular, the construction of the Broadland Northway (NDR) was largely intended to help the distribution of traffic to and from new housing built inside its length and in the north east growth triangle and employment at the Airport and Broadland Business Park. The current JCS has a clear focus for housing and other growth to be in and close to Norwich, with minimal new development to be permitted in the rural areas. The latest consultation proposals seem to be contradicting those envisaged in the JCS and the protection it gave to the rural areas which is now being sacrificed.

I am also concerned that the proposals contradict the Norwich Economic Strategy 2019 - 2024 by Norwich City Council from which the following extracts are of relevance;

*"However, there are a significant number of offices in the Norwich local authority area and in particular, the city centre, that are out-of-date and of poor quality – many of these are currently being converted to residential (predominantly student) housing. **Improving the quality of existing office stock would also counter less sustainable patterns of extensive office development on the urban fringe** and would ensure that the city centre commercial offer matches the exemplary public realm in the area. Much of the outdated office stock requires substantial refurbishment to bring it up to A-grade standard."*

*“The finite amount of employment land in the urban area (especially in the local authority area) needs to be protected – the mix of employment and residents has to be balanced if Norwich is to function as a modern urban centre. Recent monitoring has shown that there has been very little office development in the city centre whilst there has been an increase in general B1 office use on the urban fringe, mainly in Broadland. **In view of the large stock of unimplemented B1 office consents at Broadland Business Park it is important that the market for further office development in the city, particularly in the city centre, is not further undermined by yet further supply of unconstrained B1 office floorspace in outer areas, such as north of the airport and at Rackheath.**”*

*“Shrinking car ownership, especially in urban areas is likely to increase demand for walking and cycling routes, public transport, car clubs and sharing schemes. **This may also reduce the attractiveness of out-of-town shopping destinations, returning the emphasis to city centres and supporting Norwich’s low-carbon ambitions.**”*

The GNLP appears to be concentrate on developments in Broadland and South Norfolk both for employment and housing increasing reliance on private transport ignoring the vision for Norwich by the City Council. The consultation lacks clarity for the future of Norwich and its relationship with the rest of the county. The predominance of employment and retail at the edge of the city coupled with the policy of more rural housing suggest the county is intended as a dormitory to the economic fringes of Norwich and acceptance of the continued decline of the city centre.

The Plan ignores the concerns in the Norwich Economic Strategy of the unimplemented B1 office consents in Broadland and simply adds more employment provision to the north of Norwich.

This is a fundamental flaw in considering Greater Norwich in isolation to the rest of the county. Large numbers of the working population of Norwich live over 20 miles away from their workplace. There pool of qualified labour already exists in the larger towns and surrounding areas and it would seem logical that employment land is made available there rather than all in Norwich.

The Travel To Work Area (TTWA) for Norwich in the 2018 Norwich Economic Assessment covers an much wider area than that of Greater Norwich.



There are several large towns within the Norwich TTWA both within and outside the Greater Norwich area which are completely ignored in the consultation. What is the model and vision for these towns and the rest of the county?

Historically, the rural hinterland has been attracted to the major local towns and villages for employment and shopping. The policy of concentrating employment in Norwich and the endless rise in personal transport now attracts this population to the City to the detriment of the towns.

Any consultation solely centred on Greater Norwich will continue the decline of Norfolk's towns. I contend that the economy of the county is the most important contributory factor to the prosperity of Norwich.

I therefore contest that the GNLP proposals present a coherent plan and are sustainable.

### *Historic Background*

The layout of the City of Norwich has evolved over the centuries as the hub for commerce and socialisation of the county with access still based on the historic radial arterial roads drawing in the population from the surrounding countryside.

The past evolution of Norwich providing major employment opportunities resulted in the expansion of the residential areas on the outskirts of the city grouped around these radial routes. Until the 1960's this urban population was able to access the employment areas via walking, cycling or public transport within a relatively confined geographical area.

At the same time the outlying towns and villages were able to continue a self contained environment with local shops and other facilities.

The global, regional and local economy has changed in the last 50 years and the speed of change is accelerating. The GNLP recognises that the county's employment sectors are still predominantly based around agriculture and tourism with the city changing from the largely engineering base to science, technology, advanced manufacturing and service industries such as finance and research and development.

During this period of change the population has moved further out of the city relying on the car for accessing employment and leisure. The employment and retail locations have also migrated from the city to business and retail parks initially to the outer ring road and latterly to the edges near the southern bypass and the Northern Distributor Road and the Southern Bypass.

The distances between housing and employment/leisure are now such that without public transport the majority of the population is forced to be reliant on their cars.

The city has and continues to change as a result of this new demographic, encouraged by past Transport for Norwich actions and the policies of redirecting through traffic around the perimeter and removing cars from the centre.

## *Annual Monitoring*

I have looked at the GNGB annual monitoring since 2011.

Norwich has dropped from 9<sup>th</sup> in the national retail rankings to 13<sup>th</sup> in the last decade with a overall reduction in retail floorspace. It is acknowledged that on-line shopping is changing peoples' shopping habits but the consultation fails to recognise other factors which have contributed to this decline. The vibrant city is dying due to transport and development policies. Cities need a mix of activities which feed off each other but the Plan continues the isolation of the city by moving retail and employer to the edges.

The CO<sub>2</sub> emissions from transport per capita for all three LPAs have not decreased since 2011. This is without the impact of the NDR which will increase emissions further. The ambition for a modal shift in transport patterns is not working and I question whether this is a real intention or merely words to make the document conform to government policy.

"Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900)" has declined year on year. One must therefore ask whether the employment centres are in the right locations.

Both the general housing and affordable housing completions are shown as green on the RAG analysis. However until 2018/19 overall housing has fallen short of targets. More worrying the failure to achieve affordable housing targets resulting in a backlog need as outlined in the 2017 SMHA report. This is reviewed in more detail later.

There have been major losses in permitted employment floor space since 2011, particularly in Norwich. The minor increases in Broadland and south Norfolk fall well short of compensation. The fact that employment over the same period has increased would suggest a democratic change in work patterns of small start-ups from home which is totally ignored in the Plan.

I am unclear what the annual measurement for "Percentage of permitted town centre uses in defined centres and strategic growth locations" demonstrates but the figures suggest that this ambition is spectacularly failing.

"Objective 7: to enhance transport provision to meet the needs of existing and future populations while **reducing the need to travel**" is similarly failing.

## *Transport*

The Plan makes statements concerning public transport which are no more than a wish list repeating the broken promises which were made to the Planning Inspector for the NDR as part of and complementary to that road. It is now apparent that Norfolk County Council does not have the finance to back-up these statements and were hoping that the 2019 funding application to the Government would rectify this. Unfortunately, the 2020 budget announcement has not supported this application in full and expectations are that only 40% of this money will be made available.

Public transport is important both in Norwich and in a rural county particularly if a move away from reliance on the car is to be achieved. This should now be the primary consideration for transport rather than building more roads.

I am particularly concerned that two new road schemes have been introduced, namely the Norwich Western Link and the UEA/Hospital link. Both are across sensitive river valleys, the Yare and Wensum and promoted as essential for growth. However, apart from this statement there is no evidence that either is critical to the housing or employment proposals in the Plan. The stated unsubstantiated growth benefits do not justify the destruction of these protected areas.

### *Growth*

I am concerned at the over-simplistic principles for growth and the employment agenda arising therefrom. Growth seems to be assumed to be limited to more people employed preferably at higher income jobs.

The fallacy of this approach is that Norfolk has a historic low level of unemployment and therefore an inability of available labour to fulfil these ambitions, resulting in competition with other regions for this extra labour leading to inward migration. This in turn leads to more demand for housing and infrastructure. The housing need numbers in the consultation would be significantly less without this inward migration.

Another consequence of promoting competition with similar geographic areas both within and outside the UK is that there is often migration of labour and jobs away from the Norwich area as exemplified by Colmans and Britvic.

It is acknowledged that land should be made available for employment opportunities but unfortunately the consultation does not indicate what the drivers for the locations proposed are and the impact elsewhere.

Can growth be achieved other than by more jobs? Growth is defined as increased output and which can also be realised by extra productivity per operative.

Despite the net loss of employment floorspace in the last decade, unemployment in Greater Norwich has fallen which would indicate that other factors are having a positive impact on the economy outside the unfulfilled allocations for office space in Broadland.

The GNLP lacks an understanding of these factors and do not consider other avenues for increasing the GDP of the area such as education and investment in technology. Both would assist the economy without the damage of inward population migration, more housing and more roads.

The specific growth area is set out in the proposals as the Cambridge to Norwich corridor through the city centre and finishing at the north/east growth triangle.

The towns in this linear development will all benefit from the growth investments but the strategy makes any proposals for other major towns outside this corridor.

Past policies for employment locations were haphazard and are now being repeated. An example is the location of the Food Enterprise Park at Honingham. A FEZ for food related activities was an ideal opportunity to help create employment in the countryside closer to where the crops are grown. Instead the various authorities supported the location on the outskirts of the city necessitating both labour on products having to use the road system.

Despite a £1m grant to the landowner, the single occupant is a processing plant for what is left of Colmans. We now have mustard seed being stored in the Fens, transported to Norwich for processing and then transported to Burton-on-Trent for final production. Previously the final production was at the same site as the processing so how can these extra road miles be good for the environment?

There are road restrictions associated with the locations which are impacting the designs of the A47 improvements between Easton and North Tuddenham. The grade separated junction at Blind Lane/Taverham Road is solely to service the Food Enterprise Park. There are still unresolved problems in that other HGV's leaving Honington Thorpe Farms are prevented from using Blind Lane to access this junction and must still use Church Lane with implications for Easton.

This is another example of a poor planning decision for a vanity project.

Bluntly, I am unhappy with the extent of public money being given to a private landowner for a limited questionable economic return without any public debate.

#### *Sustainability and Climate Change*

I again support the CPRE Norfolk position that 'the GNLP must also assist the move to a post-carbon economy and protect and enhance our many environmental assets' (draft GNLP consultation p7.) It will be difficult if not impossible to meet these targets if the new housing targets and dispersal of sites proposed in the draft strategy are adopted. Dispersal of development increases the number of car journeys and journeys by delivery vehicles to new housing, along with the associated congestion on smaller rural roads.

In addition, CPRE Norfolk is concerned by the lack of any detailed policy on the design of new housing in the draft Plan document, other than a brief mention in the 'Design of development' in the Climate Change Statement. Detailed requirements to insist that new houses are built to the highest possible environmental standards beyond the Government's minimum standards are needed, if serious steps are to be taken towards addressing Climate Change issues.

Notwithstanding current Development Standards that specific percentages of energy provisions must be green, Councils are currently allowing developers to satisfy this requirement using calculations that the total energy usage is reduced by this percentage with the design of the houses. Both aspects should apply; the overall energy should be reduced and the green percentage applied to the reduced consumption.

The interdependence of all parts of everyday life has become ever more complicated. The current world coronavirus emergency highlights that greater analysis is required rather than simple unsubstantiated statements that a plan is sustainable. There are many variable factors outside the control of the plan makers that should but have not been considered.

Sustainability is ensuring future generations can enjoy a better quality of life than the current populations. It must be obvious that recent policies have derogated the countryside, village life and town centres. New plans should identify new policies to reverse this decline but the consultation again ignores this aspect.

## *Housing*

I support the position of CPRE Norfolk who has questioned the calculation for housing targets using the ONS statistics on household creation. It argues that these are out-of-date and are more recent statistics which show a slower rate of household creation. If this approach was adopted by the GNDP it would negate the need for any further need for new housing in the GNL. Despite claims to the contrary (draft GNL consultation p41), the GNDP is not using the most up-to-date evidence, as its figures are based on the 2014 ONS figures rather than those from 2016.

Not only are the increased housing targets unnecessary, 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 target which is irrational.

A problem with the consultation is that phasing is not specifically offered as an option within the documentation. We feel this is a serious omission given the fact that 69 Parish and Town Councils within the GNL area share the CPRE Norfolk view that a phased approach should be adopted. We urge the Greater Norwich Growth Board to seriously reconsider including phasing as the right approach to development.

There is no commitment in the GNL to build new housing to the highest environmental standards, but rather follows minimal Government requirements. This is highly regrettable.

## *Affordable Housing*

I have a particular grievance concerning affordable housing.

From current experience I am concerned that the proposals for 33% affordable housing targets in Broadland & South Norfolk and 28% in Norwich will be fall short in implementation worsening the shortage to meet the current need as identified in the latest 2017 SHMA report.

Currently, Viability Assessments are permitted by developers to allow reductions in affordable housing where full provision will not be viable. Hypothetical submissions are being made by landowners with the sole intention of increasing the land values for selling on to developers with reduced the affordable housing provisions.

I have referred examples to both Broadland and South Norfolk where affordable housing numbers have been reduced by landowners. As an example Broadland planning approval 20160498 reduces the affordable housing to 15% for the first phase based on a Viability Assessment submitted on behalf of the landowner. The submission was checked by the expert appointed on behalf of the Council who failed to note that the floor areas for sales were less than those for used in calculation of the construction costs. Both the expert and Broadland stand by the decision. The expert stating that the sales values use internal floor areas and construction values use external floor areas. Quite frankly this type of response destroys any confidence in the planning system and questions whether statements in the Draft Plan will have any relevance.

I do not believe Councils should be considering viability for Outline Planning applications. Developers will be carrying out financial assessments which will dictate the residual value of the land, rather than an excessive land value dictating the level of affordable housing.

More worrying is that both Broadland and South Norfolk have reduced the affordable housing targets from 33% to 28% based on an assessment by officers of the 2017 SMHA report which shows an overall need of 28% for Greater Norwich. This decision has not been taken to either Council for debate or the Development Documents amended.

The GNLP assessment of the same SMHA report concludes that 33% is still required for Broadland and South Norfolk but despite being aware of this different interpretation, there are currently at least two applications within Broadland proposing 28% affordable housing without a Viability Assessment, presumably based on prior discussions with officers.

How is it possible for officer representatives from Broadland and South Norfolk on the GNPD to be supporting two opposing interpretations of the SMHA report for affordable housing requirements?

[Note: I am happy to provide details of my correspondence with officers if required.]

Also of concern is the fact that I wrote to the Leaders of both Council on 10 January 2010. Mr Fuller has confirmed that he is happy for Mr Vincent to reply on behalf of both Councils as he is chair for the GNPD. As of today and despite a reminder, Mr Vincent has not replied apart from an initial e-mail saying that he would look in to the matter.

I note from a reply in the Greater Norwich Development Partnership Board minutes for January 2020 to Mr Milliken of Easton Parish council that the GNPD is not a decision making body and only advises and gives a steer and makes recommendations to its constituent authorities.

What confidence can the public have in either the GNPD or the GNLP if the representative members from the constituent bodies on the Board are approving policies for recommendation to their own Councils but then considering they have carte blanche to amend the details of previous recommendations after adoption without reference back to either the elected Council members or the GNPD Board.

Where is democracy in this process?

Submission dated 16 March 2020 by  
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