**GNLP Consultation on the draft Strategy**

**Consultation Questions for Section 1 – Introduction**

1. **Please comment on or highlight any inaccuracies within the introduction.**

The Foreword makes a fundamental assumption regarding economic growth and unfortunately no facility has been provided to question the assumption that the local plan should be based on continued linear economic growth. It must be recognised that continued linear economic growth is unsustainable globally but especially in a county with limited opportunities for growth without permanently damaging the environment and the wellbeing of people who currently live and work in the county.

The Local Plan should provide an opportunity for a sea-change in how we view the economy from “make, use, dispose” to a circular economy focusing on positive society-wide benefits in which waste is designed out of the system. The circular economy is underpinned by a transition to renewable energy sources. It is based on designing out waste and pollution; keeping products and materials in use; and the maintenance and regeneration of natural systems.

It is quite rightly stated that our strengths include the excellent quality of life on offer, our wonderful natural environment, and our heritage. We should plan to maintain these strengths such that any developments do not harm but enhance our quality of life and natural environment.

One of the principles of the NPPF 2019 is that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are “wholly exceptional reasons”[[1]](#footnote-1). Hence, the urgent need to review developments such as the proposed Wensum Valley western link road which would result in the loss of irreplaceable habitats.

We agree that “The GNLP must also assist the move to a post-carbon economy and protect and enhance our many environmental assets.” However, it should not simply “assist the move” but should be at the heart of the plan.

1. **Is the overall purpose of this draft plan clear?**

Reflecting on the overall purpose and stated priorities within the plan we do not feel sufficient emphasis has been put on the objectives established within the National Planning Policy Framework (NPPF). Chapter 2, paragraphs 7 & 8 of the NPPF state the “purpose of the planning system is to contribute to the achievement of sustainable development.” This means that the planning system has three overarching interdependent objectives: economic, social and environmental. We are therefore reviewing the plan against these three objectives “to secure net gains across each of the different objectives”.

**Consultation Questions for Section 2 – Greater Norwich Spatial Profile**

1. **Please comment on or highlight any inaccuracies within the spatial profile.**

There is no evidence that the population will grow in the way suggested by the graph as there is a national declining birth rate. The graph is simplistic and lacking evidence. The pie charts show an identical percentage of young people (28% 0-24) in 2018 and 2038 yet there is an astonishing observation that the trend for higher than average young populations is set to continue. This is unsubstantiated and inaccurate information.

Para 35 states there is a declining birth rate which is supported by the Office of National Statistics (ONS) latest report on births in England & Wales (1 August 2019): “The birth rate was the lowest ever recorded, when births are measured as a proportion of the total population. The total fertility rate stood at 1.70 children per woman, lower than all years except 1977 and 1999 to 2002.” It went on: “In 2018, the crude birth rate (CBR) was the lowest since records began, at 11.1 live births per 1,000 population of all ages.[[2]](#footnote-2)[[3]](#footnote-3)”

1. **Are there any topics which have not been covered that you believe should have been?**

How to achieve happiness and wellbeing of the community now and in the future? Continued growth is not the solution. Norfolk Association of Local Councils (NALC) has a “Wellbeing strategy” which shows the way forward for a healthy and happy Norfolk. NALC represents nearly 500 councils and parish meetings across Norfolk with perhaps three or four thousand councillors, clerks, other staff and volunteers – all of whom are working for the well-being of their residents. Themes addressed in the NALC strategy include many issues that are pertinent to the GNLP and could be ideally referenced in the plan including:

* Low carbon economy and towards net zero
* Trees, hedges and wild flowers
* Biodiversity and wild life
* Neighbourliness, inclusive communities & inter-generational issues
* Water, flooding and irrigation
* The built environment, Housing & Planning
* Cars, car parking. park and ride, lift-sharing and public transport
* Services e.g. doctors, dentists, etc.
* Loneliness
* Shopping
* Coming to terms with the new technologies and AI
* Employment, self-employment, small businesses

CPRE expressed strong support for the NALC Well-being initiative and have agreed to work with NALC to achieve the mutually compatible aims.

1. **Is there anything that you feel needs further explanation, clarification or reference?**

How is a need for 28% “**affordable housing**” to be met, simply developing more homes does not make them “affordable”. Affordable housing is an impossibility in the private sector because prices will only drop if the market becomes flooded and if that happens then the number of householders in negative equity will rocket with a very negative impact on social stability. Councils within the GNDP need to develop workable schemes to fund low-carbon social housing on a scale that has not yet been realised.

**The rail network** – with the Greater Anglia franchise which started in August 2019 more reliable and frequent services should be planned to encourage travel and commuting by rail. Until there is a good weekend rail service it will not be possible to use the train, rather than the car, for leisure commutes within and out of Norfolk in both directions. This one simple change could save very many unnecessary car journeys to and from East Anglia and support a culture change to encourage train use.

The plan suggests **Norwich Airport** is a catalyst for economic growth but it is growth that is incompatible with a low-carbon economy and minimising the impacts of climate change. The Environmental objective (para 8c) of the NPPF specifically states the need to “mitigate and adapt to climate change, including moving to a low carbon economy.” It further states that “opportunities can be taken to secure net gains across each of the different objectives”. The expansion of Norwich Airport is clearly not compatible with the NPPF environmental objective.

**The cycle network** - there has been a 40% increase in cycling since 2013 in the Norwich urban area. Whilst there is focus on the city in the plan there is little mention of cycling elsewhere in Greater Norwich. At a recent consultation with Highways England on the dualling of the A47 at North Burlingham it was stated that footpaths and cycle routes will be looked at once the road has been designed. This is old style thinking and is not giving walking and cycling the prominence they deserve for the good reasons of health, sustainable transport and tourism.

**Rural transport** – little is said in the plan of developing rural bus services. Given the urgent need to reduce car journeys a greater emphasis needs to be put on rural transportation which includes bus, rail and cycling. Greater emphasis and integrated planning is needed with initiatives such as Connecting Norfolk to promote the use of demand responsive transport services and car sharing.

**Digital infrastructure** is vital to support rural enterprises and home-working. The mobile phone network is notoriously poor and the Better Broadband for Norfolk programme has not been successful in reaching many houses in villages where there has been the roll out of fibre broadband to a central node in a village but not beyond. Digital infrastructure must be given a greater priority in the years to come.

**Emissions and climate change**

It is stated in para 82 that “Mitigating the effects of climate change within the Greater Norwich area is a cornerstone of the GNLP”. In which case much more needs to be done in curbing carbon emissions through a radical review of the transport policy as explained above, and the building of energy efficient homes. The expansion of Norwich Airport and the road network is not compatible with “mitigating the effects of climate change”. This has a knock on effect on air pollution which it is accepted remains an important issue with more work to be done. To reinforce the need to review transport options it is also stated in para 84: they (CO2 emissions) are above the national average in rural parts of the area, partly due to a greater reliance on car journeys.

**Renewable energy**

92. Our plan should support further development of decentralised, renewable and low carbon sources of energy.

Greater emphasis needs to be placed on community energy schemes. Councils should consider smart grids, greater efficiency in housing (including retrofit insulation), greater on-site renewable energy production and energy balancing and storage. See later under Policy 2 regarding Part L of the 2013 Building Regulations.

**Consultation Questions for Section 3 – The Vision and Objectives for Greater Norwich**

1. **Do you support or object to the vision and objectives for Greater Norwich?**

Comment. Para 120: in practice increased housing and population is leading to inner city wilderness NOT “lively and vibrant city and district centres” Norwich and Norfolk have lively and vibrant city & district centres now so please do not seek to “fix what is not broken!”

1. **Are there any factors which have not been covered that you believe should have been?**

Para 123: does not reference local rail transport links. need to improve local rail services on the Bittern and Wherry lines to encourage rail use. E.g. more routes between Norwich Brundall Reedham and Gt Yarmouth.

The growth of Norwich Intl Airport is not consistent with reducing carbon emissions.

The Norwich Western Link should focus on improving existing road links rather than building a new road across the Wensum Valley.

Para 126 references ““a radical shift away from the use of the private car”. But this will only happen if there are clear plans on how this can be achieved and there is insufficient detail in the GNLP on this.

Para 129: “…our proactive approach to co-ordinating development providers, organisations and agencies as well as through interventions in cases where the market cannot deliver infrastructure.” Comment: there will need to be much more active intervention and co-ordination of infrastructure development than has hitherto been seen if this ambition is to be realised. It cannot simply be aspirational but clear plans need to be established to achieve this in practice.

1. **Is there anything that you feel needs further explanation, clarification or reference?**

Para 130: Good to have the aspiration but where are the practical measures in the GNLP to actually produce greater water and energy efficiency?

Para 131. “Air pollution levels will be reduced through a combination of better design and location of development, supported by technological changes.” Equally, how will reduction of air pollution be achieved with the massive planned road expansion and destruction of woodland and green areas as a consequence?

**The plan's objectives**

As general aspirational objectives they are fine except for the objective “to achieve net zero greenhouse gas emissions by 2050”. This objective needs to be much more ambitious given the severity of the situation. Norfolk County Council has adopted a target of achieving net zero carbon emissions by 2030 for council owned land and buildings and for travel. In addition, they will work towards carbon neutrality for the county, also by 2030.

**Consultation Questions for Section 4 – The Delivery of Growth and Addressing Climate Change**

1. **Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?**

Comment: There is no clear target on energy efficiency and the reduction of carbon emissions. Back in 2008 the Climate Change Strategy for Norfolk[[4]](#footnote-4) signed by all seven district councils and the county council stated: “**“**Most of the houses and infrastructure that we build now will still be standing in 2080, when the impacts of climate change will be much greater. The considerable level of growth planned for the county by 2026 provides an immediate strategic opportunity to plan housing and infrastructure that will be much more resilient to the impacts of climate change. This will reduce long term risks to Norfolk residents and help avoid the potentially major expense of addressing problems at a later stage, after the impacts of climate change have been felt.**”**

Recent house building has generally been of a poor quality meeting the minimum of required Building Regulations. There needs to be a significant change in the standard of house building. This must be accompanied by strengthened building control departments to carry out adequate building inspections as in the past. All new housing must be carbon neutral or at least built to Passivhaus standards.

There is no provision for allotment space in any of the current developments despite it being a clearly stated Policy 2 objective.

1. **Do you support, object, or have any comments relating to the approach to Economic Development set out in the Delivery Statement?**

Object: Government and local authorities have agreed that we are facing a Climate Emergency. This has been brought on by unsustainable economic growth. We cannot continue with “business as usual”. The assumption that the population of Norfolk must accept continued economic growth “for the good of the county” is flawed. We have indicated elsewhere that population growth is not inevitable and that in fact the growth rate is declining. We do not need economic growth to lead happy and fulfilling lives. We do need an economy however, that serves the population. It needs to be a circular, zero-growth, economy underpinned by a transition to renewable energy sources, based on designing out waste and pollution; keeping products and materials in use; and the maintenance and regeneration of natural systems.

We cannot address climate change without addressing the issue of continued, unsustainable economic growth which is where the GNLP is fundamentally flawed.

1. **Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?**

Object: The statement clearly says “Infrastructure priorities benefit existing communities ………. and ***deliver sustainable and active travel choices to promote modal shift****.*” Yet the plan tries to have both an expansion of roads whilst throwing in just a few aspirational cycle paths and footpaths. This is just not enough and is the wrong way of going about modernising our transport infrastructure. In a recent Blofield parish council meeting with Highways England on the dualling of the A47 at North Burlingham / Blofield, they were asked about the footpaths, cycle ways and bridleways to cross the A47 which have been in existence for centuries. The answer given was “we design the road first and then we look at the footpaths and cycle ways”!! The problem is they are road builders. What they need to be is transport infrastructure facilitators and innovators. It requires a culture change on the part of Highways England and NCC Highways.

Comment: “Smaller scale and rural employment sites are less likely to be constrained by infrastructure requirements” But the plan needs to recognise there are infrastructure constraints in many rural locations from drainage to public transport options, to broadband and mobile phone coverage.

“Greater Norwich partners will continue to work to coordinate delivery with other providers” – Comment: this is an aspiration. Much more effort needs to be made by the partners to coordinate delivery more effectively than now. Examples include NCC Highways working in a more integrated fashion with Highways England. Anglian Water need to be included in housing and business developments which recognise technical, capacity and funding constraints.

1. **Do you support, object, or have any comments relating to the Climate Change Statement?**

Comment: Good to see reference to and use of the publication “Rising to the Climate Crisis – A Guide for Local Authorities on Planning for Climate Change”. The challenge will be to abide by the guidance. As the guide states, “Although the current National Planning Policy Framework contains strong policy on climate change, delivery on the ground through local plans has been relatively poor. Local plans in England are not dealing with carbon dioxide emissions reduction effectively, nor are they consistently delivering the adaptation actions necessary to secure the long-term resilience of local communities”. As the guide says in its introduction, “climate change is now the greatest challenge facing our society”. The recommendations therefore, need to be taken seriously and be a key reference in the future roll out of the GNLP.

Object and Comment: Bullet point 140 states how the NPPF requires local plans to "*Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts*" and to set strategic polices which address climate change mitigation and adaptation. The Climate Change Statement does not fulfil this requirement. The statement simply references other policies. It does not provide a comprehensive Climate Change Policy that can be practically applied in, for example, the case of planning applications. Given the climate emergency, a Climate Change Policy should be developed for the GNLP.

In a report to the Sustainable Development Panel, Norwich City Council, 15th January 2020, the Director of Place commented: “*There is a disconnect between the vision, objectives and climate change statement and the actual policy substance needed to enable the plan to contribute significantly to the delivery of a low carbon future.”*

Table 5 refers to the coverage of climate change issues including having an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the Climate Change Act and other key national statutory and policy frameworks. It further states: “Our ambition is to reduce per capita emissions and thereby contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050”.

There has to be more than a simple ambition. There needs to be pro-active measures and the monitoring of trends to ensure the GNLP strategy is working and the targets are met.

The methodology for assessing carbon emissions given in the Sustainability Appraisal is given in Box 2.2 (page 25):

*“Development proposals which could potentially increase the Plan area’s*

*carbon emissions by 1% or more in comparison to the 2017 estimate would*

*be expected to have a major negative impact for this objective. Development*

*proposals which may be likely to increase the Plan area’s carbon emissions*

*by 0.1% or more in comparison to the 2017 estimate would be expected to*

*have a minor negative impact for this objective.”*

Both the above scenarios will still result in an increase in carbon emissions whereas the imperative is to dramatically reduce emissions. The underlying carbon emission footprint must significantly decrease to meet national obligations.

In 2019, carbon budgets were produced for every UK local authority area with the support of the Tyndall Centre at UEA, known as SCATTER models, based on a UK budget calculated using climate equity principles from the Paris Agreement. A summary of the aggregated SCATTER budget for the Greater Norwich local authorities is given below:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Broadland** | **South Norfolk** | **Norwich** | **GNDP** |
| Remaining CO2 budget2020 – 2100 (MtCO2) | 4.5 | 4.9 | 3.4 | 12.8 |
| Budget expires at current(2017) burn-rate | 2027 | 2026 | 2027 | 2027 |
| CO2 annual reductionrate from 2020 | >13% | >14.2% | >12.7% | >13.4% |

A significant step-change in the reduction of emissions is required if we are to reach the stated targets locally, nationally and to meet the Paris obligations. The following graph indicates the magnitude of the task.



In summary, to meet the UK’s Paris Agreement obligations carbon emissions in the GNDP area need to reduce by an average of 13.4% per year. Continuing at the current rate of emissions will mean using up our remaining carbon budget by 2026/27. These figures are best estimates and are supported by the UEA Tyndall Centre.

The draft GNLP is aspirational with fine sounding statements about combatting climate change but much more is needed than is currently in the draft plan. These are suggestions for serious consideration:

* Zero carbon development through building design to deliver the highest viable energy efficiency. Passivhaus standards, etc.
* Re-use of buildings and recycling of building materials.
* Minimising waste produced.
* Energy recovery.
* Promotion of decentralised energy through encouraging community-led initiatives such as the promotion of decentralised renewable energy.
* Reduce the need to travel, particularly by private car; and secure the highest possible share of trips made by sustainable travel.
* Encouraging development that utilises and promotes the use of sustainable transport.
* Developing a more integrated transport system using new technologies and the promotion of active travel and smarter choices.
* Securing land for local food sourcing and the promotion of allotments.

As stated in Rising to the Climate Crisis:“*Action on climate change should be an integral part of the culture of plan-making and should be embedded and integrated into policy preparation. Only by treating climate issues as central to policy formulation will a local authority have effectively discharged its duty under the 2004 Planning and Compulsory Purchase Act*.[[5]](#footnote-5)”

Such policies also support other health and social objectives. Safe active travel, such as cycling, and local food sourcing, supports healthier lifestyles and social interaction at the same time as reducing carbon emissions.

**Behaviour Change**

There is no clear strategy for the required behaviour change to turn awareness into action. The 2008 Climate Change report for Norfolk[[6]](#footnote-6) recommended:

“Our behaviour change strategy should be unified under a strong, single sustainability brand for Norfolk that is readily recognised and promotes a clear message. We will need to include clear steps for engaging proactively with the wider local community to incentivise and reward behaviour change, working with community groups, schools, businesses and local partners.” (page 38).

“Norfolk is particularly vulnerable to the impacts of climate change, and has a higher carbon footprint per person than the UK average. We need to take action both to reduce our contribution to the problem and minimise our exposure to future risks.” (page 39).

We therefore recommend implementing the “Next steps” as stated in the 2008 report:

* Establish a wider Climate Change Partnership for Norfolk, with Sector Groups to address our strategic priorities, with clear governance and performance management arrangements to ensure we deliver.
* Develop a Behaviour Change Strategy, including detailed plans for community engagement.

**SECTION 5 – THE STRATEGY**

**Consultation Questions for Policy 1 – The Sustainable Growth Strategy**

1. **Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?**

We support the view of Professor John Wood, Head of Department of Veterinary Medicine**,** University of Cambridge that **t**he Cambridge - Norwich high tech link is potentially very positive: “we have very strong links and hope that a lot of biotech will continue”. However, regarding housing needs now and in the future wealthy people will always source housing but there is insufficient housing for the people who most need it to support the biotech sector: the technicians, veterinary nurses and innumerable support staff. Robust and well managed social housing schemes are the best way to provide this. We also caution against increasing our carbon footprint through the linkup. We really need a good cycle route for the electric bikes that should be ubiquitous in 10 years’ time, not further road development.

1. **Do you support, object or wish to comment on the approach for housing numbers and delivery?**

Comment: We have already questioned the projected rise in the population. No satisfactory evidence has been provided for this increase.

There appears to be a circular argument on house numbers and jobs to be created. What comes first? Is it the jobs or is it the people who need the jobs?

We have already seen that with declining birth rates the only way in which the population is going to rise in the lifetime of the plan is through new people arriving. Given that any further developments are going to increase our carbon footprint and degrade our pleasant environment why would we want to encourage an increase in an unsustainable population? The argument in the plan is to increase economic growth but if this growth is at the expense of healthy living and increased carbon emissions then it is neither a welcome nor sustainable way to plan our future.

The housing that is required should be built to provide affordable housing for those who need it and housing for the elderly as indicated by the population mix in Section 2, para 34.

A significant proportion of such housing will need to be social housing for those who cannot afford to buy.

1. Do you support, object or wish to comment on the approach for the Economy?
2. Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply?
3. Do you support, object or wish to comment on the approach to Infrastructure?

**Consultation Questions for Policy 2 –Sustainable communities**

1. Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?
2. **Do you support, object or have any comments relating to the specific requirements of the policy.**

Policy 2, Bullet point 10 states: “*All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016)”.* This is an inadequate target with cities such as Bristol and London (GLA) having 35% beyond Building Regulations. Reading, for example, states “All housing developments over 10 dwellings / 1000m2 to be designed to achieve zero carbon (subject to viability)”. Given the climate emergency the financial arguments do not stack up.

**Consultation Questions for Policy 3 – Environmental Protection and Enhancement**

1. Do you support, object or have any comments relating to approach to the built and historic environment?
2. Do you support, object or have any comments relating to the approach to the natural environment?
3. **Are there any topics which have not been covered that you believe should have been?**

Cat-exclusion zones in rural and urban-fringe landscapes.

The issue of cat-exclusion zones is a sensitive and complex issue that has not been considered in the GNLP but is a serious aspect of retaining our natural wildlife and biodiversity. In a comprehensive study highlighting the impact of humankind it was found that whilst the human population represents just 0.01% of all living things humanity has caused the loss of 83% of all wild mammals and half of plants, while livestock and pets kept by humans abounds[[7]](#footnote-7).

Domestic cats (*Felis catus*) are known predators of native and introduced wildlife occurring in high densities independent of fluctuations in prey species abundance. Because domestic cats are fed by their owners, they do not need to hunt to survive, and household food buffers them from prey population declines, enabling them to hunt birds and small mammals until prey reach very low numbers. The amount of food a cat is fed does not affect its propensity to hunt. Predation pressure is probably higher, given that domestic cats often live for 15 years or more, much longer than feral cats.

The process of urban sprawl brings the human population and their domestic cats in close contact with wildlife in areas that were previously remote, including reserves and conservation areas created to protect populations of vulnerable or threatened species. Various mitigation measures have been proposed, including devices designed to hinder cat hunting ability and regulations governing cat ownership. Such regulations may aim to reduce cat densities by limiting the number of cats per household, or they may define zones around sensitive conservation areas where cat ownership is prohibited.

How large should cat-exclusion zones have to be?

Even though the average home-range size of domestic cats living in low-density residential areas tends to be small, large inter-cat variation in ranging behaviour means that effectively to exclude domestic cats, exclusion zones would need to be wide.

Home ranges are larger at night than day. Sources of cover such as trees and buildings are preferred. Maximum distances moved and large variability between individual cats suggest buffers in rural landscapes would need to be at least 2.4 km wide, whereas those in urban-fringe habitat could be half as large[[8]](#footnote-8).

We ask that serious consideration be given to the impact of cat predation on wildlife in the vicinity of future developments.

**Consultation Questions for Policy 4 – Strategic Infrastructure**

1. **Do you support, object or have any comments relating to approach to transport?**

There is very little substance regarding the improvement and expansion of public transport to reduce car use and offer a convenient alternative. We would expect, however, that further funding of the kind that central government has recently announced for the expansion of bus transport will be made available to transform the existing road system to efficiently use any additional bus fleet. Such a pledge needs to be included in the future plan.

The NDR was designed, as the name states, as a “distributor road” and to service the North East Growth Triangle. The quickest route from the NE Growth Triangle to the A47 Westbound is via the Postwick junction and so a “Western link road” is not necessary to accommodate traffic from the North East. The NDR was designed to work without the Western Link. Way back in 2006 a Western Link was not included in the design for environmental reasons. **Nothing has changed** to alter this view. Before construction of the NDR was started Mott MacDonald were asked to look at upgrading a route from the A47 to the A1067 Fakenham Road “to B-road standard”. In practice we believe this meant wide enough for two trucks to pass each other easily. The route is now classified as the B1535. There has been a problem of “rat running” through areas such as Western Longville, Ringland, Drayton, Costessey and Taverham which has been made worse by the NDR which channels traffic through these areas. The answer to “rat running” is not more roads, and especially not the proposed Wensum link road which will irrevocably damage the environment and biodiversity. The solution is hugely improved public transport and a culture change in traditional forms of commuting and working. The plan should address how this culture change and the improved public transport is to be achieved. Currently, it does not.

There was supposed to be bus priority work in Norwich, reallocating road space freed up by the NDR. This has not happened. If it is not done soon that road space is likely to be taken up by new traffic expanding to fit the space available. Most of the so called “bus priority work”, Bus Rapid Transit (BRT), on Dereham Road, for example, employed measures that helped all traffic, which does not help modal shift.

1. **Do you support, object or have any comments relating to the approach to other strategic infrastructure (energy, water, health care, schools and green infrastructure)?**

Renewable energy should be encouraged and supported including schemes to allow and promote community energy projects.

There is a “right to connect” for new developments which means that the utility, Anglian Water, has no option but to connect new housing developments to the water supply and sewerage systems. Currently, they are unable to object to developments on the basis of insufficient infrastructure to cope and yet we see problems of water supply, sewerage capacity and sewage works (water recycling) capacity across the county. This will lead to water shortages and has resulted already in surface water flooding from sewers and regular emergency tankering of sludge from smaller rural sewage works (Reedham village is an example).

There is, therefore, a need to review the way in which utility companies contribute to decisions on planning applications. As a minimum, a higher priority should be given to the views of utilities regarding local capacity. Ofwat also has a role to play in requiring the investment necessary to bring infrastructure up to the required standard. Companies like Anglian Water make significant profits. They should be required to reinvest those profits into the public infrastructure.

Existing water resources cannot support an increased population. In March 2019 the Environment Agency chief executive James Bevan warned that England could face severe water shortages in the next 25 years if action is not taken now (<https://www.bbc.co.uk/news/uk-47620228>). East Anglia is one of the regions most at risk of experiencing drought and water shortage.

It does not make sense, therefore, to create more jobs and build more houses that cannot be sustained by existing natural resources. As Sir James Bevan stated, “The impact of climate change, combined with population growth, means the country is facing an “existential threat””.

1. Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?
2. Are there any topics which have not been covered that you believe should have been?

**Consultation Questions for Policy 5 – Homes**

1. **Do you support, object or have any comments relating to approach to affordable homes?**

Para 241: Support the policy that “sets a general requirement for on-site affordable housing provision of 33%”. There is no point in relaxing this requirement to enable developers to realise their minimum allowable profit. Schemes must be developed, or national policy modified through LA lobbying, to ensure sufficient affordable homes for those who need it.

As stated in an earlier section: We support the view thatthe Cambridge - Norwich high tech link is potentially very positive: “we have very strong links and hope that a lot of biotech will continue”. However, regarding housing needs now and in the future wealthy people will always source housing but there is insufficient housing for the people who most need it to support the biotech sector: the technicians, veterinary nurses and innumerable support staff. Robust and well managed social housing schemes are the best way to provide this.

1. Do you support, object or have any comments relating to the approach to space standards?

1. Do you support, object or have any comments relating to the approach to accessible and specialist Housing?
2. **Do you support, object or have any comments relating to the approach to Gypsies and Travellers, Travelling Show People and Residential Caravans? To help to meet long term need, this consultation specifically invites additional sites for Gypsy and Traveller accommodation, either on new sites or as extensions to existing sites.**

Support: the need for additional sites for Gypsy and Traveller accommodation.

1. Do you support, object or have any comments relating to the approach to Purpose-built student accommodation?
2. **Do you support, object or have any comments relating to the approach to Self/Custom-Build?**

Para 251: Support the general policy to facilitate self-build schemes but to also add support for self-build cooperative schemes to build affordable homes. There are very inspiring case studies of cooperative housing schemes that have multiple benefits[[9]](#footnote-9):

* Pooling of resources & capital - stronger together.
* Community involvement with the process from finding a site to delivery.
* Design of homes to fit wants, needs and aspirations.
* Select build method & contractors.
* Significant cost savings - sometimes as much as 40%.
* The building of relationships with neighbours and the wider community.
1. **Are there any topics which have not been covered that you believe should have been?**

In the policy on homes there is no reference to quality of homes, energy efficiency and climate change. These are critical issues to the future build of homes in Norfolk given the general poor quality of homes adhering to just the basic standards of house building, if that, in some extreme cases.

On the issue of build quality, there appears to be a woeful lack of building control inspections to ensure at least the minimum of standards adhering to the Building Regulations. We suspect this is in part due to a combination of the privatisation of Building Control (CNC) and the reduction in funding to local authorities to carry out statutory responsibilities adequately, in this case that of building control inspections. This dire situation needs to be urgently rectified.

Back in 2008 the Climate Change Strategy for Norfolk[[10]](#footnote-10) signed by all seven district councils and the county council stated: “**“**Most of the houses and infrastructure that we build now will still be standing in 2080, when the impacts of climate change will be much greater. The considerable level of growth planned for the county by 2026 provides an immediate strategic opportunity to plan housing and infrastructure that will be much more resilient to the impacts of climate change. This will reduce long term risks to Norfolk residents and help avoid the potentially major expense of addressing problems at a later stage, after the impacts of climate change have been felt.**”**

All new housing must be carbon neutral or at least built to Passivhaus standards.

**Consultation Questions for Policy 6 – The Economy**

1. Do you support, object or have any comments relating to the approach to employment land?
2. Do you support, object or have any comments relating to the approach to tourism, leisure, environmental and cultural industries?
3. Do you support, object or have any comments relating to the sequential approach to development of new retailing, leisure, offices and other main town centre uses?
4. Are there any topics which have not been covered that you believe should have been?

**POLICY 7 – STRATEGY FOR THE AREAS OF GROWTH**

**Consultation Questions for Policy 7.1 – The Norwich Urban area including the fringe parishes**

1. Do you support or object or wish to comment on the approach for the city centre? Please identify particular issues.
2. Do you support or object or wish to comment on the approach for East Norwich? Please identify particular issues.
3. Do you support or object or wish to comment on the approach for elsewhere in the urban area including the fringe parishes? Please identify particular issues.

**Consultation Questions for Policy 7.2 – The Main Towns**

1. Do you support or object or wish to comment on the approach for the main towns overall? Please identify particular issues.
2. Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham)? Please identify particular issues.

**Consultation Questions for Policy 7.3 – The Key Service Centres**

1. Do you support or object or wish to comment on the approach for the key service centres overall? Please identify particular issues.
2. Do you support or object or wish to comment on the approach for specific key service centres: (Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham, Wroxham)? Please identify particular issues.

**Consultation Questions for Policy 7.4 – The Village Clusters**

1. Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.
2. Do you support or object or wish to comment on the approach for specific village clusters?

**Consultation Questions for Policy 7.5 – Small Scale Windfall Housing Development**

1. Do you support or object or wish to comment on the overall approach for Small Scale Windfall Housing Development? Please identify particular issues.

**Overarching Consultation Question**

1. **Do you support or object or wish to comment any other aspect of the draft plan not covered in other questions? This includes the appendices below and the evidence base on the web site. Please identify particular issues.**

There is a stated objective to protect our environment and habitats and create new green spaces. Where in the plan is there an initiative which achieves this? The insistence on “full dualling” of the A47 is in direct opposition to such an objective. As far as can be deduced from map 4 in section 2 most of the remaining “major habitat sites in Norfolk” will soon be flooded so where will these species be relocated to?

Growth and sustainability are different goals. We should be very wary of growth because at present a very large amount of the increased demand for housing comes from an influx of population from areas such as Kent and the Midlands. People are moving to Norfolk because the “developed” environments they have been living in now have high crime, very poor air quality, terrible traffic congestion, bleak town centres with failing businesses, a plague of loneliness and mental health issues and degraded countryside. Intelligent planning is required to enshrine the lovely quality of life we are able to enjoy in our relatively low population density county and not to enslave ourselves to “growth” with all the disadvantages it can bring.

Submitted by Jan Davis on behalf of Broadland Green Party

16/03/2020

1. NPPF 2019, para 175c, page 51: “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused”. [↑](#footnote-ref-1)
2. [**Births in England and Wales: 2018**](https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthsummarytablesenglandandwales/2018) [↑](#footnote-ref-2)
3. [**‘It’s a national crisis’: UK’s birth rate is falling dramatically.** August 14, 2019](http://theconversation.com/its-a-national-crisis-uks-birth-rate-is-falling-dramatically-121399) [↑](#footnote-ref-3)
4. Norfolk Local Authorities (2008). Tomorrow’s Norfolk, Today’s Challenge. A Climate Change Strategy for Norfolk. Signed by the Leaders of all councils in Norfolk, page 36 [↑](#footnote-ref-4)
5. Para 2.4, page 17, **Rising to the Climate Crisis – A Guide for Local Authorities on Planning for Climate Change.** TCPA & RTPI. Second edition, December 2018 [↑](#footnote-ref-5)
6. Norfolk Local Authorities (2008). Tomorrow’s Norfolk, Today’s Challenge. A Climate Change Strategy for Norfolk. Signed by the Leaders of all councils in Norfolk [↑](#footnote-ref-6)
7. Yinon M. Bar-On, Rob Phillips, Ron Milo (2018). The biomass distribution on Earth. Proceedings of the National Academy of Sciences Jun 2018, 115 (25) 6506-6511 [↑](#footnote-ref-7)
8. Elizabeth M. Metsers, Philip J. Seddon and Yolanda M. van Heezik (2010). Cat-exclusion zones in rural and urban-fringe landscapes: how large would they have to be? *Wildlife Research*, 2010, 37, 47–56 [↑](#footnote-ref-8)
9. [Co-operative Housing & Community Self Build](http://cih.org/resources/PDF/presentations/Total%20Housing%202018/Martyn%20Holms.pdf) [↑](#footnote-ref-9)
10. Norfolk Local Authorities (2008). Tomorrow’s Norfolk, Today’s Challenge. A Climate Change Strategy for Norfolk. Signed by the Leaders of all councils in Norfolk, page 36 [↑](#footnote-ref-10)