

Joint letter from the following organisations:
CPRE Norfolk
Stop Norwich Urbanisation
Norwich and Norfolk Transport Action Group
Transition Norwich
Friends of Thorpe Woodlands
Hands Off Hethersett Campaign

Please respond to CPRE Norfolk

To:

Cllr Derek Blake, Portfolio Holder for Planning, Housing and the Built Environment, South Norfolk Council

Cllr Andrew Procter, Portfolio Holder, Planning Policy and Conservation, Broadland District Council

Cllr Steve Morphew, Leader, Norwich City Council

25 August 2010

Dear Councillors,

Submission Joint Core Strategy for Broadland, Norwich & South Norfolk

We the undersigned are writing to you as representatives of the local community groups listed above to ask you as members of the Greater Norwich Development Partnership (GNDP) with responsibility for your district Local Development Framework to **withdraw for review the Submission Joint Core Strategy for Broadland, Norwich and South Norfolk**, before further resources are committed to preparations for the Examination by various parties, including by our organisations.

We support the need for affordable housing, jobs for local people and the development of sustainable communities. However, we are concerned about what we regard as excessive growth proposed by the Submission Strategy which is being imposed on local communities without their backing.

There are strong reasons for reviewing parts of the Submission Strategy in view of several significant policy statements issued by the Coalition Government:

- **A commitment to localism and empowering local communities**

In a letter dated 6 July, the Secretary of State for Local Government and Communities, Eric Pickles, informed local planning authorities in England of the revocation of Regional Spatial Strategies with immediate effect. With the removal of regional housing targets as a key driver for growth, the Joint Core Strategy should be reviewed using proposals in the Planning Green Paper for empowering local communities.¹

As the Green Paper makes clear, a local plan should be built from the bottom up by local people working together with their accountable local councils, to produce measures which genuinely reflect the will of the people. This is opposite to the top-down Submission Strategy prepared by Broadland, Norwich, South Norfolk and Norfolk County Councils behind closed doors.

The Focused Changes published on 19 July are the latest example of a long process in which the views of local people have not been paramount nor fully sought, counter to the new Coalition policy. Re-labelling north-east Norwich growth location for up to 10,000 new dwellings as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to avoid the requirement for a public examination. Moreover the GNDP is conducting a rushed public consultation on a detailed Concept Statement for Old Catton, Sprowston, Rackheath and Thorpe St Andrew during the summer holidays without the aid of public exhibitions and meetings.

- **Giving priority to reducing the Budget Deficit within 5 Years**

In the light of the Government's aim to cut public spending by up to 25%, the Department for Transport wrote to Norfolk County Council on 10 June directing the authority to minimise work on a Norwich Northern Distributor Road (NNDR) pending the conclusions of the Spending Review. Also, the Regional Funding Allocation, the main mechanism for funding major local transport schemes has been suspended², following the revocation of Regional Spatial Strategies. There is a strong likelihood that public funding for the NNDR will be withdrawn.

Furthermore, Ministerial confirmation of A47 Postwick Interchange Slip and Side Roads Orders, for implementing the NNDR/Postwick Hub project, cannot be guaranteed in the light of Government plans to hold a local inquiry. The Secretaries of State advise that "the remaining objections (to the Draft Orders)

¹ Open Source Planning Green Paper, The Conservatives, January 2010. The new arrangements are to intended to "create a planning system.....within which local people and their accountable local governments can produce their own distinctive local policies to create communities which are sustainable, attractive and good to live in". Executive Summary.

http://www.conservatives.com/News/News_stories/2010/02/New_homes_and_jobs_through_Open_Source_Planning.aspx

² "Hammond pulls the plug on RFA major scheme programme", Local Transport Today 11 June – 24 June 2010,

raise issues of such significant public importance that they should be debated publicly”.³

Since the GNDP has stated that the Joint Core Strategy is reliant on delivery of a NNDR/Postwick Hub, it would be prudent to await the outcome of the Spending Review.

- **A strong commitment to transparency in government**

The Coalition Government has made transparency a central theme, stating the “need to throw open the doors of public bodies to enable the public to hold politicians and public bodies to account”. In contrast, the GNDP has met behind closed doors since its inception in 2006. A lack of transparency has increased the difficulty of following the audit trail and undermined public confidence in the plans.

- **Opportunity for reviewing Plans**

The Government has told local authorities that they may wish to review their plans or else proceed with development of their Local Development Frameworks in a way which reflects local people’s aspirations. Also, Greg Shapps MP Minister for Housing and Local Government, has stated that before releasing funding for eco-town projects, he wants to ensure that individual schemes have the support of the wider community.

There is a widespread view that house building activity will remain at a low point over the next few years, giving a window of opportunity for reviewing the Joint Core Strategy to reflect new policy changes. A review would address the large number of soundness issues identified by the Inspectors appointed to examine the Submission Strategy.

Whilst the GNDP has pressed ahead with the Submission Strategy on grounds that delay would encourage speculative development, recent local experience does not bear this out. For example, in early July 2010, developers withdrew their plans for an additional 3,000 dwellings at Hethersett following local consultation. All three local planning authorities have up to date Local Plans which will not expire in 2011; all Policies in these Plans essential to the exercise of their powers and decision-making duties have been saved by the Secretary of State’s use of powers in Planning and Compulsory Purchase Act 2004.

In summary, the Submission Joint Core Strategy does not meet local people’s aspirations for sustainable communities. In the light of the above changes, we request that you seek withdrawal of the present draft Strategy and work with local people in an open and democratic manner to prepare a revised planning

³ Letter dated 2 August 2010 from the Government Office for the East Midlands announcing the Secretaries of State’s intention to hold a local inquiry into the A47 Trunk Road (Postwick Interchange Slip and Side Roads Orders), pending the outcome of the Spending Review.

framework for creating sustainable communities that meets the needs of people in and around Norwich.

We look forward to receiving your responses.

Yours faithfully,

James Frost
Director, CPRE Norfolk

Stephen Heard,
Chairman, Stop Norwich Suburbanisation

Denise Carlo
Chair, NNTAG

Jane Chittenden,
Core Group, Transition Norwich

Phil Emery
Spokesman, Hands Off Hethersett Campaign

Lorna Beckett
Convenor, Friends of Thorpe Woodlands

CC

Richard Bacon, MP for South Norfolk

George Freeman, MP for Mid Norfolk

Keith Simpson, MP for Broadland

Chloe Smith, MP for Norwich North

Simon Wright, MP for Norwich South

Roy Foster, Mike Fox, Inspectors appointed by the Planning Inspectorate to
examine Submission Joint Core Strategy for Broadland, Norwich, Sth Norfolk

Mary Marston, Development and Infrastructure, Go East

Daniel Cox, Leader, Norfolk County Council

Michael Hargreaves, Head of Planning Policy, Go-East

Rynd Smith, Director of Policy, Quality & Development, Planning Inspectorate

29 September 2010

To - James Frost, CPRE Norfolk

Representing the following organisations
CPRE Norfolk
Stop Norwich Urbanisation
Norwich and Norfolk Transport Action Group
Transition Norwich
Friends of Thorpe Woodlands
Hands Off Hethersett Campaign

Dear Mr Frost

Thank you for your letter of 25 August sent on behalf of a number of local community groups.

In response to your first point we can confirm that the GNDP is continuing with the submission of the Joint Core Strategy and is preparing for the Examination in Public in line with the provisional programme set by the Inspectors.

The submitted strategy is the result of four years work gathering evidence and reviewing local need in order to reflect the natural growth of the area. There has been extensive engagement and formal consultation at every stage of the process. All the representations received through these consultations have been carefully considered by the GNDP, and subsequently submitted alongside the JCS as part of the inspection process.

The overarching point of your letter is that changes to government policy invalidate the need for the JCS. This is a false assumption. While the abolition of Regional Spatial Strategies removes the need to meet centrally imposed targets, it does not take away the long term housing needs and economic potential of Broadland, Norwich and South Norfolk. The JCS is the only viable way of ensuring that plans are in place to meet these needs in ways that maximise the benefits and minimise the detrimental impact to maintain the overall quality of local life. The partnership is anxious to avoid the mistakes in the past where essential items of infrastructure such as transport and schools were not put in place. It makes no sense to repeat those mistakes, which is why the councils are continuing with the strategy.

Jobs, homes, prosperity for local people



NORWICH
City Council



Norfolk County Council

The speed of growth will vary depending on the economic circumstances, but there's nothing to suggest there is not going to be increased demand for substantially more homes and jobs and that people in the city are going to stop wanting an improved quality of life.

As you know the Programme Officer has issued the Inspectors' list of matters and key questions for examination to all interested parties. The guidance note 'Invitation and guidance to respondents on the submission of statements for the forthcoming hearing sessions' sets the process in detail and how to raise the points expressed in your joint letter. This guidance note is available at <http://www.gndp.org.uk/downloads/2010-09-24-Letter-to-Representors-24-September.pdf>

The start date for the Examination in Public hearings is 9 November at The King's Centre, King Street, Norwich.

Any questions relating to the process should be directed to the Programme Officer whose contact details are included in the guidance.

Yours sincerely

Sandra Eastaugh
GNDP Manager

On behalf of:

Cllr Andrew Proctor
Portfolio Holder for Planning Policy and
Conservation
Broadland District Council

Cllr Steve Morphew
Leader
Norwich City Council

Cllr Derek Blake
Portfolio Holder for Planning, Housing
and the Built Environment
South Norfolk Council

c.c.

- o Richard Bacon, MP for South Norfolk
- o George Freeman, MP for Mid Norfolk
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