

From: Richard Williams, Committee Member
On behalf of the Community Campaign Group
Stop Norwich Urbanisation

6th December 2010

Inspector Roy Foster MA MRTPI

C/O Programme Officer
Louise St John Howe
Claypit Hall,
Foxearth,
Sudbury, Suffolk CO10 7JD

Dear Sir,

Greater Norwich Development Partnership
Joint Core Strategy

I am writing to query a number of points which were addressed during the hearing.

1. Can I first ask about the evidence given at the Hearing by the gentlemen representing the eco-town developers?

The first person, whose name I did not catch, came to the table to address the issue of the rail connection to Rackheath. He expressed surprise that his evidence had not been presented to the Hearing but none the less went on to expound at length about the progress on a light railway/tramway.

Is it appropriate for developers to be given the opportunity to present statements to the Hearing without first submitting that evidence? We were reminded that it made it very difficult when documents were presented on the day of the hearing and how important it is for interested parties to be given the opportunity to consider the evidence in ample time to make their own observations.

I have since looked for this evidence but still cannot find it.

I would like to refer to the content of that submission. The key point made was that this proposal was received

with enthusiasm by National Express and that talks were progressing well. However, if my note is correct, the basis for this enthusiasm was 5,000 return journeys a day, more than one passenger from every household. This seems very optimistic and contrary to the eco-town concept especially if they are arguing that jobs will be provided in a way which will eliminate travel. The other highlight was the journey time to the 'City Centre' but that is not the whole story. The frequency is only four vehicles per hour and to this must be added the time to reach the pick-up point; but more importantly is the time to reach an onward destination from Thorpe Station.

There must be some doubt about the rationale as the Railway Station is not close to many employment locations and onward journeys will still be required. This might negate the purported advantage of this mode of travel. Nowhere else in the JCS has it been included though similar rail links exist in the Norwich catchment which would suggest that if it were viable here why not more generally.

The light tramway and ease of construction is noted but they are planning a biomass plant at Rackheath, the feedstock for which is to be delivered by rail. That spur cannot be a light railway and although no figures have been provided for that project either, the Energy submission suggested it lead to substantial movement of materials.

The second person to give a presentation was Mr. Atkinson. He had not made any pre-submission either and yet we have had a stream of unsubstantiated suggestions made on their behalf by the GNDP. Not least of which was the proposed FC10, which comprised a concept statement that was later withdrawn.

It was very interesting to note that neither of these presenters were able to give any financial justification for their plans. Yet it seems that money is no object and funding for a scheme, the viability of which is questionable, continues to be provided by the DCLG.

However, the level of support has been drastically reduced following the change of administration.

We would ask you to judge whether this was the same Concept Document subsequently submitted to you by the developers. When I queried this, the GNDP argued that since this information was available on the developers website that it was not necessary for it to be included in the submissions. I cannot agree about that, as it was not formally available to you when considering the issues, which we raised. When the Appendices are

examined it is clear that the plans do not conform to the ECO Town specifications and have not been developed in accordance with the DCLG/TCPA practices.

3. The concept statement which the GNDP later forwarded to us was dated February 2009 and I would just like to draw your attention to the time line presented in our submission. The Eco town plans published by the DCLG in July 2008 did not include Rackheath. The technical consultation undertaken by the GNDP in August 2008 did not include the Rackheath Eco-town. It was only when the responses were made public in November of that year that Building Partnerships plans became public. They insist that it is 5000 units whilst the latest from the GNDP (RF97) still claims 3,400.

Many of these ideas are experimental, it is therefore unwise to test them on a large-scale development due to the cost and the consequences of failure. They have just not been subjected to adequate appraisal.

The point was made in our evidence that this was all being promoted by the GNDP and consequently no one was representing the views of the local community. This supports our contention that the development is not sound, that it was never the outcome of consultation but imposed by Government.

At other locations where eco towns have been mooted, residents have had the opportunity to comment on well defined proposals. Here by contrast these have been promoted through the JCS. In consequence they will potentially be agreed before the developer ever produces a plan

We do not believe that the case for the construction of a new town at Rackheath has been made. It does not conform to the requirements of the Addendum to PPS1 and so there would seem to be no basis for it to be treated any differently from a normal planning application.

It is, however, the basis for such a large element of the Joint Core Strategy that in our view it renders the whole process unsound.

2. Our second point questions whether it is the best interests of future developments in Norwich to agree with the GNDP that whilst their policy remains unsound, this can in some way be compensated by what they describe as flexibility. Their response to the question posed is to ignore the core point. If Plans should be able to show

how they will handle contingencies, it is not sufficient to say merely that they are capable of being modified. That is self evident. If there are no alternative strategies, and we submit that there are not, then the JCS is surely unsound. Their response seems to claim that instead with flexibility of delivery, this becomes an acceptable alternative. To seek approval of this strategy with its shortcomings on the basis that the GNDP will review them is, in itself, an unsound way to proceed.

The sources of funding which the Councils are going to rely on for the transport infrastructure include CIL, Homes Bonus and Growth Point Funding as well as increasing Council Tax. These sound like desperate measures at a time when councils struggle with the maintenance of basic services for residents.

3. The final point re-enforces our contention that the consultation has never been meaningful. In your letter to the GNDP (RF71) you asked them to meet with the Highways Agency and interested parties including Landowners. Such a meeting was held on 30th November. A list of delegates is included in RF97, from which you will see that a) only developers were invited to meet the Highways agency and b) GNDP Officers. I would submit that community groups and in particular NNTAG should have been included. The other issue is that there is no time for Councils and our elected members to consider what is being put forward on our behalf. These councils are the executive bodies and a significant democratic deficit exists if they are left to agree to this sort of amendment retrospectively. It is too late to cobble together a makeshift solution especially one which seeks to by-pass the soundness test.

Today, we received an email from GNDP asking us if we would like the chance to have the GNDP team to go through it and explain in any way before the 9th November. This is after the paper has been submitted. What is the point in that? It is just one further example of the cavalier way in which the GNDP conducts itself.

Yours faithfully,

A handwritten signature in red ink that reads "Richard Hilliard". The signature is written in a cursive style and is underlined with a single red stroke.

Richard Williams

On behalf of SNUB