

## JOINT CORE STRATEGY RESPONSE: Salhouse Parish Council

**6. Please give details of why you consider the Joint Core Strategy Proposed submission content to be unsound, or why it has not been prepared according to the Duty to Cooperate, legal and procedural requirements. Please be as precise as possible.  
If you wish to support the legal compliance or soundness of the Joint Core Strategy Proposed submission content, please also use this box to set out your comments?**

This representation is made on behalf of Salhouse residents through their democratically elected Parish Council under Regulation 20 of the Town and Country (Local Planning) (England) Regulations 2012.

The quality of this further consultation is very disappointing.

The Parish Council view on behalf of the residents is that the JCS is not sound for a variety of reasons as detailed in this representation.

We, as the elected representatives, therefore do not support any of the three options put forward by Greater Norwich Development Partnership (GNDP) on behalf of Broadland District Council (BDC).

In summary we do not agree that the area can support massive levels of inward migration that the JCS would require, or is an appropriate area for this to happen.

Salhouse Parish Council remains convinced on behalf of its residents that the JCS has not properly explored or consulted on all options, and we contend that the evidence shows that is the case. We have highlighted some of the key opportunities that, if taken into account and subject to a proper consultation and development process, would satisfy the locally required growth need, provide a manageable level of growth and protect agriculture, tourism and the character of the area.

Bodies such as the RIBA have supported development of alternative plans that can address housing need on a wider scale, and the Parish Council are certain that a smaller range of development and investment in new business initiatives in the area will address the sustainability of Salhouse, and the other villages in the growth triangle area itself.

As it stands, the development proposed within the JCS ignores fundamental issues such as the protection of food producing land. It does not actively address local needs and at a stroke changes the character of the area overriding policies that are both long held and have only recently been subject to review.

This consultation appears to have been produced with insufficient local understanding of the area, its history and landscape - the work commissioned by Broadland District Council has been ignored. It overlooks difficult issues, makes too many statements of good intent regarding for instance transport and health services, but backs none of these up with any developed implementable plans.

This latest consultation should be judged on the level of response received from all quarters, business, public service bodies, farmers, campaign groups, landowners, councils and particularly residents. If this is deficient in any area, or changes are not made to the JCS to reflect the views expressed, then that in itself this is evidence that the consultation is again flawed.

We remain convinced the way forward should be to withdraw the JCS as currently drafted and work with local bodies and residents, taking on board the substantial work undertaken by the RIBA, the CPRE and other bodies and arrive at a new solution that meets local need, protects the viability of food production by protecting land and water supply and delivers smaller scale solutions to jobs and gives the new generations the opportunities to meet their own aspirations within this diverse and beautiful area.

We would like to see each constituent local authority developing their own local housing strategy, using their existing Local Development Framework taking the views of Parish Councils into consideration through Parish and Neighbourhood Plans thus representing true local opinion and a bottom up sustainable housing strategy. Salhouse Parish Council have already prepared a Parish Plan which can be seen at <http://www.salhousevillage.org.uk/page19.html> and are contemplating the formation of a Neighbourhood Plan.

We believe that the results of that bottom up approach would see a reduced number of houses to meet real local “housing need”, built in the existing communities that require inward investment to ensure the sustainability of local amenities.

Our contention is that solutions exist that could enable housing need to be met, whilst still preserving agricultural and amenity land, and allowing the character of the area to be preserved. To do this the Greater Norwich Development Partnership would need to withdraw the current JCS and embark on a proper and open process engaging residents.

The process for reworking the remitted parts of the JCS have merely regurgitated the original conclusion that the most appropriate option is, in fact, the same text as before, and that this remains the best option for strategic growth in the Broadland part of the Norwich Policy Area on which submissions have already been made as part of the original process, and nothing within the new consultation changes any of those submissions.

We submit the following commentary to support this view and to demonstrate why we believe that this revised JCS and consultation is not sound and that this consultation does not address the issues that were highlighted as part of the judgement.

**7. Please set out what change(s) you consider necessary to ensure that the Joint Core Strategy Proposed submission content is sound or has been prepared according to the Duty to Cooperate, legal and procedural requirements. Please be as precise as possible.**

### Environment Assessment

There is no evidence that all options that were reviewed have been subjected to full strategic environmental assessments. The original process examined 11 potential growth locations at three different scales of strategic growth and 7 potential combinations of those locations. However this detail does not include a full and equitable assessment for every single option and only the three options put before the public in this consultation have had the benefit of these full assessments. For this reason alone this reworked proposal is unsound.

### Water

The East of England is the driest region in the UK. The Environment Agency identified the Anglian Water region as an area of moderate water stress in its 2007 consultation on water stressed areas. This was revised to one of serious water stress in the final designation. The predictions for growth in the region means water resources are going to need to be carefully managed to be sustainable without damaging the natural environment.

There is no plan apparent for managing this situation, preserving water for agriculture and dealing with additional housing demand.

### Campaign to Protect Rural England (CPRE)

The local Norfolk branch of the Campaign to Protect Rural England (CPRE) has gone on record to voice their concerns about the over development of Norwich and its surrounding catchments areas.

Salhouse Parish Council, at the October 2012 Parish Council meeting, agreed to support the CPRE alliance and agreed with the following declaration:

Salhouse Parish Council supports the aims of the CPRE Norfolk Alliance campaign to reduce the current housing targets set under the Joint Core Strategy. We urge the Greater Norwich Development Partnership to begin an immediate review of the housing targets, including opportunities for effective public participation, as provided for under the localism agenda.

### Natural Environment

BDC has undertaken a public consultation on the Landscape Character Assessment Supplementary Planning Document as it relates to the Landscape Character Assessment Review.

The relevant Landscape Character Areas for Salhouse is:

*Wooded Estatelands: Blickling and Oulton, Marsham and Hainford, Spixworth, Rackheath and Salhouse*

It is our view that the proposals in the JCS are in direct opposition to the landscape characters identified and are irreversible. The current LCA is intuitively the very opposite to

large scale development planned for in the JCS and it is recommending more wooded areas and open spaces, with protection for agriculture. The Woodland Trust has gone on record as saying that the East Anglia region is under forested and has outlined the consequences for this, not least in prevention of flood risk.

### Climate Change and Carbon Footprint

We cannot see detailed strategies developed by the rail and public transport companies that show how they will deliver services that deal with the additional transport requirements, including when feeding into existing congested routes around the growth area.

Furthermore the main transport routes are to the south of the area, and development here would necessitate longer journeys.

### Sustainable code for house construction

A major disappointment is that the original JCS proposal included the provision of 4,000 houses built to Sustainable Code 6 standard, which was part of the original Eco Town initiative proposed. The plans for the Eco town element of this proposal have been downgraded to what is now called a "low carbon development" with houses built to no more than sustainable level code 4 standard. BDC have also developed what is called the "Rackheath sustainability level" for the construction of these houses without defining what this entails.

We are therefore of the opinion that this proposal is not sound as the sustainability level of the proposed houses will be no different to current national house building standards.

The current occupiers of the 12 code 6 houses built in Stracey Close at Rackheath are all complaining of high utility bills as they are not in receipt of the "feed in tariff" to offset the high cost of renewable energy from ground source pumps and solar panel on east facing roofs which are proving to be ineffective. Wherry Housing Association are to build a further 14 houses in this small development but only to sustainability code level 4. A portion of the existing gardens of the code 6 houses will be used to build these additional homes.

### Democracy

#### Public meetings

There have been over the past three years a number of public meetings where local residents from across the area including residents of Salhouse have been able to express their views and opinions on the scale of the proposed development. These meetings were well attended and on every occasion the residents let it be known that they were not in favour of the proposals with the last one being in Sept 2011.

The latest occasion (Sept 2012) was a drop in session at Rackheath held over two evenings and only 3.7% of the respondents stated that they wanted large-scale development in the NEG area. Just fewer than 50% stated that they wanted no development at all and the remainder were split between wishing some development. A survey conducted by BDC themselves at the Rackheath 2011 summer fete resulted in 87% of the respondents being against the proposed development. Many of these respondents lived in the Salhouse area.

A petition organised by the Stop Norwich Urbanisation community campaign group collected 3,567 signatures against the proposed development. Of this number 758 were from Salhouse representing over 50% of the electorate total registered in Salhouse.

There is no evidence of how the comments at any of the meetings, the survey or the petition has influenced the proposals.

#### Broadland District Council Election

There was an election for Broadland District Council in May 2011 and one of the incumbent district councillors for the Wroxham ward, which covers Salhouse, campaigned as being for the JCS. This Councillor lost his seat to a new councillor who campaigned against the JCS

#### Salhouse Parish Council Election

A local resident who is also Chair of the Stop Norwich Urbanisation (SNUB) community campaign group was democratically elected onto Salhouse Parish Council in August 2012.

#### Health and Social care

The JCS gives no concrete plans on how the NHS locally can deal with an increasingly complex set of issues that influence health and the continuity of service for this area with the proposed growth.

This includes for care of an ageing population - in three years Norfolk is predicted to become to county with the oldest community - hospital beds, doctors, dentists and the ambulance and other care and emergency services.

There would need to be a major investment provision of additional services, against a background where substantial savings must be made by 2015.

#### Housing

The primary justification for the proposed level of houses is the need to provide housing and employment opportunities for local residents. The Joint Core Strategy requires 37,000 homes and 27,000 jobs to be delivered to 2026.

These targets are not supported by the local need for 'affordable homes' i.e. houses that can be bought outright by local first time buyers, or rented at prices that enable locally employed residents to afford to be able to live in the district if they cannot buy.

The housing list for Broadland has 4000 applicants classified as inadequately housed which is not related to placement of housing or jobs within the area by the JCS.

In our view the housing numbers for this area are not justifiable, and nor are there plans for instance to show how houses would be constructed that would sell to local first time buyers. In addition, league tables provided by Shelter show that the GNDP councils, including Broadland, are in total currently providing a more than adequate supply of affordable rented houses.

#### Employment

The other major justification is the 27,000 new employment opportunities that are planned to be delivered in the growth triangle footprint thus making it easier, using public transport or zero carbon travel, for residents to travel to work.

However the major employment opportunities, as defined by the JCS, are in the South West and South of the city based on the success of the Norwich Science Park, John Innes Centre,

Hethel Engineering centre, UEA and the Norwich and Norfolk University Foundation Trust hospital.

It would therefore stand to reason that any future large-scale housing would need to be in these areas.

### Food production

The area is primarily one of food production, and has been for centuries dating back to before the Domesday book, where the use is recorded.

Whilst the land is indicated as brown field, it should be noted that the only interruption to this use was from August 1942 when the land was requisitioned and construction started of RAF Rackheath as a heavy bomber airfield for use of the USAAF. The airfield site consisted of 40 to 50 fields as shown in the 1801 enclosure Award Map. The last USAAF aircraft left in May 1945. Agriculture returned in 1960 to this airfield part of the site

We are therefore of the view that this land has been producing food for hundreds of years except for a very small period of 14 years, of which only three were active, during the national war emergency.

The requirement for food production must direct the development to land not suitable for agricultural production.

### Norwich Northern Distributor Road (NDR)

There is no doubt that this proposed large scale development depends on the construction of the proposed Norwich Northern Distributor Road.

The strategy states however that the housing development is not reliant on the NDR but indicates that that development would have to be reviewed if the NDR were not to go ahead.

If this is the case then the strategy should have alternatives should the NDR not continue.

### Railway

There has been much speculation about the use of the existing Bittern Line railway throughout these proposals and the construction a new railway station at Rackheath and a small goods yard to support the rail delivery of bio fuels into the centre of the NEGT development.

We are not aware of any proposed investment to increase the capacity of the line to deal with the indicated demand.

### Rapid Bus system

The rapid bus system to transport residents from the proposed new development is merely a traditional "bus lane" that stops at the top of Mousehold Heath, which after Mousehold becomes a congested two way route right into the centre of Norwich.

### Neighbourhood & Community Planning

The Parish Council has already engaged itself in the planning process with a Parish Plan and has started work aimed at producing a Neighbourhood Plan as provided for in the Localism Act 2011. This act and the National Planning Policy Framework will place much

more emphasis and responsibility on local authority planners and elected members in meeting both local needs and nationally important goals

In July 2011 Salhouse Parish Council, along with Parish Councillors from 14 other Parish Councils, attended a training session hosted by Broadland District Council to explain Community Planning. As part of the process the attendees had to look at photographs of Broadland and say which pictures most sum up Broadland and explain why. These were some of the answers:

- Many open spaces and footpaths.
- Open countryside.
- Quiet and peaceful surroundings.
- Rural tranquillity.
- Quiet roads.
- Lovely countryside.

These answers are reflected in the existing landscape policies, and should be preserved.

### Current Approved Planning Applications

There is also evidence that there is within the GDNP area a large number, thought to be approximately 10,000 across Norfolk, of applications for house building that have been approved but not yet started. We would like to see these applications included in the overall mix of housing analysis needs for the future with details provided.

### Salhouse Conservation Area

Part of the Salhouse village is currently a Conservation Area and there is a current proposal to extend this to other parts of the village as defined in <http://www.salhousevillage.org.uk/PP%20Final%20Report%20Conservation%20Appraisal.pdf>.

The decision on whether this extension is approved is still outstanding and it is our view that if this approval were to be accepted then the proposals to construct thousands of houses adjoining this potential Conservation Area would jeopardise the very area that is to be conserved, and be contradictory to the principle that a conservation area should have strict control of new development.

### Alternatives

#### Relocation of Norwich International Airport

There exists an alternative of moving Norwich International Airport from St Faiths to the previous RAF Coltishall site thus releasing land adjacent to the city for housing development, and by dint of its longer runways, advanced equipment and facilities such as for engine testing and spraying, and the fact the area is used to air traffic over low density housing areas such a relocation would improve access to and from the area and remove aircraft activity from densely populated areas. There is also the opportunity to house a museum at the site.

We believe this opportunity has not been openly and properly explored or consulted on.

#### Acle Hub

The Norfolk Association of Architects (NAA) have developed a discussion document that puts forward an alternative development site using Acle as a hub linking the LEP footprint

area through Acle and the Yare valley into Norwich. We believe that this alternative has many merits and provides a real possibility of linking the high employment opportunity areas on the east coast through to the county city of Norwich through a housing hub at Acle using a sustainable public transport tram system. This alternative represents new thinking and the adaptation of new technology rather than the regurgitation of old thinking dressed up as modernisation.

### Dispersal

The rural landscape needs to be protected and at the same time housing and jobs need must be accommodated.

Dispersal can achieve this by placing smaller developments close to communities that can organically grow.

### Future Homes Commission

The recent study by the Future Homes Commission has identified a need for substantial house building in the UK, but has also found that 300,000 homes can be built annually on brownfield land near just about every city, town and village.

<http://www.architecture.com/HomeWise/FutureHomesCommission/FutureHomesCommission.aspx>

The approach suggested by the commission is a more sustainable approach, allowing organic growth whilst still protecting valuable farmland and sustaining the diversity of areas such as Broadland. It can be therefore concluded that to take such major growth in this area in such a concentration is not sustainable, and Broadland is not best placed for such growth which should go to those areas best able to sustain it.

### Norwich Policy Area

Since 2007 Salhouse has been subsequently included as an Appendix to the Norwich Policy Area in later drafts of the JCS.

This inclusion appeared without any notice to the Parish Council or without any consultation with local residents.

Salhouse was not part of the area in the Norfolk Structure Plan (1999 – 2007), the East of England Plan or the Broadland Local Plan (2006 – 2011).

This error was highlighted in a letter to GNDP in May 2012 where the Parish Council formally requested the removal of Salhouse from the NPA.

The view of Broadland District Council is that we will have to wait and see the outcome of this current consultation and inspection were the Parish Council can put forward an argument to be removed from the NPA.

We are therefore of the strong opinion that this current proposal is not sound due to the erroneous admission of Salhouse parish into the NPA. We reiterate the request for Salhouse to be removed from the NPA in this response.

### Norfolk Broads

The Norfolk Broads are a National Park for the reasons of its wetland habitat and diverse flora and fauna. Part of Salhouse is within this National Park. The surrounding area is the

gateway and protects these habitats as well as providing the buffer zone. This must be preserved if the Broads are to continue to provide the opportunity that they do. Nothing in the JCS looks at how the Broads village of Salhouse remains protected as one gateway.

## **SUMMARY**

We do not agree that the area can support massive levels of inward migration that the JCS would require, or it is an appropriate area for this to happen.

Salhouse Parish Council remains convinced on behalf of its residents that the JCS has not properly explored or consulted on all options, and we contend that the evidence shows that is the case. We have highlighted some of the key opportunities that, if taken into account and subject to a proper consultation and development process, would satisfy the locally required growth need, provide a manageable level of growth and protect agriculture, tourism and the character of the area.

Bodies such as the RIBA have supported development of alternative plans that can address housing need on a wider scale, and the Parish Council are certain that a smaller range of development and investment in new business initiatives in the area will address the sustainability of the growth triangle area itself.

As it stands, the development proposed within the JCS ignores fundamental issues such as the protection of food producing land. It does not actively address local needs and at a stroke changes the character of the area overriding policies that are long held and have only recently been subject to review.

This consultation appears to have been produced with insufficient local empathy with or understanding of the area, its history and landscape - the work commissioned by Broadland District Council has been ignored. It overlooks difficult issues, makes too many statements of good intent regarding for instance transport and health services, but backs none of these up with any developed implementable plans.

In the pages above we have set out our response to the why we believe that this proposed submission content is unsound and why it has not been prepared in accordance with the duty to cooperate, legal and procedural requirements. From the consultations that have taken place we have not seen the evidence that the outcomes of the feedback received were actively taken into consideration in the production of the JCS.

This latest consultation should be judged on the level of response received from all quarters, business, public service bodies, farmers, campaign groups, landowners, councils and particularly residents. If it is found to be deficient in any area, or changes are not made to the JCS to reflect the views expressed, then that in itself is evidence that this consultation is again flawed.

We remain convinced the way forward should be to withdraw the JCS and work with local bodies and residents, taking on board the substantial work undertaken by the RIBA, the CPRE and other bodies and arrive at a new solution that meets local need, protects the viability of food production by protecting land and water supply and delivers smaller scale solutions to jobs and gives the new generations the opportunities to meet their own aspirations within this diverse and beautiful area.