

Wednesday 2 Feb – Matter 2: Vision & Objectives

Issue 1: Have the vision, objectives and growth strategy for Greater Norwich been positively prepared, are they justified and consistent with national policy and can they be realistically achieved? Does the Plan set out a clear spatial strategy? Has the spatial strategy and overall distribution of development been positively prepared, is it justified by a robust and credible evidence base and is it consistent with national policy?

1. Does the Plan adequately set out a vision for Greater Norwich based upon the evidence?

3. Is the reference to clean growth and progression towards a post carbon economy based upon evidence and is it deliverable?

Green Party response:

Taking Questions 1 & 3 together we question whether the evidence matches the vision of clean growth and progression towards a post carbon economy.

Whilst the ambition is for “clean growth” and a reduction in carbon emissions the evidence is a trend of “business as usual” with increasing car use supported by the building of even more roads which will maintain congestion in our market towns, service centres and even along our rural roads where delivery vans compete with agricultural machinery making our rural roads as dangerous for walkers, cyclists, and drivers as ever.

Evidence of the concern at increasing traffic levels can be seen in regular reports from parish councils in the GNLP area of traffic congestion at certain times of the day (especially school drop off and pick up); speeding; and damaged, potholed roads. This makes cycling and walking to school and work hazardous and uncomfortable. Parish Councils regularly submit requests to County Highways to help solve these problems through speed limits, and traffic management measures. These situations have resulted in requests for air quality monitoring in villages due to the pollution of main traffic routes and hotspots such as the school gates.

Figures from the Tyndall Centre ([Local and Regional Implications of the United Nations Paris Agreement on Climate Change \(manchester.ac.uk\)](https://www.manchester.ac.uk/research/tyndall-centre/local-and-regional-implications-of-the-united-nations-paris-agreement-on-climate-change)) identifies the magnitude of the challenge and there is nothing in the plan that suggests the required carbon targets will be reached within the time period of the plan.

Based on Tyndall Centre analysis, for Broadland to make its ‘fair’ contribution towards the Paris Climate Change Agreement, the following recommendations need to be adopted:

1. Stay within a maximum cumulative carbon dioxide emissions budget of 4.5 million tonnes (MtCO₂) for the period of 2020 to 2100. At 2017 CO₂ emission levels, Broadland would use this entire budget by 2027 (i.e. in 6 years time).

2. Initiate an immediate programme of CO₂ mitigation to deliver cuts in emissions averaging a minimum of -13.0% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action, and should be more than simply an ambition but a plan target as a core aspect of the GNLP.

Electric vehicles are often mentioned as a key solution to the problem of transport carbon emissions but they will be phased over a long period. It will not be immediate and there will still be traffic congestion, speeding, and particle pollution from tyres, brakes, etc. Electrification (of transport and use of heat pumps, etc) will drastically multiply the demand for electricity and this needs to be factored into the plan by balancing the rate of house building and business expansion with the availability of renewable energy (electricity) and associated infrastructure.

Without a more detailed plan for Smart Local Energy Systems (SLES) and to retrofit existing housing with a concerted home insulation programme and the replacement of gas and oil boilers with heat pumps and district heating schemes for existing and new-build homes, then we will not be getting anywhere near a post-carbon economy. Additional costs of building low-carbon homes at scale is estimated at between 1 – 2.5% which can be absorbed by a small reduction in profit whilst providing opportunities for learning and optimizing designs of future schemes.

There is a concern, based on past experience, that there can be a significant gap between the design and delivered performance related to energy, carbon and cost. Developer performance needs to be monitored in terms of carbon emissions, energy consumption, and running costs to ensure compliance and adequate performance.

To be deliverable, developers should be held accountable for their performance. It is suggested they complete a declaration with each relevant planning application which answers the following questions, or a similar set of challenges, to ensure adequate performance:

- What measures have been/will be taken to reduce the energy demand associated with the proposed development beyond the minimum required in Building Regulations?
- What measures have been/will be taken to limit the carbon consumed through the implementation and construction processes, e.g. by reusing existing on-site materials, sourcing materials locally or adopting more sustainable construction methods?
- What measures have been/will be taken to utilise renewable or low carbon energy sources?

Such a declaration can go beyond clean growth, energy efficiency and carbon emissions to include wider sustainability issues:

- What measures have been/will be taken to reduce potential impacts of flooding associated with the proposed development?
- What measures will be taken to promote biodiversity in the proposed development?

Issue 2: Housing growth

6. Is the identification of a supply buffer of 22% against the housing requirement justified?

Green Party response:

In Section 2, Greater Norwich Profile, the “Population” section states that long term trends underpin the need to plan for population growth. But birth rates have been declining locally and nationally. The birth rate in Greater Norwich fell from 11.3 in 2011 to 9.6 in 2018 reflecting this pattern. The birth rate is at its lowest level recorded. Population growth, therefore, is very much due to people moving into the area. At the same time, there appears a constant clamour to create jobs but local people have to compete with people attracted into Norfolk (because it is a pleasant place to live?) for those jobs. It seems incredibly unfair and unreasonable that we do not have an integrated plan in Norfolk to recognise and take action to manage the balance between education, training, and jobs for local people. There is clearly a mismatch of education, training and jobs. The demand for “high-skilled jobs” which, under current circumstances, means recruiting skills from outside Norfolk is perverse. It results in an increasing population that cannot be sustained by ever more house building, increased traffic, and consequential damage to the environment. Another consequence is that as house prices are relatively low compared to other parts of the country then local people cannot afford to buy their own houses which are snapped up by incoming recruited skills and talent who can afford to move into a new house.

The “Brexit factor” has not been taken into account in any of the estimates of housing need. There is no longer the migration into the UK as in the past, and especially by those who have been attracted to the eastern region from Europe. This is bound to have an impact on inward migration to the area and, therefore, housing need.

The significant reduction in the availability of skilled construction workers from Europe due to Brexit and the lack of home-grown skills to fill the gap in the short to medium term will also have an impact on the skills available to deliver the proposed numbers of houses. Construction firms have complained of unavailable transport, a severe lack of materials and continued staff shortages among bricklayers, drivers, ground workers, joiners, plasterers and plumbers. It has meant many struggling to find the subcontractors needed for building projects.

Data indicates the construction sector has seen significant wage growth since the start of 2021, second only to drivers. There will be a limit to how much wage increases can fill the gap as there is heavy competition for a finite number of skilled tradespeople. Material and energy costs are also skyrocketing. The combined increased costs of skills and materials will result in increased house prices at a time when household budgets are being squeezed.

In 2018, the property price to earnings ratio was 9.2 in Broadland, 7 in Norwich and 8.8 in South Norfolk, compared to a national average of 7.8. Affordability is already a major barrier to home ownership locally.

It is agreed there is a need to plan for changes in the types of homes due to an increase in the number of older people, and more younger people sharing homes. But we cannot agree the GNLP needs to plan for additional housing needs above and beyond existing commitments.

To summarise the above:

- The various pressures on the costs and availability of skills and materials will clearly have an impact on delivery. Consequent increased house prices will further compound affordability and weaken demand. Housing targets are already ambitious and a further 22% buffer is not realistic in the circumstances.
- We are already damaging our environment through building on high quality agricultural land and infilling green spaces – that the plan states elsewhere we need to encourage and increase green spaces!
- We do not need any more houses above the minimum commitments from central government. We do need, within that allocation, the right houses to house our elderly and young.
- Any more houses will simply put more pressure on our fragile environment, and increase energy and water needs which are already in short supply and increasing in cost. It just isn't sustainable.

The extent and rate of planned housing is a national issue recognised all over the country as well-known Conservative MP, Tom Tugendhat (MP for Tonbridge and Malling), has said: "Of course we need new homes for young people in our community and to give people somewhere for their families. But the government's climate change commitments make some of these decisions pretty strange. We can't go around bulldozing fields when we need to maintain our green spaces to meet our climate commitments." (*The Observer*, 16 January 2022).