

A2 Does the evidence (including the Regulation 30 (d) and 30 (e) statements and the GNDP's self-assessment paper) show that the JCS has been prepared in compliance with the Councils' Statements of Community Involvement?

1. **No.** The JCS does not comply with PPS12 and the Councils' Statements of Community (SsCI) due to a **lack of transparency** over GNDP conduct in its handling of JCS.
See Appendix 1 (A2), Policy Framework for Transparency in Plan Making and Community Involvement.
2. **Lack of an Audit Trail**
3. Although the GNDP has consulted the public at key stages as prescribed by regulations, the GNDP has made it difficult for the public to follow an audit trail and understand the reasons for its decisions, for example the balance between SW and NE Norwich as locations for major growth. The GNDP claim that its management structure allows it to meet behind closed doors and not publish agenda papers and minutes, leading people to conclude that the GNDP has something to hide. **See Appendix 2 (A2)**
4. Acting in this secretive way has enabled the GNDP and its informal local authority grouping predecessor to push ahead with controversial policies, several of which have been announced out of the blue:
 - Bid for Growth Point status
 - Growth Programme of Development which included Postwick Hub project
 - Rackheath eco-town
5. Exclusion of the public and press enabled the four councils to negotiate over the amount and location of housing and infrastructure. This has disenfranchised the public from understanding how decisions have been reached. No plausible explanation for the exclusion of public and press has been provided.
6. NNTAG has requested release of all GNDP papers on several occasions including in letters to the Inspectors (8 and 22 April 2010) and at the Pre-Hearing Meeting. Even if all papers were released at this late stage, they would not compensate for the public's exclusion from GNDP meetings since 2007.

7. **GNDP Rebuttal**

8. The GNDP has responded to the lack of transparency issue thus:

“The decisions on the adoptions of policies were taken by the GNDP local authorities through their individual council Cabinet and full Council meetings.

“The public was made aware of the successive stages of decision making through the publication of agendas for the Cabinet and full Council meetings.”

GNDP Regulation 30 (1) (e) Statement, s. 5 Legal Compliance, Initial GNDP response

9. **NNTAG Response:**

- 9.1 There was often several months delay in reporting/referring GNDP related matters to the different committees of the four member authorities. E.g. Norfolk County Council, Issues and Options draft consultation, 2007.
- 9.2 The four local authorities have provided differing degrees of information on GNDP activities (eg Norwich City Council provided a 15 page report to its Executive on 18 October 2006 with regard to establishing a GNDP following informal GNDP meetings on 14 Aug and 27 Sept 2006. Broadland DC simply gave a verbal report to Cabinet on 11 September and a 3 page written report to Council on 19 September.
- 9.3 In some cases, Committee papers and minutes show updates on GNDP/JCS as given verbally rather than in written reports (Broadland DC is prone to this approach).
- 9.4 That there is no real justification for the GNDP’s refusal to publish agenda papers and minutes is apparent in view of the GNDP’s tendency, since early 2010, to publish its Policy Group agenda papers on its website where it so chooses.
- 9.5 There has been no formal scrutiny of the GNDP by the local authorities. The Audit Commission scrutinised the GNDP in 2008/09, but invited no public input. NNTAG requested ToR which were provided after publication of the AC report.
- 9.6 What appears in reports to the individual local authority partners appears less than complete (ref GNDP papers obtained under FoI).
- 9.7 In any case, written material, although essential for community stakeholders for obtaining a more complete picture and the placing of it in obscure parts of four separate local authority websites is not a substitute

for 1) a single source of the electronic documents that is in a single well structured website, searchable by content, and 2) the ability to attend meetings, hear discussions between authorities and how the balance between different options was struck.

- 9.8 Routine publication of agenda papers and minutes and the ability of the public to attend meetings and table public questions is necessary for giving the public a ‘narrative’ of a complex and lengthy preparation process. It should not have been necessary for the Inspectors to request EiP 86 and an audit trail of how decisions over the SW growth options were taken had the GNDP adopted an open attitude.
10. This situation wasn’t helped by the poor availability of information posted on GNDP website. Until a year ago, the GNDP web housed limited information. Even at key consultation stages, material referred to in GNDP documents sometimes wasn’t available on the GNDP website. NNTAG commented on this aspect on several occasions in its response to consultation papers.
- 11. GNDP Policy Group Meeting on 23 September 2010**
12. Even where GNDP papers are published, the public cannot be certain that they accurately reflect discussions at meetings. A recent example of this is the GNDP Policy Group meeting on 23 September 2010. Agenda papers were posted on the GNDP web in advance of the meeting on 20 September (the first occasion ever). The report by the GNDP Directors recommended against submitting the Focused Changes to the status of the Growth Triangle. Hence, the meeting was of considerable public interest.
13. A member of the public who tried to attend the meeting was turned away. (letter from Peter Lanyon of Plumstead published in *Eastern Daily Press* on 28 Sept 2010).
14. Afterwards, the GNDP published minutes of the meeting on its website, with a separate statement alongside stating that, ‘**The GNDP also agreed to review the Strategy**’. A spokesman for the GNDP said:
- “The GNDP acknowledges that since the Strategy was prepared the political and financial context has changed such that delivery may be more challenging. Consequently, we are committing to a timely review to revisit assumptions in light of emerging changes to the planning system, the localism agenda and the availability of investment. A timetable and plan for this review will be presented to the next Policy Group meeting on 16 December.”*
15. Firstly, there was no minuted record of such a discussion. Secondly, an important debate on the JCS ought to have been in the public domain. Thirdly, the statement

shows the GNDP in the driving seat. Fourthly, the recommendation to undertake an early review (ie December 2010) in the light of political and financial changes suggests that the partners have doubts over the soundness of the JCS.

A3 Has the JCS been prepared in accordance with the requirements of the 2004 Regulations (as amended) including those concerning the publication of the prescribed documents, their local advertisement and availability for inspection, the notification of DPD bodies and the provision of a list of superseded saved policies?

16. The answer is **No**. All the evidence points to the Focussed Changes public notices and consultation period being **invalid**. Minor changes recommended by GNDP Policy Group meeting on 23/9/10 ought to have been consulted upon.
17. **Time period for consultation**
18. In her letter of 20 September (EIP 78), Sandra Eastaugh of the GNDP stated, *“The Regulations do not really cover the issue of focused changes. However, we based the period for comment on the pre submission stage”*. The Local Development Frameworks Examining Development Plan Documents Procedure Guidance (2009) advises that Post submission LPA changes to a submitted DPD should be subject to the same process of publicity and opportunity to make representations as the DPD. (5.23) Therefore, notice of publication of the Focused Changes should have been handled in the same way as publication of a DPD and in accordance with S27 of the Regulations.
19. Notice of publication of the Focused Changes does not appear to accord with the requirements of the 2004 Regulations, viz S.27 Publication of a development plan document and S.28 (3) the six weeks period of notice. The time allowed for representations from 19 July to 30 August 2010 fell short of the period specified by S.28 (3) of the Regulations of ‘not less than six weeks’. Monday 19 July should not have counted as one of the 42 days, whilst 30 August was invalid as a closing date as it was a Bank Holiday (ref. High Court Civil Procedure Rules 2004, S2.8). Forty two days ought to have started from the publication of the formal notice in the weekly papers - Friday 23 July, with the last day at midnight Monday 6 September.
20. NNTAG wrote to the GNDP on 27 August pointing out this and other errors (EIP 78). In a reply dated 20 September, the GNDP Manager asserted that the bank holiday was not relevant (EIP 78). NNTAG responded on 22 September that the GNDP interpretation of the six week period was invalid (EIP 83). The GNDP has not challenged this.

21. Public notice

22. The advertisement published in the Eastern Daily Press is not a proper public notice as required by S. 27 of TCP (Local Development) (England) Amendment Regulations 2008. It fails to give the legislation under which representations were being made. It lacks a formal public authority name and address. It fails to state effectively what the policies being consulted on are. The documents published for representations were not deposited anywhere to study. There is no statement as to where representations must be sent and the closing date was invalid. A full list of the deficiencies is given at **Appendix 1 (A3)**.

23. There was no public consultation on ‘minor changes’ (EIP 93) to Joint Core Strategy as part of Focused Changes

24. The LDF Procedure Guidance states in relation to ‘Post submission changes to a submitted DPD’,

“First, the change must not undermine or possibly undermine the sustainability credentials of the plan. Second, is the change a matter that has been subject to adequate community engagement? If there is a problem with either of these matters the change may, in some instances, be acceptable provided the LPA has taken appropriate steps to demonstrate that the sustainability credentials of the plan are intact or that further adequate community engagement has occurred.

25. Appendix 3, Schedule of Further Minor Changes to text accompanying the report to GNDP Policy Group meeting on 23 September 2010, proposed changes to the JCS text to address the references to the Eco-town (p11):

- Deletion of references to: an ‘eco community’.

- Replacement by: ‘a low carbon development’; proposed exemplar development at Rackheath; Rackheath low carbon development; or even just ‘Rackheath’.

26. This change is arguably not a ‘minor change’. The ‘eco-community’ and ‘eco-town’ concept carry national policy weight, supported by strong national guidance on a wide range of development standards, including on transport (eg “at least 50 percent of trips originating in eco-towns to be made by non-car means, with the potential for this to increase over time to at least 60 percent”, ET 11.2 (a)). Replacement by ‘low carbon development’ has no special policy meaning, especially given that the Government is committed to all new homes being zero-carbon from 2016. There is a danger that watering down the eco-town concept could result in standard development.

27. **The ‘minor changes’ could undermine the sustainability credentials of the plan and they ought to have been part of the Focussed Changes consultation.**

A4 Have Sustainability Appraisal (SA) and Appropriate Assessment (AA) been undertaken, the latter under the Habitats Directive?

28. SA and AA have been undertaken. However, NNTAG considers that SA has been conducted incorrectly in accepting a NDR as part of the baseline case rather than treating the road scheme as an option with a requirement to test other alternative options.
29. The EC Directive 2001/42 on Strategic Environmental Assessment requires that
- “an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.”* (Article 5 (1))
30. Annex 1 on information referred to in Article 5 (1), specifies at (c)
- “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation”*
31. A NDR does not form part of the current state of the environment as it has not been built and there is no guarantee that it will.

B1 Are the spatial vision and objectives as part 04 of the JCS (and the strategy depicted on the key diagram at p29 of the JCS) justified, effective and consistent with national policy?

1. NNTAG is particularly concerned about the inconsistency of the strategy depicted on the key diagram with national policies on climate change (Climate Change Act 2008 and target reduction in carbon dioxide emissions of 80% by 2050 on 1990 levels; Supplement to PPS1: Climate Change) in relation to increasing car travel through major new road capacity (NDR/Postwick Hub and A47 Southern Bypass junction improvements).
2. We have several concerns:
 - 2.1 that a NDR will increase car dependency, especially since the County has timetabled construction of the road before sustainable transport elements are fully funded and delivered.
 - 2.2 that a NDR will generate local orbital journeys by road in conjunction with the A47 Southern Bypass which will be difficult to shift to low carbon modes. Locating strategic housing to the north-east of Norwich when strategic employment sites lie to the SW and linking them by an orbital road will encourage additional car trips, supported by higher car parking provision on the edge of the City.
 - 2.3 linking housing growth and employment sites in NE Norwich (Broadland Business Park and airport-related business park) via a NDR will encourage orbital movements.
 - 2.4 NATS contains no demand management measures for restraining traffic levels.
3. The response from GO-East dated 14 December 2009 to the JCS Regulation 27 public consultation highlights that national policy for transport is seeking to move the focus away from the “*predict and provide*’ approach of the past and to focus on the challenge of delivering strong economic growth while at the same time reducing greenhouse gas emissions”. (para 4).
4. The GO-East letter goes onto “*question the over-riding priority given to construction of the NDR and whether this is consistent with the commitment in Policy 1 to give priority to low impact modes of travel*”. (para 7)
5. **The submission JCS has not addressed this question.**

6. NNTAG asked GNDP (26/10/07): Has a carbon audit been undertaken for the different growth location options? GNDP Answer: “No. This would be far too detailed at this stage. Issues around transport and accessibility are key considerations for assessing locations. Minimising carbon emissions arising from the development will be something for masterplanning stages. An SA of the potential locations for growth will be used to inform the selection of the Preferred Option.”

7. In response, firstly minimizing carbon emissions should be built into the early stages of development plan preparation and not left to masterplanning stages. Secondly, the GNDP chose to disregard the SA findings on occasions (e.g. SA advised that growth outside line of NDR could increase car travel). Thirdly, we have concerns that the Sustainability Appraisal of the Pre-Submission JCS (Sept 2009) in relation to evaluation of the NDR impact on transport and travel is not evidence based and so underestimates the impact of a NDR on carbon emissions. For example,

Summary of appraisal findings, 4th para).

“The SA highlights that growth in such proximity (ie north-east Norwich) to the NDR may encourage car-based trips, but this potential negative effect is uncertain”.

SA Policy 8: Summary: Access and Transport

“Overall environmental effects – It is thought that, despite the fact that this strategy for access and transport does include the promotion of new road infrastructure, the overriding effect will be to support wider efforts to reduce car dependency and promote more sustainable travel patterns within Greater Norwich”.

SA Table 5.12: Policy 12 – Locations for major new or expanded communities in the Norwich Policy Area

“Overall summary of effects: “If suitable ambitious measures are implemented then it may be wrong to assume that access to a major orbital road – the proposed NDR – ‘on the door-step’ of the development will lead to on-going car dependency”.

8. However, EiP 88 Table 4, reveals that implementation of NATS in 2031 (NDR plus other complementary measures) increases overall traffic by 4%.

9. The NDR Major Scheme Business Case showed that carbon emissions would rise by 25,000 tonnes in the first year after NDR opening, an increase of 6% over current road transport emissions for Norwich area rising to a 57% increase by 2071.

10. The East of England Transport and Carbon Study: Assessing transport’s contribution to a low carbon economy in the East of England, EEDA, (Nov 2009), concluded that transport carbon emissions will grow significantly (35% between

2006 and 2031), if existing and proposed transport schemes (such as a NDR) are built and no other action is taken.

11. Whilst Norfolk's total transport emissions fell by 4.4% between 2005 and 2008 and at the same time traffic flows increased by 1%, the reduction may be due to a change to more fuel efficient vehicles. However, as TRACS indicates, improvements in vehicle and fuel efficiency over time will result in additional vehicle kilometres (p.82).

B2 i) Was there adequate identification, consultation upon and testing of 'reasonable alternative' spatial visions and strategies before the formulation of the submitted JCS?

12. No. This is because the four councils had a strong preference for a spatial strategy based on an excessively large north-east urban extension in conjunction with a NDR, even though there are reasonable alternatives which have not been tested, notably a better balance in the distribution of growth between NE and SW of City based around a public transport-led as opposed to a NDR-led transport strategy.

13. Housing:

Broadland DC and Norfolk CC have long favoured growth concentration in north-east Norwich in conjunction with a NDR. (See Appendix 1 (B2))

14. A range of housing distribution options were tested in the early stages and presented in the Issues and Options Consultation Report (Nov 2007) which mooted as an option an even split of 15,000 new dwellings between three major growth locations :north-east, Wymondham and a new country town based around existing settlements in the SW(5.22).

15 In the following stages, the housing allocation fell in the SW of the City
Regulation 25 Technical (Aug 2008) proposed: Hethersett/Little Melton area 4,000, Wymondham 4,000.
Regulation 25 public consultation (March 2009): Hethersett 1,000, Cringleford 1,200, Wymondham 2,200.
Proposed Submission JCS (Nov 2009): as March 2009.

16 At the same time, housing numbers grew in north-east Norwich:
Regulation 25 Technical (Aug, 2008) 6,000.
Regulation 25 public consultation (March 2009): Old Catton, Sprowston, Rackheath, Thorpe St Andrew 'Growth Triangle' 7,000.
Proposed Submission JCS (Nov 2009): 7,000 new dwellings rising to 10,000 in a 'Growth Triangle'.

NNTAG surmises the reasons as follows:

17 Political considerations

As the GNDP Soundness Self Assessment document (March 2010) acknowledges,

*“The choice of strategic options were **political decisions** and were made having considered all of the evidence and the consultation responses”*

Stage 3: Plan preparation – formulation phase (Regulation 25 public consultation), Q8.

i) SNDC was unwilling to take large concentrations of growth and negotiated a dispersed distribution. In addition, the Council sought extra housing growth at Long Stratton to help fund a bypass. This followed a letter from the Department for Transport to Norfolk CC in October 2006 notifying of the Minister’s intention not to confirm Side Road and Compulsory Purchase Orders following a local public inquiry unless the County could find alternative means of funding the Long Stratton bypass. Planning permission for Long Stratton bypass expired in July 2010.

ii) Broadland DC wanted major growth in NE Norwich to secure significant infrastructure.

iii) The bottom line of Norfolk CC was to achieve a NDR.

iv) Norwich City Council wanted higher growth and in 2006, with the support of the Norfolk LGA, asked EERA for an additional 2,400 new dwellings on top of the Draft East of England Plan allocation. It supported a NDR for serving Norwich Airport.

18. GNDP support for a Norwich Northern Distributor Road

North-east Norwich became the primary growth location and additional housing was channelled here to help boost the justification for a NDR and increase funding opportunities for a NDR (Growth Point and Community Infrastructure Funding for Postwick Hub, Eco-town Funding for NDR, extra scope for developer contributions). Also, Broadland DC was willing to accept growth in one large concentration, unlike South Norfolk DC.

The GNDP submitted a bid for a Growth Point Development Programme, which included the Postwick Hub project, the first stage of a NDR. Norfolk CC, with the help of Broadland District Council, secured planning permission for Postwick Hub in December 2009. Earlier in the year, Norfolk CC and Ifield Estates had submitted a joint planning application to Broadland DC for Broadland Gate/Postwick Hub. The application was advertised as a departure from the adopted Local Plan. The normal planning procedure involves the local highway authority applying to itself for a County road scheme. In this case, the County applied to the district council for a County road scheme on the back of a business park. In doing so, the County avoided the requirement for a local public inquiry into objections to Postwick Hub.

In August 2008, the GNDP nominated Rackheath as an eco-town location without any prior public discussion, partly to boost the justification for a NDR and funding possibilities for infrastructure.

19. Dependence of JCS on a NDR and No Plan B

In this way, the JCS became ‘predicated’ on a NDR, with ‘No Plan B’.

A Plan B could involve some re-distribution of the housing growth away from NE Norwich to SW of City; abandonment of a NDR/Postwick Hub; making best use of the existing road and rail infrastructure to SW of City; development of a turn-up-and-go public transport system.

20. Transport:

The spatial strategy has been predicated on a NDR-led transport strategy. Reasonable alternatives have not been tested in relation to the spatial planning strategy as required by PPS12 (4.36)

“Core strategies must be justifiable: they must be:
founded on a robust and credible evidence base; and
the most appropriate strategy when considered against the reasonable alternatives”.

Although a Public Transport Strategy option was tested in the course of NDR Major Scheme Business Case preparations and in further work requested by the Department for Transport, the option performed badly, as transport consultant, Keith Buchan, MTRU, commissioned by NNTAG and CPRE Norfolk, concluded.

i) Review of NDR MSBC December 2008

Ref. Appendix 2 (B2): pages 6 and 8 of: Norwich Northern Distributor Road (NDR): Preliminary data requests and subsequent analysis: powerpoint presentation to the Department for Transport by MTRU, December 2008.

“Public transport options are inadequately prepared and perform strangely – in the Forecasting Report worse than Do Minimum and with one extra passenger in the pm peak compared to the Preferred scheme.....There is no evidence of a “best performing alternative” having been conceived, prepared or presented”. (p6)

“No proper preparation and analysis of non-road alternative as in webtag and Treasury Green Book (NATS is not comparable”. (p8)

Ref Appendix 3 (B2) page 3 of Interim Note from MTRU, Feb 2009.

“The conclusion that the public transport option is extraordinarily ineffective therefore stands”

ii) Further work Norfolk County Council on sensitivity testing and modelling work.

MTRU commented briefly on the results (EiP T14) and concluded:

transport emissions will be worse;
present levels of congestion will become worse;
none of the sensitivity tests address the lack of serious consideration of alternative options.

All the tests are based on virtually zero demand management.

Ref. Appendix 4 (B2) Initial response by MTRU to sensitivity testing reports for the Norwich Northern Distributor Road, 4 December 2009.

See also Appendix 5 (B2), letter from MTRU to NNTAG dated 23 September 2009, (copied to DfT and Norfolk CC), setting out some views on problems with the NDR model in relation to switch to sustainable transport modes.

Although NDR was granted Programme Entry in December 2009 subject to a number of conditions, the DfT only gave its support to a shorter road to A140 north of Norwich on the basis of the value-for-money test, largely derived from time savings.

The present roads planning and appraisal system is skewed towards road building. Hence, the new Government has decided to reform the submission of major scheme business cases and has suspended the Major Scheme Guidance for Local Authorities (Interim Guidance on Local Authority Major Schemes, DfT, June 2010). It is highly likely that the value of time savings will be reduced, whilst carbon savings will be given a higher value.

In relation to the JCS, we conclude with our earlier point that preparation of the Core Strategy did not consider reasonable alternatives to a NDR in accordance with PPS12.

B2 ii) Is there a clear audit trail demonstrating the decision-making process by which the spatial vision and objectives of the submitted JCS were arrived at?

No. It is necessary to fit together all parts of the bigger picture using many different sources. Exclusion of the public and press from GNDP meetings and the difficulty in following a narrative through the committee papers of four councils has made it difficult if not impossible to follow the audit trail

B2 iii) If (in any aspect) a balance was struck between competing spatial alternatives, is it clear how and why the selected balance was struck?

No it is unclear how the balance between competing options was struck. The public consultation documents do not explain the reasons for channelling major growth to north-east Norwich and dispersing housing growth to the SW of Norwich.

Eg Regulation 25 Public Consultation Report (March 2009) simply states:

Policy 5: Locations for major change and development in the Norwich Policy Area

“The Issues and Options consultation (Nov 2007 – Feb 2008) invited comments on specific locations for major growth. Although there was no significantly different public preferences between places, a number of places for larger scale growth have been considered for further investigation and public consultation. The technical consultation (Aug 2008) suggested three options and these are described in Appendices 1,2 and 3. the favoured options draws on the response to theses and other evidence gathered and takes account of the latest information on current and past housing supply.”

The Reasoned Justification accompanying Policy 5 does not explain the reason for the choice of options and how the balance was struck between NE and SW of City. All three options revolved around a north-east ‘growth triangle of 7-10,000 dwellings. Appendix 0 on the ‘Favoured Option’ described at some length the GNDP’s preference for a north-east growth triangle, but no explanation was provided for choosing it over the SW area.

Note on the Background to a proposed North-East Norwich Urban Extension in conjunction with a Norwich Northern Distributor Road

Norwich and Norfolk Transport Action Group, September 2010

Overview

Broadland DC and Norfolk CC have aspired to build an urban extension of 7,000 new dwellings on the NE side of Norwich in conjunction with a NDR after the proposal for a Norwich Northern Bypass was put forward in 1988, with the prospect of opening land for development. Norfolk CC dropped the NDR in the period 1996 – 1999, whilst maintaining support for an NE urban extension, but resurrected a NDR in 2001.

The Panel Report (June 2006) of the Examination into the Draft East of England Plan held in 2005/2006 recommended deletion of the location-specific proposal for a major urban expansion of about 7,000 dwellings in NE Norwich linked to major transport improvements.

“We do not consider that there is sufficient sound evidence at present about the environmental capacity and infrastructure requirements of the various possible growth options for the NPA.”

The evidence base for the various growth options particularly in relation to infrastructure requirements remains an issue in the current list of Matters for the Submission JCS.

The June 2006 Panel Report overlapped with public consultation on the Broadland Local Development Framework Core Strategy in July/August 2006. The two main priorities in the latter were to secure a north-east sector extension and a NDR in line with the Draft East of England Plan. This policy was overtaken by the Panel Report and East of England Plan (May 2008), which deleted explicit references to the NE urban extension and NDR.

Nonetheless, the concept of the NE urban extension on land opened up by a NDR was carried forward into the Joint Core Strategy and through its various stages.

In the early stages, the JCS considered a range of growth options in the NPA. The Issues and Options Report in 2007 proposed a balanced distribution in major growth between NE Norwich and A11 corridor at Wymondham/ Hethersett. However, from the outset the JCS treated the NDR as part of the baseline case and not as an option.

The Regulation 25 Technical Consultation in August 2008 put forward three potential options for major growth distribution. Common to all three was a NE urban extension/ NDR (6,000 dwellings) at Sprowston/Rackheath. In South Norfolk NPA, the numbers of new housing differed between options. Option 1: SWest (Hethersett/ Little Melton area) 4,000; Wymondham 4,000. Option 2: SWest 4,000; Wymondham 2,000. Option 3: SWest nil; Wymondham 2,000; new village (4,500) to south at Mangreen.

The Regulation 25 public consultation in March 2009 advocated a Favoured Option:

- i) major growth located in a 'Growth Triangle' of 7,000 dwellings rising to a total of at least 10,000 after 2026. The area now included development of an eco-town at Rackheath which had been announced by the GNDP in August 2008.
- ii) moderate growth to SW of City – Wymondham (2,200), Hethersett (1,00), Cringleford (1,000), Easton/Costessey (1,000) and Long Stratton (1,800 to help fund a bypass).

A report to Norfolk CC Cabinet on 5 January 2009 listed disadvantages of the South Norfolk Option which included "*the dispersed nature of development in the A11 corridor challenges the viability of high frequency public transport and BRT.....Overall the infrastructure costs of this Option are likely to be higher than the previous options considered*". (2.8). The report concluded, "*The proposed distribution of growth in South Norfolk poses significant challenges to the planning and provision of secondary school places, public transport and other transport priorities. However, the GNDP considers that these risks are outweighed by the advantages of the proposed distribution*". (9.1)

What were the reasons for concentrating major growth in NE Norwich and dispersed growth in South Norfolk part of Norwich Policy Area? Based on examination of all the evidence, NNTAG surmises some of the reasons:

1) Political Considerations

The GNDP was made up of four councils each with different aspirations and priorities:

- Broadland DC aspired to develop a NE urban extension on land opened up by a NDR. The Council was willing to accept substantial growth to maximise infrastructure.
- South Norfolk Council was unwilling to accept a large concentration of growth and was happy for Broadland to shoulder the pressure. SNDC wanted housing growth at Long Stratton to help fund a bypass following the Department of Transport letter to Norfolk CC in 2006 informing that the Government would not fund a bypass.
- the bottom line of Norfolk CC was to build a NDR.
- Norwich City Council supported significant growth in NPA to boost the role of Norwich as a regional city and support its aspiration for Unitary status.

2) Funding Considerations

Policy decisions followed funding. Increased emphasis on NE Norwich responded to the availability of new Government Funds for supporting housing growth (Growth Point, Community Infrastructure, Eco-town). The GNDP took advantage of the funds for helping to meet the large shortfall in funding for a NDR. The NDR was split into two schemes and a bid was made for Community Infrastructure Funding for Postwick Hub project, the first stage of a NDR, on the basis of opening up land for housing and employment, even though Broadland Local Plan showed orbital road links between an improved A47 Postwick Interchange and A1151 Wroxham Road with the aim of serving major housing growth in the north-east. The JCS has been very much led by a NDR.

In this way, the Submission Joint Core Strategy was made dependent on delivery of a NDR, leading the GNDP to claim that there is 'No Plan B'.

Decisions/Activities: NDR/North-East Norwich Growth Area

1988 – Review of NATS1 undertaken by Halcrow Fox. The proposed package included five road schemes and a 7-site bus park and ride system; it was predicated on completion of the Norwich Inner Ring Road Phase 3 (IRR3) which the County argued was necessary for removing 19,000 vehicles which passed through the City centre without stopping. Behind the scenes, developers through landagents Savills, promoted a north-east urban extension in conjunction with a proposed Norwich Northern Bypass.

1992 A Northern Bypass formed part of the Preferred Strategy.

1992, June – Halcrow Fox recommendations were adopted by Norfolk CC with the exception of the Northern Bypass and associated environmental protection areas.

1993, March - Structure Plan for Norfolk to 2006 was approved. The County undertook a Review of Structure Plan for Norwich Policy Area which ran only to 2001. Public consultation document included a Norwich Northern Distributor Road.

“The road would be intended primarily for local traffic travelling around the northern urban area. This would make it very different from a bypass. The NDR – if it were built – would pass close to the built up areas and so be very accessible for short journeys. To make sure a new road would not create additional traffic it would be necessary to prevent new development in areas either side of the road”.

Norfolk Structure Plan: Norwich Area Review: How should the Norwich area develop over the next 12 years? Norfolk County Council, 1994.

1994 – IRR3 was rejected by the Secretaries of State on environmental grounds following a call-in inquiry. The refusal of IRR3 led to a fundamental review of NATS2.

1994 – the public were consulted on a Northern Bypass as part of the review of the Norfolk Structure Plan for Norwich Policy Area. While the majority of respondents supported a NDR, there were strong objections on environmental grounds.

1996 - Norfolk County Council abandoned Norwich Northern Bypass on financial and environmental grounds and because national policy had begun to change towards a presumption against providing additional highway capacity.

1997 – NATS3 adopted - park and ride and no significant increase in road capacity.

1998 – Examination in Public into Norfolk Structure Plan Review for Norwich Area. Norfolk CC proposed a 7,000 dwelling urban extension in north-east Norwich, without a Northern Bypass. The Panel rejected the proposal as the public had not been consulted.

1999 – Norfolk Structure Plan NPA to 2011 adopted without a Northern Bypass.

2000, 8 November – following the election of a new County administration in May, the County Strategic Planning and Transport Review Panel requested and received a report on the NDR which noted that *‘Recent developments...have led to some requests that the possibility of a northern orbital route for Norwich be reviewed’*.

2000 – adoption of Broadland Local Plan. Land was allocated for a Broadland Business Park and a safeguarded route for a Broadland Business Park Link Road linking the A47 Postwick Interchange to B1140 Plumstead Road East to the west of Thorpe End village.

2001 – ‘Shaping the Future’, a local partnership established by Norfolk CC in 1997, published an economic strategy which included an aspiration for a NDR. The report was signed by the Norfolk’ Chief Executive as Chair of the Management Board. Shaping Norfolk’s Future sits on the GNDP Policy and Directors’ Boards and Transport Group.

2001, 19 September – the Nfk CC Cabinet endorsed the Shaping the Future strategy, thereby endorsing the concept of a NDR before investigation of the road had begun.

2001, 21 November – Norfolk CC Cabinet agreed to review NATS, including a NDR. In December, the County issued a brief to consider possible NDR route options.

2001, December – work commissioned to assess possible NDR options. The NDR Environmental Assessment Report published in 2003 explained, *“The need for a road will be considered as part of the review of the NATS strategy and can be examined in the issues consultation for the Structure Plan (review). However, Members have already agreed to reconsider a NDR should this emerge as a chosen strategy from NATS study”*.

2002, October - Public consultation on Norfolk Structure Plan Review Issues Report Looking Towards 2025. Location options for major growth were:

- edge of the built up area to the north-east of Norwich, “somewhere between the B1150 North Walsham Road and the A47 East”; (“a proposed Northern Distributor Road would serve the area and development could contribute to its funding”).
- Wymondham.
- a new village or significant expansion of an existing village;
- split major growth between NE Norwich and Wymondham.

The process was overtaken by the re-shaping of development plan system.

2003 – public consultation on NATS Review Problems and Issues. The first question asked whether the respondent supported a NDR between A47 west and A47 east for:

- tackling rat running and traffic congestion around north Norwich.
- improving strategic access to and from north Norfolk, Norwich airport;
- facilitate housing growth in the Norwich area.

The County stated also that a NDR was needed to remove 19,000 vehicles passing through from the City centre without stopping. (same figure for IRR3 in 1992). 78% of respondents supported a NDR. This was unsurprising because the consultation document had emphasised the traffic reduction role of a NDR, with tables showing traffic reduction on various road links; but no mention of housing numbers.

2003, 18 August – a report by the Director of Planning and Transportation to Norfolk CC’s Cabinet explained that, “*The original Norwich Area Transport Strategy in 1994 identified problems that could be overcome by providing more road capacity in the northern part of the city.....these problems still exist and a NDR is therefore an important element of the preferred strategy in the present review of NATS*”. This reads as though the NDR was being taken as a given element of NATS prior to completion of the NATS Options Assessment Report published in November 2004.

2003, October – public consultation on a NATS Preferred Strategy. NDR formed the principal plank. Other elements proposed for tackling short/medium term issues before a NDR could be built and longer term issues that a NDR would not address included:

- new bus station and improved links between bus and rail stations;
- road safety measures
- improving public transport including a potential new Park and Ride site;
- traffic management measures for reducing through traffic;
- programme of inner and outer ring road junction improvements.

2004, November – NATS Options Assessment Report was produced. This reviewed transport problems in Norwich and considered options for ameliorating the problems and meeting the County Council’s objectives for transport. The report identified four alternative strategies, one of which included a NDR, with the other three not including the road scheme. The report concluded that the NDR was the only option “*that answers the majority of these concerns*”, namely “*the problems and issues identified*”.

2004, November to December - public consultation on NDR route options, one of which involved a single carriageway inner route incorporating improvements to existing roads plus proposed developer-funded road links safeguarded in the Broadland Local Plan (Replacement) 2006 (Broadland Business Park Link Road between A47 Postwick Interchange (proposed for improvement in the Local Plan) and Plumstead Road; and Blue Boar Lane link road between Salhouse Road and Wroxham Road for serving major housing allocation at Sprowston).

2004, December – submission of Draft Revision to Regional Spatial Strategy for the East of England between 2001 and 2021 to the Secretary of State by EERA and placed on deposit for consultation to March 2005. The housing allocation for NPA was:

Broadland	- 10,500
Norwich	- 10,600
South Norfolk	- 8,400
Total	= 29,500 new dwellings

The supporting text (5.62) added, *“New allocations will include a major urban expansion in the north east sector of the urban fringe linked to major transport improvements. The core development will be masterplanned to provide a coherent new urban village”*.

The RSS identified a large number of major transport infrastructure priorities including a full NDR. *“A Norwich Northern Distributor Route is essential to improve the quality of life in residential areas, aid rural regeneration, enhance links to strategic employment areas, facilitate urban expansion and improve access to Norwich International Airport”*.

2005, May – letter from Norfolk LGA to EERA supporting Norwich City Council’s bid for additional 2,400 houses.

2005 – publication of Broadland DC Local Development Scheme for 2005-08. *“The Core Strategy is seen as a priority in order to enable the Council to address two major issues. The first is the need to give early development plan backing to a proposed northern distributor road for Norwich as proposed by the County Council and subject to the confirmation of the principle of the proposal through the RSS process. The second reason is to reflect the growth proposals in the draft RSS which will require significant land allocations including a major urban extension to the north east of the Norwich Urban Area. The Core Strategy DPD will define the area for more detailed work through the North east Sector AAP and will relate the area to the Northern Distributor Road Proposal”*. (2.10 – 2.11).

Work on a North East Sector Area Action Plan was scheduled to start in 12/07. A map showed the approximate area of NE Sector AAP located inside the line of NDR. The LDS identified a NDR and major urban extension as “key risks”. (6.9)

2005, 26 September – the Full County Council adopted Preferred NDR Route from A47 Postwick to A1067 Fakenham Road (outer Eastern blue route between Postwick and A140 Cromer Road). It dropped the western river crossing to A47 west on environmental grounds, later adopting a A1067 - A47 link road to address the problems.

2006, March – the NE Extension was put forward as one of four initiatives in a Norwich Area New Growth Point bid submitted jointly to CLG by Norfolk County Council, Norwich City Council, Broadland and South Norfolk District Councils, to tap into a Growth Point infrastructure fund of £40 million. The public had no input.

2006, adoption of Broadland District Local Plan (Replacement). It included the allocation of a significant area of housing land at Blue Boar Lane Sprowston and the provision of a new road linking Wroxham Road to Salhouse Road for serving the development and to enable orbital movements between these two radials. The Transport chapter explained that the Sprowston development can help to contribute to improving wider transport infrastructure:

“The development has also been designed to facilitate the eventual creation of an orbital route around the north-east of the urban area to link with the Broadland Business Park link road in order to improve access to the strategic employment location and offer relief to the existing inadequate road system and enable the improvement of conditions for journeys by other modes within the built up area. This would be consistent with the District Council’s view that a northern distributor road could contribute to a wider transport strategy of the area if that were to be the outcome of a review of the Norwich Area Transportation Strategy. However, even if a complete northern distributor road were not to be proposed, an improved orbital route would help to integrate the new housing allocation into the existing urban form. Even this more modest ambition will however necessitate looking beyond the present plan period. To give greater certainty, a strategic reserve is proposed to enable a complete link between two radial roads to be planned though its completion is likely to be after 2011”.
(Ref. see p4 of attached Note on Broadland Business Park Link Road Evolution, by John Walchester, Broadland DC, 6 May 2010, information requested by NNTAG).

At an earlier Broadland Local Plan public inquiry, the Highways Agency had said that Broadland Business Park Phase 2 should not go ahead without improvements to the Postwick Junction, a position upheld in the Local Plan adopted in 2006.

2006, June – NDR confirmed as a priority scheme for Regional Funding Allocation (£61m in period beyond 2009/10).

2006, June - the Government published the Panel Report on the East of England Plan December 2004 following the Examination in Public held November 2005 – March 2006. The Panel recommendations for Norwich Policy Area included:

- Provision for 33,000 net additional dwellings in 2001 – 2021. The Panel deleted the LPA specific numbers, leaving the figure to be determined locally.
- A joint planning mechanism for achieving an integrated approach to planning and delivery of a cohesive core strategy across the NPA.
- Removal of the location-specific proposal for a major urban expansion of about 7,000 dwellings in NE sector linked to major transport improvements. *“We do not consider that there is sufficient sound evidence at present about the environmental capacity and infrastructure requirements of the various possible growth options for the NPA.”*
- *“achieve a major shift in emphasis across the Norwich Policy Area towards travel by public transport”*. In their commentary the Panel stated, *“in our view some form of relief road to the north of the City is almost certain to form one element among a package of transport measures in a sound core strategy for the NPA and we consider that this scheme should be assessed in this context”*.

2006, adoption of NATS3 to 2025.

2006, July/Aug - Broadland DC consulted the public on LDF Core Strategy Issues and Options. Responses were reported to Cabinet on 8 Jan 2007. In answer to 'Which Broad Pattern of Development Would You Prefer Up To 2021?' 50% of the 86 responses preferred the north-east. The majority of respondents preferred focussing most or all of the Broadland Urban Area allocations inside the proposed NDR.

2006, 29 Sept - Broadland DC Spatial Planning Advisory Board considered options for a joint or coordinated core strategies.

2006, 6 November – Report to Norfolk CC Cabinet on NATS/NDR Progress. Estimated cost of NDR had increased from £91m at 2006 prices to £100m at outturn prices in 2010. PFI was ruled out. Funding pot for NDR comprised:

- RDA - £61m
- Other 40% of funding from other sources including:
- Estimated developer contributions of £15 - £20m
- Growth Point and Transport Innovation Funds were seen as possible options for helping to meet a £20 – 25 million funding shortfall.

2006, 4 December - Broadland DC Cabinet agreed that future work should be guided by consideration by the new GNDP before endorsement by the District Council

2006, December – publication of the Secretary of State's Proposed Changes to the Draft Revision to the RSS for the East of England. The changes were accepted for the Norwich Policy Area. In addition, Norwich was identified in the Plan as a New Growth Point, reflecting the announcement of New Growth Points on 24 October 2006. The proposed lower case text accompanying the policy "*achieve a major shift in emphasis across the NPA towards travel by public transport*", read:

"Norwich area transport priorities will be determined through review of the Norwich Area Transportation Strategy and should include further development of park and ride, a rapid high quality public transport network serving key existing and proposed growth locations and guidance on parking provision. A package of transport measures required to improve the quality of life in residential areas, aid rural regeneration, enhance links to strategic employment areas, facilitate urban expansion and improve access to Norwich International Airport, including a possible distributor road to the north of Norwich, is currently being assessed by the local authorities". (13.82)

2007, Jan 8 – Broadland DC Cabinet agreed to the production of a Joint Core Strategy and that information provided by LDF Core Strategy exercise would be of value to JCS.

2007, May - the DCLG invited bids for eco-towns, new settlements of between 5,000 and 20,000 homes which demonstrate the highest level of sustainable development.

2007, June – July – Joint Core Strategy consultation workshops. A topic paper, Strategic Growth Options, June 2007, prepared by the district and County Councils discussed the

benefits/disbenefits of concentration/dispersal options. Appendix 1 described an initial assessment of broad locations for major growth:

- North East Sector (inside the NNDR)
- North East (outside the NNDR, vicinity of Rackheath)
- East Sector (outside the NNDR)
- North East and East combination
- South East Sector (vicinity of Poringland)
- South Sector (A11 – A140 outside A47)
- South West Sector (A11 – B1108)
- West Sector (River Yare to River Wensum)
- North West Sector (A1067 – NNDR)
- North Sector (North of Airport)
- Wymondham

2007, 13 September - letter sent by Department for Transport to Norfolk County Council advising that the plan to procure a NDR under the Strategic Partnership contract with May Gurney without competitive tendering was “potentially illegal”.

2007, 1 October – the GNDP submitted a bid to DCLG, Programme of Development 2008 - 11. Projects included Postwick Growth Hub, for which £21.15m was sought for bringing forward sustainable housing and employment growth on the eastern edge of Norwich by addressing an existing constraint at a ‘key’ Trunk Road junction, supported by an extended Park and Ride facility and community based Sustainable Travel Group.

2007, 19 November – 8 Feb 2008, Joint Core Strategy Issues and Options consultation. Appendix 4: Some Issues relating to Potential Growth Locations. Locations included:

North East Sector (Inside the NNDR)

“Large scale urban extension has been the subject of previous public consultation (Structure Plan review and draft RSS) and was generally supported.” NB above notes show that this was not the case in relation to Structure Plan review and draft RSS.
- *“This appears to be a very good location for a large scale urban extension. Various constraints suggest that the amount of developable land inside the NNDR may not be sufficient to provide a single coherent new community of this scale although this would depend on density assumptions”.*

North East Sector (Outside the NNDR, Vicinity of Rackheath)

- *“Location outside the NNDR may encourage rat running through network of existing lanes”.*
- *“The area may be worth further investigation particularly in conjunction with development inside the NNDR to provide a network of new villages supporting a wide range of services”.*

South West Sector (A11 – B1108 Outside A47)

“With good existing priority measures capable of expansion and fast journey times, this appears to be the best location for the provision of very high quality public transport.

Capacity to accommodate a large/new expanded settlement is worthy of further investigation.”

Wymondham

“ well related to Norwich and has a wide range of services and jobs. It appears to be a suitable location for further investigation for strategic growth”.

2008, May – the East of England Plan was issued by the Secretary of State. Policy NR1: Norwich Key Centre for Development and Change read:

- provide for 33,000 net additional dwellings in the NPA in the period 2001 – 2021 facilitated by joint or coordinated Local development Documents prepared by Norwich, South Norfolk and Broadland.

- achieve a major shift in emphasis across the NPA towards travel by public transport, cycling and walking.....Requirements for transport infrastructure arising from development in the Norwich area should be determined having regard to NATS which provides a strategy for improving access by all modes of transport across the NPA.

2008, May - the DCLG announced a short-list of 15 eco-town sites which featured the former RAF airfield near Coltishall, N. of Norwich, nominated by a developer.

2008, July – Nfk CC submitted NDR Major Scheme Business Case to Department for Transport at an estimated cost of £116.5m.

2008, 1 August - the GNDP announced that it had written to Caroline Flint MP Housing Minister, proposing Rackheath as an alternative location for an eco-town to Coltishall. There was no prior public consultation on the bid. The GNDP press release stated, *“It will be put to local people in a full public consultation next year.....The North East sector is an area which has been identified as an area for planned and managed growth and Rackheath is part of this”.* The GNDP press release continued, *“If the Government wants to see an eco-town and Rackheath is considered suitable, then it must fund the infrastructure to provide it and that includes the Northern Distributor Road.....The planned development in Rackheath is dependent on the construction of the NDR.”* *The GNDP recognizes that 10% of the costs for this must come from local contributions, but the bulk of funding will have to come from Government scheme to support growth”.*

2008, Issues and Options, Report of Consultation concluded,

“Locations for major growth and change in the NPA

“Respondents supported the option of large scale urban extensions and a possible new settlement by a small margin (34% to 31%) over a more dispersed pattern of growth. An option of an even larger scale of concentration in one new town south of Norwich was suggested in a limited number of responses”.

Different locations for development were favoured in responses to the Long and Short

Questionnaires although there is significant overlap between them. In the Short Questionnaire responses (taking account of all expressed preferences) a majority were in favour of the South-west, South-east, Wymondham and North-east/East sectors. In the Long Questionnaire responses the most favoured individual locations were the North-east, South-west, and Wymondham and an overall strategy for large scale growth to be focussed on these three locations, either solely or in combination with one or more additional locations, received majority support (53%).

Whilst the Long Questionnaire gave results in favour of growth to provide a Long Stratton bypass, the local survey (undertaken by South Norfolk District Council) indicated that local people are evenly divided for and against such a solution. Only a minority of local people would support a development in excess of 1500 dwellings”.

2008, Aug to Sept – JCS Regulation 25 Technical Consultation (based on 36,000 dwellings in the NPA in the period 2006-2026). The GNDDP had intended to produce a Preferred Option for public consultation in summer 2008, but was overtaken by changes to the plan-making process. To comply, the GNDDP carried out a technical consultation in August 2008. Consultees were asked to consider three potential options for the distribution of major growth in and around Norwich and on major sites. Major growth (6,000 dwellings) at Sprowston/Rackheath area and a NDR/NATS were common to all 3. In South Norfolk NPA, the numbers of new housing differed between the options.
Option 1: South West (Hethersett/Little Melton area) 4,000; Wymondham 4,000.
Option 2: South West 4,000; Wymondham 2,000.
Option 3: South West nil; Wymondham 2,000; new village (4,500) to south at Mangreen.

2008, 3 September - A report submitted to Norfolk CC’s Planning, Transport, Environment, Waste Review Panel requested approval for the submission of separate planning applications for NDR and Postwick Hub , with the intention of running the two applications in parallel to ensure progress on each was not dependent on the other.

- *“A strategic planning application will be submitted for the whole of the NDR between the A1067 at Attlebridge and the A47 trunk road at Postwick, this application will be considered through the County Council’s planning system”.*
- *“A further application will be submitted to Broadland District Council for the Postwick junction and associated road links (known as Postwick Hub) which will deliver this section of the NDR together with an expansion of the Postwick Park and Ride. The separate scheme be progressed as a development led scheme through Broadland District Council’s local planning system”.*

The report also stated that:

“Members will be aware that earlier this year the County Council submitted an expression of interest for Community Infrastructure Funding (CIF) for the Postwick Hub scheme. On 30 July we were informed that the scheme has been taken forward for further appraisal and an allocation of £21m identified. We are required to submit a business case by 31 October and this is now being prepared. This gives the County Council further

encouragement in the ability to close the funding gap in the financing of the NDR and would enable us to make a start on the scheme in 2010, subject to planning permission”.

2008, Sept 15 – Norfolk CC Cabinet was asked to give approval to proceed to planning application stage. However, the process was cut short, partly due to an adverse assessment by an independent planning consultant who had been engaged by the County to review the NDR planning application. The advice was that the application was unlikely to be successful because it contained insufficient complementary measures even though a NDR was presented as part of a NATS package.

2008, October – Norfolk CC submitted a separate Business Case for Postwick Hub to DCLG for Community Infrastructure Funding (£21m) for unlocking housing and employment growth. All 15 design options tested for a Postwick Hub had assumed a NDR. Papers obtained by NNTAG in May 2010 under FoI showed that the Homes and Communities Agency had recommended rejection on grounds of an “over-engineered and disproportionate” scheme; DfT had expressed misgivings; DCLG endorsed the project.

2008, December – NNTAG and CPRE Norfolk, assisted by Keith Buchan, MTRU transport consultant, gave a presentation to Department for Transport on why the NDR should not be given Programme Entry. The Department invited us to present our case to Norfolk CC officials, with DfT and GO-East present to hear the County’s response.

2009, January – Norfolk CC and Ifield Estates submitted a joint planning application to Broadland DC for outline permission for Broadland Gate (3rd phase of Broadland Business Park) and full permission for Postwick Hub. The application was advertised as a departure from Broadland Local Plan. The County later submitted a revised planning application seeking to close the A47 Postwick Interchange slip road to Yarmouth Road east. Had the County applied to itself for planning permission for a County road scheme in the normal way, any objections might have led to a local inquiry. By applying to a district council for an access road serving a business park, the County had avoided a public inquiry. GO-East obtained a legal opinion, but said it was up to objectors to seek judicial review. The Secretary of State declined to call in the planning application.

2009, March – JCS Regulation 25 Public Consultation.

This featured GNDP ‘favoured option’ comprising:

- major growth to the north-east of Norwich in the Old Catton, Sprowston, Rackheath, Thorpe St Andrew ‘Growth Triangle’ either side of a NDR (at least 7,000 dwellings, rising to a total of at least 10,000 after 2026); a large part of development at Rackheath may be provided as an eco-community.
- moderate growth at Wymondham (2,200), Hethersett (1,000), Cringleford, (1,200) Easton/Costessey (1,000), Long Stratton (1,800 homes in conjunction with a bypass).

A report to the Norfolk CC Cabinet which met on 5 January 2009 noted:

“In the autumn, the GNDP undertook a consultation with “technical” consultees on a draft JCS which included 3 Options for accommodating large scale growth in the

Norwich area. Having considered the report outlining responses from this technical consultation, alongside other evidence, the GNDP Policy Group has recommended that a full public consultation be undertaken using the same draft policies as for the technical consultation, modified to include a single favoured option for large scale growth in the Norwich Policy Area.” (2.1)

“Since publication of the technical consultation, revised monitoring information has become available. As a result, the requirement for new housing allocations in the NPA has been revised downwards to 21,000 from the previous 24,000”. (2.3)

“Allocations in Broadland will total 9,000 dwellings for the period to 2026, achieved through an increased delivery rate for growth in the Sprowston/Rackheath area..... The concentration and scale of growth in the Sprowston/Rackheath area is dependent on the implementation and timing of the NDR and will maximise the opportunity to provide and support new secondary education provision and high quality public transport”. (2.4)

“The main differences are in South Norfolk where the favoured Option proposes (2.5)

<i>Location</i>	<i>Number of dwellings to 2026</i>
<i>Wymondham</i>	<i>2,200</i>
<i>Long Stratton</i>	<i>1,800</i>
<i>Hethersett</i>	<i>1,000</i>
<i>Cringleford</i>	<i>1,200</i>
<i>Easton</i>	<i>1,000</i>
<i>South Norfolk NPA small sites</i>	<i>1,800</i>

“In addition, a new community of 2,200 dwellings is proposed at Mangreen to commence after 2018 and subject to further work on feasibility. The growth at Mangreen will be over and above the 21,000 dwellings required.” (2.6)

The report went on to list the advantages and disadvantages of the proposal.

Advantages included:

- development at Long Stratton will provide funding to help deliver a bypass;
- the reduced scale of development in Wymondham and Hethersett is likely to make it easier to preserve their character;

Disadvantages included:

- level of development proposed at Long Stratton is insufficient to fully fund a bypass
- the dispersed nature of development in the A11 corridor challenges the viability of high frequency public transport and BRT.

“Overall, the infrastructure costs of this Option are likely to be higher than the previous options considered.” (2.8)

“Conclusion:..... The proposed distribution of growth in South Norfolk poses significant challenges to the planning and provision of secondary school places, public transport and other transport priorities. However, the GNDP considers that these risks are outweighed by the advantages of the proposed distribution”. (9.1)

2009, March – Norfolk CC issued a leaflet Transport in the Norwich Area: A summary of our plans for the future, proposing to examine public transport, walking and cycling options. *“These proposals will be delivered as part of a package with the NDR....”*

2009, 27 March – a letter from DfT to Norfolk CC described Postwick Hub as being “significantly over-engineered” without a NDR in place. DfT/CLG Ministers agreed to proceed with the scheme on condition that Ministers grant the NDR Programme Entry.

2009, 6 April – update to County Cabinet on NATS and NDR, to include,
- Work taking place to develop a detailed NATS Implementation Plan for transport delivery over the next 15 – 20 years, a key component of which is a NDR. *“The current work to develop the NATS IP will develop a range of transport interventions alongside the NDR. Bus Rapid Transit along the main radial roads into Norwich is likely to be a key element of the proposals. This work will form the transport element of the GNDP Joint Core Strategy and will also firm up complementary measures for the NDR planning process.”*

Partly because of the need to prepare a NATS IP and partly because the refresh of the Regional Funding Allocation recommending an increased allocation of £79.7m for a £127 million NDR, to be made available two years later than previously indicated, a revised programme for NDR was reported. The date for submission of planning application had been delayed to Spring 2010. *“The new timetable will allow us to further strengthen the NDR planning application”.* (3.2.3)

2009, July – the DCLG published PPS: Eco-towns – A supplement to PPS1. The statement provided the standards that any eco-town will have to adhere to. Appendix A showed a list of four locations that included Rackheath with the potential for an eco-town. The GNDP press release (16/7/09) stated: *“We’re delighted that bids for a share of the £60 million local infrastructure fund are now being invited”. All new development in the Greater Norwich area is dependent on significant infrastructure improvements, particularly the Norwich Northern Distributor Road – an integral part of our plans to improve the local public transport network and reduce reliance on the private car”.*

2009, 15 Sept – letter sent by DfT to Norfolk CC requesting further modelling and sensitivity testing for a NDR. *“It is vital that the Department is completely satisfied with the Business case before Ministers can consider whether or not to grant Programme Entry for the scheme”.*

2009, 12 Oct to 27 Nov – publication consultation seeking views on a NATS Implementation Plan for transport delivery over the next 15 – 20 years; “Transport for Norwich: A summary of our plans for the future”

2009, November – Proposed submission JCS.

This carried forward the GNDP ‘favoured option’ for major growth. A O/S based map showed the geographical extent of the ‘Growth Triangle’ (Appendix 5).

2009, November – an extraordinary meeting of Broadland DC agreed to submit a bid

(21 votes for, 7 against) for £28.4m for Rackheath eco community (4,150 dwellings).

2009, November – the Highways Agency on the instruction of Norfolk CC published Draft Slip and Side Roads Orders for A47 Postwick Interchange, subject to the District Council granting planning permission.

2009, 9 December – Broadland DC gave outline planning permission for Broadland Gate and full planning permission for Postwick Hub. The Council allowed up to ten years for submission of reserved matters for Broadland Gate.

2009, 16 December – NDR received Programme Entry for a shorter route between A47 Postwick and A140 north of Norwich Airport. The County decided to proceed with a three quarters route to A1067. The decision triggered the release of funding previously approved for the Postwick Hub junction scheme from round 2 of the Community Infrastructure Fund. In a letter dated 24 March 2010, John Healey Housing Minister advised the Leader of Broadland DC that “Given the inter-dependency of the two schemes we have agreed with the Department for Transport that they should be treated as one project. We have therefore transferred the CIF funding for the scheme to DfT”.

2010, Feb – Housing Minister pledged £16m funding for Rackheath from £60m pot.

2010, 8 Feb – letter from the Department for Transport to Norfolk CC confirming Programme Entry for a NDR, with a maximum Departmental contribution of £73 million, subject to conditions which include:

- development of a new traffic model on a Productions and Attractions basis;
- NDR to be progressed as part of a multi modal solution; “*We will also wish to see at the next approval stage evidence that progress has been made on delivering these proposals*”.

2010, Feb 10 – Broadland DC Progress report to Planning Committee advising that a potential Area Action Plan for Old Catton/Sprowston/Rackheath/Thorpe St Andrew Growth Triangle is to be taken forward as a Supplementary Planning Document rather than as a Development Plan Document, to enable a quicker process.

2010, 5 March - GNDP submitted JCS to Secretary of State for examination. “*The JCS cannot be delivered without the implementation of the Norwich Area Transportation Strategy including the Northern Distributor Road*”. (2.3)

2010, 6 April – Report to Norfolk CC Cabinet seeking approval for a NATS Implementation Plan to provide the transport elements of the JCS. An update was also given on a NDR/Postwick. It was intended to submit a planning application for a NDR to A1067 in Autumn 2010. The report also sought approval to underwrite the funding shortfall of £39.7m for the longer NDR by use of Prudential Borrowing, trusting that ‘most, if not all’ money would come from contributions including payments from developers.

2010, 10 June – letter from the Department for Transport to Norfolk CC stating that the Department can give no assurances on its intention to fund any schemes awarded Programme Entry by the previous Government. This includes the NDR.

2010, July/August - GNDP public consultation on Focused Changes to Submission Strategy included changes to policies on Old Catton/Sprowston/Rackheath/Thorpe St Andrew Growth Triangle in seeking to designate area as a ‘strategic allocation’ to be followed up by a Supplementary Planning Document rather than an Area Action Plan.

2010, 2 August – the Secretaries of State via Government Office for East Midlands notifies parties of their intention to hold a local inquiry into A47 Postwick Interchange Draft Slip and Side Roads Orders, depending on the outcome of the Spending Review. “The Secretaries of State are satisfied that in the circumstances of this case the remaining objections raise issues of such significant public importance that they should be debated publicly at a local inquiry and that an inquiry is likely to produce significant new information relevant to their decision”.

2010, Autumn – public consultation on design of 200 dwellings as a Rackheath exemplar before submission of planning application.

2010, 23 September – GNDP Policy Group meeting recommended to proceed with the JCS, subject to the focused changes that have recently undergone consultation, with the exception of proposed changes relating to the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle and to undertake an early review of the JCS in view of the changed financial and political context. This suggests that the GNDP has doubts over the soundness of the strategy.