

Norwich JCS EiP November 2010

**Part B Old Catton/Sprowston/Rackeath/Thorpe St Andrew growth triangle**

**Procedure**

**B1 In Principle (aside from any comments about its contents), do policy 10 and appendix 5 (as amended by GNDP Focussed Changes 8-10, including the concept statement) provide a sound procedural basis for the strategic allocation of the growth triangle and an appropriate level of guidance for taking its development forward in a coordinated way without an AAP through future detailed master planning of the various quarters?**

No. The GNDP has withdrawn Focussed Changes .

**Soundness of the proposal**

**B2 Is this strategic allocation justified, effective and consistent with national policy?**

No, as answer B1 above.

**B3 Does the amended concept statement provide sound guidance for the development? Are the content and objectives of the two maps in the concept statement effectively communicated, or does the key need to include further explanation of the ‘areas of green space’ and the ‘constraints and opportunities for new development?’**

The amended concept statement has been withdrawn. There is a lack of clarity however over the status of Rackheath eco-community and the eco-town concept in general.

In NNTAG’s statement for 1A(3), we raised concern over the GNDP lack of consultation on minor change from eco-community to ‘low carbon development’.

Furthermore, in a letter to Snub in June 2010, Grant Shapps, the Housing Minister said:

*“Under Conservatives there will be no special status for eco-towns over and above any other housing. This is because we want to see all housing to be eco-friendly.....We will also ensure that where houses are built will become entirely a matter for local communities rather than directed by Ministers in Whitehall. “*

If the Government has removed special status for eco-towns, north-east Norwich could end up as a standard build development of 10,000 houses. Although the new housing might be eco-friendly, the eco standards set out in PPS1: Eco-towns, such as provision of transport and green infrastructure, could be watered down.

**Transport Issues related to the growth triangle**

**B4 i) Is the NDR justified and effective as the means of providing the ‘necessary access to key strategic employment and growth locations’ and releasing road capacity to achieve ‘significant improvements to public transport, walking and cycling in Norwich’ and particularly North Norwich.**

No. The County’s latest traffic figures continue to show the costly ineffectiveness of a NDR based NATS.

**Ref. EiP 88 Table 4: Flows on Radial routes to the North of Norwich**

<b>AADT</b>	<b>2031</b>	<b>2031 with NATS IP</b>	<b>% change with NATS</b>
A140 outside built up area	28000	31000	11%
A140 inside built up area	20500	19000	-7%
<b>A140 corridor total</b>	<b>48500</b>	<b>50000</b>	<b>3%</b>
B1150 outside built up area	12000	9800	-18%
B1150 inside built up area	14000	11000	-21%
<b>B1150 corridor total</b>	<b>26000</b>	<b>20800</b>	<b>-20%</b>
A1151 outside built up area	16000	19000	19%
A1151 inside built up area	21000	18500	-12%
<b>A1151 Corridor total</b>	<b>37000</b>	<b>37500</b>	<b>1%</b>
Salhouse Road outside built up area	9200	12900	40%
Salhouse Road inside built up area	14500	12000	-17%
<b>Salhouse Road Corridor Total</b>	<b>23700</b>	<b>24900</b>	<b>5%</b>
Plumstead Road outside built up area	8100	17500	116%
Plumstead Road inside built up area	14000	13000	-7%
<b>Plumstead Road Corridor Total</b>	<b>22100</b>	<b>30500</b>	<b>38%</b>
<b>Overall Network Change</b>	<b>157300</b>	<b>163700</b>	<b>4%</b>

**According to the table, the NATS Implementation Plan (IP) in 2031 will see a 4% increase in traffic on existing radial roads in north-east Norwich, compared to Do-Nothing in 2031. The Do-Nothing shows fewer traffic movements (157,300 AADT) compared to NATS IP which includes NDR (163,700 AADT).**

The results infer that a NDR would induce additional traffic onto the existing road network as well as on the NDR, even though a 50% reduction in motorised trips from new growth is assumed (EIP 88 7.1).

Table 4 also shows modest reductions (7 – 21%) in traffic on roads within the Norwich built up area. However, traffic will need to be accommodated on less road space than currently exists since road space will have been reallocated to complementary measures in the NATS IP. It is likely therefore that congestion will be worse for general traffic.

NNTAG has asked the County for a copy of the traffic flows data for the main corridors.

Work conducted previously on the interaction between land use planning and a NDR has also shown large traffic increases in the vicinity of the road. The report, Trunk Roads and the Generation of Traffic (Department of Transport, 1994), featured the Norwich NDR as an example of interaction modelling between land use/ transport. Consultants Halcrow Fox modelled traffic levels on a NDR as if available development sites took place to 25% and 100% of their assumed capacity. The study concluded that “*the resulting induced traffic would be very significant indeed on the new road in the vicinity of the development*”. (Appendix 1 (B3 (4) )

Assumptions fed into the traffic model determine the results. For example, the NDR Forecasting Report assumed over 90% car commuting to associated new development. (NB, trip generation data used out-of-town development reliant on car use as a comparison rather than city centre development with a choice of sustainable transport).

Ref. page 5 of Interim Note from MTRU for NNTAG et al, (Feb 2009)  
in Appendix 3 (B 2), NNTAG 7172

### **Impact of Half NDR Route on Traffic Flows and Complementary Measures**

Although Programme Entry was awarded for a half route, the County continues to model a NDR on the basis of a three quarters route to A1067 (Joint Core Strategy NATS proposed implementation strategy p61). However, since the cost benefit ratio of the section between A140 and A1067 was judged poor by the Department for Transport and given that no housing development is allocated for the North-West outer quadrant , it is difficult to see where an additional £30 million for a longer route will come from.

It is important to enquire what effect a half route would have on traffic flows, the implications for NATS Implementation plan and extent to which elbow room would be created for complementary measures in the north east of Norwich and City centre.

### **Traffic Impact on Areas Outside NDR**

Another aspect which the County has not addressed is the extent of the NDR’s traffic impact on areas outside the road such as rat running through villages and rural lanes and the need for any mitigation measures.

## Smarter Choices

There is strong evidence to demonstrate that smart choices reduce by around 10 %. The Sustainable Transport Demonstration Towns (which included Peterborough) achieved *actual* reductions in traffic of 9% in trips and 5% in car mileage.

Sensitivity testing of the NDR traffic model for the Department for Transport show lower traffic flows on links previously exhibiting traffic growth, suggesting that the model is very sensitive to small adjustments. This indicates a strong potential for sustainable transport and land use planning policy measures for producing beneficial change. (T14)

A smarter choices package would be more consistent with eco-town concept. Smarter choices would reduce traffic and create elbow room for complementary measures, housing and employment growth at a fraction of the cost of the NDR. Yet NATS is weak on smart choices.

## B5

**NNTAG will await GNDP statements before responding. We have a few points to make in the interim.**

**3) Is there a reasonable prospect of (other elements in NATS) being implemented within a timescale in step with the new development or would the NDR tend to generate more car dependency?**

As suggested in B4 above, the traffic flow figures presented in EIP 88 Table 4 show that a NDR will increase car movements, on both existing radial roads to the north of Norwich and on the new NDR.

**4) Is the relative remoteness of the eco town from current transport infrastructure likely to militate against high public transport useage?**

Yes. The Focused Changes Policy 10 proposals map highlighted the fact that an eco-town at Rackheath will remain a free standing settlement in open countryside on the far side of a NDR and separated from the built up area by Beeston historic parkland. NATS suggests that buses serving Rackheath will travel to/from Norwich via Salhouse Road, a road which passes through countryside before reaching the built up city and inside the city across the extensive Mousehold Heath. For these reasons, Salhouse Road will remain a low density corridor between the Inner Ring Road at Ketts Hill and Rackheath. The location of Rackheath eco-town will therefore remain relatively remote, casting further doubt on the ability of the eco-town to support high frequency public transport.

**5) Would an effective JCS set minimum threshold levels of public transport accessibility, allied to the progress of development?**

Yes, an important mechanism. Minimum thresholds of public transport usage/modal split should also be set.

**B6 In view of the importance seemingly ascribed to the proposed eco-town's proximity to rail services at the time of its selection as such, is there any realistic prospect of significant improvement to the low level of service and the limited number of destinations currently available on the Norwich-Cromer line or its transformation into some other form of more attractive public transport facility?**

No, the prospect is slim. The Rackheath is not sufficiently large to justify a more frequent rail service.

A tram-train system would be beneficial, assisted by a new spur into the Rackheath development to improve patronage, but size of the development would not justify the cost unless shared with major development in other parts of the NPA. A report of a tram-train system using the Norwich – Sheringham line/Norwich to Great Yarmouth line/ a street running train through Norwich city centre, along Ipswich Road and down to Harford Bridge was costed at £116m at 1994 prices (Chris Wood, TransPlan).

### **Implementation Issues associated with the triangle**

**B7 i) If the NDR is fundamental to the delivery of the JCS, are the resources likely to be in place to achieve it and when?**

Even if central Government funds of £73 m for a NDR and £21m for Postwick Hub are forthcoming, it will be difficult to secure the remaining amount through developer contributions in the current market conditions and other as yet identified sources. NNTAG considers that it will not be feasible to raise funding for a three quarters route.

Another financial dependency needs to be taken into account. A NDR would increase traffic pressures on the A47 Southern Bypass junctions. The JCS proposes improvements to Thickethorn and Longwater junctions at a cost of £40 million apiece. To our knowledge, the Highways Agency is not willing to fund the work.

There is also an important issue whether resources will be available for delivering NATS Implementation Plan in accordance with the conditions of Programme Entry, especially in a period of tight public spending. It would be a disaster if the NDR were to be constructed without a strong programme of complementary measures.

Completion of statutory processes cannot be guaranteed either. Depending on the Spending Review, the Minister has promised a local inquiry into A47 Postwick Interchange Slip and Side Roads Orders. In a letter dated 2 August 2010, the Minister stated the "*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*". (EIP 75);

Also, Lothbury Property are challenging the planning permission granted by Broadland District Council for Broadland Gate/Postwick Hub in the High Court.

**B7 ii) What would be the consequences of a possibly unknown delay in provision of the NDR?**

The JCS and north-east urban extension would both be much improved. It is quite possible to build 5,000 – 7,000 new dwellings in north-east Norwich without a NDR, so long as a strong package of sustainable transport measures is implemented alongside, including an intensive smart measures and demand management such as parking controls.

Implementation of the proposed orbital road links in the Broadland Local Plan 2006 would give access to the north-east quadrant:

- Broadland Business Park Link Road (Postwick Interchange to Plumstead Road East);
- Blue Boar Lane Link Road (Wroxham Road to Salhouse Road);
- modest improvements to A47 Postwick Interchange without a NDR;
- Closure of the short gap (Plumstead Road East to Salhouse Road) as mooted by Broadland DC.
- These links would create an orbital route between Postwick Interchange and A1151 Wroxham Road for serving Broadland Business Park Phases 2 and 3, 600 dwellings at Brooke Farm, 1,200 dwellings off Blue Boar Lane, Sprowston and north east urban extension.

**B7 iii) Does the JCS have flexibility in this respect, bearing in mind that JCS Policy 10 states ‘Delivery (of growth triangle) is dependent on the implementation of NDR?’**

Yes. As NNTAG has indicated elsewhere, the delivery of the Growth Triangle has been made deliberately dependent on a NDR, but it doesn’t have to be the case.

**B10 If the JCS is unsound in relation to the growth triangle, are there any specific changes that would render it sound?**

- delete NDR/Postwick Hub
- build road links in adopted Broadland Local Plan and consider closing gap between Broadland Business park Link Road and Blue Boar Lane Link Road (but not through Racecourse Plantation);
- reduce the amount of housing growth in NE Norwich (maximum of 5 – 7,000 dwellings). Should housing market improve, consider a major location at Wymondham/Hethersett.
- delete Norwich Airport related employment site on line of NDR (unsustainable location, related employment should be located close to airport site (KLM Call Centre was converted to bathroom showroom a few months after opening – ie limited scope for airport-related employment as passenger numbers have fallen sharply and air freight is negligible)

If planning permission for Broadland Gate is quashed in High Court, delete allocation for 3<sup>rd</sup> phase of Broadland Business Park in JCS

**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 (3<sup>rd</sup> 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.