

Joint Core Strategy for Broadland, Norwich and South Norfolk Broadland Part of Norwich Policy Area Examination

Matters and Questions for Examination - May 2013

Norwich and Norfolk Transport Action Group (NNTAG) Res. No. 124224

Matter 1 – Legal Requirements

1.1. In the light of the councils' response in SDJCS 7 and 8, would representors explain exactly what parts of the High Court Judgement and Court Order have the councils not complied with?

The High Court remitted the strategic growth identified in the NEGOT and directed that a Sustainability Appraisal be prepared for the specific purposes of considering the strategic growth in the NEGOT and reasonable alternatives to it.

The EC Guidance on the SEA Directive¹ states that the Directive does not define reasonable alternatives (5.13) but says that an alternative can be a different way of fulfilling the objectives of the plan or programme (5.13) and that

“Part of the reason for studying alternatives is to find ways of reducing or avoiding the significant adverse environmental effects of the proposed plan. Ideally, though the Directive does not require that, the final draft plan would be the one which best contributes to the objectives set out in Article 1” (5.14) viz:

- To provide for a high level of protection of the environment.
- To contribute to the integration of environmental considerations into the preparation and adoption of certain plans and programmes with a view to promoting sustainable development.

One of NNTAG's key concerns relates to the spatial distribution of growth and transport infrastructure. We believe that the allocation of strategic housing in north-east Norwich and strategic employment to south-west of city, connected to each other by a NDR and A47 Southern Bypass, is likely to generate orbital car travel leading to unsustainable travel habits and increase greenhouse gas emissions. Norfolk County Council intends starting NDR construction in 2017/18, well ahead of BRT programmed for completion in 2026.

¹ IMPLEMENTATION OF DIRECTIVE 2001/42 ON THE ASSESSMENT OF THE EFFECTS OF CERTAIN PLANS AND PROGRAMMES ON THE ENVIRONMENT. http://ec.europa.eu/environment/eia/pdf/030923_sea_guidance.pdf

The GNDP considers that employment opportunities in the SW and NE would reduce the need to travel. However, the employment allocations in Policy 9 are intended to serve the NPA as a whole. Another problem is that hospital services for the city and North-East Norfolk are concentrated at the Norfolk and Norwich University Hospital off the A47 Southern Bypass at Colney. The hospital is a major traffic generator and offers the largest area of car parking in the County (planning permission was recently granted for a further 350 car parking spaces).

We fear a “M25” effect if a NDR is built across the River Wensum, aside from adverse impacts on the Special Area of Conservation. Public pressure has been building for a complete NDR. In their County council election manifestos on 2 May 2013, both the Conservatives and Liberal Democrats committed themselves to seeking to fully complete the NDR.

The JCS was required to accept a NDR as part of the JCS baseline, but this does not mean that allocation of strategic housing growth either side of a NDR is acceptable in terms of sustainable development. A NDR is predicted to generate at least 25,000 tonnes of carbon dioxide on the day of opening.

The SA identifies a number of other negative impacts in relation to Alternative one:

- ENV 1 (effect of traffic on the environment);
- ENV 4 (biodiversity and geodiversity);
- ENV 5 (landscapes, townscapes and the historic environment);
- ENV 9 (make best use of resources including land and energy).

Rather than try to avoid the negative impacts by considering reasonable alternatives, the SA/JCS seeks to mitigate them.

The reason for the SA seeking to mitigate rather than avoid negative impacts by considering reasonable alternatives is that the JCS gives greater priority to provision of new infrastructure. The SA defines reasonable alternatives as providing a strategic scale of development (7,000 to 10,000 dwellings in a single or combination location) in order to deliver the necessary supporting facilities, in order to support, the long term viability of a new secondary school (SDJCS 3.2 4.11.4) (and also convenience retailing (ie car-based) and public transport – Appendix k). NNTAG questions this approach.

First, the threshold has been set higher than in the 2006 Broadland DC LDF Issues and Options consultation which proposed an urban extension in north-east Norwich of 5,000 dwellings

Second, demand for secondary school places may be lower than estimated. The 2011 Census shows a lower rate of population growth in Broadland district than in Norwich and South Norfolk, whilst the 2011-2021 Household Formation figures for England show a 7% reduction on 2008 estimates.

Third, the SA assumes that the local authority is the only provider of secondary education. However, a number of new would-be providers outside of local authority control are entering the scene:

- a new Free school for 100 14- 18 years old specialising in science and maths is set to open in the city centre (Bethel Street) in Sept 2013.
- a submission to the Department for Education for a new Free High School for 360 pupils aged 11 – 16, to open in September 2014 in a city centre location.
- a new Norfolk University Technical College will open in September 2014 based in South Norwich but serving all of Norfolk. It will cater for 600 14 – 19 year old students, offering an academic or vocational route or apprenticeships, with the emphasis on science, technology, engineering and maths.

Other secondary school places outside of local authority control may potentially be created over the JCS plan period and therefore Norfolk County Council education assumptions and plans may need adjustment.

Norfolk County Council proposes locating a new secondary school at Rackheath. Contingency sites may become available. The NS&OC Sustainability Statement says (p17), “The proposals do not provide land for a secondary school, but this could be considered at a later date in the AAP decides a location in the western part of the Triangle is to be preferred”. In its response on the outline planning application, Norfolk County Council requested the safeguarding of a site in the event that one is required. Beyond Green says that it will identify suitable locations on the consortium land-holding.

Provision of a new secondary school for a new community in the north-east cannot be the overriding factor in determining whether reasonable alternatives provide a high level of environmental protection with a view to promoting sustainable development.

We address the public transport issue in our response to Q1.5.

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Matter 1 – Legal Requirements

1.2. In the light of the councils" response in SDJCS 7 and 8, would representors say whether all the reasonable alternatives have been identified with the reasons for their selection? Is there any other evidence that representors, in the light of the councils" responses, want to place before me to help me decide whether these are reasonable alternatives?

1.1 A reasonable alternative involves small/medium scale redistribution of housing numbers from north-east Norwich to south-west of the City. This was rejected by the GNDP on grounds that it does not provide a strategic scale of growth.

1.2 In addition to the adverse environmental effects identified, Alternative one does not demonstrate any signs of delivery at Rackheath. It is therefore legitimate to reassess the south-west of City as a reasonable alternative where conditions for growth appear stronger.

NNATG Reasonable Alternative

1.3 Ideally, we wish to see a reduction in the NPA housing target. We endorse the CPRE case in its submission to Q 1.11, namely the GNDP has planned for a substantial over-supply of housing numbers relative to demand and delivery in 2001 to 2026.

1.4 Until such time the GNDP conducts a review of NPA housing numbers, NNTAG proposes the following distribution:

1.5 - 3,520 dwellings at NS&OC. There may be potential for extra dwellings in this location (Beyond Green originally considered a range of 3 – 5,000). We oppose major growth at Rackheath and general infilling in the NEGTAAP south-east sector such as north of Thorpe End.

1.6 In terms of the remaining 2,000 dwellings (of the 7,000 dwellings to 2026), we support some re-distribution to SW of city. Suggested search sites include Hethersett (eg land to north of Thickthorn Hall).

1.7 In the SW quadrant, NNTAG would like to see development at a higher housing density of 40 dwellings per ha (NS&OC mixed use development equates to a net density of approximately 40 dwellings per ha and Rackheath eco-community Masterplan also advocates an average of 40 dwellings per ha). Higher housing densities make best use of land, reduce the need to travel, support public transport and minimise green house gas emissions. There is scope for increasing housing densities in proposed housing allocations (eg 2012 Cringleford Neighbourhood Plan recommends 25 – 30 houses per ha).

1.8 We do not support a strategic scale of growth in the south-west, for example around Wymondham), as this would threaten the strategic gap between Wymondham and Hethersett.

1.9 We do not support identification of reserve sites at present, given the excessive housing numbers to 2026.

South West of City

1.10 The SA SDJCS 3.2 (p43) assesses the South-West Sector thus; “The proximity of this sector to strategic employment areas, potential for public transport enhancement and availability of land which is not constrained by environmental considerations make this area suitable for small, medium or large scale strategic growth”.

1.11 Although this option was identified in the long list, it failed to reach the short list because it did not meet the GNDP’s threshold definition of strategic scale of development.

1.12 Additional information in support of NNTAG’s reasonable alternative relates to the SW’s increased importance as a strategic employment area and greater delivery certainty. New employment in this location will create added pull for residents of north-east Norwich. As the GNDP recognizes, it is important to locate housing close to employment in order to curb commuting by car.

1.13 A joint City Deal bid put forward by Norwich City Council, Broadland, South Norfolk, Norfolk CC and New Anglia LEP in conjunction with partners from business and research and educational institutions involves expanding the Norwich Research Park at Colney to four times its size.¹ A Government decision is expected in November. As part of NRP expansion:

- South Norfolk Council approved the Masterplan for Norwich Research Park North (30ha) in Jan 2013. It approved a planning application for the Centrum building for mixed office and laboratory space in Aug 2012.

- A Masterplan is being prepared for Norwich Research Park South which would extend the existing Norwich Research Park and link into Norwich and Norfolk University Hospital and NRP North.

- Planning application was submitted to Norwich City Council last November for a NRP Enterprise Centre for low carbon business incubator units on land at the University adjoining Earlham Hall.

1.14 As noted in our response to Proposed Submission JCS, some re-distribution of growth away from NE to SW sector would make best use of existing transport infrastructure and avoid the need for new transport infrastructure, notably a NDR This would help meet ENV 9 “To make the best use of resources...”

1.15 Recent transport infrastructure announcements include line speed improvements on the Norwich to London mainline (Network Rail Five Year Plan 2014 – 19) and track doubling at Ely North Junction in 2014 to enable an increase in the frequency of rail services between Norwich and Cambridge to half hourly.

1.16 Norwich City Council has submitted a £3.4 million bid to Government for a City Cycle Grant at the invitation of the Department for Transport. If successful, the money would be used to create an eight mile cycle route from the Norwich Research Park to Heartsease via the city centre.

¹ “By bringing together the three strands of enterprise and innovation, skills and infrastructure we will aggressively exploit the growth potential of our world class asset, Norwich Research Park (NRP). We will make Greater Norwich a dynamic international centre for business enterprise in life science to meet the global challenges of healthy ageing, food and energy security, sustainability and environmental change”. (Norwich City Deals Expression of Interest: Transferring world class research into world class business, Jan 2013)

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Matter 1 – Legal Requirements

**1.3. In the light of the councils' response in SDJCS 7 and 8, would
representors say that the selected reasonable alternative sites'
assumptions are correct in terms of housing numbers likely to be
delivered?**

1.1 Selected reasonable alternatives, in our view, over-estimate the housing numbers likely to be delivered.

1.2 The high JCS housing target of at least 37,500 dwellings by 2026 was generated in a different era, based on over optimistic assumptions about strong economic growth into the future. The GNDP Annual Monitoring Reports since 2008 have all shown a large shortfall in housing delivery.

1.3 Lower household formation figures for Norwich Area (7% reduction estimated for 2011 - 2021 compared with 2008) and a lower rate of population growth in Broadland than in the City of Norwich and South Norfolk suggest a slower rate of housing delivery in NEGTA than programmed by the GNDP.

Alternatives One and Two

1.4 An outline planning application has been submitted for the west sector at North Sprowston and Old Catton (3,520 dwellings). Pre-application workshops run by the developer had indicated a range of 3,000 to 5,000 dwellings in this location. A smaller development reflects the developer's assessment of market conditions.

1.5 A planning resolution has been passed for 600 dwellings on land north of Brooke Farm in the south east sector. The development has been held up by Broadland DC's insistence on a planning condition making delivery contingent upon Postwick Hub, opposed by the developer. Planning approval has been granted to 1,200 dwellings at White House Farm, as allocated in 2006 Local Plan.

1.6 Public consultation on a Masterplan for an eco community at Rackheath (4,150 dwellings) was held in 2008. Since the JCS hearing in 2010, little

activity has occurred. This is not surprising. Building Partnership's (and Barratt Homes) proposals for infrastructure (such as a rail freight link and a future tram-train for serving 5,000 dwellings) and community gain are unrealistic. Further public consultation in mid 2010 on the development of 200 exemplar dwellings (Rackheath Exemplar Project which includes 40% affordable housing) has not yet resulted in a planning application.

Alternative 3

1.7 The JCS allocates at least 2,200 dwellings to Wymondham and at least 1,000 to Hethersett. The following have been approved:

- 350 new dwellings off Norwich Common at Wymondham (Sept 2011). A planning inspector overturned South Norfolk Council's original refusal at appeal on grounds of deficit in the five year land supply. This is in addition to the JCS allocation.

- 1,196 houses north of Hethersett village centre. (Jan 2013)

1.39 Planning permissions continue to be granted in the NPA, but they are not matched by delivery rates which is apparent from the accumulation of outstanding planning permissions in the NPA.

1.8 An excessive housing target for NPA has created an excessive high five year land supply target which is leading to planning permissions being granted on non-allocated sites in rural locations such as in Wymondham, Mulbarton (180 dwellings on land east of Long Lane, Feb 2013) and Blofield (175 dwellings off Yarmouth Road, won on appeal, March 2013) where infrastructure costs are lower. Hence, a JCS review is essential.

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Matter 1 – Legal Requirements

1.4. In the light of the councils' response in SDJCS 7 and 8, have the significant environmental effects of the reasonable alternatives been correctly assessed?

In relation to the south west sector, we refer to NNTAG's response to the Proposed Submission in which we point out errors in the scoring. We respond to the GNDP rebuttal in Q 1.5 paras 1.10 – 1.17.

Alternatives One and Two

A new point of information regarding the NEGТ and biodiversity - Thorpe Woods (Racecourse, Belmore and Brown's - 82ha) within the NEGТ are designated a County Wildlife Site. Natural England recently designated 32 acres of Racecourse Wood as ancient woodland. Friends of Thorpe Woods have formed to protect the woods from any development threats – <http://savethorpewoods.co.uk>

The presence of important biodiversity areas within the NEGТ underlines a conclusion in the GNDP report, "Historic Characterisation and Sensitivity Assessment: GNDP Preferred option growth areas (undated) that sensitivity assessments of the historic landscape in the report do not necessarily run parallel with the other criteria such as biodiversity.

Missing from SA

– environmental impact of NEGТ and NDR on Wroxham/Hoveton (see NNTAG's response to 1.15.

- environmental impact of NEGТ and NDR on Thorpe End Garden Village Conservation Area. Traffic projections show a substantial increase in the volume of traffic through the village in 2017 and 2032 with a NDR.

- environmental impact of BRT and high frequency buses across Mousehold Heath bisected by Gurney Road;

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Matter 1 – Legal Requirements

1.5. Does the SA clearly set out (page 79 onwards in SDJCS 3.2) the reasons for the selection of the JCS NEGT submitted proposal (Alternative 1), and the reasons why the other reasonable alternatives were not chosen? If not, why not?

Reasons for Selecting Alternative One

1.1 No compelling set of reasons for concentrating 7,000 - 10,000 dwellings to the north-east of Norwich has been given.

1.2 Deliverability: No evidence has been put forward to justify the claim that deliverability is improved by providing three main focuses of development. NNTAG presumes that this refers to the three potential Core Development Areas

1.3 Existing and proposed housing commitments in the South East and Western Core Development Areas identified in the Growth Area Action Plan Options Consultation Draft (Dec 2012) would offer a wide choice of housing and tenure types. No justification has been offered for claiming that choice would only become available with the addition of a third focal point at Rackheath.

1.4 BRT: The NEGT is not well related to the chosen BRT corridor (Gurney Road/Salhouse Road). BRT would not serve North Sprowston/Old Catton (Core Development Area 2) which lies some distance away from Salhouse Road.

NNTAG doubts the viability of the Salhouse Road route and whether the first phase can be delivered by 2016 as programmed in the LIPP.

1.5 BRT would initially serve the South East Core Development Area. To access this area, the BRT would run through a mix of low to medium density urban development inside the ORR (Whitefriars and housing off Barrack Street and open space (Mousehold Heath, countryside). Beyond the ORR, Salhouse Road passes between Heartease Estate and Salhouse Industrial Park. Thereafter, Salhouse Road runs through woodland and out to new housing development planned for White House Farm. To the east of Salhouse Road, development of land north of Thorpe End is uncertain as is

land at Pig's Park, north of Thorpe End. To the west of the road lies historic parkland and beyond lies Rackheath in the north sector. In the absence of major new housing at Rackheath, it is not clear that the existing and committed development to the west and east of Salhouse Road is sufficient to support high frequency BRT.

1.6 Design: this SA statement (Dec 2012) is not borne out by the evidence shown in the Growth Triangle Area Action Plan (GTAAP) which proposes three core development areas. In NNTAG's view, they do not add up to a coherent whole. The West sector provides the most coherent site. The North sector is separated from the proposed extension to the urban fringe by a proposed NDR. The South-East sector comprises a collection of areas of land which lack coherence and do not relate well to each other or depending on which parcel of land, to transport, services or the character of existing developments (land North of Thorpe End, Pig's Park, land to the east of railway line, land at Gazebo Farm).

1.7 Broads: The SA does at least acknowledge one disadvantage – the proximity of the Broads (compared with Alternatives two and three). The need for mitigation would be avoided if housing in a proposed North sector could be re-distributed to another location such as SW of the City.

Reasons for Rejecting Alternative Two

1.8 The reasons relate to the strategic scale of growth sought (7 – 10,000 dwellings) and the intensity of development. A different response might result if the scale was set at 5 – 7,000 dwellings at a residential density of 40 dwellings per in an extension to the urban area. The Sustainability Statement for NS&OC says that "land within the applicants' control remains available for additional allocations in the western part of the Triangle if considered appropriate".

1.9 The GNDP's search for a site for at least 10,000 dwellings to accommodate growth after 2026 takes JCS beyond the plan preparation. We consider this to be unreasonable in terms of public acceptability and because background circumstances might change.

Reasons for Rejecting Alternative Three

1.10 No compelling reasons for rejection have been set out.

1.11 Delivery: within existing strategic growth locations there would be sufficient choice, whilst across the NPA, there would be sufficient choice and rates of delivery.

1.12 Impacts: the A11 corridor within the South Norfolk NPA is sufficiently large to accommodate strategic growth.

1.13 BRT: the make up of Alternative three ensures its rejection on grounds. It is self-evident that two blocks of 1,000 dwellings each in the north-west and north-east sectors do not justify BRT.

1.14 Biodiversity: strategic growth would offer the opportunity for enhancing green infrastructure for example in relation to the river valleys in South Norfolk NPA.

Other Reasonable Alternatives

1.15 Various combinations of housing numbers split between north-east and south-west of City are available and we consider that they would better meet the JCS objectives, protect the environment and promote sustainable development.

1.16 In its rebuttal of NNTAG, the GNDP gave the reasons outlined in SA p79 which we have addressed in 1.10 – 1.14 above. In addition, the GNDP responded:

1.7 Wymondham: development above 2,200 dwellings would exceed the High School capacity and therefore to secure the long term viability of a new secondary school a further 7,000 to 10,000 dwellings would be required. NNTAG response is that new secondary school places are becoming available outside of the local authority system. Some redistribution of housing growth away from north-east to south-west on the scale we propose could be accommodated within the total provision of secondary schooling.

1.8 NATS: evidence shows that there is much more flexibility to deliver sustainable transport across NPA than acknowledged by NATS. The first stage of BRT along Dereham Road has been delivered without a NDR and removal of through traffic from the city centre has also been agreed without a NDR in place. Other measures are available for improving sustainable travel in Norwich such as traffic management for removing on-street car parking on A1151 Wroxham Road/A1151 Sprowston Road to free up space for a 24-hour bus lane.

1.9 Rackheath Masterplan on which the public were consulted gave high propriety to rail as a means of promoting sustainable development. We have doubts about the viability of BRT along Gurney Road/Salhouse Road for serving NEGT.

1.10 Development Outside NDR at Rackheath: The GNDP states that allowing some development (ie medium scale development of 4,000 dwellings) at Rackheath would allow for a lower level of development and hence more limited landscape impacts inside the NDR. However, re-distributing some growth to south-west of City would have a similar effect.

1.1 Transport and the need to travel: the GNDP states that the north-east is contiguous with the urban fringe, large parts of it are closer to the city centre

than the SW sector and for much of the area there will be no need to cross a significant road. It is true that a part of the housing allocation in the north-east is contiguous with the urban area. However, another large part is outside the NDR in a free-standing settlement, separated by historic parkland and a NDR comparable to the distance of the south-west sector from the urban edge. Also, some parcel of potential development land within a NDR are fragmented not well related to the urban edge eg land east of railway line. The south-west sector lies on the A11 / New market Road corridor which take people directly to the main shopping street by bus.

If not, why not?

1.12 The GNDP's selection of NEG T was political. Norfolk County Council gave the highest priority to securing a NDR. Broadland DC wanted strategic scale growth concentrated on one site in order to obtain high levels of infrastructure, notably a NDR. South Norfolk Council sought to limit the amount of housing in its district and not accept strategic scale growth. Norwich was happy to support these proposals in return for a Norfolk County Council commitment to deliver sustainable transport within Norwich.

1.13 In preparing the adopted JCS, the GNDP held all meetings behind closed doors so that their negotiations were not seen and heard by the public. Following the High Court challenge, the GNDP has stuck doggedly to its original plans, despite economic upheavals challenging the optimistic assumptions of the adopted JCS.

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Matter 1 – Legal Requirements

1.6. Is it correct that the selection of the submitted JCS proposal Alternative 1 has been assessed in the SA report as being partly dependant on the delivery of the Northern Distributor Road (pages 62, 63 and 80 of SDJCS 3.2)? Is this realistic (see 3.4.11 last bullet and 4.11.23)?

Work on the JCS included NATS/NDR as a base assumption, leading the GNDP to claim that a NDR was fundamental to the whole JCS delivery.

The GNDP concentrated growth in north-east Norwich to help make the case for a NDR and in turn justify the road on grounds it would support growth in north-east. Through the GNDP, the three district Councils have committed to contributing £30 million of Community Infrastructure Levy funding for a NDR.

All three preferred growth options in the Proposed Submission JCS included a NEGТ of 7-10,000 dwellings on either side of a NDR, (now Alternative one) denying the public a genuine choice. The SA accepted a NDR as a done deal. It did not explain the reasons for selecting a NEGТ designed around a NDR.

On the other hand, the JCS Panel did not accept the GNDP case that all JCS growth in NPA was dependent on a NDR, saying that the delay in delivering a NDR did not prevent JCS provision of housing or employment development within Norwich City or South Norfolk Council areas, or existing housing commitments in Broadland.

The Panel highlighted the significant potential for further development in the growth triangle before confirmation of the timing of NDR delivery. It modified the JCS (Policy 20) to indicate that at least 1600 dwellings plus 200 dwellings exemplar at Rackheath could take place without improvement to Postwick Junction. The JCS reference to Postwick Hub was modified to to read “improvements to Postwick Junction (in the form of Postwick Hub or a suitable alternative)”, in response to objections from developers and community groups.

The Panel also directed further investigation of any potential for further growth as part of the NEGТ AAP in the absence of any confirmation of delivery of a NDR.

In the Proposed JCS Submission, the SA maintains that a NDR would ameliorate congestion on roads in the north-east quadrant and release road capacity for public transport improvements for serving growth. (SDJCS 3.2, p 62,63 and 80).

This is notwithstanding the fact that NDR Provisional Traffic Flows (two-way AADT) shown at the public exhibitions in Feb/March of this year and also last year demonstrate a much mixed picture. As with any new road, a NDR would redistribute traffic: reduce traffic on some part of the highway network, increase it on other parts and make marginal difference either way on other sections.

Traffic on two major radials in north-east Norwich would increase noticeably.

A1151 Wroxham Road (north of NDR)

	Without a NDR	With a NDR
2006	10900	
2017	10300	16000
2032	18200	24700

A1151 Wroxham Road (south of NDR)

	Without a NDR	With a NDR
2006	10900	
2017	10300	14500
2032	18200	18800

Plumstead Road (north of NDR)

	Without a NDR	With a NDR
2006	5100	
2017	5700	7200
2032	7800	10300

Plumstead Road (south of NDR in middle of Thorpe End village)

	Without a NDR	With a NDR
2006	8500	
2017	9200	11700
2032	11,100	15900

A NDR is unnecessary for creating capacity on radial roads for buses, walking and cycling. Road space could be released along the wide single carriageways of A1151/Wroxham Road and A1151 Sprowston Road for a 24 hour in-bound bus lane simply by applying TROs to remove on-street parking. All properties lining Wroxham Road, bar a terrace block close to ORR, have off-street parking. Closer to the city centre, Sprowston Road becomes narrower and passes through dense terraced housing reliant on on-street parking. A possible traffic management solution might be to introduce a gyratory system using Sprowston Road, Denmark Road and Magdalen Road in conjunction with TROs to re-arrange on-street parking. A gyratory system for buses already operates nearby along Magpie Road, Edward Street and Madgalen Street. Bus priority at junctions would also improve bus running between North Sprowston and city.

Major developers with an interest in the north-east sector do not regard a NDR as necessary for their scheme.

Lothbury Property Trust (developers of Broadland Business Park Phase 1 and 2 and 600 dwellings on land at Brooke Farm) has formally objected to Postwick Hub draft slip and side road orders, whilst noting the over-dependence on a NDR in its response to JCS Submission.

Building Partnerships, joint developers of Rackheath eco town were reported as stating that the: "NDR is seen as bringing benefits to the eco-community, but the eco-community is not designed to encourage private vehicle movements. We're not reliant on the NDR. It's linked to the city by two radial routes that both have established public transport services." ("Eco-town is not reliant on road link" EDP 18/11/10).

Although Beyond Green, developers of North Sprowston and Old Catton (NS&OC) assume a NDR in their outline planning application Transport Assessment (planning ref 2012/1516), the company investigated 'with' and 'without' construction of a NDR scenarios in their emerging plans. Without a NDR, BG say that design plans for an East – West High Street could be modified to take significant volumes of traffic, enabling the High Street to carry 900 vehicles in am peak With a NDR or 2150 vehicles Without a NDR. (Appendix 1.5 no 1).

Beyond Green has devised a traffic neutral strategy, whereby, *"for every additional car journey created by a new development, measures are put in place to enable and encourage an existing car journey to be taken off the road, for example by investing in bus services that serve neighbouring communities or creating safe routes for cyclists."*

ii) Is Delivery of a NDR in 2017/18 realistic?

No. In 2008, Norfolk County Council split a NDR into two parts for the purposes of funding and planning: (i) the NDR and (ii) Postwick Hub. Rather than speed up delivery of Postwick Hub and NDR, this strategy has slowed it down.

Postwick Hub

Postwick Hub is a private development road scheme based on a developer's request for a connection with the trunk road. The developer in this case is Norfolk County Council.

Norfolk County Council and Ifield Estates Ltd applied to Broadland DC for a business park in outline (as an extension to Broadland Business Park of around 25 ha (Broadland Gate) on land within the NEG T) and new road access (Postwick Hub) as a departure from the Local Plan. Broadland DC granted planning consent in October 2011, with ten years allowed for submitting reserved planning matters for Broadland Gate.

The road connection requires S10 and S14 Orders to be promoted by Secretary of State of State for Transport who called in the draft slip and side road orders in August 2010 as a result of objections. A pre-hearing took place on 20 July 2012, but the inquiry scheduled for September was postponed by HA and NCC due to incomplete traffic evidence. A new public inquiry opens on 3 July.

As a stand alone highway scheme, Postwick Hub is "significantly over-engineered" for the stated purpose of serving Broadland Gate and 600 houses to the north. In an earlier letter dated 27 March 2009, the DfT had stated that

"Without the NNDR being in place, it is commonly agreed that the proposed CIF scheme at Postwick would be significantly over-engineered and it is doubtful it would offer value for money

The most recent economic appraisal shows Postwick Hub as having a Benefit Cost Ratio of minus 2.9. (HA Economic Appraisal Report May 2013). The HA imposed an Article 14 Direction on Postwick Junction due to concerns over tailbacks along the A47/A1042 slip road. As a result, a resolution to grant planning permission for Broadland Business Park Phase 2 and 600 houses to the north has been made conditional upon delivery of Postwick Hub, with the

S106 agreement yet to be signed. It remains to be seen whether a more permissive approach is taken to development proposals that generate traffic on trunk roads by the proposal to remove the “nil detriment” requirement in the DfT consultation on “The Strategic Road Network and the delivery of sustainable development” which will replace circular 02/2007 “Planning and the Strategic Road Network”.

In their joint Statement of Case, the HA and Norfolk County Council also justify Postwick Hub on the need for future proofing of the junction in the event of a proposed NDR. However, the NDR has yet to be the subject of a planning application and environmental impact assessment.

NDR

The JCS shows the NDR as a route between A47 and A1067 and the traffic case and modelling for a NDR/NATS assumes a three quarters route. On the other hand, the DfT gave programme entry to just a half NDR between A47 and A140.

To speed up the planning process, Norfolk CC Cabinet resolved on 3 December 2012 to pursue a NDR through the National Strategic Infrastructure Project (NSIP) procedure under the Planning Act 2008. This step coincided with DfT consultation seeking to close down use of the procedure by changing the qualification threshold for roads and railways, with an indication that the changes will come into force in June 2013 (para 83). Norfolk CC is in the process of preparing an application for Development Consent for submission to the Planning Inspectorate in November 2013 and is relying on slippage of the Parliamentary timetable to secure acceptance.

There is no firm funding in place for a NDR extension to A1067. Norfolk County Council intends raising the additional £50 million from sources which include Prudential Borrowing and Community Infrastructure Levy (CIL). The latter source is looking increasingly unlikely. The Inspector who examined the GNDP CIL proposals reduced the residential development rate for the Inner Zone of Norwich and immediate surrounds from £115/sqm to £75/sqm. South Norfolk Council has identified a £50 million shortfall in CIL income (EDP 7/5/13).

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¹ “Major Infrastructure Planning Reform – Amendments to the Definitions for Highways and Rail Nationally Significant Schemes in the Planning Act 2008” (Dec 2012).

Alternative New Road Capacity Solution

A set of developer funded inner orbital link roads is emerging in the north-east sector between Broadland Business Park and Hurricane Way. (Appendix 1.6 no. 2), generally following the NDR pink route option (2004 public consultation).

They are considered in the Growth Triangle AAP Issues and Options Consultation (Dec 2012).

Although the road links do not follow a smooth line and the two sections of road in possession of planning consent (or else a resolution to grant planning consent) have different design standards, if built, they would create a more direct, albeit slower route between the Airport and A47. Besides accommodating travel from NS&OC and other developments, additional road capacity close to the built up area would likely attract some traffic from the ORR and in turn create space on ORR for additional city bypass traffic. New ORR capacity could be supplemented by some modest upgrading of ORR junctions which could incorporate better pedestrian and cycle crossings.

Together with an NPA package of sustainable transport, modal shift and travel planning measures, the inner link roads have the potential for better supporting growth. As yet, the suite of inner links has not been modelled and tested.

A NDR Is Not Necessary (with ref to SA 4.11.23)

Objectives in the NDR Best and Final Funding Bid (Sept 2011) are stated as:

1. To deliver economic growth

- link strategic employment sites, Norwich International Airport and major housing growth areas to the trunk road and give strategic access to north-east Norfolk.

2. To provide sustainable transport benefits.

- to deliver NATS measures including bus rapid transit, walking and cycling measures and improvements within the city centre.

3. To improve the quality of life for communities.

- to stop traffic from using inappropriate routes in northern areas of Norwich; to avoid traffic delays on radial roads and the inner and outer ring roads and to remove cross-city traffic in the city centre.

Developments which meet some of these objectives are taking place without a NDR:

Proposed Business Park at Norwich Airport

The Councils' aspire to grow the airport to 2.3 million passenger per annum by 2030. Instead, passenger numbers have fallen from 770,000 ppa in 2007 to 428,000 in 2011/12.

The adopted JCS provides for a business park on 39ha of land in the NE corner of Norwich Airport inside a NDR route. A planning application (ref. 13/00520/0) was submitted to Norwich City Council in March 2013 for a new 30 ha aviation business park, with access provided by a new link road from the A140 roundabout on Holt Road. Although the scheme is located close to a NDR, it is not designed to be dependent on it.

The proposed business park represents a diversification of Norwich Airport activities and a recognition that Norwich Airport passenger numbers are highly unlikely to expand to over 2 million by 2030.

Removal of Through Traffic from City Centre

An transport scheme has been agreed by Norwich Highways Agency Committee (21/3/13) for removing through traffic from St Stephens/Rampant Horse Street, using simple measures that include Traffic Regulation Orders for removing on-street parking. The work will take place without a NDR.

BRT

The first stage of BRT along Dereham Road was opened on 16/3/13. A connecting bus lane along Grapes Hill and Chapelfield North has been approved, subject to completion of statutory procedures. .

Rat running in the northern suburbs

Norfolk County Council have proposed measures for alleviating traffic impacts in the NW quadrant where the NDR terminates. Similar measures could be applied across north Norwich given the political will.

There is some measure of congestion in north Norwich (as there is across NPA) but the problem has been facilitated by Broadland DC's traditional approach to land use and transport planning which has built in car dependency. NNTAG anticipates that the NS&OC planning application will act as a new template for future development in the district and encourage modal shift more widely.

**Joint Core Strategy for Broadland, Norwich and South Norfolk
Broadland Part of Norwich Policy Area Examination**

Matters and Questions for Examination - May 2013

Norwich and Norfolk Transport Action Group (NNTAG) Res. No. 124224

Matter 1 – Legal Requirements

Q 3. Whether public consultation processes have been correctly carried out

3.1. In the light of the councils response in SDJCS 7, exactly what is wrong with the councils" public consultation procedures? What legislation or Statement of Community Involvement do they fail to comply with and why?

On 19 July 2012, the GNDP held a meeting to approve the Pre-Submission publication of the remitted parts of the JCS, publishing a voluminous amount of written material.

No Council discussions with the public were held during the preparation of the Pre-Submission document.

The Councils published the documents on their websites at the start of public consultation on the Proposed Submission documents from 10 August to 15 October 2012.

No public engagement of any kind took place during the period of consultation (eg public exhibitions, public meetings, a variety of printed materials).

The Councils deliberately failed to make any efforts to engage the public in any way. The substantial quantity of materials published and its complexity made it very difficult for members of the public to understand, hence the consultation comment about the material and process being "incomprehensible". In its response, the GNDP remarked that explanatory materials, including a non-technical summary of the SA were provided. However, so great was the amount of material dumped that it was hard for the public to find their way around it.

Norwich City Council expressed the attitude that not many members of the public would bother to respond to the consultation. We believe that the Councils deliberately sought to minimise public involvement.

This attitude was contrary to the intentions expressed in the Councils' Statements of Community Involvement to engage the public at the Pre-Submission consultation stage and more generally:

Broadland: In its Update Note (Oct 2008) on SCI, BDC stated an intention to use as many techniques as possible in involving the community in the draft version of the submitted DPD, “in keeping with the objective of a continuous programme of community involvement and of achieving as much consensus as possible”.

Norwich: “When consulting the community as part of the planning process the Council should always adhere to its Vision and Values (transparency/openness, care, respect, partnership, pride, which strongly support an open approach to community involvement”.

South Norfolk Council – the SCI commits to using a wide range of methods for engaging with the public at all stages (p5 – 7).

NNTAG considers that the manner in which the Councils undertook the consultation actively discouraged public understanding and engagement and was not in keeping with the Aarhus Convention which seeks to promote public participation in decision making viz.

Article 3 General Provisions

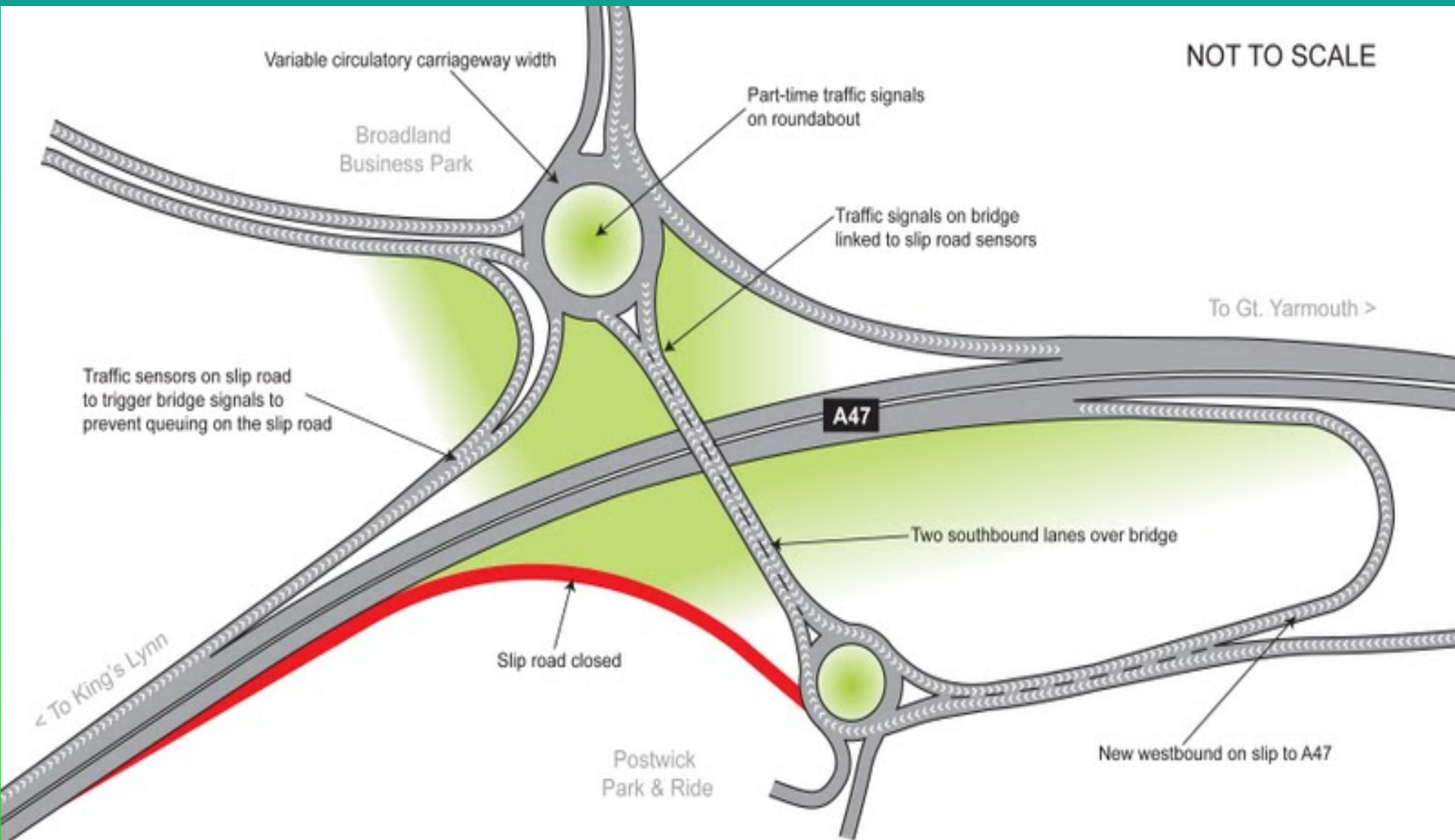
2. *“Each Party shall endeavour to ensure that officials and authorities assist and provide guidance to the public in seeking access to information, in facilitating participation in decision-making...”.*

Sustainable Transport Package – road building

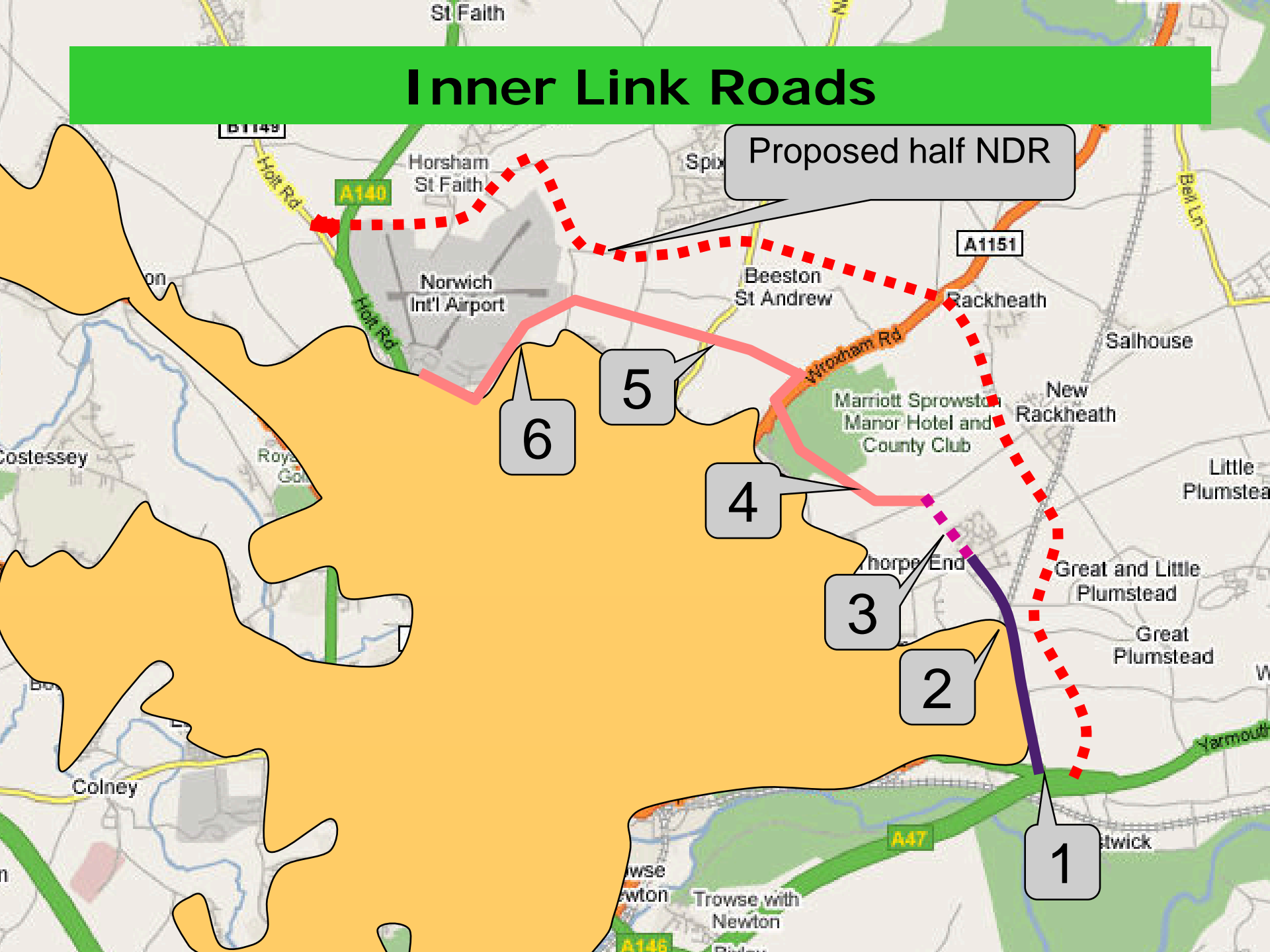
Developer funded inner link roads between A47 Postwick Junction and North Walsham Road would provide capacity for growth in NE

- 1) Lothbury have proposed a modest upgrade to Postwick Junction without an NDR (from £2m).
- 2) Extension of Broadland Business Park Link Road to Plumstead Road East (planning consent, developer funded).
- 3) Closure of gap between Plumstead Road East and Salhouse Road (NEGT AAP consultation). NNTAG and community groups support eastern route skirting Thorpe Woods.
- 4) White House Farm Link between Salhouse Road and Wroxham Road (planning consent, developer funded)
- 5) New E-W link between Wroxham and North Walsham Roads with bus link to Airport (planning application March 2012, developer funded).
- 6) The GNDP is considering compulsory purchase of land for extension of E-W link to Airport Industrial Park at Hurricane Way.

BBP Developer's £2m Postwick Enhancement



Inner Link Roads



Proposed half NDR

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Beyond Green in Broadland Q&As

13th October 2011

This document will be regularly updated to address issues raised as the Broadland project progresses. This update picks up several questions raised by stakeholders and the public during design workshops and public exhibitions held from 5th to 9th October 2011. For more information on how we at Beyond Green Developments are approaching this project, please see the exhibition boards displayed during those design events which are available on the [Broadland project page](#) of our website.

1. **Do you own the land? Which landowners are you working with?**
2. **Why are you proposing housing here?**
3. **Where are you in the process? When might development start?**
4. **How will the development be phased? When will new schools, services and community facilities be built for example?**
5. **Have you worked out what the mix of housing types will be?**
6. **Will you build all the houses yourselves? How would you ensure that what you promise in terms of design quality and sustainability will be delivered?**
7. **What are your proposals for Beeston Park? Would it be a local park or a bigger attraction for the wider area?**
8. **Are your proposals dependent on the delivery of the proposed Northern Distributor Road (NDR)?**
9. **Will the level of traffic in your proposed High Street allow it to work as a pedestrian environment?**
10. **Are your proposals for shops and workplaces realistic or appropriate given the location and the proximity of Blue Boar Tesco, Norwich City Centre, Broadland Business Park etc?**
11. **How do you propose that parking be managed?**
12. **How can I be kept informed?**



1. Do you own the land? Which landowners are you working with?

We're working with a consortium of landowners including the Beeston Estate, Norfolk County Council, the Alderman Norman Foundation and the Morley Agricultural Foundation. Collectively, the land concerned comprises over 200 hectares. We don't own any of the land at present, but have entered into a long-term partnership agreement with the landowners to bring forward proposals on the land for a sustainable new community.

2. Why are you proposing housing here?

There are several reasons why we've decided to investigate the potential for a new high quality development in this location.

The site is located within the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle, an area identified by the GNDP as having the potential to accommodate thousands of new jobs and homes over the next 20 years. In addition to this policy context, our own analysis of anticipated population and demographic changes both in the region and nationally suggests this is an area where the need for new homes and jobs will increase. We believe that Broadland and Norwich are already and will become increasingly attractive places for people to live, being located close to the Broads and the north Norfolk coast but within reach of the vibrant cultural and retail offer of the medieval city of Norwich, with easy access to Cambridge.

At a local level, the land we're exploring has a number of strengths: it's located close to the built-up edge of Sprowston and Old Catton and traversed by three radial routes from the city, meaning it has good access, less reliance on major new infrastructure and can be integrated with existing areas of development. On a large piece of land like this it's possible to bring forward a well-planned, coherent development rather than a piecemeal series of poorly-planned and under-equipped housing estates. This presents significantly greater opportunity to deliver real benefits to people already living in the area.

3. Where are you in the process? When might development start?

We entered into a long-term agreement with a core group of landowners in 2010. Since then we've carried out a wide range of surveys and research into the land to help inform design work in due course. We've also undertaken extensive conversations with many organisations and people in the local area and beyond, including the local authorities, elected representatives, parish councils, the business community, charities and local interest groups. These have been with the purpose of gaining a thorough understanding of the area and how development in this location might fit in with and enhance it.

We're currently talking to the wider community to hear their views on the prospect of development in this area – including their hopes for how a well planned and designed new place might provide benefits for the area in the longer term. Following a series of community planning workshops in June 2011, we held community design events in early October at which a draft masterplan was presented and discussed alongside strategies for transport, green infrastructure, resources, public services, shops and workplaces. The feedback from these events will be used to refine the plans before an outline planning application is prepared in the first half of 2012.

If approved, detailed applications for phased development could commence in 2013, with development potentially starting in 2014.

4. How will the development be phased? When will new schools, services and community facilities be built for example?

Careful phasing is needed to ensure that development is viable at all stages and that the critical mass necessary for a vibrant, sustainable community is reached as early as possible. Several options will be considered, but initial stages of development are likely to be adjacent to existing radial roads so that the first homes and workplaces aren't contingent on delivery of an excessive amount of infrastructure, e.g. long access roads. As it will serve as a key gateway, the proposed Wroxham Road Square is a prime candidate for delivery in an early phase. The proposed realigned Wroxham Road / High Street area could be an alternative or complementary starting point. Depending on market conditions, delivery of the full proposals is likely to take around 15-20 years.

We will work with statutory providers to ensure that appropriate sites and facilities are allocated for schools, healthcare, community facilities and other public services and to ensure that they're clearly programmed into the delivery of the development. Under the emerging Community Infrastructure Levy method of providing infrastructure to support development, developers have a reduced influence over the delivery of these facilities, but we'll work as closely as possible with the relevant bodies to optimise the location, design and timing of their delivery.

5. Have you worked out what the mix of housing types will be?

We're continuing to work on the mix of housing, taking into account demographic drivers, market evidence and local guidance. Our overall aim is to create a place where people of different ages, family types, incomes and interests can all find a place to suit them. There will be a wide range of housing types, from small apartments to large detached houses, including some extra-care housing for older people and other specialised accommodation. We will reserve a number of plots for self-commissioned and one-off houses. We will aim to comply with GNDP policy on affordable housing and further

extend access to low-cost housing – particularly for the young – by facilitating other tenures such as private long-term rental and shared-ownership, although the majority of homes will likely be owner-occupied.

6. Will you build all the houses yourselves? How would you ensure that what you promise in terms of design quality and sustainability will be delivered?

We expect to act as ‘master developer’ for the scheme, meaning we’ll work alongside local stakeholders and the community to shepherd the overall vision and strategy for the development and will either contract directly with infrastructure providers and builders ourselves or procure delivery from other parties, such as housebuilders, depending on the needs and characteristics of the particular phase of development. It’s likely that mixed-use areas will be delivered directly, with a wider range of parties being involved in the delivery of housing.

We have a long-term delivery model. This means we have a vested interest in ensuring the development is of a consistently high quality and that the place we create improves over time. Any planning approval will contain ‘conditions’ to ensure that what is proposed in a planning application is delivered. These will commit the development to being delivered in a certain way which can’t be substantially altered without a separate application. In addition, it is expected that following outline planning consent a Design and Sustainability Code would be submitted. This would govern aspects of the detailed design of all development phases, whether delivered directly by us or in partnership with third parties.

7. What are your proposals for Beeston Park? Would it be a local park or a bigger attraction for the wider area?

Proposals for Beeston Park are at an early stage, and will form part of a wider plan to provide access to varied green spaces across the development. The key principle underpinning our approach to Beeston Park is that this attractive landscape should be opened up to public access, potentially reinstating historic planting and footpaths, and that a new use should be found for Beeston Hall, such as a hotel, conference centre and/or café/restaurant. It’s likely that Beeston Park will be part of a larger ‘country park’ linking to other green spaces across the wider area. This would have a number of benefits, including helping to relieve visitor pressure on the Norfolk Broads. Whatever its ultimate designation, Beeston Park will provide excellent amenity for residents both of the new development and of existing parts of Sprowston, Old Catton and Spixworth.

8. Are your proposals dependent on the delivery of the proposed Northern Distributor Road (NDR)?

Delivery of the NDR as part of the wider Norwich Area Transport Strategy is a central plank of the adopted local policy framework under which we're advancing our proposals. Policy set out in the adopted GNDP Joint Core Strategy is that development in the Growth Triangle is limited to approximately 1,600 homes without confirmation of the delivery of the NDR. The Strategy provides for investigation (through the preparation by Broadland District Council of an Area Action Plan (AAP) for the Growth Triangle) of any potential that may exist for further development to take place without confirmation of the delivery of the NDR. If it becomes clear that there's no possibility of the timely construction of the NDR, a review of the proposals for the Growth Triangle would be triggered.

We're committed to an approach to development that facilitates face-to-face contact, encourages walking and cycling and radically reduces carbon emissions from transport by cutting unnecessary and casual car use. The key elements of this approach are a compact and walkable layout, excellent public realm, a mixed-use environment in which people can shop and work near where they live, good connections by public transport, bicycle and on foot to destinations locally and further afield, and localised demand management measures such as car club provision and parking restraint. Through this approach we aim to achieve a steady and ultimately far-reaching modal shift away from the private car, and in doing so help to reduce pressure on local road infrastructure. Whatever the particular issues facing the local transport network, this philosophy is fundamental to authentic sustainable development and to our competitive differentiation from other developers.

Given the current uncertainty over the NDR's funding and timing of delivery, our project team is assessing the effects on the transport network of development on our consortium's land both *with* and *without* construction of the NDR. The work is at a very early stage, and no firm conclusions can be drawn. However, preliminary analysis of the emerging plan indicates that levels of traffic on key routes such as the North Walsham Road and the proposed new east-west High Street through the development would be lower with the NDR than without it. For example, with the NDR, peak-time movements on the proposed east-west High Street would be up to 900 vehicles per hour in the worst-case scenario; this is comparable with peak-hour traffic levels experienced on, for example, the Unthank Road in Norwich. If the development were to take place without the NDR then the High Street would potentially need to accommodate east-west peak time movements of up to 2,150 vehicles an hour in the worst-case scenario, comparable with parts of the B1108 Earlham Road. We don't think such a level of traffic is incompatible with high-quality development but it would mean that street typologies on primary routes would need to be carefully designed so as to preserve a high-quality

pedestrian environment and public-transport priority whilst accommodating the necessary extra capacity.

These matters will need to be the subject of full Environmental Impact Assessment and Transport Assessment as part of a planning application, in light of the most up-to-date information available. However, it will ultimately be for statutory bodies to determine whether development proposals to deliver housing growth can be acceptably accommodated without the relief provided by the NDR, taking into account all factors including many beyond the scope of our studies.

9. Will the level of traffic in your proposed High Street allow it to work as a pedestrian environment?

The High Street in the evolving masterplan has been conceived to create a vibrant mixed-use centre which - as in traditional towns and neighbourhoods - is at the intersection of the busiest and best-connected routes, making it the natural focal point for contact and trade. Up to a point - and especially in new places - significant vehicular traffic on such routes is desirable to create passing custom for shops and services to help create the 'critical mass' of demand to sustain localised mixed-use.

There are many examples of successful and popular High Streets in which a significant weight of vehicle movements co-exist with an active and vibrant pedestrian experience; and others where congestion and poor air quality has led to failing shops and a weak public realm. Even in the worst-case scenario for peak-time traffic, we wouldn't expect the quality of the pedestrian experience to be severely compromised.

10. Are your proposals for shops and workplaces realistic or appropriate given the location and the proximity of Blue Boar Tesco, Norwich City Centre, Broadland Business Park etc?

Our emerging proposals respond to stakeholder and community representations and expert analysis that a sustainable place should provide a different kind of mixed-use experience from either the city centre or large-floorplate retail and business parks.

We aim for a small-scale localised retail offer with a range of small, mostly independent shops which will serve the local community. Our High Street would only attract people from farther afield if it offered something distinctive as a destination in its own right, rather than undermining or replicating the offer of established centres. With regard to employment, the majority of spaces will be for SMEs and the combination of location, local environment and amenities, the authentic sustainability of the development and the lease terms on offer will differentiate the development from established and competing places. There may be some premises for larger companies, but we don't believe that

strategic employment sites need to be protected from the competition this development might offer in that field. In addition, we expect the development to offer an excellent environment for homeworkers and self-employed people.

We'll work hard to market any development to prospective occupiers and we're confident there will be a strong demand. However, by ensuring that buildings close to the intended mixed-use centres of the development are adaptable to different uses, we aim to avoid the need to predict-and-provide for demand and to enable the local economy to evolve and grow over time.

11. How do you propose that parking be managed?

There is evidence that residential parking restraint is important in encouraging the take-up of alternative modes of transport. We intend that any development here will be highly walkable, incorporate local workplaces, shops and services (reducing the need to travel), provide good new bus connections, improve cycle links to the city centre and elsewhere, help people with active travel planning, and provide a car club to service certain types of journey without the need for a private vehicle. We anticipate that this range of alternatives will reduce the need for many households to own a second, and some a first, private car.

We'll design, allocate and manage parking within the development to allow some parking spaces to be 'retired' over time as demand allows, with the aim of reducing the overall ratio of residential parking from at or close to 'standard' levels towards an average of one space per dwelling as the development is built out. Our long term delivery model will enable us to monitor and actively manage the parking strategy for the area, ensuring that agreed standards are enforced. A parking strategy will be submitted to Broadland DC with the planning application, and we'll work closely with Broadland on an ongoing basis to implement the agreed strategy as the development progresses.

12. How can I be kept informed?

If you'd like to be kept informed about our consultation programme, please email broadland@beyondgreen.co.uk asking to be added to our mailing list.