

**via e-mail and post**

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25 July 2013

Dear Secretary of State

**Norwich Northern Distributor Road project –  
Qualifying Submission under Section 35 of the Planning Act 2008**

I wish to formally request you to exercise your power under section 35 of the Planning Act 2008 (PA 2008) to direct that the Norwich Northern Distributor Road (NDR) is a Nationally Significant Infrastructure Project (NSIP), and that it and any matter associated with it is to be treated as development for which a Development Consent Order (DCO) is required.

The NDR was within the definition of a NSIP contained in section 22 of the PA 2008. However now that The Highway and Railway (Nationally Significant Infrastructure Project) Order 2013 has been brought into force, with effect from 25 July 2013, this takes the NDR outside of the provisions of the PA 2008.

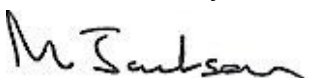
The attached note sets out in detail Norfolk County Council's assessment of the argument for designating the NDR as a NSIP and for progressing it through the DCO route.

Norwich is the largest economy in the east of England, is a global centre for key growth sectors including the sciences and advanced engineering, is a recognised Growth Point and, as Greater Norwich, has been invited by Government to negotiate a City Deal. The NDR, which would link the Trans European Network–Transport and the national Strategic Road Network to Norwich International Airport to large areas of existing and potential employment and residential development, would enable significant levels of growth in both Greater Norwich and East Anglia, which will contribute to the national growth objective and to the rebalancing of the economy.

We have already progressed through part of the relevant pre-application procedures, with a view to submitting an application for a DCO in November 2013. We are concerned that the delay which would be engendered if another authorisation route now had to be followed would postpone the opening up of very significant growth potential, and its contribution to the national economic recovery.

I look forward to a positive response to our request. In the meantime, please do not hesitate to contact me if you require any further information.

Yours sincerely



Mike Jackson  
Director of Environment, Transport and Environment

## **Norwich Northern Distributor Road – an infrastructure project of national significance**

### **Introduction**

The Norwich Northern Distributor Road (“NDR”) is a proposed transport infrastructure project which will link to the Trans European Network – Transport (“TEN-T”), and the Strategic Road Network (“SRN”).

The NDR is exceptional because it will provide much improved access to Norwich International Airport, which has a nationally significant role in the offshore oil and gas industry as well as passenger services to UK and international destinations. It will therefore complete network linkage, via the TEN-T and the SRN, between the Airport, the deep-water ports of Great Yarmouth and Lowestoft, and the associated Enterprise Zone with its energy industry and supply chain embracing the full energy spectrum, from gas through to nuclear and offshore wind. The NDR will enable significant levels of growth in employment and housing in both Greater Norwich and East Anglia, which will contribute to the national growth objective and to the rebalancing of the economy.

The NDR is also of a substantial size, both in terms of engineering scope and financial commitment, comprising some 20 kilometres of dual carriageways, with a projected total scheme cost of some £141.5m. It is a priority for investment within the National Infrastructure Plan as one of the Development Pool projects (that with the highest DfT funding approved for a road) which secured Programme Entry in December 2011.

Since December 2012 the NDR has been progressed with the objective of submitting an application for a Development Consent Order in November 2013, in accordance with the procedures for a Nationally Significant Infrastructure Project (“NSIP”) set out in the Planning Act 2008 (“the PA 2008”). Until 25 July 2013 the NDR fell within the definition of a NSIP contained in section 22 of the PA 2008.

The Highway and Railway (Nationally Significant Infrastructure Project) Order 2013 was made on 24 July 2013 and comes into force on 25 July 2013. The effect of the Order is to take the NDR outside of the provisions of the PA 2008.

The Council considers that the NDR is of national significance, and wishes to continue with an application for a DCO for the NDR under the PA 2008. The Council is therefore making this submission to the Secretary of State giving its reasons why it considers that the Secretary of State should direct that the NDR is to be treated as of national significance.

The Council is concerned at the delay to the very significant growth potential, of benefit to the national economy, which would be engendered if another authorisation route now had to be followed.

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### **1. Summary**

This submission is a qualifying request under section 35ZA(1) and section 35ZA(11) of the PA 2008 for a direction under section 35(4) of the PA 2008 that the NDR should be treated as development for which development consent is required.

The NDR is a major development comprising the construction of significant transport infrastructure. It extends for some 20km from the A47(T) east of Norwich to the A1067 to the north west of Norwich, and includes the Postwick Hub junction, which is also being separately progressed via the HA 1980 side road and slip road orders process. It has the **support** of key stakeholders. The Secretary of State for Transport has confirmed in a relevant funding decision that the NDR has been through a stringent assessment process. A local MP and the New Anglia Local Enterprise Partnership have expressed their support and note the NDR's importance to the economy.

The key Government objective of creating **growth in the national economy** will be achieved by an accumulation of growth across the nation – in London and in the regions. The Government has recognised a need to rebalance the economy, reducing its dependence on London and the South East, and boosting in particular the role of regional cities. Norwich is the largest economy in the east of England, is a global centre for key growth sectors including the sciences and advanced engineering, is a recognised Growth Point and, as Greater Norwich, has been invited by Government to negotiate a City Deal. The NDR will enable significant levels of growth in both Greater Norwich and East Anglia, which will contribute to the national growth objective and to the rebalancing of the economy.

The national **transport system is a vital engine for economic growth**, and improvement of the links that help to move people and goods around helps to build a balanced economy. The NDR will drive growth in East Anglia: it is identified as critical to the delivery of the adopted vision and objectives that are set out in the Joint Core Strategy that covers three local authority areas in and around Norwich, it directly supports over 135ha of proposed employment growth, and it improves links to Enterprise Zones in Great Yarmouth and Lowestoft. The national significance of the NDR has been recognised by its inclusion in the **National Infrastructure Plan**.

The NDR **links directly to the Trans European Road Network and the national Strategic Road Network.**

The NDR provides much improved access to **Norwich International Airport, which provides a nationally significant role in the offshore oil and gas industry** as well as passenger services to UK and international destinations. Due to severe pressures on existing capacity of airports in the South East, demand for services using the airport is likely to grow and there is currently no direct link to the airport from the Strategic Road Network.

The NDR will therefore complete **network linkage, via the TEN-T and the SRN, between the Airport, the deep-water ports of Great Yarmouth and Lowestoft, and the associated Enterprise Zone with its energy industry** and supply chain embracing the full energy spectrum, from gas through to nuclear and offshore wind.

By linking the Trans European Network - Transport (TEN-T) and the national Strategic Road Network to Norwich International Airport and large areas of existing and potential employment and residential development, the NDR will enable significant growth, with consequent benefits to the national economy. The additional GVA resulting from the NDR is currently assessed as being **approximately £1.1 billion** over the period to 2044, at 2010 prices.

The **sustainable transport measures** enabled by the NDR will make better use of the transport network, and support growth even further across the urban area and surrounding rural hinterland.

The NDR is of a **substantial size**, both in terms of engineering scope and financial commitment, and is one of the Development Pool projects (that with the highest DfT funding approved for a road) which secured Programme Entry in December 2011.

For these reasons Norfolk County Council considers that the NDR should continue to be classified as a **project of national significance.**

## **2 Description and current status**

### **2.1 General Description**

The NDR would be predominantly a dual-carriageway all-purpose distributor road which would link the A47 Trunk Road at Postwick in the east to the A1067 Fakenham Road near Attlebridge in the west, over a length of approximately 20km (see plan in Annex A). It includes the Postwick Hub junction, which is also being separately progressed via the Highways Act 1980 side road and slip road orders process. Over its length the NDR would be variously constructed at grade, on embankment, and in cutting. At various points along the route drainage lagoons and other associated road infrastructure would be constructed.

The NDR includes two grade-separated junctions at the following locations:

- A47 Postwick (to include new roundabout east of the existing roundabout with provision of new eastbound on and off slip roads to/from the A47 Trunk Road)
- A140 Cromer Road (to include east and west bound on and off slip roads).

It also includes on-line at-grade roundabouts to link with the existing highway network, six overbridges carrying existing roads, a bridleway, and accesses over the NDR, and four underbridges which will carry the NDR over the A47 Trunk Road at Postwick, a railway line, a minor road, and a new flood culvert / bat underpass.

The NDR includes various improvements and additions to facilities for walkers, cyclists and horse riders, including new bridleways adjacent to some sections of the NDR, extensive 'linear' facilities along the majority of the route, facilities within new bridges over the NDR and improved surfacing on some existing rights of way. All of these are provided so as to maximise the accessibility and facility that the NDR will provide for all highway users.

Mitigation works are also proposed to ameliorate the adverse environmental impacts of the NDR, including areas of new habitat creation, habitat enhancement, and bat gantries.

The NDR is described in detail in Annex B.

## **2.2 Pre-application consultation**

The NDR has already been through significant consultation processes and will go through a further extensive pre-application consultation process in accordance with the PA 2008, and therefore details may change as a result. This document describes the NDR in its current form.

## **2.3 The NDR and key local growth and transportation strategies and plans**

The Joint Core Strategy (JCS) - prepared by Broadland District Council, Norwich City Council and South Norfolk Council, working together with Norfolk County Council as the Greater Norwich Development Partnership - sets out the long term vision and objectives for the area covered by the three Councils, and provides strategic polices for steering and shaping development.

The JCS identifies Greater Norwich as having the region's largest economy and being one of the most important city regions in the east of England. The JCS sets out a far reaching spatial vision to be achieved by 2026. The JCS then sets out a series of eight polices that apply across the whole area covered by the strategy that are aimed at achieving this vision. Policy 6 deals with access and transportation matters. It states that:

*"The transportation system will be enhanced to develop the role of Norwich as a regional Transport Node, particularly through the implementation of the Norwich Area Transportation Strategy, and will improve access to rural areas. This will be achieved by:*

- *implementation of the Norwich Area Transportation Strategy (NATS) including construction of the Northern Distributor Road (NDR)*
- *..."*

The supporting text to the policy also highlights that the NDR scheme is a strategic transport improvement required to deliver growth and facilitate modal shift (paragraph 5.47). Policy 9 of the JCS deals with the Strategy for growth in the Norwich Policy Area (NPA) and explains that this area is the focus for major growth and development. The construction of the NDR (to provide strategic access, significantly improve quality of life and environmental conditions in the northern suburbs and nearby villages, and provide capacity for comprehensive improvements for buses, cycling and walking as well as facilitating economic development) is highlighted as a piece of transport infrastructure required to deliver growth and support the local economy.

The Norwich Area Transportation Strategy (NATS) seeks to deal with transport issues that hinder the Norwich Area fulfilling its potential. The principal objectives of NATS aim to develop sustainable transport, reduce congestion and improve air quality and promote modal shift. The aim is to ensure that the transport system is reliable and sustainable for future growth.

The strategy looks to implement this by the delivery of key elements, these are:-

- Bus Rapid Transit corridors (BRT)
- Cycling and pedestrian improved network and facilities
- The NDR
- Improved Rail and Bus Services.

The traffic relief which would result from provision of the NDR is considered to be essential to enable the BRT and cycling and pedestrian improvements to progress.

## **2.4 Current status**

Since December 2012 the NDR has been progressed with a view to submitting an application for the DCO in November 2013. The NDR has been registered with the Planning Inspectorate, and they have engaged in discussions and visited the NDR's location. A Scoping Opinion was issued by the Planning Inspectorate in April 2013. After the required consultation with the relevant Local Authorities, the Statement of Community Consultation was issued to the Local Authorities on 20 June 2013, and published in the press on 21 and 28 June 2013. The consultation processes set out in sections 47 and 48 of the PA 2008 started on 8 July 2013. The consultation under sections 42 and 44 of the PA 2008 will commence within the next two weeks.

The Council is concerned at the delay to the very significant growth potential, of benefit to the national economy, which would be engendered if another authorisation route now had to be followed.

The NDR is an infrastructure project in the field of transport and so satisfies the condition set out in section 35(2)(a)(i) of the 2008 Act. All of the intended works are to take place in England and so the NDR satisfies the condition set out in section 35(2)(b) and section 35(3)(a) of the 2008 Act.

## 2.5 **History**

A Major Schemes Business Case for the NDR was submitted to DfT in 2008. After responses were provided to DfT's request for various sensitivity tests on traffic and economic assessments, DfT gave programme entry to the section of the NDR from the A47(T) east of Norwich to the A140 junction at Norwich International Airport in December 2009. This section had a BCR of 4.6. The submission documents can be found at the following link:

[http://www.norfolk.gov.uk/Travel\\_and\\_transport/Transport\\_future\\_for\\_Norfolk/Transport\\_for\\_Norwich/Northern\\_Distributor\\_Road\\_and\\_Postwick\\_Junction/NCC105114](http://www.norfolk.gov.uk/Travel_and_transport/Transport_future_for_Norfolk/Transport_for_Norwich/Northern_Distributor_Road_and_Postwick_Junction/NCC105114)

A Development Pool Bid for the NDR was subsequently submitted to DfT in September 2011. DfT accepted this and added the NDR to their list of "Local authority major transport schemes – development pool projects" in December 2011. The updated overall BCR of the NDR was 7.4 (inclusive of wider monetised benefits). The submission documents can be found at the following link:

[http://www.norfolk.gov.uk/Travel\\_and\\_transport/Transport\\_future\\_for\\_Norfolk/Transport\\_for\\_Norwich/Northern\\_Distributor\\_Road\\_and\\_Postwick\\_Junction/NCC105056](http://www.norfolk.gov.uk/Travel_and_transport/Transport_future_for_Norfolk/Transport_for_Norwich/Northern_Distributor_Road_and_Postwick_Junction/NCC105056)

In April 2012 Norfolk CC resolved to fund the additional section of the NDR from the A140 junction to the A1067 to the northwest of Norwich.

## 3 **The national significance of the NDR**

### 3.1 **Norwich makes a significant contribution to the UK economy and the NDR supports national growth potential**

The national economy is the sum of a number of parts. Nationally significant infrastructure projects influence parts of the national economy rather than the economy as a whole. In its Response to the recommendations of the Heseltine Review "No Stone Unturned" (March 2013) the Government has recognised a need to rebalance the economy away from over-reliance on London and the South East. The Government Response states:

*"Over recent decades, London and the south-east have been relied on as the primary source of economic growth in the UK. Despite significant investment in the regions, London, with around 13 per cent of the population, produces around 21.5 per cent of UK Gross Value Added (GVA), and has the highest GVA per head of all regions. But countries can be more successful when they are driven not just by their capitals, but by multiple thriving centres each with their own strengths."*

*"Every locality must be able to fulfil its full potential by taking responsibility for decisions and resources that affect their local economies. That is why the Government has taken steps towards a rebalanced economy, where every part of the UK – not just London and the south-east – drives strong and lasting growth."*

*“Cities and their wider economic areas account for 74 per cent of the UK’s population and 78 per cent of UK jobs. The Government has taken decisive action to give cities, as engines of economic growth, the powers and tools they need to drive growth through City Deals.”*

*“Infrastructure forms the backbone of a modern economy and is vital to long-term economic growth. However, years of under-investment have left the UK’s infrastructure bursting at the seams and struggling to keep pace with the demands of a growing population. To address this, the Government has made infrastructure a central part of its growth agenda...”*

*“Furthermore, the Government is taking a more strategic approach to infrastructure investment and set out for the first time a long-term plan for the UK’s infrastructure in the National Infrastructure Plan.”*

Norwich is a key engine of growth across a wide sub-region, therefore making a significant contribution to national growth. The NDR supports this growth potential and also contributes to the success of the wider surrounding area including Great Yarmouth and Lowestoft and their Enterprise Zones (see below).

The additional GVA resulting from the NDR has been assessed as **approximately £1.1 billion** over the period to 2044, at 2010 prices.

The significance of Norwich to the national economy is highlighted by the following considerations:

- Greater Norwich was invited by the Government to negotiate a 2nd wave City Deal. Infrastructure to release growth is identified as one of our key challenges.
- Norwich is the largest economy in the east of England (number of jobs in the urban area - source BRES)
- It is a global player in financial services and the largest general insurance centre in the UK
- The city centre consistently ranks in the top 10 of UK shopping centres and Norwich is a top 10 day-trip tourist destination (tourism is a priority of the New Anglia LEP)
- The Norwich area is a global centre for key growth sectors, including life sciences and advanced engineering
- Norwich has recently been ranked the 6th best city in the UK for “good growth” (Demos-PWC “Good growth for cities” index Nov 2012)
- The area is committed to growth. We have an adopted Joint Core Strategy (covering the 3 districts and endorsed by the County Council) which aims to deliver a minimum of 37,000 dwellings and 27,000 jobs. Our City Deal proposes to release a higher rate of job growth i.e. 40,000 by 2031.
- Proposed growth potentially includes a 10,000+ dwelling urban extension (amongst the largest if not the largest urban extension in the country) which is directly served by, and reliant on, the NDR. This “growth triangle” uniquely includes both an ecotown (at Rackheath) and a major proposal for a highly sustainable new quarter that is effectively a garden suburb (North Sprowston & Old Catton – a planning application by Beyond Green). Whilst the parts of the Joint Core Strategy promoting the “growth triangle” remain in draft form,



pending the outcome of an Examination, the Rackheath ecotown is specifically promoted by Government policy (PPS1 ecotowns supplement remains government policy alongside the NPPF).

- Norwich International Airport (NIA) plays a nationally significant role in the offshore oil and gas industry in the southern North Sea; it is home to four of the leading offshore helicopter transport companies - Bristow, Bond, NHV and Dancopter. NIA also provides scheduled services to both international and domestic destinations, including Aberdeen (5 flights a day) and Amsterdam Schipol (4 flights a day), from where passengers connect to other international destinations.
- NIA passenger numbers for 2011/12 totalled some 428,000, of which approximately 60% were classified as Schedule Traffic, some 20% as Charter Traffic, and some 20% as Gas Platform and Domestic Charter.

The NDR directly supports over 135ha of proposed employment growth in locations directly accessed by or in close proximity to the route. This scale of development is partly directly dependent on the NDR, but of equal importance the success of these proposals is much more likely with good connections. These locations for growth include:

- an approved 15ha extension of Broadland Business Park known as Laurel Farm and a further permission of 25ha known as Broadland Gate. Neither of these developments can be implemented before improvements to the Postwick Junction of the A47.
- new employment allocations of 30ha associated with Norwich International Airport, and the emerging proposal for 25ha at Rackheath within the growth triangle.
- a current planning application for Norwich Aeropark of 40ha of employment development.
- In addition, the Beyond Green planning application covering part of the growth triangle includes 16,800m<sup>2</sup> of employment space and a further 8,800m<sup>2</sup> of other commercial development.

In steady state, by 2032, it is estimated that GVA in Greater Norwich will be around £180m per annum higher with NDR than without. Although there are no official statistics for GVA in Greater Norwich, it has been estimated at around £7bn in 2013, based on the East of England forecasting model. Over the years to 2032, this will add an average of about 0.14 percentage points to the annual growth rate of GVA in Greater Norwich and, cumulatively, will leave GVA in 2032 about 2.6% higher than it would otherwise have been. This will be a substantial contribution to eliminating the historic shortfall of growth in Norfolk in comparison with the national average and, because the additional GVA is expected to be almost entirely from the private sector, to re-balancing Norfolk's economy.

### **3.2 Infrastructure for growth**

The implementation of NATS and the delivery of the NDR are identified as critical to the future success of the Norwich economy, which in turn makes these actions of significance in the ability of the Norwich and North Norfolk area to continue to make important contributions to the national economy. The full benefits of NATS cannot be achieved without the NDR.

The JCS for the area is supported by comprehensive infrastructure planning. The NDR (and other elements of NATS) are identified in the JCS as Priority 1 infrastructure critical for growth and the delivery of the overall strategy.

A large number of existing businesses and employment areas are concentrated along the northern section of the existing Outer Ring Road (ORR). This northern section of the ORR is particularly congested and conditions will worsen without the NDR. In future forecast years, the NDR will reduce predicted traffic levels on the ORR, on some locations to less than current traffic flows.

As proposed in NATS, the NDR will enable the development of a modern, sustainable transport system for Norwich, including Bus Rapid Transit and facilities for cyclists and pedestrians. This is an important part of the Strategy, as underlined by the DfT's funding grant for the NDR having been made on condition that NCC must commit to a funded and timetabled package of sustainable transport measures in Norwich City Centre. The sustainable transport measures enabled by the NDR will make better use of the transport network, and support growth even further across the urban area and surrounding rural hinterland.

The National Infrastructure Plan (NIP) includes 40 priority investments. These priorities include "Local authority major transport schemes – development pool projects". The NDR has programme entry status in the development pool and is, therefore, a priority for investment within the NIP. As a priority in the NIP, the NDR has already been considered of national significance.

### **3.3 Access to Norwich International Airport**

The NDR will complete network linkage between the Enterprise Zone and deep-water ports at Great Yarmouth and Lowestoft, and Norwich International Airport (NIA), via the TEN-T and the SRN. The NDR provides improved access to NIA, which provides a key role in the offshore oil and gas industry as well as passenger services to UK and international destinations. The NDR will also provide direct access to a new airport related business park and the proposed Aeropark.

The Enterprise Zone is focussed on the nationally significant offshore energy industry and supply chain embracing the full energy spectrum, from gas through to nuclear and offshore wind, and the NIA provides vital support to this industry through helicopter based servicing and national and international flight connections.

Pressures on existing capacity of airports in the South East of England are already more severe than those in the rest of the country, and therefore demand for services from NIA is likely to grow, particularly as a result of the enhanced wider SRN access that will be brought about by the dualling of the last section of A11 single carriageway, due to be completed in 2014.

### **3.4 The NDR's connection to the TEN-T and the SRN**

The NDR will connect to the Trans European Network – Transport (TEN-T) and the Strategic Road Network (SRN) at the Postwick Hub Junction. The NDR includes

alterations to the slip roads (part of the SRN) at this grade-separated interchange.

This section of the SRN is the A47(T), which provides a strategic route from Great Yarmouth to Peterborough, where it links to routes to the Midlands and the North. Locally the A47 links via the A11(T) to Cambridge and London. At Great Yarmouth the A47 links to the A12 (T) which provides a route to Lowestoft. The A47 is one of only a limited number of routes within the East of England which is recognised as part of the TEN-T, because of its strategic connection between the A1 corridor and the East coast ports. Norwich is a hub within that route.

By linking the TEN-T and the SRN to Norwich International Airport and large areas of existing and potential employment and residential development, together with improving links to Enterprise Zones in Great Yarmouth and Lowestoft, the NDR will enable significant growth, with consequent benefits to the UK economy.

### **3.5 The size and nature of the NDR**

The proposed NDR is of a substantial size, both in terms of engineering scope and financial commitment. The proposed NDR comprises some 20 kilometres of dual carriageways and 10 junctions, together with connecting links to side roads. It extends from the A47(T) east of Norwich to the A1067 to the north west of Norwich, and includes the Postwick Hub. The NDR includes significant landscaping and other measures to mitigate impacts on the environment. The projected total scheme cost is some £141.5m. It will involve a substantial investment in the Greater Norwich economy. It is one of the Development Pool projects (that with the highest DfT funding approved for a road) which secured Programme Entry in December 2011.

## **4 Support for the NDR**

The NDR's entry to the Department for Transport's development pool was announced in December 2011 (Local Authority Majors - Development Pool Schemes - Scheme Decisions - December 2011). At that time the Secretary of State for Transport said:

*“All the projects have been through a stringent assessment process to ensure they offer value for money and are affordable for both the Government and the local area. Transport infrastructure is central to growth, and I am announcing funding for a further 21 local major transport schemes. Along with the schemes announced last month we've supported investment of over £1.4bn that will strengthen local economies and improve local transport links for communities across the country.*

*“Almost all journeys begin and end on local authority networks, which provide the crucial links that allow people and businesses to prosper. We are investing in schemes that will provide better access to jobs and services, reduce congestion and enable more goods to move more easily around our country. This will be £1.4bn invested in local communities to build the transport system we need to get the economy back on track. “*

Chloe Smith MP said:

*"This is good news. I have long supported the proposed road scheme and spoke about it in my first speeches in Parliament. I have most recently been pressing transport ministers to approve it. The campaigning has paid off.*

*"It will help businesses and support job creation. It also stands to free residents from congestion and improve the green travel choices available in the city centre."*

Andy Wood, Chairman of the New Anglia Local Enterprise Partnership, said:

*"This is a truly significant decision. We know that the road scheme will directly create thousands of new jobs and has the potential to transform the economic prospects of northern Norwich and significant parts of Norfolk. It is gratifying that the Government has chosen to invest in a project which is so important to our area."*

Recently Caroline Williams, Chief Executive of Norfolk Chamber of Commerce, said:

*"Norwich Northern Distributor Road is widely supported by businesses in and around Norwich. Improved access around the north and east of the city would be a major benefit for many businesses and would remove obstacles to growth that are holding back development and preventing the Greater Norwich area from playing a full part in the economic recovery of this region. Anything the Government can do to facilitate progress on this vital, nationally important infrastructure project would be warmly welcomed by the business communities in Norwich and across Norfolk."*

## **5 Conclusion**

This submission provides a description of the NDR in section 2 and Annex B. This satisfies the requirement to "specify the development" in section 35ZA(11) of the PA 2008. The submission also explains (in section 3) why the conditions in section 35(2)(a)(i) and section 35(2)(b) of the PA 2008 are satisfied. The procedural pre-conditions to the making of a direction under section 35(1) of the 2008 Act are therefore met.

In section 3, information is provided to enable the Secretary of State to determine that the NDR is of national significance.

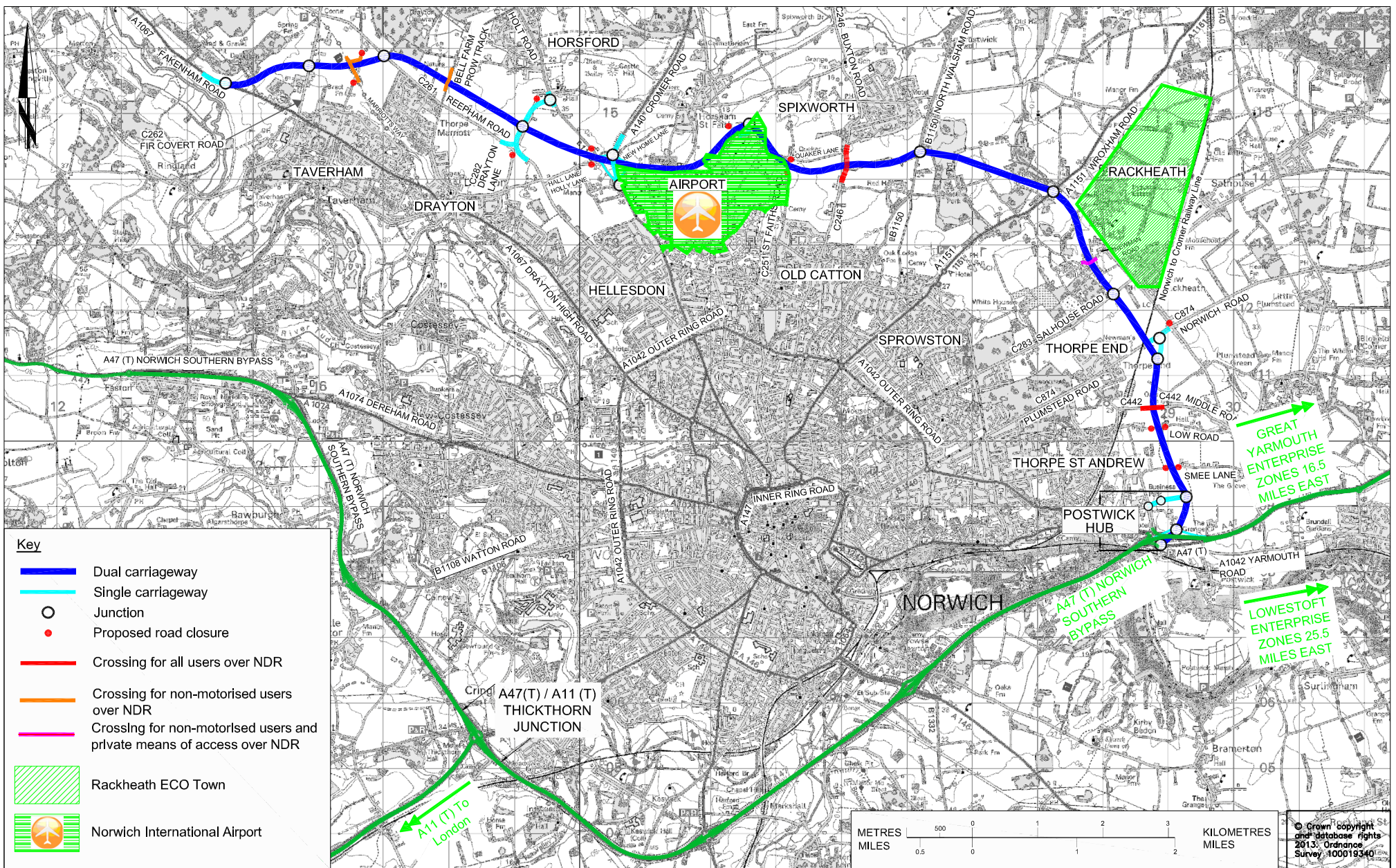
NCC therefore presents this submission as a qualifying request for a direction under section 35(1) of the PA 2008.

Until 25 July 2013 the NDR was a NSIP because it involves works to the Postwick Junction of the A47 and is being constructed for a purpose connected with the A47 trunk road, which is part of the SRN, and so fell within section 22(2) of the PA 2008. The effect of The Highway and Railway (Nationally Significant Infrastructure Project) Order 2013, which comes into force on 25 July 2013, is to take the NDR outside of the revised provisions of section 22 of the PA 2008.

If a direction under section 35(1) of the 2008 Act is not made, there will be delay and abortive costs. Since the purpose of The Highway and Railway (Nationally Significant Infrastructure Project) Order 2013 is to make the NSIP regime more flexible so that it can better facilitate growth, there is a strong case for providing clarity for the NDR by confirmation that it can be treated as a NSIP pursuant to a direction.

In the event of a direction being granted, the Secretary of State is requested to consider whether provisions set out in section 35ZA(5) should be included. Such provisions may be relevant, in relation to the pre-application procedures undertaken by the Council, depending on the date a direction is given. The Council would welcome the opportunity to make further representations on this matter in the event that its case for a direction is accepted.

**Annex A – Plan**



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 Director of Environment, Transport and Development  
 Norfolk County Council  
 County Hall  
 Martineau Lane  
 Norwich NR1 2SG

DRAWING TITLE  
 NORTHERN DISTRIBUTOR ROAD

| REV. | DESCRIPTION | CHECKED | DATE |
|------|-------------|---------|------|
|      |             |         |      |
|      |             |         |      |
|      |             |         |      |

| INIT. | DATE  | DRAWING No.               |
|-------|-------|---------------------------|
| OS    | 2013  | R1C093-R1-4278            |
| NCC   | 06/13 | PROJECT TITLE             |
| NCC   | 06/13 | Northern Distributor Road |
|       |       | SCALE                     |
|       |       | FILE No.                  |
|       |       | NTS                       |
|       |       | R1C093                    |

## **Annex B – Detailed description of the NDR**

### **Development Specification**

To construct the NDR will require the carrying out of development in the form of building and engineering operations and changes of use of land. For the purposes of section 35ZA(11)(a) of the PA 2008, the Council relies on the description of the carriageway, the built features, associated works, statutory undertakers works and complementary works set out below to specify the development which is the subject of this request.

### **Description of the Carriageway**

The NDR is shown on the attached Plan. It would be predominantly a dual-carriageway all-purpose (D2AP) distributor road which would link the A47 Trunk Road at Postwick in the east to the A1067 Fakenham Road near Attlebridge in the west, over a length of approximately 20km. Over its length it will be variously constructed at grade, on embankment, and in cutting. At various points along the route drainage lagoons and other associated road infrastructure will be constructed.

### **Route of the NDR**

The NDR will pass through Broadland District and Norwich City Council administrative areas and the following parishes:

- Horsford
- Spixworth
- Drayton
- Rackheath
- Horsham and Newton St Faith
- Taverham
- Postwick with Witton
- Attlebridge
- Beeston St Andrew
- Great and Little Plumstead
- Sprowston

### **Built Features**

a) Ten new highway structures will be constructed:

Six of the structures will be overbridges and will carry the following existing routes which will be re-aligned over the NDR:

- Marriotts Way - permissive path providing a pedestrian, cycling and horse riding facility along the route of disused railway,
- Bell Farm Track – Horsford Restricted Byway No 5 and private means of access to Bell Farm,
- A140 Cromer Road,
- C246 Buxton Road,



- Newman Road - private means of access,
- C442 Middle Road.

Four underbridges will carry the NDR over the following features

- Norwich to Sheringham railway line,
- C874 Plumstead Road,
- a new flood culvert/bat underpass which will be located to the west of Rackheath,
- A47 Trunk Road at Postwick.

**b)** The scheme includes two grade-separated junctions at the following locations:

- A140 Cromer Road (to include east and west bound on and off slip roads)
- A47 Postwick (to include new roundabout east of the existing roundabout with provision of new eastbound on and off slip roads to/from the A47 Trunk Road)

**c)** Eight on-line at-grade roundabout junctions will be construction to link with the existing highway network as follows:

- A1047 Fakenham Road
- C262 Fir Covert Road
- C621 Reepham Road
- C282 Drayton Lane
- B1150 North Walsham Road
- A1151 Wroxham Road
- C283 Salhouse Road
- C874 Plumsteasd Road (South)

**d)** Two further on-line roundabouts are proposed at the following locations:

- Northernmost point of Norwich Airport to include a new access to Petans, who provide offshore Safety and Survival training.
- At the proposed Business Park to link the NDR to the proposed Broadland Gate link road

**e)** Four off-line roundabouts are proposed to accommodate off-line traffic at the following sites:

- C282 Drayton Lane/ B1149 Holt Road
- C874 Plumstead Road (North)
- Proposed site at Broadland Gate
- Junction of Oaks Lane with A1042 Yarmouth Road

**f)** A major/ minor priority junction is also proposed at C282 Drayton Lane/ C621 Reepham Road

## **Associated Works:**

- a) The following permanent road closures are proposed:
- U57168 Breck Farm Lane (to the south of the NDR)
  - U57168 Furze Lane (to the north of the NDR)
  - C282 Drayton Lane (to the north and south of the NDR)
  - B1149 Holt Road (to north of NDR)
  - U5714 Holly Lane (to the south of the NDR)
  - C251 Bullock Hill (to the north of the NDR)
  - U57188 Quaker Lane (to the north of the NDR)
  - C251 St Faiths Road (to the south of the NDR)
  - C258 Broad Lane at its junction with C874 Plumstead Road/ Norwich Road
  - U59392 Low Road (to the east and west of the NDR)
  - U59400 Smee Lane (to the east and west of the NDR)
- b) The following Tracks and other rights of way are proposed to be stopped up:
- Track running north -south between Attlebridge RB3 and A1067 Fakenham Road (to the north and south of the NDR)
  - Removal of the Attlebridge Restricted Byway No 3 between the NDR and the A1067 Fakenham Road
  - Private means of access leading from Long Dale to Dog Lane (to the north and south of the NDR)
  - Track running from C621 Reepham Road to Glebe Farm on B1149 Holt Road (to the north and south of the NDR)
  - Private means of access leading from Old Norwich Road to the northern entrance to Norwich airport to the north of the NDR)
  - Spixworth BR1 to the east of the proposed NDR
  - Horsham St Faith and the Newton St Faith BR6 to the west of the NDR
  - Track leading north of Red Hall Farm, Beeston Lane (to the north and south of the NDR)
  - Track leading north of Beeston Lane approximately 400m east of Park Farm (to the north and south of the NDR)
  - Track leading west from Green Lane West to pumping station (to the north and south of the NDR)
  - Track leading north from Gazebo Farm north of the NDR
  - Track leading southward from Newman Road over its entire length
  - Track leading from Green Lane West to Hall Farm west of the NDR
  - Great and Little Plumstead FP5 to be stopped up (to the north and south of the NDR)
- c) The following Tracks and other rights of way are proposed to be diverted:
- Attlebridge RB3 (to the north of the NDR) diverted adjacent to the NDR to the proposed A1067 Fakenham Road Roundabout
  - Horsford RB 7 between the proposed Drayton Lane and the existing Drayton Lane
  - Access from A1151 Wroxham Road to sewage works where it meets the

- proposed NDR junction
  - Postwick FP2 to be stopped up between Smee Lane and A47 Trunk Road and replaced with Footway/ Cycleway adjacent to NDR
- d) Various extensive improvements and additions to facilities for walkers, cyclists and horse riders are proposed including new bridleways adjacent to some sections of the NDR, facilities within new bridges over the NDR and improved surfacing on some existing rights of way.
- e) Mitigation works are also proposed to ameliorate the adverse environmental impacts of the NDR, including areas of new habitat creation, habitat enhancement, and bat gantries.
- f) Various diversions and other works to accommodate statutory undertaker operator apparatus will be required including a diversion of a high pressure (HP) National Grid gas main. This diversion of the HP gas main may have the potential to fulfil the criteria under the s 14 (1) and s 20(3)(b) of the PA 2008 to be a nationally significant infrastructure project in its own right. However work to date indicates that this is unlikely because the works to undertake the diversion are currently considered not to generate significant environmental effects. Work is continuing on this aspect including further liaison with National Grid.
- g) It is proposed to carry out the following off-line complementary works:
  - Relocation of the C258 Green Lane West junction with the A1151 Wroxham Road 75m to the south west with diversion of the former road
  - Closure of the C249 Rackheath Lane at it junction with the B1150 North Walsham Road together with widening of the C249 Crostwick Lane arm of the junction
  - Traffic management measures on the C874 Plumstead Road through Thorpe End
  - Shared Use Footway/ Cycleway on Reepham Road ( north side) between Horsford RB5 and the U51249 Long Dale

### **Proposed Traffic Regulation Orders**

It is proposed to make the following Traffic Regulation Orders as part of the NDR:

- Clearway for entire length of NDR between and including the A1067 Fakenham Road Roundabout and A47 Trunk Road at Postwick and roads forming the Postwick Hub junction and Broadland Gate Link
- Amendment to speed limits on existing routes where these are bisected by the NDR
- Extension of the existing 30 mph speed limit on Middle Road westward to a point immediately west of the proposed bridge over the NDR, to
- include the built up extents of Toad Lane closest to Middle Road

- 60 mph speed limit on the NDR between the proposed roundabout junction of Salhouse Road and Plumstead Road
- 40 mph speed limit to roads forming the Postwick Hub junction, south of and including the proposed Broadland Gate link

**Illumination**

Street lighting is not proposed for the majority of the length of the road; it is proposed at the A47 Postwick Hub (i.e. from the proposed Business Park Roundabout to the A47 Trunk Road)

## **Annex C – Policies, statements etc**

The Government's **National Infrastructure Plan** (November 2011) states that:  
*"Infrastructure networks form the backbone of a modern economy and are a major determinant of growth and productivity."*

The NIP explains that the Government's vision (in the 2011 White Paper) of "a transport system that is an engine for economic growth" is set in this context:

*"The UK has extensive and sophisticated infrastructure that has been developed over hundreds of years. However, historically the UK's approach to the development of these networks has been fragmented and reactive. Investment has not kept up with the needs of a growing population and opportunities to maximise infrastructure's potential as a system of networks have not been exploited. Most importantly, the UK has never before had a clear long term plan for maintaining and improving its infrastructure. To remain globally competitive, the UK needs to address these failures and develop an infrastructure capable of supporting a dynamic, modern economy. This National Infrastructure Plan sets out a new strategy for meeting the infrastructure needs of the UK economy."*

The NIP, in Appendix C "Priority programmes and projects: milestones", includes (at Table C.1: Transport) reference to "Local Authority major transport schemes – development pool projects – Further schemes to be announced in December 2011".

NCC submitted a Development Pool bid (in September 2011) for Government funding for Local Authority major transport schemes. NCC's bid sought funding for the NDR.

Pursuant to the proposal in the NIP to announce further funding for the Development Pool schemes in December 2011, funding for the NDR was confirmed by the Department for Transport on 14 December 2011. This funding grant is subject to satisfactory completion of all remaining statutory processes, and is made on condition that before Full Approval will be granted, NCC is required to commit to a funded and timetabled package of sustainable transport measures in Norwich city centre, as proposed in the Norwich Area Transportation Strategy.

Building on its statement in the NIP that infrastructure is a "major determinant of growth and productivity" in the **National Infrastructure Plan Update 2012** the Government reported on its progress in delivering priority infrastructure projects and in sustaining its commitments to infrastructure set out in the NIP. In the NIP Update 2012 the Government restated its commitment "to ensuring that infrastructure investment is not subject to any unnecessary delays" (at page 8) and "to ensuring that the road network is fit for the UK's future transport needs" (page 15).

A further update on the delivery of priority infrastructure investments was published in the **National Infrastructure Plan Update: HM Treasury, March 2013** (delivered in connection with the Government's March 2013 Budget). In the NIP Update 2013, the Government reiterated its belief that "*Infrastructure is vital to the success of any modern economy; it drives growth, creates jobs and generates the networks that allow businesses and organisations to thrive. Investing in and improving this country's infrastructure in order to make the UK globally competitive is a key part of the Government's economic strategy*" (page 1, para 1.1). It is in this context that the NDR is being brought forward. The Government's Response to Alan Cook's Review of the Strategic Road Network, ***A Fresh Start for the Strategic Road Network: The Government Response*** (May 2012) highlights the Government's view of the role of the strategic road network and the need for appropriate improvements to the network and outlines a package of reforms to the current operating model for the network.

The Government recognises (at paragraph 1.5 of the Response) that "*Transport plays a vital role in the economic growth and prosperity of this country*" and considers (per paragraph 1.6) that "*the strategic road network is of critical importance to delivering its vision*" of "*a dynamic sustainable transport system which drives economic growth.*" The Government's goals for the strategic road network (as set out in the Response) are:

- (a) to support economic growth by delivering a world class effective, efficient and resilient network which meets and responds to the real needs of users - the individuals, businesses and communities that it serves;
- (b) to support a greener network by reducing the environmental impacts of journeys, such as carbon, air quality and noise;
- (c) maintain this valuable and strategic national asset [i.e. the strategic road network] in good physical condition; and
- (d) to support the safety and security of users on this network. The Government recognises (at paragraph 2.3) that "*a less congested and more reliable strategic road network is important for economic growth.*"

In the **Budget Report 2013, *Budget 2013*** dated 20 March 2013, reforms were announced to improve the UK's infrastructure in order to help UK businesses to create jobs, and it was noted that the (future) "*increase to capital spending plans ... will strengthen UK infrastructure and support growth in the economy*". It also noted that "*The Government will continue with the reform of the planning system to ensure the regime is simple to access, supports growth and is responsive to housing need*".

In his **Autumn Statement 2012** delivered on 5 December 2012, the Chancellor noted the link between growth and capital investment in transport when he stated that *“we go on equipping Britain to succeed in the global race by switching from current spending to capital investment in ... roads ...”*. He noted that current savings across Whitehall would be re-invested as part of a *“... capital investment in the infrastructure of our country. It is exactly what a government equipping Britain to compete in the modern global economy should be doing. We’re committing an extra billion pounds to roads, including four major new schemes ...”*.

In The Rt Hon the Lord Heseltine of Thenford’s report of October 2012 **No Stone Unturned in pursuit of Growth** he noted that *“Decisions on housing or transport, education or welfare support will have a far greater long term impact on our economic prospects than any form of direct support provided to business”*.

In the Government’s Response to Lord Heseltine’s report (March 2013), the Government stated:

*“Over recent decades, London and the south-east have been relied on as the primary source of economic growth in the UK. Despite significant investment in the regions, London, with around 13 per cent of the population, produces around 21.5 per cent of UK Gross Value Added (GVA), and has the highest GVA per head of all regions. But countries can be more successful when they are driven not just by their capitals, but by multiple thriving centres each with their own strengths.”*

*“Every locality must be able to fulfil its full potential by taking responsibility for decisions and resources that affect their local economies. That is why the Government has taken steps towards a rebalanced economy, where every part of the UK – not just London and the south-east – drives strong and lasting growth.”*

*“Cities and their wider economic areas account for 74 per cent of the UK’s population and 78 per cent of UK jobs. The Government has taken decisive action to give cities, as engines of economic growth, the powers and tools they need to drive growth through City Deals.”*

*“Infrastructure forms the backbone of a modern economy and is vital to long- term economic growth. However, years of under-investment have left the UK’s infrastructure bursting at the seams and struggling to keep pace with the demands of a growing population. To address this, the Government has made infrastructure a central part of its growth agenda...”*

*“Furthermore, the Government is taking a more strategic approach to infrastructure investment and set out for the first time a long-term plan for the UK’s infrastructure in the National Infrastructure Plan.”*

The Government's strategy for economic growth is reflected at the European level by the designation of a comprehensive **Trans-European Network of transport routes** (TEN-T Routes). The A47 is within the TEN-T Routes network. The purpose of this network is to further the aims of the European Single Market and to reinforce economic growth, employment creation and social cohesion in accordance with the objectives of Articles 170 to 172 and 174 of the Treaty on the Functioning of the European Union.

**DfT Circular 02/2007** applies to the strategic road network including the A47 Trunk Road. The Circular is subject to revision to bring it fully in line with the National Planning Policy Framework. The draft replacement document *The Strategic Road Network and the Delivery of Sustainable Development* is currently subject to public consultation and subject to outcome of the consultation is likely to come into effect in Summer 2013

Paragraph 4 of the Circular states:

*“The efficient movement of people and goods on the strategic road network has a key part to play in supporting the economy. The Agency, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient strategic road network in England. Amongst its activities the Agency is responsible for considering the potential impact on the network of proposals for new developments. Part of this remit is to enable the network to support the economic viability and sustainable growth of regions.”*

The Circular, at paragraph 6, explains the policy background as follows:

*“The Government’s policies for growth and regeneration depend on creating employment opportunities and encouraging the development of sustainable communities.”* At paragraph 7 the Circular acknowledges that *“The successful delivery of growth and regeneration objectives in any development plan relies on the provision of infrastructure to ensure the foundations for successful development.”*

The objectives of the NDR are in accordance with the Government’s aims to facilitate growth and sustainable development and to provide the necessary infrastructure to support the delivery of such development.

In the most recent **Local Transport White Paper. Creating Growth. Cutting Carbon - Making Sustainable Local Transport Happen** (January 2011), the Government sets out its vision for local transport: *“Our vision is for a transport system that is an engine for economic growth, but one that is also*



*greener and safer and improves quality of life in our communities."*

The 2011 White Paper goes on to say that:

*"By improving the links that help to move people and goods around, and by targeting investment in new projects that promote green growth, we can help to build the balanced, dynamic low carbon economy that is essential for our future prosperity."*

It also states that:

*"The Government believes that it is at the local level that most can be done to enable people to make more sustainable transport choices and to offer a wider range of genuinely sustainable transport modes – environmentally sustainable as well as fiscally, economically and socially sustainable."*

**The Department for Transport's 'Transport Business Case'** (published in April 2011) sets out how the DfT assesses the business case for major investments and supports Ministers as they make decisions on those major investments in transport.

Ministers take decisions on investment in support of their policy objectives for transport and are informed by evidence set out in a business case. Business cases are developed in line with the Treasury's advice on evidence-based decision making (as set out in the Treasury Green Book and are based on the Green Book's best practice five case model approach. This approach is intended to test whether transport schemes:

- (a) are supported by a robust **case for change** that fits with wider public policy objectives – the 'strategic case';
- (b) demonstrate **value for money** – the 'economic case';
- (c) are **commercially viable** – the 'commercial case';
- (d) are **financially affordable** – the 'financial case'; and
- (e) are **achievable** – the 'management case'.

Ministers take into account the evidence in all five cases (making up the business case) when making a decision as to whether or not to invest in a transport scheme.

It is in this context that Ministerial decisions were made in December 2011 to award funding in connection with the DfT's Development Pool process, pursuant to which funding for the Northern Distributor Road was approved.

The **National Policy Planning Framework** was published on 27 March 2012, in furtherance of the Government's objectives of reforming the planning system to make it less complex and more accessible, and of protecting the

environment and promoting sustainable growth. Paragraph 17 of the NPPF sets out the Government's "core planning principles" which include the principle that land use planning should "*proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. [...]*" and advocates that "*Every effort should be made objectively to identify [...] and respond positively to wider opportunities for growth.*"

Government policy set out in paragraph 21 of the NPPF affirms that "*Planning policies should recognise and seek to address potential barriers to investment, including [...] any lack of infrastructure*" and advises that in drawing up their Local Plans, local authorities should "*identify priority areas for economic regeneration [and] infrastructure provision.*"

In support of the Government's objective of promoting sustainable transport, the NPPF provides (at paragraph 31) that "*Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development.*"

With regard to the Government's objective to support business growth, the NPPF advises (at paragraph 160) that local planning authorities should, in working closely with the business community, "*identify and address barriers to investment, including a lack of [...] infrastructure [...]*" and should (per paragraph 162) "*take account of the need for strategic infrastructure [...] within their areas.*" The NPPF emphasises (at paragraph 177) the importance of "*ensur[ing] that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion*" and encourages local planning authorities (per paragraph 181) to put plans in place "*to provide the land and infrastructure necessary to support current and projected future levels of development.*"

The planning policy objectives (set out above) relating to transport infrastructure are integral to the Government's objective (as expressed in paragraph 28 of the NPPF) of "*support[ing] economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.*"

The NDR, if implemented, would contribute to the planning policy objectives of the NPPF (as outlined above) by providing transport infrastructure to facilitate and service planned future economic growth.