

Response to GNDP RF97 re. Plan B by NNTAG

**1. Overview**

In RF75, the Inspectors invited the GNDP to consider the potential for a Plan B partial alternative to the NDR in view of the uncertainty over funding.

In its response (RF97), the GNDP merely offers a two-step approach based around a NDR/Postwick Hub. The GNDP maintains that opening Postwick Hub in 2012 would facilitate at least 1,800 dwellings in the Growth Triangle by providing access to developer funded link roads, before construction of the NDR in around 2016/17 for delivering the Growth Triangle in its entirety.

Firstly, the GNDP merely asserts that funding will be found, but it is not in any position to offer any concrete evidence that this will be the case.

Secondly, the GNDP has not produced evidence to show that housing and employment are dependent on the Postwick Hub project, followed by a NDR.

NNTAG considers that NDR/Postwick Hub is not required for growth and the design of Postwick Hub incorporating a NDR would disadvantage business:

- Building Partnerships state that Rackheath eco-town is not dependent on a NDR.
- Growth between Postwick Junction and Wroxham Road (west of Rackheath Park) can be accessed via link roads identified in Broadland Local Plan Replacement 2006. The Local Plan Inspector considered that the proposed link roads would provide suitable access to an expanded Broadland Business Park and to major housing growth off Blue Boar Lane, with or without a NDR.
- The Local Plan accepted that enhancements to Postwick Junction would facilitate a connection to the 'inner' link roads. The Highways Agency has not objected to the planning application for further development of 14.6 ha of B1, B2 and B8 uses at Broadland Business Park (Phase 2), 600 dwellings at Brooke Farm and a link road to Plumstead Road East.
- By contrast, Postwick Hub design incorporating a NDR would disadvantage all future users of the junction as most drivers passing through would be forced to take a lengthy detour around a "significantly over-engineered" Hub in order to travel to either Broadland Business Park, east Norwich, north-east Norwich or all destinations east of Norwich along the A47. (RF105C , RF106)

- The GNDP states that a NDR is required to access a proposed new business park for Norwich airport on the line of a NDR. However, NNTAG considers that a more sustainable location is available on land close to the airport.

## 2. NNTAG advocates the following amendments to JCS submission:

### Replacement Wording for Policy 10 - Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth area

“This location will deliver an urban extension to the north-east of Norwich within the setting of historic parklands at Rackheath, Sprowston and Beeston, linked to an eco-town at Rackheath. Delivery of the growth is dependent on the implementation of an integrated sustainable transport package to include appropriate highways infrastructure.”

NNTAG also proposes deletion of all references in JCS to a NDR including in para 6.18 and replacement of ‘Postwick Hub’ by ‘Postwick Junction enhancements.’

Policy 20 page 63 – NNTAG does not support wording of proposed new paragraph after paragraph 7.11. We recommend its deletion.

## 3. Why NDR/Postwick Hub are Not Required for Growth

### i) Housing

GNDP has not produced evidence to show that NE growth area (7,000 dwellings to 2026 rising to 10,000 thereafter) is dependent on a NDR/Postwick Hub:

Environmental and developer interests represented on Matter 3B on 17 November unanimously endorsed the position that the NE growth area is not dependent on a NDR/Postwick Hub.

i) Building Partnerships has stated that Rackheath eco-town (4,200 dwellings) is not reliant on a NDR. The transport issue for Rackheath is whether rail and public transport improvements are financially viable and not whether a NDR is necessary or deliverable.

ii) Between Postwick Junction and Wroxham Road (west of Rackheath Park), growth in the form of an urban extension can be served by a combination of Broadland Business Park Link Road and Blue Boar Lane Link Road (in line with Broadland Local Plan Replacement 2006), closure of the short gap between Salhouse Road and Plumstead Road East and modest enhancements to Postwick Junction, (the plan tabled by Landstock Estates offers an alternative design without a NDR).

**See note by Broadland DC Planning Department on the evolution of the inner link roads in Broadland Plans 1994-2006, attached to back of NNTAG Appendix to Matter 1B Statement.** The note was written by a policy officer at Broadland DC following NNTAG request in May 2010 for background to the proposed link roads.

The note shows that the proposed link roads were considered and endorsed by the Local Plan Inspector for providing access to further growth of Broadland Business Park and housing growth at Blue Boar Lane, Sprowston and also contributing to orbital traffic movements in the area. The Local Plan Inspector supported these link roads with or without a NDR which he saw as having different objectives.

iii) West of Wroxham Road (and west of Beeston Park), growth could be accessed via an access road off North Walsham Road, to be designed through an AAP, within an overall Masterplan.

'Plan B' link roads and junction improvements can be funded by developer contributions (as envisaged by Broadland Local Plan Replacement 2006).

The 'Plan B' links would be more useful for running public transport, than a NDR as the buses using them would be closer to residents they serve, offering more intermediate use and closer to the city.

A NDR would not release road space for sustainable transport. EiP 88 Table 4 shows a 4% overall increase traffic in NE Norwich with NATS IP in 2031.

## **ii) Employment**

According to RF97, the NDR is required for employment in the vicinity of proposed Postwick Hub (5.3) and strategic employment growth near the airport (5.5). In fact the Postwick Hub design would inconvenience business. In relation to unlocking land for airport-related uses, NNTAG considers there are more suitable sites off Fifers Lane close to the airport.

## **Broadland Business Park (BBP)**

Existing and new employment in this location would be greatly inconvenienced by the Postwick Hub design as drivers wanting to access the sites would be forced to go on a lengthy detour around the excessive layout of Postwick Hub. In a letter dated 27 March 2009, the Department of Transport advised Norfolk County Council that Postwick Hub would be "significantly over-engineered" without a NDR being in place and "it is doubtful it would offer value for money".

1. **BBP Phase 1** is currently served by A47 Postwick Junction. Postwick Hub would inconvenience users as closure of the A47 eastbound off-slip road would force all motorists and bus passengers to travel a lengthy detour around the substantial 'Hub'.

**2. BBP Phase 2:** submitted planning application comprises 14.6 ha of employment land for B1, B2 and B8 uses, 600 dwellings at Brooke Farm and a link road between Peachman Way and Plumstead Road East. The report to BDC Planning Committee on 8 September 2010 reports the Highways Agency:

“No objections and have removed the Article 14 holding directive”.

The application was not determined due to the legal challenge by Lothbury against the grant of planning permission for Broadland Gate/ Postwick Hub.

Postwick Hub would also inconvenience the users of BBP Phase 2.

**3. BBP Phase 3** – Norfolk CC and Ifield Estates submitted a joint outline planning application to Broadland DC for Broadland Gate and a full application for Postwick Hub. Both schemes were advertised as a departure from the Local Plan. Norfolk CC applied to Broadland DC to build Postwick Hub in the guise of an access road for serving a business park rather than applying to itself for deemed planning consent for a County road scheme (ie Postwick Hub is the first stage of a NDR) in order to avoid a planning inquiry into the road scheme.

Broadland DC granted outline planning consent for Broadland Gate, allowing ten years for submission of reserved matters (ie no urgency for its development). Full planning permission was granted for Postwick Hub, implementation of which is dependent on the confirmation of draft Slip and Side Road Orders, to enable closure of the A47 off-slip road and its replacement by a lengthy new side road. Making of the draft Orders is by no means guaranteed given the Secretary of State’s decision to hold a public inquiry into the controversial scheme. Most traffic passing through the junction would be forced to travel a lengthy detour.

#### **Rackheath Employment Area**

Building Partnerships has stated that the eco-town is not reliant on a NDR.

#### **Norwich Airport**

Norwich Airport is of moderate size (421,000 passengers from Sept 2009 to Aug 2010, CAA UK Airport Statistics) and its air freight operations are small. The JCS proposes a new business park of around 30ha on the line of a NDR for uses associated with the airport.

NNTAG considers that there is no justification for building either a NDR in order to service a new remote airport-related business park or designating land for a new business park on the line of a NDR. Land closer to the airport is available for development (eg there is surplus capacity at the 48 ha Norwich Airport Industrial Estate close to the Airport off Fifers Lane (GNDP Employment Sites and Premises Study, Appendix 3: Rest of Norwich: Norwich Airport Industrial Estate).