

**Part 1. Personal Details**

Representations can not be considered anonymously. All representations made will be available for public inspection by appointment, and will be published on the GNDP website. However, this will exclude address, telephone number and email address of respondents which will be used for GNDP purposes<sup>1</sup> only and will be removed from the published representations.

1. Personal Details*	2. Agent's Details (if applicable)
*if an agent is appointed, please complete only the Title and Name boxes in below, but complete the full contact details of the agent in column 2.	
Title	Mr
First Name	Stephen
Last Name	Heard
Job Title (where relevant)	
Organisation (where relevant)	SNUB
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone number	
Email address	

<sup>1</sup> The above personal data will be processed in accordance with the Data Protection Act 1998 and will only be used by the Greater Norwich Development Partnership, and its constituent bodies, for the purposes of contacting you about the Joint Core Strategy. It will not be passed on to any third parties.

**Part 2a. Your Comments on Legal Compliance**

**3. Are the Main Modifications to the Joint Core Strategy for Broadland, Norwich and South Norfolk: Broadland part of the Norwich Policy Area legally compliant? (please refer to the guidance notes below for explanation)**

Yes

No

No  
Comment

Please use the space below to provide more detailed comments:

See separate letter

## Part 2b. Your Representation on the Schedule of Main Modifications

Please use a separate sheet for each reference number.

**4. Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1). If your comment relates to the Sustainability Appraisal Addendum, HRA Addendum or the Additional (minor) Modifications please state this clearly in the box.:**

MM1

*Comments without the relevant reference number will not be accepted.*

**5. Do you consider the Main Modification you have referenced above to be 'Sound'? (please refer to the guidance notes for explanation of the term)**

Yes

No

**6. If you consider the Main Modification to be unsound please specify your reason below: (tick all that apply)**

A. It has not been positively prepared\*

B. It is not justified\*

C. It is not effective\*

D. It is not consistent with national policy\*

\* An explanation of the Tests of Soundness is provided in the guidance notes.

**7. Please give details of why you consider the Main Modification is unsound. Please be as precise as possible. If you wish to support the soundness of the Main Modification, please also use this box to set out your comments.**

See separate letter

**8. Please use the space below to give details of what alteration(s) to the Main Modification you consider necessary to make it sound and why. Please suggest revised wording.**

See separate letter

The Inspector will decide if further public hearing sessions are required as part of the examination process.  
All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments on the Main Modifications.

**9. Do you consider it necessary to participate at the oral part of the examination? (If reopening the hearing is required by the Inspector)**

No, I do not wish to participate at the oral examination

Yes, I do wish to participate at the oral examination

X

**10. The Inspector may hold further examination hearings as a result of the representations. If you wish to participate at any examination hearing, please outline why you consider this to be necessary:**

Due to my legal challenge.

**11. Do you wish to be notified of the following? (please tick as appropriate)**

The publication of the  
Inspector's Final Report  
**YES**

The adoption of the Joint Core  
Strategy for the Broadland part of  
the Norwich Policy Area **YES**

**Signature:**



**Date:**

21<sup>st</sup> October 2013



Website: [www.snubcampaign.org](http://www.snubcampaign.org)  
Blog: [www.snubcampaign.blogspot.com](http://www.snubcampaign.blogspot.com)  
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## 1. INTRODUCTION AND CREDENTIALS

- 1.1 This representation is made by Stephen Heard the founding Chair of local campaign group Stop Norwich Urbanisation (SNUB) on behalf of its 3,600 supporters and followers located primarily but not exclusively, in the nearby footprint of the proposed NDR.
- 1.2 I need to make it clear that it is a matter of public record that I was, in August 2012, democratically elected as a Parish Councillor at Salhouse the adjacent parish to Rackheath and therefore one of the parishes that will be directly impacted by plans for major development in the North East Growth Triangle and beyond including these NDR proposals. I campaigned, in a contested election and subsequent vote, on the plans for development in the North East Growth Triangle including the NDR and the Postwick Hub. I was duly elected with a mandate to campaign against these plans.
- 1.3 SNUB also work closely with the campaign group entitled Norfolk and Norwich Action Group (NNTAG) and other local campaign groups brought together under the auspices of the local CPRE branch alliance. Details of the other organisations that are part of this Alliance can be found at: <http://www.cprenorfolk.org.uk/alliance-on-housing-2/>. This campaign alliance is against the over development of the Norwich Policy Area and the environmental harm that will undoubtedly ensue if the NDR were to proceed.
- 1.4 I'm also in contact with fellow campaigners in Kings Lynn who are active against the planned incinerator and other like-minded community groups across the UK. I was shortlisted as local campaigner of the year in 2010 by The Sheila McKechnie Foundation (SMK) which exists to support individuals, groups and communities to have the skills and confidence to speak up and take effective action on issues that matter to them. They do this by connecting, informing and supporting campaigners. SNUB also received funding from the Grassroots Action Fund managed by the Benjamin Foundation in 2012 in national recognition of the strength of our campaigning here in Norfolk.
- 1.5 I'm also the manager owner of a local management consultancy business which specialises, among other things, in carbon management and I have a Post Graduate Certificate in Sustainable Business from the University of Cambridge. I was the sustainability lead for HM Treasury where I was a Senior Civil Servant responsible for national procurement framework contracts and the stewardship of £68bn of public money.

- 1.6 Finally I set legal history in 2011 by successfully challenging the legality of the JCS in the high court (Heard v Broadland District Council, South Norfolk District Council and Norwich City Council) due to the absence of an appropriate Strategic Environmental Assessment. These credentials and experience qualify me to make this submission on behalf of local residents.

## 2. HISTORY AND CONTEXT

- 2.1 However before commenting on the future it is worth putting this proposal into a historic context as SNUB supporters believe that it is important to understand the history. In 2000, a group of leading Norfolk businessmen acting under 'Shaping Norfolk's Future' drew up a "wish list" of five key transport projects: a dualled A11 and A47, a NDR, expansion of Norwich Airport and a Great Yarmouth outer harbour. They saw them as the springboard for their ambitions for major economic expansion.
- 2.2 Dualling the A11 and A47 would give continuous dual carriageway from London and the Midlands to Great Yarmouth. The NDR would provide a connection to the airport. Together with the Southern Bypass, it would form a third orbital ring around Norwich. The airport and Great Yarmouth outer harbour would then connect Norfolk to Europe.
- 2.3 Norfolk County Council backed this "wish list" in 2001. However, in selling a NDR to the public, they stressed its role as a **local road** in reducing rat running and congestion in north Norwich. It was silent on the primary strategic reason for the NDR, namely, to open up the NEGT land for major development around Norwich and form a key part of businesses' grand economic vision for Norfolk. That came much later.
- 2.4 Since then, the County and District Councils have worked to embed the NDR in NEGT development plans and various planning applications. Recently, SNUB's successful legal action put a spoke in their efforts to develop a NDR-led NEGT with 10,000+ houses.
- 2.5 The local authorities in the Greater Norwich Development Partnership (GNDP) along with national government agencies at the Highways Authority and officials in the Department of Communities and Local Government have consistently insisted that the NDR, the Postwick Hub and the Joint Core Strategy are not linked. The Examination in Public and these modifications prove beyond reasonable doubt that the three are linked.
- 2.6 The application letter from Norfolk County Council to the Secretary of State for the NDR to be classified as a Nationally Significant Infrastructure Project (NSIP) seen here:  
<http://www.gndp.org.uk/content/wp-content/uploads/downloads/2013/08/Norfolk-County-Council-Letter-to-Secretary-of-State-re-S35-direction-for-NDR.pdf> is boastful in the extreme as it states the following as justification for the NDR to be classified as a NSIP:

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*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).*

- 2.7 This contemptuous statement unequivocally demonstrates the linkage between the NDR and the proposed North East Growth Triangle (NEGT) that has yet to be adopted as it was deemed to be unlawful in the High Court when SNUB successfully challenged the JCS. The NDR is a local road that is planned to support the urbanisation of Norwich and not for its original intention of providing a third orbital route around the city of Norwich. There is therefore no need for the NDR.
- 2.8 SNUB believes that Norfolk County Council's decision to promote the NDR as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008 is a flagrant misappropriation of the legislation which was intended to support the delivery of vital national infrastructure. The NDR would be located on the sensitive NEGT urban fringe of the city and would therefore involve multiple local issues which should be aired in a planning inquiry whilst pursuit of the NSIP strategy would suppress public discussion of the proposal and its impacts.
- 2.9 Likewise these plans have not had the benefit of being reviewed under the auspices of a new suite of emerging guidance on Development Management and on a range of other topics, including Local Plans, which was published by the Government on 28 August 2013. This emerging National Planning Practice Guidance is available only on the web at: <http://planningguidance.planningportal.gov.uk/>
- 2.10 The web site says that the Government considers that whilst the draft guidance is a material consideration, it is likely to have limited weight. It also says that when the draft Guidance is finalised later this year that it

*"Expects the Secretary of State to specify that the new guidance applies only to Local or neighbourhood Plans which have not yet been submitted for examination. Any Local or neighbourhood Plans submitted before the new guidance is issued may rely on the previous guidance."*

- 2.11 As the majority of local Parish Councils have yet to submit a Neighbourhood Plan then they will be subjected to this new guidance which will, we understand, take precedence over any "planning by appeal" regime thus taking local opinion into consideration and enacting and reinforcing the real ideals of localism. The local view here is that this road is not required.
- 2.12 As well as the boastful statement above the letter goes on to say the following about the NDR:

*"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.*

*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."*

- 2.13 Yet the aforementioned business growth strategy produced by the LEP <http://www.newanglia.co.uk/Page.aspx?Id=222> makes no reference to these important employment growth opportunities as it highlights Life Sciences (based south of Norwich City), Energy (based offshore of Great Yarmouth and Lowestoft) and Ipswich as its three largest priorities in terms of generating new employment into the region. The strategy makes no mention of whether the area around the proposed NEG-T is to become an enterprise zone in parity with Great Yarmouth and if so what the implications for future funding if monies originally destined for that area ends up in the NEG-T area?
- 2.14 The knee jerk reaction of the LEP to rather belatedly state that the proposed Broadland Gate business park development would be used to support hundreds of "back office" support jobs for the offshore industries is once again taking local residents for fools. SNUB suggest that this was a last minute pitch by a desperate GNDP at the Postwick Hub public inquiry to try and demonstrate and justify the need for an additional business park that will need the Postwick Hub which in turn will link the NDR to the TEN-T road network. Smacks of desperation as no other large employers have come forward to provide the thousands of jobs that are needed to justify the NEG-T urbanisation which is needed to support the NDR and vice versa.
- 2.15 SNUB suggest that this NSIP application is both premature in the light of the present outstanding reports from HM Planning Inspectorate and a fool hardy way to spend such a large amount of public money particularly given the following:
- the level of UK public debt
  - the fact that it is unnecessary either to open up either development (as this can be supplied by a combination of the Inner Ring Route and an improved local rail service), nor substantial business interests

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- that the County Council will have to raise debt against uncertain development / land value receipts, and in the likely circumstance of rising interest rates - this cannot under any circumstances be considered 'prudent borrowing'.
- the present approach being taken to force the NDR on Norfolk makes a mockery of the concept of nationally important infrastructure, and this planning procedure was conceived to apply to for example new power stations, airports and other infrastructure genuinely in the national interest. The procedure should not be deployed to get around proper due diligence and public consultation.
- the burden of contributions required of developers to pay for the NEGТ will mean that funds from development will not be able to be deployed within the growth areas to pay for the infrastructure required to make them genuinely sustainable, walkable communities - in so doing you will be imposing a business model on the Norwich growth areas that will intensify rather than reduce dependence on the car.
- The need for Norfolk County Council to secure £182m (recently increased by £7m to £189m) of recurrent savings over the next three years which is being achieved by cutting 25% from all existing NCC contracts including those delivering front line social care services; yet NCC are prepared to enter the commercial financial markets to borrow up to £60m to fund the gap for the NDR. The economics of a madhouse!

- 2.17 There is no doubt that this proposed large scale development depends on the construction of the proposed Norwich Northern Distributor Road (NDR) which has its roots in 1940s planning. The strategy states that the housing development is not reliant on the NDR but admits that development would have to be reviewed if the NDR were not to go ahead<sup>1</sup>.
- 2.18 Indeed we were told at one of the many public meetings in 2009 by the then leader of Broadland District Council that if the NDR was not built then there would be no large scale development of houses in the North East Growth triangle. This proved to us and the hundreds of local residents present at the meeting that the real reason for the NDR was to provide infrastructure for the 10,000+ houses to be built in the growth triangle and nothing to do with easing congestion. SNUB believe that a reduced level of development could be substantially opened up by a much more modest link road (the Inner Link Road) which could be paid for entirely by development without the use of huge sums of public money acquired through borrowing. Norfolk County Council to date has failed to undertake and publish a technical and costed appraisal of this alternative development strategy.
- 2.19 SNUB also contend that the evidence base underpinning the Norfolk Area Transport Strategy (NATS), of which the NEGТ is a major element, is fundamentally flawed on the basis of the failure to undertake due diligence on rail as a movement option. The use of rail as an alternative to the NDR, given the existence of the Bittern Line within the immediate vicinity of the NDR and the proposed NEGТ development triangle, cannot be ignored on the basis of the unfeasibility argument. Rail industry experts suggest that if around 3,000 homes could be created at points along the

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<sup>1</sup> Development beyond the pre-NDR threshold established through the AAP process will not be possible without a commitment to the NDR. If it becomes clear that there is no possibility of the timely construction of the NDR, a review of the JCS proposals for the NEGТ and the implications for the strategy as a whole would be triggered.

Response to Joint Core Strategy, Main Modifications Consultation, The Town and Country Planning (Local Planning) (England) Regulations 2012. Commissioned by SNUB prepared by SH Management Ltd on a per bono basis Bittern Line, the upgrades required to get to 30 min service could be viable thus negating the need for the NDR to achieve the mass movement of people from the proposed NEGТ. SNUB does not see this in any of the alternatives which have centred on other road schemes and not the improvement of existing rail links.

- 2.20 A consideration to the construction of a light rail corridor for the 'inner link road' as a planned multi-modal route to include car, bike, and tram connecting the Broadland Business Park in the South with the Airport Business Park in the north has not been considered. The absence of planners building these type of rail options into the overall master planning makes a mockery of NATS and impossible for the scenario testing for the JCS and NDR to be undertaken on a systematic basis as the rail scenario has never been subject to due diligence.
- 2.21 We would like to suggest that further consideration is given to the potential of local rail and light rail in helping to create a sustainable movement network for the County at the earliest opportunity, such that this can be built into the movement modelling, land release proposition, CIL; and such that the route of the NDR is adapted so that it does not foreclose on rail/ light rail should this be deemed a desirable option in future.
- 2.22 When arguing against the NEGТ, it should be remembered that opposition to this development at the outset was based on environmental issues. Issues that come to mind include the peace and tranquillity of historic Rackheath Park, the wetland habitat of Dobb's Beck and The Springs, to NW of A1151 which drains into River Bure, the peace and beauty of the area around Beeston St. Andrew, and of course the effect on the Wensum Valley, which is not part of this proposal, but could be if you believe the local media. The water draining off the proposed development will undoubtedly contain pollutants in the run-off.
- 2.23 Much of the discussion on climate change is about reducing carbon dioxide emissions, but preparing for the effects of climate change is just as important. The Intergovernmental Panel on Climate Change (IPCC) Special Report of November 2011, *Managing the Risks of Extreme Events and Disasters to Advance Climate Change Adaptation*<sup>2</sup> explains the impact that effective land use planning for adaptation can have in preparing economies and societies for the effects of climate change. The UK's Adaptation Sub-Committee also identifies the importance of the land use planning system in adaptation.
- 2.24 Changes in rainfall, rising temperatures and erosion of the coastline all call for more adaptation measures to reduce the impact of human development on the climate system, particularly in relation to reducing greenhouse gas emissions. Recent key changes to environmental legislation have impacted on local policies on climate change. Planning plays a key role in helping to secure reductions in greenhouse gas emissions and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure. We do not believe that NCC has considered the likely impacts of climate change and, using the available evidence and these key changes, positively and proactively planned for these impacts when considering their plans for growth in the NEGТ including the NDR.

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<sup>2</sup> <http://ipcc-wg2.gov/SREX>

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- 2.25 The UK has a unique Climate Change Act (CCA) that should influence genuine low carbon policy. The Act sets a legal requirement to achieve carbon reductions of 34% by 2020 and 80% by 2050.
- 2.26 In 2010, the Climate Change Committee (CCC) optimistically estimated that Integrated land use and transport planning could generate emissions reductions of up to 2 MtCO<sub>2</sub> by 2020 “through designing new residential and commercial developments to minimise additional car miles.” Such emission reductions are necessary to lay the foundations for deep cuts in transport emissions required through the 2020s.
- 2.27 Optimism had turned to pessimism in June 2012 when the CCC stated concern as to whether such appropriate land-use planning decisions would actually be made locally. CCC proposes that the risk needs to be monitored. In reality, the difficulties in obtaining climate-friendly strategic planning decisions result from deep systemic issues. Much more is needed than “monitoring”.
- 2.28 Squeezing out carbon needs to be central in local strategic planning for any chance in meeting the CCA objectives of deep, national, emission reductions. Future proofing LDF's to truly comply with national policy and the CCA requires so much more: real numerical and quantifiable reductions in total carbon emissions across the whole plan area by each sector. Current practice of “postponing” detailed consideration of emissions is untenable - if the carbon footprint is not evaluated at the LDF stage when considering the overall strategy, it will be impossible to fix it downstream.
- 2.29 Nor is it practical to use offsetting strategies between sectors when this year CCC advises that carbon reduction measures need to increase four-fold to meet CCA budgets. Supposing some low carbon home building can offset a carbon-intensive road scheme as they have done in this strategy is not sustainable.
- 2.30 Meeting the requirements of the CCA is essentially a numbers game, not currently understood by Inspectors who may just see carbon emissions as just another air quality management issue. Carbon has to become a planning issue. We need Planning Inspectors to rigorously review every carbon assessment for its realism, measurability and monitor-ability throughout the plan period. The audit trail of supporting documents needs to be shaken up to make such quantitative appraisal possible. For example, it is an anachronism in the age of climate legislation that sustainability appraisals can be accepted without any meaningful evaluation of carbon emissions. This is making a mockery of the Act even before the end of its first 2008-2012 carbon budget period.
- 2.31 We believe that the NEGTS and the construction of the NDR will see a positive increase in the carbon footprint of the geographical area and for this reason the strategy is deemed to be unsound.
- 2.32 Indeed a recent edition of the Lancet made clear the links between climate change and health. New studies published in the Lancet highlight climate change as a global health issue. They also point out that carbon reduction strategies can improve health in other ways besides mitigation against climate change. It refers to these additional, independent health benefits as ‘co-benefits’ for health arising from action

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on climate change. The main points it makes are around the links between health  
and:

- Household energy emissions
- Urban land transport
- Food and agriculture
- Short-lived greenhouse pollutants

- 2.33 We believe that the increased in carbon emissions generated by the proposed NEGТ will have a detrimental impact on residents health and well-being and provide even more strains on the local health system.
- 2.34 Indeed UK Government has already been criticised over poor air quality as it fails in its duty to protect UK citizens from the harmful effects of air pollution. ClientEarth cites the East of England region in a legal challenge which shows that the UK government will suffer from illegal levels of nitrogen dioxide until as late as 2025. This proposed Postwick Hub development will make the air quality even worse for existing and new residents leaving local authorities open to a legal challenge as they continually breach the EU Air Quality Directive.
- 2.35 We disagree with the developer's proposed approach for as far as known at this stage the developer is not proposing to evaluate the impact that the scheme itself would have on climatic factors. Instead, the developer is intending to evaluate the impact that the adaptation and mitigation measures integrated into the scheme would have, which of course since they are mitigation measures would likely result in a positive assessment.
- 2.36 It is generally understood that, in accordance with the EIA directive, the promoter must evaluate the impact the development or scheme itself would have on climatic factors (i.e. increasing carbon emissions) and not just the mitigation/ adaptation measures. The developer has not provided any compelling evidence within the scoping report to justifying the scoping out of this requirement.
- 2.37 Inspector Vickery adjourned the JCS EIP as he was concerned about the impact that additional journeys would have, as potential incoming residents had to commute to work, on the carbon footprint of the area. The co-terminus plans for the Postwick Hub and the NDR will inevitably result in longer journeys and an increase in carbon emissions contrary to the mandated and legal requirement set out in the Climate Change Act 2008 to measure and monitor progress towards a 10% carbon reduction by 2015 on 2007 levels.
- 2.38 This builds upon the statutory targets of reducing carbon emissions by 26% by 2020 and 80% by 2050, based on 1990 levels. The Act legally requires all organisations to demonstrate how this reduction is being measured, monitored and managed. There is also an adaptation requirement in the Act.
- 2.39 Indeed the Intergovernmental Panel on Climate Change (IPCC) Special Report of November 2011, Managing the Risks of Extreme Events and Disasters to Advance Climate Change Adaptation explains the impact that effective land use planning for adaptation can have in preparing economies and societies for the effects of climate change. The UK's Adaptation Sub-Committee also identifies the importance of the land use planning system in adaptation. Local authorities, like Norfolk County

Response to Joint Core Strategy, Main Modifications Consultation, The Town and Country Planning (Local Planning) (England) Regulations 2012. Commissioned by SNUB prepared by SH Management Ltd on a per bono basis Council and the other members of the GNDP, should consider the likely impacts of climate change and, using the available evidence, positively and proactively plan for these impacts when considering new development as they propose in the Postwick Hub and develop adaptation options for existing areas.

- 2.40 All bodies should be considering the risks associated with climate change and are required to refer to the DEFRA guidance on this when reporting to the Secretary Of State.
- 2.41 I'm also intrigued as to the Natural Environment and Rural Communities Act of 2006 which is designed to ensure that natural environment is conserved, enhanced and managed for the benefit of present and future generations. How do these plans achieve this or the desired outcome of the new Social Values Act? Indeed how do these plans fit with the ideals of sustainability as designated by the Bruntland Commission which states that

*"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs".*

- 2.42 The adoption of a pooled Community Infrastructure Levy to be allocated via a yet to be agreed process by the Greater Norwich Development Partnership (GNDP) adds to the economic uncertainty of infrastructure projects such as the NEGT. Indeed at the time of penning this South Norfolk district council has yet to set the CIL and the other pooling local authorities have yet to agree. The NDR will cost circa £148M; Department of Transport has committed to invest £86.5M leaving circa £60M to be underwritten by Norfolk County Council who plan to borrow this sum against future land receipts – in so doing they will commit themselves (and tax payers) to an excessive release of land, ahead of what the market can be shown to support, as has been demonstrated by the CPRE Norfolk. This may lead to a devaluation of development land and consequent lower level of receipts than they are predicting, which could in turn place the county in a parlous financial position in meeting repayments on borrowing.
- 2.43 Norfolk is a precious and beautiful county, crowned by a fine, historic city – it is exactly the sort of location that could drive the future economy of the UK with an outstanding quality of life proposition coupled with a well-educated workforce and independent business culture. It is time for Norfolk County Council and others to acknowledge and take seriously the contrarian views that have been put forward by residents, land interests and business alike, and consider that perhaps there may be some substance to concerns, and possibly an alternative vision for growth that could deliver prosperity without undermining the golden goose that is the Norfolk countryside.
- 2.44 Further the justification of the NEGT on the basis of jobs creation is equally far-fetched, and a truly enlightened transport strategy that puts sustainable land use and movement patterns at its heart, and which preserves and enhances the incredible asset of an unspoilt countryside would in fact do much more to generate jobs and investment than these current plans. An alternative 'vision' for NEGT needs to be developed following a robust inclusive and transparent process, there is quite a lot of form on how to do something like this quickly and effectively, as has been achieved in other parts of the UK.

- 2.45 Finally it is apparent to all local residents that the north east fringe of Norwich is one of the least spoilt edges of a major British city, having not to date been destroyed by the imposition of a concrete ring of steel; the fine agricultural countryside and lovely well landscaped arterial routes to Salhouse, Acle, Wroxham, Spixworth and Walsham, Felthorpe will all be destroyed by the imposition of the NEG. This is a very important area of landscape transition between the edge of the city and the Broads which are one of Norfolk's environmental jewels - to put it under concrete in the manner proposed is a scandalous misunderstanding of what is valuable in this county.