

CPRE NORFOLK STATEMENT ON GNDP RESPONSE (RF97) TO THE NOTE FROM THE INSPECTORS, RF75

Summary of Conclusions

The Inspectors ask *'to what extent there could be potential for a Plan B partial alternative to the NDR'*. *'The JCS would also need to explain that once Plan B had been completed, if there was still no prospect of the NDR being completed, then the whole of the JCS would need to be reviewed'*.

In our view the GNDP have not addressed this question. They make the assumption that the NDR will go ahead at some stage, and the task is to *provide the contingency to enable programmed development to commence in the period before completion of the NDR is assured'*.

This is a fundamentally different proposition than is required for a Plan B. The assurance for funding for the NDR can not be made before December 2011, and the outcome of a public inquiry can not be taken for granted.

The commentary in the GNDP response is flawed throughout, and so is the proposed revision of Policy 10 and Policy 20. We set out more detailed comments in support of this view below, but first indicate the way that the first paragraph in Policy 10 needs to be revised and expanded at page 62 of the section entitled Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle.

CPRE Proposal for the Revision of Policy 10, first paragraph of growth triangle

Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth area

The proposal is that the location will primarily deliver new development extending on both sides of the Northern Distributor Road. However, as it is not possible to obtain certainty on the delivery of the NDR within the programmed adoption date of the JCS, a partial alternative to a growth triangle and NDR is also proposed.

The alternative would be based on an integrated extension of the present urban fringe. It would utilise and expand on the existing commitments in the Broadland NPA, and link these with a single carriageway road which connects the Postwick Junction, Plumstead Road, Salhouse Road and Wroxham Road.

Policy 20 (Implementation) sets out the common first stage programme for both options. When this programme has been completed, if there were still no firm prospects of the NDR being constructed, then the whole JCS would then need to be reviewed.

If the NDR does proceed, and other primary infrastructure constraints are also resolved, then this major growth will take the form of series of inter-related villages or quarters which will include: [the text then continues as on page 63].

Consequent to amendments to Policy 10 being made to include a Plan B along the lines we suggest it would then be necessary to make changes to Policy 20. Also the map at Appendix 5 at page 105 of the JCS should show, as well as the proposed growth triangle, an overlay of what would represent an urban fringe extension growth area which represented the Plan B approach we suggest or similar.

CPRE Comments on the GNDP evidence (selected paragraphs)

Paragraph 1.1 A key and wrong assumption is made at the outset that the NDR will go ahead at some stage.

Paragraph 3.1. The wording is not clear, but seems to be assuming that there are no transport regulatory or funding obstacles to delivery, and if there is some other constraint on infrastructure provision, then only then will there be a need to examine what further growth can come forward. In fact, all first priority infrastructure - transport, water and electricity - must be in place.

Paragraph 3.2. Having suggested on the 23rd November that RF26 should be extended to consider employment sites as well as housing through the prism of first priority infrastructure requirements, we have to welcome in principle the addition of this consideration. However (third bullet point) a Postwick junction enhancement is not necessarily the same as the Postwick Hub, which is designed to serve an NDR. There is also a question mark over the type of employment planned at the Broadland Gate, with an emphasis on mundane jobs that do not sit well with the need to re-structure and upgrade the Norfolk economy; and which will compete both with Norwich City Centre and the market towns to the north.

The job growth directly associated with Norwich Airport is likely to be modest. For employment purposes it can be serviced by public transport on existing routes from Norwich, the Thorpe Marriot and Taverham area, by foot or bicycle from the over-grown village of Horsford, and market towns such as Aylsham to the north. In the Norwich Airport the need for a new electricity sub-station is a more significant infrastructure need than the NDR.

Paragraph 4.2. We draw attention to the fact that S106 contributions to affordable housing have been historically well below past and current targets, and more than ever CIL/106 funding source face competing demands for them. We would hope that GVA Grimley take this into account in their study, with quantification of this type of effect.

Paragraph 5.3. This statement on the NDR makes again the point that it is key dependency; this points up that a Plan B is required, but not provided in the GNDP response to RF75.

Paragraph 5.5. See points made at 3.2 on the NDR and Norwich Airport.

Paragraph 5.6. There has been a circularity justification in the progression of the JCS and the NATS, with one being quoted as supporting the other; meanwhile the NDR has moved from a full east west route, to a three quarter route, to a half route. There are issues yet to be properly addressed, whether in fact the NDR, and a timescale

which delivers the major public transport improvements at a later date, would in practice embed car dependency, and depress future provision and use of public transport.

Paragraph 5.8. The NDR is not included in the Big Conversation because the £40m underwritten by the County Council falls beyond the three year time frame for cuts in expenditure. However it is not sound to assume that the decision of the 6th April 2010 Cabinet meeting is irrevocable; or that the estimated cost will not escalate.

Paragraph 5.9. The benefits of an NDR are subject to differing views and while the GNDP believes the funding will be agreed by the Dept of Transport in December 2011, this may not be their finding; or that of a public inquiry, which might take a less mechanistic and formulaic approach of the potential benefits arising from an NDR.

Paragraph 6.5/6.6. The long list of potential sources from which funding for the Postwick Hub might be garnered implies much less certainly than the previously promised £20m from the CLG.

Paragraph 6.7 (and 7.1). The urban fringe housing and local road access described - Postwick junction, Plumstead Rd, Salhouse Rd to Wroxhan Rd should form the basis of a Plan B, with an initial core of the development of 600 houses as a Business Park allocation and the White House Farm/Blue Boar Lane scheme (1,600 houses). However, this approach is not followed up and 'grown' to an alternative to the NDR and a Plan B. Apart from further development along the access route, a further extension of the access road to the North Walsham Rd, also supporting urban fringe extension, is conceivable; but further west beyond that the safety and noise zone constraint of the airport comes increasingly into play.

Paragraph 7.4. The combined trajectory (appendix 3) shows growth in the north east sector as reaching a transport (NDR) constraint at 2016/17; but then continues the trajectory as though the NDR will be in place by then.

Appendix 2: Policy 10. The amendment proposed to Policy 10 makes no reference to a Plan B, and that failure to implement an NDR should trigger a review of the JCS. Even on its own TINA terms it is not well worded. It would be more accurate to say: *The new location will primarily deliver new development on both sides of the NDR.* Plan A is a 'jump-out beyond the current urban fringe, and not an urban extension as commonly understood.

Also the statement that *Delivery of the growth triangle in its entirety is dependent on the implementation of the Northern Distributor Road* ducks the question on how much can be delivered and where this would take place in the absence of an NDR, which is part of the Plan B issue. Given however that the amendments to Policy 10 fail to deal at all with the Plan B requirement, these comments might be considered as being academic.

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