
The Norfolk County Council (Norwich Northern Distributor Road (A1067 to A47(T))) Order

Applicant's comment on Written Representations by Great and Little Plumstead Parish Council

Planning Act 2008

Infrastructure Planning

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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Introduction

This document provides the Applicant's responses in respect of selected issues raised by Great and Little Plumstead Parish Council in their Written Representation to the Examining Authority dated 26 June 2014. The Written Representation covers many issues. Some of these have been addressed elsewhere (including the Applicant's comments on Relevant Representations, and the Applicant's comments on other Written Representations). Therefore a selection of issues raised have been extracted and comments provided.

The points have been responded to where possible in the order they were raised. Each issue, or in some cases a summary of it, is shown in italics.

This document should also be read in conjunction with the Statement of Common Ground NCC/EX/6

Applicant's comment on Written Representations

Representation

- 1.1. *By closing down the road widths and introducing pinch points, allowing blue badge parking and taxi ranks clogging up the arterial routes has resulted in ineffective public transport movements leading to congestion, delayed journey times, increased fuel costs and excessive carbon emissions which have a direct correlation with the health of the population.*

Applicant's comment

- 1.1.1. The overall transportation strategy for the Norwich area, NATS, is a package of transport improvements, interventions and measures. Together these improvements, interventions and measures will deliver a reliable, efficient and long-term sustainable transport network which will improve travel choices accessibility and connectivity and which will support the continued economic and physical growth of the Norwich area.
- 1.1.2. The NDR is an integral part of NATS and required to address existing problems and issues which include an Outer Ring Road operating at near capacity or overcapacity around the northern part of the city.
- 1.1.3. By relieving the traffic congestion on radial routes in the suburban area and by providing an alternative route for car users, the NDR would help to facilitate the introduction of bus priority measures and an orbital bus service. By freeing the internal road networks of new development areas of the need to cater for extraneous through traffic, better residential environments could be created, which would be more easily penetrated by local bus services and walking and cycling routes.

- 1.1.4. Whilst some bus related improvements have been progressed through the NATS, improvements to the public transport corridors to the north and east of the City have been constrained by the amount of traffic and related congestion on key radial routes and the ring road routes. With the reduction in traffic flows and congestion on these routes forecast to result from the NDR, further improvements in these areas can be made and benefits realised.
- 1.1.5. NATS has delivered transport improvements across Norwich for many years including significant provision of Park and Ride facilities and a major new bus station which have contributed to the reduction in traffic levels within the city centre. However, the issue of rat running in the northern suburbs has not diminished over that period.
- 1.1.6. Chapter 3, the Needs and Alternatives section of the Environmental Statement (Document Ref. 6.1) describes the work carried out in devising NATS.

Representation

1.2. *We would suggest that key roads within Norwich should be subject to a congestion charge (vehicle specific, not emissions). Along with this action, St Stephens should be opened to greater width to encourage and facilitate the free movement of Public transport and emergency vehicles through the city at the same time penalising those who drive through its key routes.*

Applicant's comment

- 1.2.1. A key NATS measure which is the removal of general traffic from St Stephens Street which will significantly improve movement of public transport, emergency vehicles and cyclists is programmed for delivery in Autumn 2014.
- 1.2.2. The NDR is an essential element of NATS which is a balanced package of measures designed to address existing and future transport problems and issues in the Norwich area. These problems and the development of NATS are set out in Section 3 of the ES (Document Ref. 6.1).
- 1.2.3. Congestion charging for Norwich was considered in the governments Transport Innovation Fund (TIF) programme in 2007 and 2008. Some important lessons were learnt from this study in relation to the size of the charging cordon and public consultation, but no charging scheme was proposed. The work concluded that:
- Modelling work suggested that road pricing had a similar operational impact to NATS which includes city centre measures to remove through traffic
 - Road pricing would not address the issues that the NDR element of NATS resolves
 - There was little stakeholder support for road pricing

Representation

1.3. *The NDR has now deemed to be a road of National Importance (NSIP) and is now not subject to the normal planning permission. The result of this action (which occurred half way through the recent consultation, which asked do you support the NDR? Analysis by an independent source concluded 80% of respondents opposed the NDR) has disenfranchised communities, Parish Councils and individuals from the normal planning process.*

Applicant's comment

- 1.3.1. Section 2.7.4 to 2.7.8 of the Pre-application Consultation Report (Document Ref 5.1) outlines Norfolk County Council's (NCC) reasoning for its view that the NDR is a development for which development consent is required. This includes a chronology of events prior to the application for a DCO being made, which states that in December 2012, the applicant decided to promote the NDR as a Nationally Significant Infrastructure Project (NSIP). At that time the NDR fell within the definition of a NSIP set out in Section 22(2) of the Planning Act 2008 (as it then was) because it included works to the Postwick junction of the A47(T) and was to be constructed for a purpose connected with the A47(T).
- 1.3.2. Publication of the notice stating where and when the SOCC could be inspected took place on 21 June 2013 and on 28 June 2013, with the first publication exhibition held on 8 July 2013. The Section 48 Notices were published on 12 July 2013 and 19 July 2013. The programme of public exhibitions ran until 12 August 2013. Section 42 consultation letters were issued on 30 July 2013 and representations under all three strands of consultation were invited until 20 September 2013. Further information on the consultation is set out in the rest of the Consultation Report.

- 1.3.3. On 24 July 2013 the Highway and Railway (Nationally Significant Infrastructure Project) Order 2013 (S.I. 2013/1883) (the Highways Order) was made and the Order came into force on 25 July 2013. This was some weeks after the start of the statutory consultation process referred to above. The Order amended Section 22 of the Planning Act 2008 so that a project such as the NDR would not (from 25 July 2013 onwards) fall within the definition of a NSIP.
- 1.3.4. On 25 July 2013, the applicant submitted a qualifying request to the Secretary of State for a direction under Section 35(1) of the Planning Act 2008 that the NDR was a project of national significance and so should be treated as development for which development consent was required.
- 1.3.5. The volume of respondents objecting to scheme is considered small when compared to the overall number of people consulted. It is approximately 2% of the 57,000 residential and business addresses sent consultation letters. The proportion of respondents opposed to the scheme is considered a reflection of the area of consultation. i.e. that the consultation focused on the areas most directly affected rather than areas further afield, which are likely to benefit from the NDR and future NATS measures that depend on the NDR. NCC's analysis of the Section 47 and 48 consultation responses is contained in Chapter 5 of the Pre-application Consultation Report (Document Ref 5.1), with the key issues identified highlighted in Section 5.4 and is considered not to be a misrepresentation of the consultation responses.

- 1.3.6. Progression of the Scheme through the Development Consent Order process (i.e. as a nationally significant infrastructure project) in accordance with the Planning Act 2008 is not detrimental to local people (nor anyone else) in any way. The process is established through statute, is sanctioned by Government as being reasonable for the determination of proposals for infrastructure and provides a clear procedure for the involvement of all parties. Local people have been invited to participate in the Examination process, and previously had opportunities to be involved in both non-statutory and statutory pre-application consultation.

Representation

1.4. *We also call into question the validity of the decision to proceed to the pre – enquiry by PINS because a large quantity of responses from the Green Party, CPRE, NNTG, SNUB and others were lost/misplaced by NCC and did not get forwarded to PINS. It is known these responses raised key legal points of objection.*

Applicant's comment

1.4.1. NCC received over 1400 responses to its consultations under Section 47 of the Planning Act, which commented on a wide range of issues associated with the NDR proposals. NCC is aware that three submissions made by Norwich Green Party, CPRE and SNUB were on the balance of probabilities received but unfortunately were not logged. In respect of these submissions, the Planning Inspectorate has concluded that the points raised in them had been raised by other consultees and therefore are covered in the Consultation Report. A legal point raised about the changes to the legislation during the consultation process was addressed in any event in the Consultation Report (as referred to in section 2.8.10 above) In addition there will be further opportunity for these comments to be considered during the examination process.

1.4.2. The County Council's Head of Procurement carried out an extremely thorough investigation, and although he was unable to arrive at a definitive view as to what happened, NCC have apologised to the Green Party, SNUB and CPRE. The full report has now been published (Review into missing submissions to Norwich Northern Distributor Road consultation process - included within Appendix A of NCC/EX/4 Applicants Comments on Relevant Representations) No other individuals or groups have come forward suggesting that their submissions have not been included within the consultation report.

Representation

1.5. *Consultation Route Choice - Much has changed in the eleven years since the only public consultation conducted by Norfolk County Council on the NNDR route; this was in 2003 and was for a complete Northern by pass from the A47 T to the A47T. The proposed NDR of course does not reflect in any way, that which was put forward for consultation to the public in 2003, this was for a full NDR from the A47 at the Postwick Junction through to the A47 West across the Wensum Valley, and a complete joined up route. It was the link over the Wensum Valley based on cost and environmental concerns that stopped this scheme from proceeding.*

Applicant's comment

- 1.5.1. The ES (Document Ref. 6.1) explains in Section 3.8 (paragraphs 3.8.23 to 3.8.26) that prior to the County Council adopting a preferred route for the NDR in September 2005 consultation on alternative routes was carried out in 2003, 2004 and 2005.
- 1.5.2. These consultations are summarised in Appendix B of the Pre-application Consultation Report (Document Ref. 5.1).
- 1.5.3. A road linking the A1067 and the A47(w) would have to cross the Wensum Valley, which is designated a Special Area of Conservation (SAC) under the European Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora - often referred to as the Habitats Directive.
- 1.5.4. An assessment of options across the Wensum Valley concluded, in 2005, that significant impacts on the SAC would be likely, and there was doubt as to whether, under the terms of the Habitats Directive, it would be possible to design an acceptable scheme. This in turn raised the prospect that consent for a wider scheme including such a link might not be granted.

- 1.5.5. On 19 September 2005, the Applicant's Cabinet resolved to have no NDR link between the A47(w) and the A1067. It therefore did not form part of the adopted route. Cabinet also resolved to complete highway improvements on the existing route between Lenwade and Hockering and these works have since been completed and the route is due to be reclassified to a B class later in 2014.
- 1.5.6. There has been significant consultation and scheme development carried out since the route was adopted in 2005 and this is detailed in the Pre-application Consultation Report (Document Ref. 5.1).
- 1.5.7. At its meeting of 16 September 2013 the meeting of the Norfolk County Council resolved to recommend to Cabinet that they submit an application for a DCO in respect of the NDR as proposed (i.e. between the A47 at Postwick and the A1067 near Attlebridge) and to also commission a report on a feasibility study of providing a link across the Wensum Valley from the A1067 to the A47(w).
- 1.5.8. Whilst at its meeting of 7 October 2013 the applicant's Cabinet resolved that a "scoping report on the feasibility of providing a link across the Wensum Valley from the A1067 – A47 be written once consultation work was completed", this study has not been carried out and there is therefore currently no proposal establishing the form any link between the A1067 and A47(w) would take, or indeed whether any such link is feasible. The Transport Assessment for the NDR (Document Ref 5.5.) shows that the NDR provides substantial benefits without a further link between the A1067 and A47(w) and that the NDR will reduce daily traffic on existing routes between the A1067 and the A47(w) between Drayton/Taverham and Costessey. The NDR is therefore in no way dependent on the provision of such a link. The feasibility and environmental acceptability of a link to the A47(w) have not been established and the previous assessment in 2005 discarded this option. Accordingly, it is the position of the Applicant that the NDR can and should be considered on its own merits without such a link.

Representation

1.6. *We believe that our alternative proposal to the NDR for an inner orbital from the Postwick Hub and on to Norwich Airport meets the immediate requirements for housing development and business park expansion that already has planning permission.*

Applicant's comment

- 1.6.1. Chapter 3 of Volume 1 of the ES (Document Ref 6.1) explains the consideration given to potential alternatives. Section 3.15 discusses Alternative 5 which comprises developer link roads between radials (within the growth areas).
- 1.6.2. Further analysis using the DCO transport model for alternatives is provided in The Traffic and Economic Appraisal of NDR Alternatives (Document Ref 5.12). Section 8 of the report provides an analysis for Alternative 5 and conclusions are summarised in Section 9.
- 1.6.3. Alternative 5 (developer link roads) singularly fails to reduce traffic on inappropriate routes and relieve the existing network. Whilst the Alternative includes the city centre traffic management measures the reductions of cross city centre traffic are much smaller compared with the DCO Scheme, especially for trips crossing the Outer Ring Road Cordon. The junction analyses show that North Walsham Road and Wroxham Road junctions would operate substantially over their theoretical capacity with long queues and delays, with delays of over 10 minutes at North Walsham Road Junction in the 2032 AM peak, and 5 minutes in the 2032 PM peak. On these grounds the developer link roads would not operate satisfactorily and they would cause particularly severe difficulties in implementing the proposed shared use high street-type design envisaged in the development proposals.

- 1.6.4. For the Beyond Green planning permission for North Sprowston, Old Catton the development is proposed to provide an internal east west street which will ultimately span four radial routes from St Faiths Road to Wroxham Road. All the roads within this development, including the east west route, will have a 20mph speed limit to make it easier for pedestrians to cross streets at any point. Speeds will be kept low through design rather than enforcement, using features such as short lengths of street between junctions, narrow carriageways, on street parking, limiting forward visibility and the use of shared space on some tertiary streets.
- 1.6.5. The Norwich Area Transportation Strategy sets out to reduce rat running in north Norwich. This is explained in 3.5.4 (policies 5 and 6) of the ES (Document Ref 6.1) and it would not be possible to achieve this without an alternative to serve these movements given the constraints in the network which are explained in section 3.4.

Representation

1.7. *It is important to understand the lack of funding for the NDR, whilst the Government has said it will contribute £86 million there remains a £62 million shortfall. Norfolk County Council budget for 2016-17 shows a projected shortfall of £18 million which will grow to £51.7 million in 2017-18 and a further £61 million budget savings will be required up until 2020 this further highlights the importance of our cost effective alternative!*

Applicant's comment

- 1.7.1. Funding for the NDR project has been agreed by Norfolk County Council Cabinet. This includes details of the funding sources and the value underwritten by the County Council, which is supported by an in principle agreement that up to £40m Community Infrastructure Levy (CIL) income can be used towards the project.

- 1.7.2. This reflects the importance of the NDR as essential and high priority highway infrastructure supporting growth in employment and housing as set out in the adopted Joint Core Strategy, as well as providing much needed benefits in transport terms by resolving existing traffic problems and providing direct access from the strategic road network to Norwich International Airport.
- 1.7.3. The NDR has a 'very high' Benefit to Cost Ratio (BCR), as set out in Document 5.7. Economic Appraisal Report, demonstrating that it is a good use of public funds. Sustainable transport is at the heart of NATS and only so much can be implemented due to existing issues and constraints that the NDR addresses.
- 1.7.4. The transport benefits of the Scheme would bring substantial land use and economic development benefits that are set out in Document Ref. 10.3. These benefits include:
- 4,358 net additional direct jobs arising from the development sites listed in this report
 - When multiplier effects are included the figure (of 4,358) rises to 5,230 net additional jobs that would not otherwise arise in Greater Norwich
 - £1.099bn of additional GVA is forecast to be generated by those 5,230 jobs over some 30 years
 - £966m of net additional physical investment in roads, infrastructure and housing
 - An average of 426 construction jobs (rising to 511 when multiplier effects are included) in each of the years until development is complete (estimated at 2034).

Representation

1.8. *Our Parish Councils along with other Parishes and organisations such as CPRE have consistently made the case that the volume of housing proposed under the Joint Core Strategy massively exceeds evidenced local demand.*

Applicant's comment

1.8.1. The Greater Norwich Development Partnership (GNDP) provided evidence to the JCS examination to demonstrate that housing provision in the adopted JCS remained appropriate to meet locally assessed need. Inspector Vickery concluded "The GNDP figures indicate that the adopted JCS total still lies comfortably within the range of various projections based on completion extrapolations, affordable housing requirements, and population and economic figures [Table 1 of SDJCS 14 and TP 13]". [Report to Broadland District Council, Norwich City Council and South Norfolk District Council, November 2013 paragraph 40]. (Appendix E) Inspector Vickery also concluded that "overall the housing totals and modified Housing Trajectory represent a realistic, balanced, deliverable, justified and soundly based set of figures which would meet the objectively assessed housing needs over the plan period" (ibid. paragraph 80).

Representation

1.9. *Climate Change - We would ask how the proposed NDR complies with meeting reduction targets outlined in the 2008 Climate Act. Clearly traffic will increase substantially on radial routes to and from the proposed NDR given the massive Business Park and housing development identified. If the potential Rackheath Eco Town planning is granted then you can add a further 31500 movements, our alternative Pink route orbital is closer to Norwich and therefore radial movement will be much less than the further out proposed NDR. With our Alternative, Orbital facility will be accessed sooner, reducing journey times, cost, congestion, pollution and generally supporting the emergence of a more sustainable growth footprint that will enable modal shift from the car.*

Applicant's comment

- 1.9.1. Volume 2 Chapter 5 of the Environmental Statement (ES) (Document Ref 6.2) describes how carbon emissions have been calculated. The methodology used in this assessment follows the main principles prescribed in Design Manual for Roads and Bridges (DMRB) HA/207/07, "Air Quality". An assessment of long-term emissions has also been undertaken following the approach outlined in WebTAG 3.3.5, "The Greenhouse Gases Sub-Objective". Details of the approach are set out in Volume 1 of the ES Chapter 5 (Doc Ref 6.1)

- 1.9.2. Projections of carbon emissions at the Local Authority level have been made and used to provide context for the environmental impact assessment. There is no specific obligation for Local Authorities to reduce carbon emissions as the targets are applicable at the national level only. However, estimates have been made of what Local Authority emissions could be in future if they follow the trajectory of national emissions reductions.

- 1.9.3. The projections have been made using data from DECC's "Updated Energy and Emissions Projections" (2013) to calculate the rates at which emissions are projected to change between milestone years. The same trend has then been applied to combined emissions of Broadland, North Norfolk and Norwich.
- 1.9.4. Since the national reduction targets are based on absolute emissions, the total change in emissions that would result from this Scheme is likely to be less than presented in the assessment in the long term. While national reduction targets do not apply directly to Local Authorities, the predicted changes in emissions on the transport network are unlikely to materially affect the ability of the Local Authorities to contribute to these targets. This is consistent with the draft Government policy statement issued in December 2013.
- 1.9.5. Traffic forecasts have been made in accordance with DfT guidance set out in WebTAG and has taken account of the full implementation of the JCS. The forecast traffic includes all the generated traffic from the development sites in Norwich, South Norfolk and Broadland. This is set out in section 5 of the Traffic Forecasting Report (Document Ref. 5.6).
- 1.9.6. The traffic modelling takes account of the full range of existing and forecast travel across Norwich, both radial and orbital movements. NDR results in reductions in traffic on inappropriate routes and reductions in traffic on the radial routes into the city centre. These impacts are explained in Section 7 of the Traffic Forecasting Report (Document Ref. 5.6).

- 1.9.7. The alternative option referred to in the respondents comment above singularly fails to reduce traffic on inappropriate routes and relieve the existing network. Whilst the Alternative includes the city centre traffic management measures the reductions of cross city centre traffic are much smaller compared with the DCO Scheme, especially for trips crossing the Outer Ring Road Cordon. The junction analyses show that North Walsham Road and Wroxham Road junctions would operate substantially over their theoretical capacity with long queues and delays, with delays of over 10 minutes at North Walsham Road Junction in the 2032 AM peak, and 5 minutes in the 2032 PM peak. On these grounds the developer link roads would not operate satisfactorily and they would cause particularly severe difficulties in implementing the proposed shared use high street-type design envisaged in the development proposals. The delays would also mean that the Alternative would fail to meet the improved transport connectivity objective for the Scheme.
- 1.9.8. The overall effect of the Scheme will be to increase emissions by around 13ktCO₂ in 2017, due largely to an increase in vehicle kilometers travelled. This increase is around 0.6% compared to all emissions in the local authority areas around the Scheme. In 2032, the increase will be 18ktCO₂ representing 1.1% of all emissions in the local authority areas.
- 1.9.9. There are currently no local or regional emission reduction targets in place for carbon reductions. At the national level, the increase in emissions associated with the Scheme is unlikely to materially affect the ability of local authorities to contribute to national level emission reduction targets.

Representation

1.10. *One has to evaluate the Environmental Statement produced by Mott MacDonald, this clearly demonstrates the serious noise pollution which is will blight the Community by the NDR. What the Mott MacDonald report does not highlight is the increase in radial movement to and from the NDR.*

Applicant's comment

- 1.10.1. The effect on Noise is presented within the Environmental Statement (ES) (Document Ref. 6.1). The ES presents the findings of the Environmental Impact Assessment (EIA) and details the effects of the Scheme, both adverse and beneficial.
- 1.10.2. An overall view of the results of the EIA is presented in the Non-Technical Summary (Document 6.3) Section 16 provides a Summary of Effects. The detailed analyses and assessments are presented within Volume 1 of the ES (Document 6.1) The technical reports that support these assessments can be found in Volume 2 of the ES (Document 6.2).
- 1.10.3. The proposed Scheme incorporates measures to prevent, reduce and where possible offset environmental impacts from the earliest stage of the project. Specific details of the proposed mitigation measures are included in the individual topic sections of this ES. The proposed measures were designed according to statutory and non-statutory guidance and the DMRB to provide proposals that are proportionate to the significance of the relevant effect. Such mitigation measures are set out in the requirements in the applied for Development Consent Order and NCC is committed to delivering them as an integral part of the proposed Scheme.

- 1.10.4. The traffic flows forecast with the NDR are compared to those without the Scheme in the Traffic Forecasting Report (Document Ref. 5.6) in Vol. 3 Figures I.1 to I.4. These show that there are increases on some radial routes in the vicinity of where they connect with the NDR. Furthermore the Traffic Forecasting Report in Vol. 1 Section 7 describes the reductions in traffic in other parts of the network with NDR. In particular traffic would be reduced in the suburban area, including on radial routes, and on inappropriate routes that are currently used by orbital traffic movements.
- 1.10.5. The noise assessments used the traffic model data for the proposed Scheme, which covered the wider Norwich highway network, This identified increases, as well as decreases, in traffic numbers across the network. Any increases in traffic on radial routes to and from the NDR referred to in point 1.10 above have therefore been assessed in the Noise and Vibration chapter of the ES.
- 1.10.6. The Design Manual for Roads and Bridges (DMRB) Volume 11 Section 3 Part 7 HD213/11 Noise and Vibration (2011) describes a methodology for the assessment of road projects in the UK. The methodology requires that the study area is identified as an area within 1km of the physical works associated with the Scheme. Within this study area, road traffic noise predictions are performed at any sensitive receptor within 600m of a road where there is the possibility of a change of 1 dB LA10,18hr upon Scheme opening, or 3 dB LA10,18hr in the long term.
- 1.10.7. For potential effects due to road traffic noise outside of the 1km area, the methodology requires that sensitive receptors are identified adjacent to roads where the change in received road traffic noise level would, as a result of the proposed Scheme, increase or decrease by at least 1 dB LA10,18hr on opening or 3 dB in the long term. Consequently, the spatial extents of the assessment extend beyond the physical works associated with the Scheme.

Representation

1.11. *The integrity of Broadland landscapes and routes which are a fundamental element of the attractiveness and tourism offer of the Broads will be seriously jeopardised by the proposed NDR.*

Applicant's comment

- 1.11.1. The effects on Landscape, Air Quality, Noise, Water and Drainage, Ecology, Agricultural Land, Carbon and the Community are presented within the Environmental Statement (ES) (Document Ref. 6.1). The ES presents the findings of the Environmental Impact Assessment (EIA) and details the effects of the Scheme, both adverse and beneficial.
- 1.11.2. An overall view of the results of the EIA is presented in the Non-Technical Summary (Document 6.3) Section 16 provides a Summary of Effects. The detailed analyses and assessments are presented within Volume 1 of the ES (Document 6.1) The technical reports that support these assessments can be found in Volume 2 of the ES (Document 6.2).
- 1.11.3. The proposed Scheme incorporates measures to prevent, reduce and where possible offset environmental impacts from the earliest stage of the project. Specific details of the proposed mitigation measures are included in the individual topic sections of this ES. The proposed measures were designed according to statutory and non-statutory guidance and the DMRB to provide proposals that are proportionate to the significance of the relevant effect. Such mitigation measures are set out in the requirements in the applied for Development Consent Order and NCC is committed to delivering them as an integral part of the proposed Scheme.

- 1.11.4. In addition the Habitats Regulations Assessment has considered any potential effects on protected sites and species. This has been undertaken in consultation with Natural England and the Environment Agency who have the responsibility for the protection of the Wensum SAC. This can be found in Document 6.2 Environmental Statement: Volume 11: Chapter 17. Habitats Regulations Assessment, the addendum is still in draft form and is being reviewed by Natural England this will be made public as soon as Natural England have finished the review of the data submitted.
- 1.11.5. The Landscape chapter of the Environmental Statement states that “The Broads Authority Executive Area lies to the north and south of the scheme, the closest part of the boundary lying to the south of Postwick where it follows the flood plain of the River Yare, 0.5 km away from the intersection of the NDR with the A47 trunk road. In the north, the closest part of the boundary of the Broads area to the NDR lies 1.5km to the north of the Springs at Rackheath (see drawing MMD-233906-DT-0669). Due to a combination of distance, intervening vegetation, undulating topography and the existing urban character of the Postwick Junction, the Scheme will not have any significant landscape or visual effects on the Broads Authority Area. This is confirmed by the extent of visibility as shown on the ZVI drawings (MMD-233906-DT-0953 to MMD-233906-DT-0955)”.
- 1.11.6. The Statement of Common Ground with the Broads Authority shows general support for the scheme, with no cited concerns relating to Broadland landscapes.

- 1.11.7. The Land Use and Economic Development Report (Document Ref 10.3) contains information on the impact of the NDR on tourism. Some respondents to a qualitative business consultation and engagement exercise in 2011 predicted that “the tourism industry will benefit significantly due to easier access into the city drawing in new visitors and a larger number of customers who currently travel elsewhere.” (section 4.2.3).
- 1.11.8. Table 5.2 – NDR qualitative assessment of wider economic benefits – describes benefits to tourism as follows:-

NDR’s influence on Norfolk tourism:-

“Norfolk’s visitor economy is an important sector of the economy and the NDR will improve connectivity for tourists visiting the Norfolk Broads, north Norfolk coast, Great Yarmouth and Norwich as part of a visit. It is difficult to assess the influence the NDR may have on the volume and value of tourism in the area but connectivity within the area will be improved through the NDR and such improved connectivity can reasonably be expected to improve attractiveness of these renowned destinations to visitors. Improved connectivity will also serve to protect Norfolk’s position as a visitor destination for all segments of the market.

Access to Norfolk will be enhanced through improvements to the A47 and A11 (and the A14), but the NDR will also improve connectivity between Great Yarmouth and areas to the north of Norwich. This could improve day visitor trips to the seaside town from residents and visitors to areas north of Norwich, the Norfolk Broads and the north Norfolk coast. The NDR is therefore integral to the provision of greater intra-County connectivity enabling visitors to move around and between destinations with greater ease avoiding the need to travel through central Norwich unless they wish to.”

- 1.11.9. Benefits of the NDR to traffic movements are detailed in the Transport Assessment Report (Document Ref 5.5), and these will enhance access thereby benefiting tourism. In particular, forecast effects of the NDR on city centre traffic and city centre through traffic are detailed in sections 9.5 and 9.7, and improvements to highway journey times are detailed in section 9.8.

Representation

1.12. *The NDR is a land-hungry solution cutting through very high quality arable land. The NDR inherently will stimulate low intensity land development model that will encourage infill and ‘sprawl’, further displacing productive arable land from productive use whilst producing ‘yield’ of development across a very considerable acreage.*

Applicant’s comment

- 1.12.1. The effects on Landscape and Agricultural Land are presented within the ES (Document Ref. 6.1). The ES presents the findings of the EIA and details the effects of the Scheme, both adverse and beneficial.
- 1.12.2. The routing of the road was based on factors including the importance of maintaining the coverage of the “best and most versatile” agricultural land to the north of Norwich. This is the land which falls within the land classification categories 1, 2 and 3a according to the Agricultural Land Classification (ALC) of England and Wales. The route was selected to avoid all grade 1 agricultural land, but it was not possible to avoid lands of the lesser “best and most versatile” grades. Therefore, within the scheme footprint (i.e. the DCO boundary) there are 168.30 ha of grade 2 and 114.20 ha of grade 3a agricultural land, and there are no areas of grade 1 agricultural land. As described in the Environmental Statement (Doc Ref 6.2, Chapter 13), 142.3 ha of grade 2 and 99.95 ha of grade 3b agricultural land will be permanently lost to the scheme.

- 1.12.3. This was recognised as a major adverse and significant impact on agricultural land as a national resource, but was considered unavoidable. This assessment should be considered in relation to current farming practices and the benefits arising from a potential increase in biodiversity from intensively farmed land lost to habitat creation.
- 1.12.4. The level of housing and employment provision in the JCS is required to meet the objectively assessed need to support economic, household and population growth. This has been determined by the local plan process which is the appropriate mechanism. The JCS legitimately and appropriately takes account of the plans of the transport authority including the proposals for NATS and the NDR. The JCS proposals for growth to the NE of Norwich were subject to examination as recently as 2013 and found sound.

Representation

1.13. *Within NATS it is a requirement that Gurney road is closed off to cars and Lorries and only Buses and cyclists are allowed through. The output of this decision is to force other vehicles to seek an alternative route into Norwich, this will be via outer ring road access into Norwich, and this will result in increased congestion at Wroxham road and Plumstead road roundabouts.*

Applicant's comment

- 1.13.1. The closure of Gurney Road to general traffic except buses and cyclists is a possible measure that could be implemented as part of the Salhouse Road BRT route. As it is hypothetical it has not been included in the modelling and assessment work for the NDR. If NCC were to consider implementing such a measure further assessment work would be carried out to determine any adverse impacts and how they might be mitigated.

Representation

1.14. *We consider no evidence has been provided by Norfolk County Council to support the statement (stated in 3.2.1.14 in the preliminary Environmental Information Report)- that not proceeding with the NDR would pose a serious economic risk to Norwich City and the regions.*

Applicant's comment

- 1.14.1. Paragraph 3.2.1.14 of the Preliminary Environmental Information Report summarises the risks to growth. It states : *“The NDR has been designed sustainably to meet the social, economic and environmental objectives set out in local and national planning policies. It will facilitate the step change in the city’s transport infrastructure required to bring forward and serve the full scale of residential, population and economic expansion identified in existing and emerging planning policies for the area, and assist in providing the improvements in accessibility required for sustainable economic growth. Failure to implement the proposals would pose a serious risk to the long term future of the City and its region”*
- 1.14.2. The economic development impact of NDR is set out in Document Ref. 10.3. The economic impact assessment of the proposed NDR is provided within the context of the Joint Core Strategy’s (JCS) stated growth targets which are in place to guide the future of the Greater Norwich economy. The JCS identifies the NDR as key strategic piece of transport infrastructure that will play a key role in supporting the delivery of growth in housing and jobs over the next two decades. The JCS is the adopted strategy for the area and has been tested at examination and found sound.

- 1.14.3. The economic development impact of NDR is set out in Document Ref. 10.3. The economic impact assessment of the proposed NDR is provided within the context of the Joint Core Strategy's (JCS) stated growth targets which are in place to guide the future of the Greater Norwich economy. The NDR is a key strategic piece of transport infrastructure and will play a key role in supporting the delivery of growth in housing and jobs over the next two decades.
- 1.14.4. The JCS has identified need for employment growth which will attract investment. The New Anglia Strategic Economic Plan (SEP) considers that "The Norwich Northern Distributor Road is fundamental to the delivery of the overall scale of growth, the remainder of the transport package that supports growth, and key elements of the City Deal" (paragraph 6.12) The SEP makes numerous references to the significance of the Norwich area economy. Specific references include recognition of the civil aviation cluster at the airport (at paragraph 2.5). Paragraphs 6.20 and 6.21 specifically refer to the northeast quadrant of Norwich including the airport and surrounding development opportunities, Rackheath and Broadland Business Park.