

Campaign for Better Transport

Comments on bid: Norwich Northern Distributor Route

14 October 2011

This project represents a massive investment of public money in a misconceived project with mixed local support. The road has generated enormous controversy.

It also carries a huge financial risk for Norfolk County Council, which is being masked by the fact that a '1/2 NDR' instead of a '3/4 NDR' scheme is being proposed in the current bid. In reality, on top of £22 million from local funds for the scheme as proposed, NCC plan to build the additional section entirely from local funding sources, spending a further £45 million. This project will therefore dominate investment in council capital projects for years ahead, affecting many other services, as well as sustainable transport development.

The scheme as proposed also suffers from a complete lack of consultation. No alternatives to the NDR were offered in the process of consulting on the recent Joint Core Strategy, as the NDR/Postwick Hub were assumed as fixed elements from the outset, and public support claims in the BAFB depend largely on responses to a much larger 2003 'full NDR' proposal.

Well worked out alternative plans for an inner road project and a much smaller Postwick Hub development are viable, well supported and much cheaper, and better fit the strategic development of the city and sustainability goals. However, these have never been considered by the council.

Claims that this road is needed for development are also not true. Development that is planned for the north east of the city does not depend on the road, and all the major developers in the north-east growth area have stated that they do not want a NDR and expressed support for a Plan B package based on an inner E-W link road, modest improvements to A47 Postwick Interchange and sustainable transport.

Consultants MTRU have studied the BAFB in detail and have also concluded that this bid fails strategic objectives on climate change, health, economy and sustainable development.

We recommend that this proposal is rejected, and that the constructive alternative proposals put forward for the use of CIF funds in a modified Postwick junction proposal and inner link road, followed by a programme of sustainable transport improvements within the city, are progressed instead.

Strategic fit, local and regional plans (Best and Final Bid section 1.3)

The NDR was included in the 'Joint Core Strategy' produced by Greater Norwich Development Partnership (GNDP) as a fixed element, with no other options available. The JCS was adopted in March 2011 after a statutory Examination in Public. This is now subject to a legal challenge in the High Court on a number of points, which include the failure to assess the NDR as part of the Sustainability Appraisal of the JCS because it was assumed by GNDP to be a fixed element.

However, NCC has failed to mention three important and material facts about the JCS planning inspector's report in their Interim Information submitted to DfT in June 2011 and in their BAFB, namely that, in the judgement of the Inspector:

1. Issues relating to the NDR and growth are deferred to the Area Action Plan level and do not affect early phase delivery of JCS.
2. Smaller scale and lower cost improvements to the A47 Postwick junction can unlock growth in north-east Norwich as an alternative to the proposed £21m Postwick Hub within the current funding period.
3. The building of the NDR (or not) is not necessary for growth in the Norwich Area as a whole.

Campaign for Better Transport's full report on consultation failings for the NDR (separately submitted) gives more details of this judgement.

Selection of options, consideration of alternatives and strategic fit (BAFB sections 1.3)

It is clear from the separate submissions by consultants MTRU, CPRE Norfolk, SNUB, NNTAG, Norwich Green Party and others – as well as the failures in consultation outlined below – that alternatives to the NDR have not been seriously considered since at least 2003, when overwhelming public support for public transport improvements was overlooked.

This represents a damaging and expensive failure to explore better value, less environmentally damaging solutions. As the MTRU submission observes:

"Having undertaken studies in the region over a number of years it is hard to believe that there is not a more effective intervention at a lower cost."

We agree with MTRU's opinion that: *"no testing of the best possible sustainable package without a road scheme has been undertaken, meaning that the requirement to test alternatives has not been met."*

In addition, in the BAFB, the car mode share for associated developments is very high – 94 to 96% – while developers in the area who are opposed to the NDR/Postwick Hub are working towards housing developments that are 'traffic neutral' and make use of public transport and the principle of reducing the need to travel. Other developers are also planning inner east-west roads that would form a complete link between the Postwick junction and the A140 at Norwich Airport, all sections of which would be funded from developer contributions.

As MTRU's report states in its consideration of the strategic fit of the proposals:

"NPPF: Given the 94% car mode share predicted in the model for existing and new development if the road is built, this is not sustainable in any sense in terms of the planning policy framework."

A well thought out alternative proposal has been submitted separately by opposition County Councillor Andrew Boswell on behalf of the 22 Green Party councillors in the Norwich City area. This proposes two complementary ways forward in the absence of an NDR:

- That some of the existing CIF funding commitments to Norfolk are diverted to a first stage inner link road project (already in the local plan) and a much smaller Postwick junction improvement.
- That the remainder of the CIF funding is assigned to bringing forward a programme of sustainable transport improvements within the central parts of Norwich, and to bus improvements to the outer edges of the city.

We believe this approach would be a constructive way to support Norfolk County Council while rejecting this damaging proposal, and that these would be found to be very good value ways to use this public money, so we fully support this suggestion.

Value for money (BAFB sections 2.5, 3.2)

The value for money case of the NDR has been studied by MTRU, and their conclusions are that the case has not been made in a way that enables a true assessment to be made.

This is because of the conflation of the scheme with the Postwick Hub proposals, and the counting of benefits against the '3/4 NDR' proposals and associated developments, which may not materialise. Crucially, the report says:

“No test has been undertaken with the Postwick junction included in a ‘Do Minimum’ against which the cost and benefit of the NDR [are compared]. Without this it is not possible to assess the true value for money of the NDR itself.”

Within the calculations that are provided in the NDR, the consultants' work has also uncovered a very high dependence on small time saving (over half of the benefits are due to time savings of less than 5 minutes, and 27% from savings of less than 2 minutes) as well as a lack of local benefits from the proposals, especially in the city centre.

The MTRU submission says: *“The benefits are also strongly focussed on long distance traffic, with 20% for traffic with a trip length of over 50 kilometres, and a further 38% for traffic with a trip length of between 20 and 50 kilometres,”* and the study also highlights the effect this would have on the economy of the city centre, lowering the business density and reducing agglomeration.

Given the extraordinarily high level of local authority spending associated with this proposal, and the planned future extension of the road to a 3/4 NDR, this lack of benefit for local residents serves to highlight further the opportunity cost of pursuing this scheme at the expense of more sustainable proposals focused more on the inner parts of the city and public transport investment.

Consultation process (BAFB section 5.1)

There has never been a specific consultation on the Norwich Northern Distributor Road. The scheme has instead always been a fixed part of much larger and complex consultations for transport and development around Norwich.

This scheme has changed so much since it was first proposed that the public have never been asked specifically about a three-quarter NDR, the current half-NDR route, or the Postwick Hub.

In their final bid document Norfolk County Council says that, way back in 2003, 78 per cent of people supported the road, failing to mention that, in the same questionnaire, over 90 per cent said they supported public transport improvements.

Campaign for Better Transport's full report on consultation:

http://www.bettertransport.org.uk/system/files/NNDRconsultationCfBT_Oct11.pdf

Delivery issues:

These issues may jeopardise the scheme going ahead at all, or delay any spending on the scheme until after the Spending Review period.

Planning process and statutory orders (BAFB section 3.3)

Consent has been granted for the Postwick Hub. However, the planning process has yet to be started for the NDR part of this scheme.

This process would be likely to go to a full Public Inquiry, and would take a large amount of time to consider. Any problems or lack of consultation in this process would be scrutinised and challenged by the committed local campaigners (including opposition from County Councillors from more than one party), which could also jeopardise the planned timescales for this scheme.

The scheme risk register includes the following strategic risk to the planning process for the NNDR:
“Extended inputs required to obtain planning permission and CPO/SRO for scheme or High Court Challenge affects programme

- *Probability: 1*
- *Most likely additional cost: £500,000”*

We consider this to be an underestimate considering the likely objections from local people, campaigners and developers and businesses opposed to the scheme.

Third party funding and how LA contribution will be funded (BAFB sections 4.3, 4.7, 4.10)

The council is hoping to gain contributions from private developers putting up houses in the North East of Norwich to support the Norwich Northern Distributor Route. However, all three developers in this area have already said that their housing plans can proceed without the distributor road, and two have submitted alternative low cost Postwick junction improvements. The final bid contains just £4 million in third party contributions, towards a total local contribution of £26 million. This £4 million is ‘Growth Point’ funding through the Greater Norwich Development Partnership (Local Enterprise Partnership), and is not from a developer or private contribution.

Campaigners have also questioned the viability of the private developer associated with the outline planning application for a business park within the Postwick Hub at the eastern end of the Norwich scheme (Broadland Gate). The applicants were granted ten years by Broadland District Council in which to submit detailed plans. A registered company is named in the plans (Ifield Estates Ltd), but it has never posted any revenues at Companies House. Legal questions have also been raised about the Council paying all the costs of a joint hybrid planning application for Broadland Gate/Postwick Hub and NCC has been referred to the Audit Commission as a result.

Consideration of the risks of campaigning and peaceful protest action (BAFB sections 3.8, and 5.3)

Nowhere in the BAFB section 3.8 or the scheme risk register¹ is the likelihood of protester action mentioned.

We consider this omission to be unrealistic. Given the high degree of controversy, the high level of carbon emissions associated with this scheme, and the length of new road proposed, there is a very high risk of protests should the scheme be given funding and planning approval and begin construction.

¹ Combined Risk Register, Document Ref: 34
<http://www.norfolk.gov.uk/download/NCC094555>

There are already very well organised protest groups in the region and the campaign is likely also to attract the attention of direct action climate campaigners from across the UK. Given these considerations, we would consider the risk of protester activity in this case to be more like 80–90%.

If it occurred, this activity might include site occupations in the form of protest camps (and the necessary court actions and use of specialist bailiffs to remove the camps and inhabitants), large scale demonstrations, site occupations and disruption to construction work. It might also be necessary to seek injunctions to prevent further protests.

We would anticipate that the estimated delay to the scheme due to such activity would be between 8-15 weeks, and would estimate the cost of this to be £1–2million (estimate based on protests against the A4146 Stoke Hammond and Linslade Western Bypass in 2005 as a comparison).

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Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX

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