

## **Policy 4 - Strategic Infrastructure MM10**

### **Status of the Norwich Western Link (NWL)**

- 1.1. I object to this modification as it appears to obfuscate whether the NWL is part of the Plan or not.
- 1.2. The Regulation 19 review clarified that it is not in the Plan as the Partnership's response to this specific issue (see question 33 in the Inspectors' initial questions) which confirms;

*"In the same way that policy 4 sets out improvements to rail services and to trunk roads, the **GNLP does not promote the NWL as a proposal of the plan**, but instead reflects its inclusion in other plans."*<sup>1</sup> [Emphasis added].

- 1.3. As a reminder, the full text of paragraph 44 in the Policy 4 Strategic Infrastructure Topic Paper reads;

*"In the same way that policy 4 sets out improvements to rail services and to trunk roads, the **GNLP does not promote the NWL as a proposal of the plan**, but instead reflects its inclusion in other plans. When this particular scheme progresses to a preliminary design for which planning permission and statutory orders can be sought, it will be assessed through the planning application process. When this process is triggered, **the environmental effects of the Norwich Western Link will be assessed against the relevant legislative and regulatory requirements and against policies contained in this plan (if adopted) including Policy 3 (Environmental Protection and Enhancement), together with all other material consideration.**"* [Emphasis added].

- 1.4. The Partnership response notes the applicable "other plan" under which the NWL is referenced as<sup>2</sup>;

*"Policy 4 of the GNLP therefore lists the **NWL as an element of Transport for Norwich**".*

The original wording of the relevant section of Policy 4 is repeated in the response;

*"A considerable shift towards non-car modes will be promoted in the Norwich urban area over the plan period. High density growth will be focussed in locations with good access to improved sustainable transport networks and interchanges in Norwich, creating a virtuous cycle where clean transport is*

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<sup>1</sup> [https://www.gnlp.org.uk/sites/gnlp/files/2021-11/IQL%20Response%20final%20R\\_0.pdf](https://www.gnlp.org.uk/sites/gnlp/files/2021-11/IQL%20Response%20final%20R_0.pdf) (paragraph 117)

<sup>2</sup> [https://www.gnlp.org.uk/sites/gnlp/files/2021-11/IQL%20Response%20final%20R\\_0.pdf](https://www.gnlp.org.uk/sites/gnlp/files/2021-11/IQL%20Response%20final%20R_0.pdf) (paragraph 118)

*prioritised, less use is made of cars and space is used more efficiently and attractively.*

*This will be achieved by Implementation of the Transport for Norwich Strategy (TfN) including:*

- significant improvements to the bus, cycling and walking networks to promote modal shift;*
- developing the role of the park and ride system;*
- changing attitudes to travel;*
- delivery of the Norwich Western Link road.”*

- 1.5. However, the status of the TfN strategy is defined in the Regulation 19 Evidence Base List of Documents as;

*The Transport for Norwich Strategy as a “**Non GNLP produced document for information only**”. [Emphasis added]*

- 1.6. In response to part of question 33 of the extent of development dependent on the NWL, the Partnership states;

*“No development delivery in the GNLP is dependent on the completion of the NWL road.”<sup>3</sup>*

- 1.7. The reading of response paragraphs 117, 118 and 119 can only be interpreted as the NWL being referenced only in the Plan under non GNLP documents but not **promoted** as part of it.

- 1.8. MM10 now removes the NWL from the items referenced under the Transport for Norwich Strategy contrary to the Partnership response to question 33 and reclassifies in a group with other infrastructure for Regional Connectivity.

- 1.9. The revised heading for this group is; “**promoting regional connectivity recognising the work already underway**” [Emphasis added], which reintroduces ambiguity and should be changed in recognition that all of these schemes, ideals and projects are outside the control of the Partnership and are being, or will be, **promoted by others but do not form part of the Plan**.

- 1.10. Requirement 16 of the National Planning Policy Framework (NPPF) states that Local Development Plans should contain policies which are clearly written and unambiguous.

- 1.11. The reintroduction of “promoting” in the modification creates ambiguity, as none of the schemes can or will be brought forward by the Partnership.

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<sup>3</sup> [https://www.gnlp.org.uk/sites/gnlp/files/2021-11/IQL%20Response%20final%20R\\_0.pdf](https://www.gnlp.org.uk/sites/gnlp/files/2021-11/IQL%20Response%20final%20R_0.pdf) (paragraph 119)

1.12. The modified Transport Policy states;

*“Transport improvements will support and embrace new technologies and develop the role of Norwich as the regional capital, support strategic growth in the Cambridge Norwich Tech Corridor, improve access to market towns and rural areas and promote sustainable and active transport.*

*Transport infrastructure will be brought forward to support the development aims of this plan. A considerable shift towards non-car modes will be promoted in the Norwich urban area over the plan period. High density growth will be focussed in locations with good access to improved sustainable transport networks and interchanges in Norwich, creating a virtuous cycle where clean transport is prioritised, less use is made of cars and space is used more efficiently and attractively.*

***This will be achieved by:***

*And promoting regional connectivity recognising the work already underway on:*

- *Enhancement of rail services, including improved journey times and reliability to London and Cambridge, supporting the East-West Rail link and innovative use of the local rail network.*
- *Improvements to the A47, including delivery of the Blofield to North Burlingham, Thickthorn and North Tuddenham to Easton improvements being progressed by National Highways.*
- *The Norwich Western Link being progressed by Norfolk County Council.*
- *Enhancement of the Major Road Network including provision of the A140 Long Stratton bypass being progressed by Norfolk County Council.*
- *Protection of the function of strategic transport routes (corridors of movement).*
- *Continued investigation of and support for rail freight opportunities.*
- *Supporting the growth and regional significance of Norwich Airport for both leisure and business travel to destinations across the UK and beyond.”*

1.13. It is disputed whether promoting (assuming a meaning of supporting and encouraging) the work of others as this section of the transport policy will assist the achievement of the principles outlined in the heading, particularly when the majority will have an adverse climate implication.

1.14. The alternative aspect of promoting is that of bringing forward schemes in terms of planning and funding. In this respect National Highways and Norfolk County Council are clearly the promoters and the partnership cannot therefore be promoting any of these schemes against this meaning.

- 1.15. **A further change of this ambiguous wording is recommended to remove the ambiguity.**
- 1.16. This matters because the GNLP is being used by Norfolk County Council to progress the NWL. Papers for the Cabinet meeting on 4 December 2023 relies on this changed wording of MM10 as suggesting the NWL is included in the emerging GNLP, thus justifying progressing the NWL to planning and authority for Compulsory Purchase Orders and Side Road Orders applications
- 1.17. The wording of MM10 is repeated verbatim in the papers.
- 1.18. Validation of planning applications must be in accordance with the local plan unless material considerations apply, the procedures setting out how these considerations should be approached are defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 setting out how these<sup>4</sup>.
- 1.19. If the intention of the modification is to now promote this entire regional connectivity group as integral to the Local Plan, it is a complete turnaround from the written response to the Inspectors' questions, therefore necessitating a review of the implications of this reversal.
- 1.20. All new road infrastructure projects included as part of the Plan must be considered within the Habitats Regulations Assessment (HRA) and the Sustainability Appraisal (SA), both individually and collectively with the other development strategies.
- 1.21. **They are not.**
- 1.22. The Policy 4 Strategic Infrastructure Topic Paper paragraph 44<sup>5</sup> seems to suggest that a planning application for the NWL will have to be assessed against the policies in the GNLP if the GNLP is adopted.
- 1.23. Clarification is required on how this would work in practice and whether NCC is aware of this additional material consideration?

#### Other Matters

- 2.1 The phraseology of "and to:" at end of the introduction paragraph for Other Strategic Infrastructure appears to be missing an action link to the grouped list under.

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<sup>4</sup> Article 11

<sup>5</sup> See para 1.3 above