



National Highways
Priory Court
Priory Business Park
Stannard Way
Bedford
MK44 3WG
28 September 2026

Dear Sir/Madam

Greater Norwich Local Plan 2045 – National Highways Regulation 20 Scoping Consultation

Thank you for consulting National Highways on the preparation of the Greater Norwich Local Plan 2045 at the Regulation 20 Scoping Consultation stage. We welcome the opportunity to engage early in the plan-making process and look forward to continuing to work collaboratively with the Greater Norwich authorities and Norfolk County Council as the plan progresses.

National Highways is responsible for the operation, maintenance and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of State. Within the Greater Norwich area, our interests principally relate to the A47 and A11 trunk roads together with their associated junctions and connections to the wider highway network.

At this stage, we recognise that the consultation is intended to inform the scope, content and overall direction of the emerging Local Plan rather than seek views on specific site allocations. Our comments are therefore strategic in nature and intended to assist in the development of an evidence-led growth strategy.

Supporting Sustainable Growth

National Highways supports the objective of preparing a Local Plan that delivers sustainable economic growth, housing delivery and infrastructure investment across Greater Norwich. The SRN plays a critical role in connecting communities, supporting economic activity and facilitating regional and national movement of people and goods.

A well-planned strategy for growth can support both the delivery of development and the continued safe and efficient operation of the SRN. We therefore support an integrated approach to planning which aligns future development with the capacity and function of transport infrastructure and promotes opportunities for sustainable travel alongside investment in highway infrastructure where appropriate.

Vision-Led Planning

We support the application of a vision-led approach to plan making. Such an approach seeks to establish a clear transport vision that reflects the wider ambitions for places and communities and uses this vision to guide planning, assessment and decision-making. The emerging Local Plan provides an opportunity to align growth, infrastructure and transport planning in a manner that supports sustainable movement of people and goods whilst maintaining the safe and efficient operation of the SRN.

We would welcome continued engagement with the Greater Norwich authorities and Norfolk County Council to better understand the emerging vision for the area and how future transport strategies and evidence can support its delivery.

The Importance of the Strategic Road Network

The emerging Local Plan should recognise the strategic role of the A47 and A11 corridors in supporting Greater Norwich's economy and connectivity. These routes perform functions that extend beyond the plan area, serving regional and national movements and providing important links to employment areas, ports, airports, logistics facilities and neighbouring authorities.

The Local Plan should therefore seek to:

- Protect the safety and operational performance of the SRN.
- Consider the cumulative impacts of growth on strategic corridors and junctions.
- Support development patterns that minimise the need for additional strategic road trips where reasonable alternatives exist.
- Promote transport solutions that contribute towards sustainable travel objectives whilst maintaining network resilience.
- Ensure that infrastructure requirements arising from growth are identified at an early stage.

Freight and Logistics

We note that the consultation material places relatively limited emphasis on freight and logistics movements despite the important role that the A47 and A11 corridors perform in supporting the movement of goods across Norfolk and the wider region. The SRN provides a key function in connecting businesses, industrial areas, logistics facilities, ports and markets, and therefore plays an important role in supporting economic growth and competitiveness. This will be particularly important where future employment growth, logistics activity or strategic employment allocations are proposed.

As the evidence base develops, we would welcome consideration of freight demand, logistics activity and the cumulative impacts of both housing and employment growth on strategic transport corridors. Future transport evidence should seek to understand how freight movements may change over the plan period and whether any infrastructure interventions may be required to maintain the safe and efficient operation of the SRN.

Growth Strategy and Settlement Hierarchy

The consultation invites views on the future growth strategy and settlement hierarchy for Greater Norwich. The relationship between the distribution of growth and the transport network

will be an important consideration in assessing the sustainability and deliverability of future options.

At this stage, it would be appropriate for the plan-making process to consider the transport implications of alternative growth scenarios and how these align with the wider vision for the area. The scale and location of future development may have differing impacts on strategic transport corridors and infrastructure requirements.

We note that the authorities are undertaking bespoke work to consider the potential for one or more new settlements as part of the Greater Norwich Local Plan 2045. Given the scale of development being contemplated and the potentially significant transport implications arising from such proposals, we consider it important that transport infrastructure requirements are assessed as a fundamental component of the site selection and appraisal process. Given the scale of development under consideration, National Highways considers it essential that the transport implications of any new settlement option are considered alongside the assessment of reasonable alternatives. Early consideration should be given to strategic accessibility, transport connectivity, impacts on the SRN, infrastructure delivery requirements and the phasing of growth. We would welcome ongoing engagement as this work progresses to ensure transport implications are fully understood at an early stage.

As the plan evolves, National Highways would welcome engagement regarding:

- The scale and distribution of future housing and employment growth.
- Potential concentrations of development that may influence demand on the A47 and A11 corridors.
- Strategic infrastructure interventions that may be required to support planned growth.
- Opportunities to align land-use planning with wider transport objectives.

Evidence Base and Future Work

We welcome the commitment to preparing a robust evidence base to support the emerging Local Plan. Transport evidence will be a critical component of the plan-making process and should provide a robust assessment of the potential impacts of growth upon the Strategic Road Network, consistent with the principles set out within Department for Transport Circular 01/2022.

Given the early stage of plan preparation and the fact that specific site allocations are not currently under consultation, National Highways is not presently in a position to reach conclusions regarding the detailed impacts of future development proposals on the SRN. A proportionate and evidence-led assessment process will therefore be required as the plan progresses.

We would expect future stages of plan preparation to be informed by:

- Appropriate strategic transport modelling.
- Assessment of cumulative impacts on the SRN.
- Consideration of planned and committed infrastructure improvements.
- Assessment of mitigation requirements where significant impacts are identified.
- Ongoing engagement between the plan-making authorities, Norfolk County Council and National Highways.

National Highways welcomes the proposed commissioning of Strategic Transport Modelling and Trunk Road Junction Modelling identified within the Infrastructure Topic Paper. Given the importance of this evidence to the development of the preferred growth strategy, the scope, assumptions, forecast years, development scenarios and assessment methodologies should be discussed and agreed with National Highways at an early stage. The evidence should assess reasonable alternative growth options, cumulative impacts arising from planned development, and the interaction between growth and committed transport infrastructure. Early agreement regarding modelling requirements will help ensure that the evidence base remains proportionate, robust and capable of supporting future plan-making decisions whilst reducing the potential for delays later in the plan-making process.

We would also welcome discussions regarding the appropriate timing and scope of a future Statement of Common Ground to support effective joint working throughout the plan-making process.

Infrastructure Planning and Delivery

National Highways encourages the Local Plan to maintain a clear relationship between planned growth and infrastructure delivery. Where future evidence identifies impacts on the SRN arising from proposed growth, it will be important that suitable mitigation measures are identified and that there is a realistic understanding of delivery mechanisms, funding opportunities and implementation timescales.

Where future evidence identifies the need for improvements to the SRN, the Local Plan should identify an appropriate delivery mechanism and realistic funding approach. There should be no presumption that infrastructure requirements arising from development will be funded through future Road Investment Strategy programmes. Infrastructure requirements should therefore be considered proactively as part of the plan-making process.

The plan should seek to ensure that infrastructure requirements are considered at an early stage so that transport constraints do not unnecessarily delay development whilst also ensuring that the safe and effective operation of the SRN is maintained.

National Highways considers that any infrastructure identified as necessary to mitigate impacts on the SRN should be supported by a clear delivery strategy. This should identify the responsible delivery bodies, potential funding sources, dependencies, indicative timescales and any links to development phasing. Demonstrating infrastructure deliverability at an early stage will be important in supporting a sound and effective Local Plan.

Other Strategic Considerations

National Highways notes that future site allocations may also raise considerations relating to matters such as noise, drainage and the safeguarding of highway infrastructure, which can be addressed as the evidence base develops.

Continued Engagement

National Highways welcomes the opportunity for continued engagement throughout the preparation of the Greater Norwich Local Plan 2045. We recognise that further evidence, including site assessment work and transport analysis, will emerge as the plan progresses and we look forward to reviewing future consultation documents, growth options, policy proposals and site allocations as they become available.

At this stage, National Highways supports the preparation of an evidence-led Local Plan that positively plans for growth whilst recognising the important role of the Strategic Road Network

in supporting the long-term economic success of Greater Norwich. We remain committed to working collaboratively with the authorities, stakeholders and promoters to ensure that transport considerations are appropriately integrated into the plan-making process and that future growth can be accommodated in a safe, sustainable and deliverable manner.

Yours sincerely,



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