

Mr P Courtier
Head of Development Management
Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich, NR7 0DU.

10th February 2009

Dear Mr Courtier,

Application No. 20081773. Outline Planning permission for Business Park and Postwick Interchange.

CPRE Norfolk objects both to the process which these developments are following, and what is being proposed. We deal first with the process, then with the specific planning proposals for the Postwick Hub and Broadland Gate Business Park.

1. The Planning Process.

The Postwick Hub is intended and designed as the first stage for a proposed Northern Distributor Road (NDR); the County Council and Broadland District have started with the ambition of building an NDR; to justify the NDR it has been firmly linked to a new and very large settlement for the north east sector of Norwich at Rackheath; Rackheath has recently been proposed as an eco town.

This chain started to emerge at the E-i-P of the East of England Plan. The whole approach to the Core Strategy of the Greater Norwich Development Partnership (GNDP) has since been skewed, with a fixed element of an NDR with a large settlement in the north east. There is a failure so far to consider and consult on alternative and holistic options which could lead to a more sustainable way of developing the future growth of Norwich. In particular there needs to be a better approach to the ways of linking existing and new major housing growth with the strategic employment sites, and the role of public transport within this.

This type of debate is being replaced by a series of piecemeal decisions which negate the need for getting it 'right' for this and succeeding generations.

This approach continues by pursuing the Postwick Hub with one Government Department (CLG), and the rest of the NDR through the normal route of the DfT, and the links to the recent proposal to make the Rackheath settlement an eco town. The choice of Rackheath as an eco town is clearly a great improvement upon Coltishall, which was totally unacceptable. But the placing of so much housing growth at the 'wrong end' of the north east and south west diagonal is by no means the best situation. The SW is where the larger part of job growth is planned, and most certainly the high skill technical jobs. It is ironic that an eco town development is seen by the GNDR as being dependent on a major road building programme.

The pursuit of a high level of roads infrastructure (NDR cost £130m) in the north east and in other parts of the Greater Norwich Area is not only environmentally damaging, not least on climate change grounds, but is counter productive in achieving more worthwhile aims, including the provision of affordable housing, through competing with Government and developer contribution finance.

2. The Postwick Hub.

The Postwick Hub is clearly planned to be the first stage of the NDR, which relates to our first point of objection. However, even in the NDR context, the Hub is over-designed and badly designed to serve that purpose. The NDR would feed into an existing roundabout, not designated for improvement in the plan, and would be inadequate in dealing with the traffic levels generated. This roundabout feeds into the proposed Hub, which requires a bridge over the A47 and a new and large roundabout. The bridge component may cost £10m out of the £21m total, taking the NDR to £150.

The Hub is also inefficient in serving the proposed Broadland Gate Business Park, with a circuitous route from the Hub to the entrance to the Park. It is 'not fit for purpose' and in the absence of an NDR would become an expensive 'white elephant'.

3. The Broadland Gate Business Park.

The problem with expanding the Broadland Business Park is the need to avoid traffic tailback at peak commuting hours, from on and off the existing junction with the A47. A much simpler, more effective and less expensive design than the Postwick Hub is required, and surely achievable.

However the whole concept and contents of the Broadland Gate Business Park proposal should be re-visited. This is part of a generic issue, starting with the current review of the RSS. The RSS review shows all the signs of being treated as a continuation of 'business as usual'. There is a case for a serious debate as to whether the recession is just a temporary five year blip (in itself not insignificant in a long term strategic plan), or whether it marks a watershed that requires making changes in assumptions in economic and social matters, and some major adjustments.

The Broadland Gate concept is a splendid example of what might be going seriously out-of-fashion, and a diversion from what we need to put in place for the future. The Commercial Zone at 42,000sqm 'will make up by far the largest element of the overall development' and provide 'flexible business space designed to meet the needs

of the modern employer'. We ask what types of business, and what will be the needs of the 'modern' employer over the years to 2026?

The RTP study on economic growth in Norfolk, commissioned to sit alongside the RSS, rightly pointed to the need for a re-structuring of the Norfolk economy, with a much greater proportion of high level skilled jobs. This was seen as more important than just the simple number of jobs. What will we have at Broadland Gate, more high quality jobs, or will we see, whether by intention or not, a very large warehousing and distribution centre based on road haulage?

The Business Village at 4,500sqm is positioned to access amenities which will include shops, financial and professional services, restaurants/pubs and cafes. The Hotel and Leisure Zone, with hotel and spa, etc, covers an area of 9,100sqm. These are all jobs in the finance, retail and service industry, upon which Norwich City is overly reliant, and more vulnerable during a recession. These jobs do not help the re-balancing of the Norfolk economy, they compete with 'the offer' in the City Centre, and they utilise greenfield land to do it.

The car showroom covers an area of 1,200sqm, and 'it is allied to the existing car showroom on the opposite side of Broadland Way, this aspect of the proposal will create a gateway to development'. The car showroom is relatively small in space requirements, but has an iconic status and message. Namely, we are to continue and expand a large dependency on the car, and with it road transport in general.

In summary then CPRE Norfolk objects to:

- The planning process by which these and other proposals are being pursued, and pre-empting the Core Strategy for the Greater Norwich Area, and a future Examination-in-Public.
- The development of a Postwick Hub interchange which is aimed as being the first stage of the NDR; and at the same time does not meet well either NDR needs, or the much simpler requirements of the Broadland Gate proposal, which is the subject of this application.
- The concept of the purpose of the Broadland Gate proposal as regards the types of development and jobs which it will produce; the competition with Norwich City Centre that will arise; the use of greenfield land in this process; the indications that it will be overly dependent on road haulage; and that it will promote an increase in car travel through the location and accessing of the commercial, service and leisure facilities.

Yours sincerely,

Ian Shepherd
Policy Co-ordinator