

Mrs Dawn Stokes
Development and Infrastructure
Planning Casework Team
Government Office East of England
Eastbrook
Shaftesbury Road
Cambridge, CB2 2DF.

3rd December 2009

Dear Mrs Stokes,

Request to Secretary of State for an Article 14 Direction in respect of Broadland District Council Planning Application PLA 20081773 in two parts: a) Outline Planning Application for a Business Park (Broadland Gate), and b) Full Planning Application at the Junction Improvements at the A47 Trunk Road Postwick Interchange (Postwick Hub).

Broadland District Council is seeking to determine the above application at a planning committee meeting on the 9th December. CPRE Norfolk requests that the Secretary of State consider the imposition of an Article 14 Direction which would prevent a decision being taken until the Greater Norwich Development Partnership has been able to adopt the Joint Core Strategy.

The basis for our request is contained in our objection of the 9th February 2009 (enclosed), where we deal with the application in three parts: The Planning Process; the Postwick Hub; and the Broadland Gate Business Park. The concerns expressed then on the planning process have grown rather than diminished in the interim period. We move from the wider strategies in which the application is set to the specifics of the application as follows:

1. The East of England Plan adopted in May 2008 went into an immediate review, as you will be aware. The first consultation ending on the 24th November set out for comment four scenarios for housing and economic growth over the period 2011-2031. The lowest scenario for growth was a continuation of RSS. CPRE East of England and also CPRE Norfolk in their responses to EERA, argued that a scenario with growth lower than RSS should have also been considered; so did Norfolk County Council, and we think likely other Local Authorities.

2. The Greater Norwich Development Partnership (GNDP) Joint Core Strategy submission document is out on consultation until the 14th December (and in our view in extending to 2026, pre-empts the RSS Review). The Norwich Northern Distributor Road (NDR) forms a fundamental part of the overall spatial strategy. It can be argued that it was unwise of the GNDP to embark on the submission JCS knowing that the DfT would not be able to take a decision on programme entry on the NDR until around mid-December (due to the County Council not producing some of the supporting evidence required for the MSBC over a prolonged period of time).

3. The 'Transport for Norwich' consultation, which closed on the 27th November, speaks of an 'agreed' NDR. A timeline in the consultation booklet shows a heavy roads infrastructure programme preceding by some years modest public transport proposals, by which time car dependency will have become embedded. Costs are not shown, but can be found at appendix 8 of the GNDP consultation, and are summarised as part of our response to Transport for Norwich (also enclosed).

4. The Postwick Hub is specifically designed on the assumption that it is the first stage of an NDR, and that the NDR will be constructed in the manner and along the length of route proposed. If this proposal is not accepted, then the NDR would be over-engineered, over costly, and may well not be optimal for existing and future development in the north east sector of Norwich.

5. The Broadland Gate Business Park pre-empts the progress of the GNDP Joint Core Strategy. This is by no means a formality, as the application if approved will see a major competitor to the function of Norwich City Centre, as being a large out-of-town complex on Greenfield land, designed for the primary access being by car.

In summary, our case is that within the Norwich Policy Area of the GNDP Core Strategy, the sequential process to an orderly and efficient route to planning decisions is largely being inverted. In particular, the Broadland Gate and Postwick Hub planning application should not be determined in a way that would pre-empt, and potentially confound, the strategic framework which will be decided upon at a later date.

Although time is short I hope you will be able to give consideration to the points we make. In that context, we e-mail to you this letter today; and also send by post a paper copy of this, and the two enclosures.

Yours sincerely,

Ian Shepherd
Policy Co-ordinator
CPRE Norfolk

Cc
Mary Marston, GO-East
Steve Berry, DfT