
The Norfolk County Council (Norwich Northern Distributor Road (A1067 to A47(T))) Order

Applicant's comment on Responses to LIR

Planning Act 2008

Infrastructure Planning

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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Introduction

This document contains Norfolk County Council's comment on a selected number of responses to the Local Impact Report.

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Applicant's comment on Responses to LIR

1.1. Campaign for Better Transport – Dated July 2014

Response to LIR Report

It is also not clear, when modelling a do-minimum scenario, exactly what is being modelled. Does this mean no new roads other than those directly serving new developments or does it model something more strategic that might serve some of the function of the NNDR but with far less impact? Without this being made explicitly clear, it is impossible to properly assess the NNDR and the need for it and whether there are better options which cost less and have far less impact on the environment and other road users. CfBT would like to request that the promoters of the new road are required to clarify their evidence on these points in a way that is transparent and easy to understand.

Applicant's comment

- 1.1.1. The Do Minimum scenario represents the forecast network and land use development conditions that would likely be in place either with or without the major transport scheme intervention (in this case the NDR). The assumptions are fully and clearly set out in the Traffic Forecasting Report (Document Ref. 5.6). The approach set out in section 4.3 explains that future proposals are allocated a degree of uncertainty. The highway network proposals and their categorisation of uncertainty are shown in Table 4.2 and for public transport measures in Table 4.3. The land use proposals and their uncertainties are dealt with in section 5.3 and provided in Appendix C for housing and Appendix E for employment.

Response to LIR Report

CfBT would like to see details of the actual noise levels that non-motorised users would be subjected to on the many new cycleways, footpaths and bridleways proposed to be built as part of this project. Many of them have been placed very close to the road which is where the greatest noise will be. While the Environmental Statement depicts the change in noise levels that are predicted to occur as a result of the scheme, it does not provide any contours above a 10dB change.

Applicant's comment

- 1.1.2. Contours plans in Volume 2 Chapter 11 of Document Reference 6.2 were produced to reflect the presentation of noise level changes in the Assessment Summary Tables (Table 11.19, Table 11.20 and Table 11.21 of Vol. 1 Chapter 11 Environmental Statement Vol.1 (Document Reference 6.1). CIBT are correct in that their comment to the effect that there will be areas close to the scheme where noise changes are greater than 10dB, however these can be seen as solid lines within the coloured noise bands of the respective contour plans progressing in increments of 1dB.

Response to LIR Report

However, the NNDR LIR also highlights that the Inner Ring Road will be significantly more trafficked, more so with the construction of the NNDR than without it. More traffic will also be generated on many of the radial routes while some areas inside the NNDR will see traffic levels fall. This information is illustrated by a graphic representation overlaid on a map showing the percentage change in traffic flow in 2036. However, it does not state whether it is comparing traffic in 2032 with today's traffic or a no NNDR scenario.

Applicant's comment

- 1.1.3. The text in the LIR in sections 6.5 to 6.9 compares traffic changes with existing levels (2012) and with forecast Do Minimum levels and it makes the distinction between these clear. The paragraph preceding section 6.5 makes it clear that 2032 figures have been examined for the forecast scenarios.

1.2. CPRE Norfolk – Dated 21 July 2014

Response to LIR Report

Norfolk County Council essentially represents the interests of the consortium of councils which make up the Greater Norwich Development Partnership. We have a situation where the LAs in their planning role are effectively also the applicant. Norfolk County Council and the other Councils are talking amongst themselves, with no separation of roles between writing and determining an application. In this type of situation, the LIR in fact becomes a 'sell' for the granting of the application, which is the case here. They are not seeking out any negative points, and inevitably leading to a case for a balance entirely in favour of their application.

Applicant's comment

- 1.2.1. It is common for local authorities to be involved with projects both as developer and as local planning authority. In this type of situation authorities ensure that decisions on "developer" issues are not made by the same people who are making decisions on the "local planning authority" issues. This is quite lawful; were it to be otherwise the activities that councils could engage in would be severely limited. Were it be otherwise, how could, for example, the "education" part of the Council decide to build a school when the planning application would be determined by another part of the authority.
- 1.2.2. The Council treats the separation of powers seriously. For example, at the DCO hearing on 24 July the local planning authority part of the Council was represented by a solicitor from Suffolk County Council, whilst the developer part of the council was jointly represented by an in house and external solicitor.

1.3. Norfolk and Norwich Transport Action Group – Dated July 2014

Response to LIR Report

NNTAG does not agree that implementation of sustainable transport measures is dependent on the NDR. We recommend that the NCC audits all Norwich Radial roads served by busses to determine the potential scope for bus priority measures to encourage modal shift.

Applicant's comment

- 1.3.1. The implementation of BRT as an upgrade to previously improved bus routes, with dedicated road space at congested points, will require a more radical approach to bus priority including the reallocation to buses of some existing road space currently used for general traffic.
- 1.3.2. Assessment of transport corridors in Norwich against a clearly defined set of objectives for a high quality rapid transit service identified that up to six corridors could be considered for upgrading to a BRT service.
- A1074 Dereham Road
 - A11 Newmarket Road
 - A1042/A1242 Yarmouth Road
 - C283 Salhouse Road
 - A140 Cromer Road
 - A1067 Fareham Road
- 1.3.3. Feasibility and conceptual design work (Placemaking and landscaping strategy) has been carried out on Dereham Road, Newmarket Road Salhouse Road and. Yarmouth Road. This work gathered information on corridor topography, landscape character, existing green infrastructure, crime and deprivation, proposed development sites, bus journey times and reliability, activity centres, cycle routes, accidents and existing bus stop infrastructure which can be used to further guide more detailed

whole corridor design. As a result of the feasibility and concept work a significant level of infrastructure investment has been made, in particular to the Dereham Road and Newmarket Road corridor. Further feasibility for the remaining corridors will be progressed in the near future.

Response to LIR Report

The LIR acknowledges the adverse impact on walking and cycling on major radial routes out of the city. The Norwich Southern Bypass is a good example of how a road creates a major barrier to walking and cycling in the countryside close to the city. We consider that conditions across the network would deteriorate generally overtime with the NDR and rather than pretend that a new road would encourage modal shift to foot and cycle is to reduce traffic growth.

Applicant's comment

- 1.3.4. The LIR also notes that cycling and walking are particularly important modes of transport within the more urban area, where more facilities and services are available in the close proximity of people's homes and consequently, the effect of the NDR across the main urban area is largely beneficial. It goes on to say that beyond the NDR additional footpaths, cycle ways and bridleways will improve general facilities, whilst the expanding communities should be able to offer a wider range of services locally, thus improving the potential for local journeys on foot and by bike.
- 1.3.5. Approximately 25 kilometres of new links suitable for use by pedestrians, cyclists and equestrians where permitted would be provided alongside, over, and connecting with, in places, the NDR route, together with improved surfacing provided on some existing rights of way. The scheme includes seven grade separated crossings of the NDR and two grade separated crossings of the A47. Various NMU at grade crossings of NDR and side roads are also proposed. The NMU proposals are shown on the General Arrangement Plans (Document Ref. 2.6).

- 1.3.6. A key element in this NMU strategy was the Norwich Cycle Network. The Norwich Cycle Network was launched in 2012, with the aim of encouraging more cycling. It features 7 main routes called pedalways linking with a number of local neighbourhood routes. These provide a network of cycle routes connecting the main urban area of Norwich. The Norwich Cycle Network was developed as part of the Norwich Area Transportation Strategy through extensive consultations with other local authorities and cycling groups.