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

# Applicant's comment on Written Representations by Hockering Parish Council

Planning Act 2008

Infrastructure Planning

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

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## Introduction

This document provides the Applicant's responses in respect of selected issues raised by Hockering Parish Council in their Written Representation to the Examining Authority dated 26 June 2014. The Written Representation covers many issues. Some of these have been addressed elsewhere (including the Applicant's comments on Relevant Representations, and the Applicant's comments on other Written Representations). Therefore a selection of issues raised have been extracted and comments provided.

The points have been responded to where possible in the order they were raised. Each issue, or in some cases a summary of it, is shown in italics.

# Applicant's comment on Written Representations

Representation

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| *1.1.* | *The increase in traffic through the area is predicted to increase by 150% after the NDR is built. The upgraded HGV route is unsuitable to take this increase, and the impact on the local roads and villages will be massive. Safety, especially at junctions, will be seriously compromised. We cannot accept the almost 'throw-away' statement in para 9.3.7 of document 5.5 that "the HGV improvements also being a solution to any increase in traffic on these two routes due to the NDR ". Even with the 'traffic management' measures and signage that para 9.3.7 mentions, the increased traffic will not all use that route, as it is by no means an attractive road for traffic, being under 6m wide in places, with right-angle bends, and poor access onto and off the A47,* |

Applicant's comment

1.1.1. Norfolk County Council (NCC) Cabinet resolved on 19 September 2005, to have no NDR link between the A1067 and A47 and to also pursue a separate scheme to address existing local issues between Hockering and Lenwade. On the 9 November 2009 NCC's Cabinet agreed to undertake works to progress a route improvement scheme that also included the introduction of HGV restrictions in Hockering, reclassification of the route to a B road and in the longer term to consider improvements to the junctions with the A47 and A1067 and the northern section of the route when funding permits.

1.1.2. The improved route between the A1067 and the A47 addresses previous HGV problems by diverting HGV's away from the villages of Weston Longville and Hockering. The route improvement works have been completed, with reclassification of the road to a B road and an accompanying HGV ban to be implemented in Hockering in 2014.

1.1.3. Marl Hill Road leads onto Church Street, which has a 6' 6'' width restriction (restriction runs from Morton Lane/Ringland Lane through Weston Longville to Rectory Road) and a 7.5T Gross Vehicle Weight restriction (restriction runs from Morton Lane/Ringland Lane through Weston Longville to just north of Wood Lane/Walnut Tree Lane). This means HGVs should already use Weston Hall Road. The aim is to deter other vehicles and light goods vehicles from using Marl Hill Road and traffic will be signed to use the new B road from the A1067.

1.1.4. NCC has committed to monitor the A1067/Weston Hall Road (C173) junction following reclassification of the improved route to a B road. Analysis of the existing Weston Hall Road junction shows that it would appear to operate acceptably in 2017 but with the increased traffic has identified that the capacity would be exceeded in the 2032 PM peak. A roundabout solution at this location would have an impact on the Wensum Special Area of Conservation. Traffic signal control to the junction was assessed and this showed that the junction would operate acceptably well. A scheme to introduce traffic signals at the junction at Weston Hall Road junction could be introduced within the limits of the existing highway if future monitoring suggests that it was necessary.

1.1.5. With work being progressed to scope a feasibility study to investigate a new link between the A1067 and A47 and possible future dualling of the A47, NCC has also committed to monitor the A47/Wood Lane (C167) junction following reclassification of the improved route to a B road.

1.1.6. An existing signing strategy is in place that assigns southbound HGV traffic to the route via Weston Hall Road (C173) and then via either Wood Lane for traffic to the A47(E) or Stone Road for traffic to the A47(W). North bound HGV traffic is currently directed through Hockering.

1.1.7. With completion of the improved route and reclassification to a B road north bound traffic will be signed via Wood Lane for traffic from either

A47 (E) or A47 (W). South bound HGV traffic would still be signed via Weston Hall Road (C173) and via either Wood Lane for traffic to the A47 (E) or Stone Road for traffic to the A47 (W). If found necessary, modifications to the signing strategy plan could be considered that would sign other traffic via Stone Road for traffic to A47 (W).

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| *1.2.* | *Table 9.1 of Document 5.5, lists the parallel routes C167 Weston Longville and C173 Lenwade to Hockering and gives traffic flows for 2012 and for 2017 if the NDR is built. Their prediction is that traffic through Weston Longville will increase from 1400 to 3300 when the NDR is built. It is difficult to believe that this increase in flow rate could ever be accommodated by the narrow road through the village. Presumably this large increase is because of extra traffic using the NDR to travel East – West, which currently uses the A47 entirely. The traffic model clearly does not go in to this level of detail, and so has produced figures which are simply not believable by those with accurate local knowledge.* |

Applicant's comment

1.2.1. It is known that the C167 through Weston Longville is already used as a route between A1067 and A47(T) despite the narrow road through the village. With the implementation of NDR it is forecast that there will be an increase in traffic between the A1067 and A47(W) and the model shows that much of this increase occurs via the C167 as this is the shortest and quickest route, notwithstanding the problems that may occur with higher volumes of traffic in the village. It is accepted that this increase would be undesirable, but it is expected that this will be alleviated by the improvement to the C173 route and traffic management measures proposed for this corridor which are described below and that would supplement the existing width restriction on the C167 through Weston Longville.

1.2.2. An existing signing strategy is in place that assigns southbound HGV traffic to the route via Weston Hall Road (C173) and via either Wood Lane for traffic to/from A47(E) or Stone Road for traffic to A47(W). North bound HGV traffic is assign through Hockering.

1.2.3. With completion of the improved route and reclassification to a B road north bound traffic will be signed via Wood Lane for traffic from either A47(T) East or A47(T) West. South bound HGV traffic would still be signed via Weston Hall Road (C173) and via either Wood Lane for traffic to/from A47(E) or Stone Road for traffic to A47(W). If found necessary, modifications to the signing strategy plan could be considered that would sign through traffic via Stone Road to A47(W).

Representation

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| 1.3. | *Accepting the predicted figures for the two routes combined together shows an increase from 4400 vehicles to 6800 (154%) on building the NDR. This surely reflects the displacement of traffic which currently uses the A47. The Application does not make this point.* |

Applicant's comment

1.3.1. The Traffic Forecasting Report (Document Ref. 5.6) identifies traffic impacts in section 7.1. Paragraph 7.1.5 describes the impact on strategic movements to the west of Norwich and identifies an increase in forecast traffic on Fakenham Road and a reduction on the A47 west of Dereham Road.

Representation

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| 1.4. | *The traffic forecasting report contains much detail of computer models used, and predictions of minutes saved on many routes, but there appear to be no verbal descriptions. There appear to be no source-and-destination analyses, or even junction-turning counts, from which such deductions can be made. Without that, one cannot have any conceptual framework from which to gain faith in the predictions. One is completely reliant on what "the computer says". This is totally unsatisfactory when £150M of public money is in question. In the case of the A47-A1067 route, the prediction has got the detail wrong. In how many other areas has it made similar errors?* |

Applicant's comment

1.4.1. Section 7 of Traffic Forecasting Report (Document Ref 5.6) contains detailed descriptions of network performance in terms of traffic impact, queues, effect on people, city centre through traffic, highway journey times and journey time on public transport routes. Highway and public transport journey times are reported for particular strategic origins and destinations.

1.4.2. Appendix M of the Highway Model Local Model Validation Report contains sector analysis of the trip distribution (as a check on the effects of the matrix estimation process).

1.4.3. Appendix F of the Transport Assessment (Document Ref 5.5) contains junction turning flows.

1.4.4. The response to ExA first Written Questions 1.4 contains information on traffic predictions of the A47-A1067 corridor. It is not accepted that there is an error in the model here and therefore it is wrong to assume that there are errors in other areas.

Representation

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| 1.5. | *A main stated aim of the NDR is to reduce through-traffic in the city centre. I have found no figures in the Application to show what proportion of the traffic inside the inner ring road is actually through-traffic, rather than with a destination/source inside the ring, so it is not possible to know what effect an NDR would have on these journeys.* |

Applicant's comment

1.5.1. It is not a main stated aim of the NDR to reduce through-traffic in the city centre. Rather, the NDR enables measures that reduce through-traffic in the city centre. In view of this two relevant of objectives of the NDR are to:

- Reduce traffic levels, and thereby relieve congestion, on the existing road network within the urban area and beyond to the north of the city centre
- Increase the opportunities for improving provision for public transport and other sustainable forms of transport and for improving traffic management within the city centre, thereby encouraging modal shift

1.5.2. There are no figures in the application documents that quantify the proportion of through traffic, but there are figures that demonstrate the reductions brought about by the NDR and the city centre measures that the NDR enables. This is set out in section 7.4 of the Traffic Forecasting Report (Document 5.6) which details the impact of the NDR and the city centre measures in combination.

1.5.3. Table 7.5 shows that:

- By 2017 traffic crossing through the city centre within the Inner Ring Road (IRR) will decrease from 2012, due to measures that are currently being constructed including those on Chapelfield North, and will decrease further still with the NDR.

- By 2032 traffic crossing through the city centre within the IRR will increase from 2017 without an NDR, but with the NDR and additional city centre measures decrease to half of the 2012 levels.
- By 2017 and 2032 traffic using the Outer Ring Road (ORR) to get around Norwich will increase compared to 2012 levels, but with the implementation of the NDR will decrease to less than 2012 levels.

Representation

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| 1.6. | *Without information on the source and destination of traffic on the outer ring, it is not possible to determine what effect an alternative route (which is effectively what the NDR is) will have on the traffic there, another claimed benefit of the NDR. Much employment, retail, housing and schools are situated very near to the outer ring. It is difficult to believe that a very large proportion of it has source and /or destination well outside the ring.* |

Applicant's comment

1.6.1. Origin and destination data collected from direct surveys of motorists, and on a comprehensive basis to cover all movements in the Norwich and surrounding area, have been used to derive a traffic model which was used to assess the impact of the NDR.

1.6.2. This traffic model was validated to meet DfT guidance targets and the validation results that support the latest traffic model are set out in the Highway Model - Local Model Validation (Document Ref. 5.9).

1.6.3. This sets out how the latest survey data collected in 2012 has been used to build the traffic model shows that it provides a good representation of traffic behaviour in the study area. The base model is checked by comparing overall modelled flows across strategic cordons (rings) and screen lines. These global checks meet DfT criteria. On this basis it is considered that the base model forms a robust basis from which future year forecasts for the NDR scheme can be developed.

1.6.4. The traffic model developed for Norwich and for the appraisal of NDR is designed so that it is capable of forecasting the traffic impacts of the proposed measures, or alternatives to these, across the city network and surrounding area. To produce the most likely and credible forecasts it is necessary to start with a base model of sufficient accuracy and realistic assumptions about the changes in traffic demand and the behaviour of users. The Department for Transport (DfT) produce best practice guidance that sets standards that should be met in the development of the base model, and provides guidance and data for the realistic estimation of the future. The traffic model development has complied with this guidance and used the data made available by the DfT.

1.6.5. Therefore, all of the required origin and destination data is contained in the traffic model which is fit for the purpose of assessing the impacts of the NDR, including on the Outer Ring Road.

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| 1.7. | *It is inconceivable that the NDR would have any effect on existing regular transport holdups such as A47 from Dereham (roundabouts at Mattishall Road and Easton) A146 from Lowestoft and the A140 through Long Stratton. The popularity of these schemes and the prevalence of massive queues miles outside the city must surely lead to the conclusion that a major way of reducing congestion would be to boost public transport from the outlying villages and towns, not build more roads, which history shows will simply encourage more road trips.* |

Applicant's comment

1.7.1. The application for the NDR scheme makes no claims that it will address congestion and delay experienced at the locations stated above.

1.7.2. The NDR is an essential element of NATS which is a balanced package of measures designed to address existing and future transport problems and issues in the Norwich area. These problems and the development of NATS are set out in Section 3 of the Environmental Statement (Document Ref 6.1).

1.7.3. Public transport initiatives are an essential complement to the NDR and key to the implementation of a sustainable transport policy but, even in combination, they do not constitute an alternative to it. By relieving the radials of traffic, the NDR would help to facilitate the introduction of bus priority measures and an orbital bus service. By freeing the internal road networks of new development areas of the need to cater for extraneous through traffic, better residential environments could be created, which would be more easily penetrated by local bus services and walking and cycling routes.

Representation

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| 1.8. | *Despite the support for public transport, NCC has continued to pursue the NDR, claiming that only when it reduces traffic on the city's roads can it enact improvements in public transport. Rather than following the public's desire, and planning and consulting on better public transport, it has made fairly modest changes to public transport and instead spent much manpower pursuing the NDR.* |

Applicant's comment

1.8.1. A considerable amount of NATS measures including bus improvements have already been implemented across Norwich as a result of the NATS strategy, due to having such a well developed strategy and implementation plan. Significant changes have been made to public transport through the introduction of electronic ticketing for Park and Ride, launch of a Bus Charter for Norwich, an infrastructure upgrade package for all bus stops in Norwich, delivery of new printed travel information throughout the city centre and along key transport corridors, priority measures for late running buses at all signal controlled junctions in Norwich and near completion of a new bus lane. Committed works include the provision of a new public transport route into the city centre via Chapel Field North and removal of general traffic from a congested city centre street where significant delays to public transport are experienced. The strategy has also delivered an adopted cross city cycle network plan, which is receiving significant investment and this, alongside the public transport benefits, is providing further transport benefits and improved travel choice.

Representation

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| 1.9. | *There are numerous ways that NCC can improve public transport, without building the NDR, but they have shown themselves incapable of handling them; just two examples are The Bus Station and the Outer Circle Bus Route. This gives no confidence that NCC currently has the will or ability to improve public transport, if the NDR were built. As finance is always going to be a difficulty, is it inevitable that there will be no money for any publics transport improvements once the NDR has been paid for.* |

Applicant's comment

1.9.1. As set out in 1.8.1 above Norfolk County Council has been successful due to NATS in bidding for central government funding. For example most recently Better Bus Access (BBA) which has seen bus improvements delivered across the Norwich network and specifically on the Dereham Road BRT corridor. NCC has been successful in a £5.5m bid for implementation of the Norwich Pink Pedal way of its cycle network (published in July 2012, and forming part of the NATS Implementation Plan adopted in April 2010, with details shown in the tracker provided in response to Examiners first questions in appendix I).

1.9.2. Norwich bus station is a flagship transport interchange providing modern facilities and high quality travel information. Further improvements are being delivered over the coming months, through the installation of new electronic displays and a tactile map showing information for those with impaired vision. The bus station currently handles 43 different bus services operated by 8 separate transport providers. In a typical weekday, there are around 700 daily departures, which equates to nearly 4500 departures a week. The bus station (which is now operated by one of the main bus operators working with NCC) is a vital part of public transport operations in Norwich, along with other key interchanges at St Stephens Street and Castle Meadow.

1.9.3. In reference to the Outer Circle Bus Route, it is assumed that this relates to the Norwich Orbital bus service introduced in November 2005 using Urban Bus Challenge funding from DfT. The service was expected to run for 3 years but higher than expected running costs and lower than expected passenger figures led to the service running until early-2007. Continued operation of the service would have required continued subsidy of more than £700K per annum at the time the service was running. The orbital bus service did not meet expectations for a number of reasons which include:

- The service was not as frequent as other city services making it a less attractive option despite the fact it offers direct journeys
- There were existing alternate services available for at least parts of the journeys
- Longer journey times existed due to the circular nature of the route
- Lack of take up by business users, despite initial research indicating otherwise
- The coverage by the media was largely negative
- New services do take time to establish and passenger numbers which was very low to start with
- Punctuality of the service following the route change was severely affected by roadworks at the boundary which may have resulted in passengers losing confidence in the service
- The timetable for a circular service was complicated and potential passengers may not have appreciated they could make a journey without the need for changing buses.
- Orbital tickets were not valid on other city services

- There were changes in the commercial bus network between submitting the bid and implementation of the service that undermined parts of the route.

Representation

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| 1.10. | *There are two main rail lines near Norwich, which each split into two further lines, all very much under-used. A rail line to the inner ring road was abandoned decades ago, but the route still exists and could be resurrected. The old railway route to Fakenham, now the Marriot's Way, to the north of the city, could be resurrected as a light rail line, with stops at Hellesdon, Drayton, Thorpe Marriot, Lenwade.* |

Applicant's comment

1.10.1. The consideration given to the potential role of local heavy rail and light rail during the 2002-2005 NATS Review and subsequently is documented in Section 3.8 of Chapter 3 of Volume 1 of the ES (Document Ref. 6.1).

1.10.2. The potential of local heavy rail services to play a role in facilitating local movement needs is limited by the geography of the rail network within the Norwich Policy Area (NPA).

1.10.3. The only rail stations, other than Norwich, within the NPA are:

- Brundall and Brundall Gardens on the Wherry Lines to Great Yarmouth and Lowestoft;
- Salhouse on the Bittern Line to Sheringham; and
- Wymondham on the line to Ely.

1.10.4. Additional rail stations within the NPA to the east of Norwich have been considered as potential NATS interventions and this is documented in the 2005 NATS Options Assessment Report, which makes the following comment:

*"An additional rail station provides an additional travel choice and can contribute to improving accessibility into the city centre and delivering modal shift. Depending on the exact site of the station, this intervention could contribute to economic vitality (Broadland Business Park) or assist growth in the north east sector (Dussindale), although both these areas have good bus links to the city centre. A station at Postwick is likely to provide few benefits for the NATS area that are not provided by the present Park and Ride service, although it would create potential for Park and Rail for travel to Great Yarmouth and Lowestoft."*

1.10.5. Even allowing for the possibility of new stations, a very small percentage of the population of the NPA would have access to a heavy rail service for local travel. A heavy rail option thus could not make a significant contribution to the objectives set for the NDR scheme or represent an alternative to building an NDR.

Representation

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| *1.11.* | *There is no reason why improvements in bus routes and services cannot be introduced without building the NDR. The popularity of the Park and Ride schemes shows this. The way buses operate in the Norfolk area, with each ticket being paid for by cash, and drivers and passengers not understanding the routes, where the stops are, nor knowing the right price, makes loading remarkably slow. In other cities like London and Birmingham, payment by such means as 'Oyster Card' or 'Travel Card, were introduced decades ago with much reduced loading times.* |

Applicant's comment

1.11.1. As discussed in response to 9.1 above a considerable amount of NATS measures including bus improvements have already been implemented across Norwich as a result of the NATS strategy.

1.11.2. Norfolk County Council has received a grant of £2.5 million over three years to deliver the Holdall smartcard® project across Norfolk. Norwich Park and Ride will be the first service the card will be available on, and this has been partly funded by the Better Bus Area project. A Holdall smartcard® is a plastic card that fits in to your wallet or purse. It has a chip which stores ticket information and cash electronically, making it quicker than cash transactions on the bus and storing your season tickets securely. Holdall smartcards® are more durable than paper tickets and speed up boarding times. Boarding times are a particular issue for customers during peak times and we want to help make this quicker.

1.11.3. Holdall smartcards® can provide numerous benefits to passengers and the wider economy through their flexibility and convenience. A greater variety of tickets will be available and boarding times will be reduced with fewer cash transactions. Making public transport more efficient could persuade fewer people to use cars, having an impact on congestion and the environment. We have applied to be part of this

pilot to allow Norfolk residents to be among the first to experience the benefits of these technology advances, and to ensure that transport services meet the needs of local people, businesses and visitors now and in the future.

Representation

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| *1.12. The documentation is unnecessarily-long and confusingly-arranged.* |

Applicant's comment

1.12.1. The documentation has been developed to comply with the statutory processes and is considered to be appropriately detailed given the scale of the Scheme. The Applicant has provided a single search document and guidance to assist those wishing to find specific details within the documentation.