

Joint Core Strategy for Broadland, Norwich and South Norfolk Inspectors' Advertised Changes IC1	Representation number 8018
Norwich Green Party Written Submission Response	

Author

This Norwich Green Party representation is authored by Councillor Andrew Boswell. I make this statement as local politician elected to Norfolk County Council in 2005 to represent residents in the Norwich Nelson division, an area to the West of the City Centre. The Green Party hold 21 council seats [14 City Council, 7 County Council] within the Norwich urban area and are the main opposition group on the City Council.

Endorsement

The submission is endorsed by Councillor Philip Hardy, Leader of the Green Party group on Norfolk County Council, Councillor Claire Stephenson, Leader of the Green Party group on Norwich City Council, and (Norwich) Councillor Adrian Ramsay, Deputy Leader of the Green Party England and Wales.

IC1: Flexibility and Resilience of the JCS in relation to the Northern Distributor Road (RF 117)

1 Overarching comments

1.1 What should happen next?

1 The proposed Changes IC1 are not a satisfactory response to the Inspector's original concerns about the soundness of the NDR in the JCS. These concerns can only be addressed now by the creation of an authentic Plan B that has no dependencies on an NDR and Postwick Hub gyratory. A proposal for the basis of such a Plan B is suggested towards the end of this document.

2 From the beginning of the Inspection process, the Inspector has raised concerns about the soundness of the NDR as 'critical infrastructure' in the GNDP JCS. In the EIP23 notes¹ that accompanied the Exploratory meeting on 12th May 2010, the Inspector noted 'preliminary soundness concerns' and went on to ask questions about the 'role and function' of the proposed road scheme, the 'main aspects of relief' from it, and 'what are the evidence based benefits of the NDR to public transport'.

3 Since this there have been a number of further documents seeking to resolve these concerns including EIP88² and RF92³. However, the Green Party's view is that these matters have not yet been satisfactorily resolved and the soundness of the JCS remains in doubt until they are. It is essential to address strategic matters concerning the NDR within the context of the JCS at this stage; leaving them to a narrower NDR planning inquiry in several years' time will be too late.

4 This submission will set out detailed concerns that

- the justification for the NDR and the associated Postwick Hub is flawed, and has not been properly tested against alternatives.
- the GNDP's notion that the NDR is needed to create road space for the sustainable measures in NATSIP is not supported by the evidence. The evidence points to the opposite conclusion.

¹ <http://www.gndp.org.uk/downloads/EIP-23-Exploratory-Meeting-notes-to-accompany-the-agenda-w.pdf>, section 3.

² EIP88: GNDP response to the Inspectors' requirements arising from the Joint Core Strategy Exploratory Meeting held on 13 May 2010

³ RF92: Statement from NNTAG and GNDP setting out their respective views on Table 4 of EIP88 and the extent of their agreement and disagreement

Norwich Green Party Written Submission Response

- an NDR generates considerable traffic and increased flows on radial roads in NE Norwich from its inception. The principal causation of these changes come is the NATSIP/NDR transport policy itself, not the projected increase of housing in the area.

5 This document provides the Inspector with an evidence based critique of the soundness of the Plan A JCS and proposed “Inspector’s Changes” built around NATSIP/NDR. It also suggests a pragmatic way forward for an authentic Plan B.

6 The proposed Inspector’s Changes leaves the JCS open to further change and review in the near future. We presented here additional concerns about the transport policy within the JCS being fit for purpose over the longer term. We recommend that the best approach for the people and communities of the Norwich area would be to do the work, at this stage, to generate a plan that is not subject to future failure, uncertainty and redesign. Such a plan would be based on the housing growth and transport strategy that has a high level of certainty of success and deliverability, and therefore fewer requirements for contingency planning. This approach would meet the requirements of PPS12, paragraph 4-46 (below), that effective strategies must deal with changing circumstances and look over a long time frame, at least 15 years by designing out contingencies in deliverability at the outset

“Plans should be able to show how they will handle contingencies: it may not always be possible to have maximum certainty about the deliverability of the strategy. In these cases the core strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use”.

7 This is the time to generate an authentic Plan B now because, as the GNDP acknowledge, an existing commitment of 1400 dwellings in Broadland can take place without any changes to the existing Postwick junction⁴. An analysis by Create Consulting for Barton Willmore (RF107⁵) shows that 3,200 dwellings plus committed developments can be brought forward using an alternative design to Postwick junction with no NDR⁶. Considerable existing permissions in Norwich and South Norfolk exist too.

8 These provide a ‘window of opportunity’ in which existing permissions would allow housing development to continue whilst a true JCS Plan B were developed. Such a Plan B JCS is a much more realistic proposal in the current economic situation, it would relieve community distress and uncertainty, and it would not leave the JCS open to a likely redesign and review in just 5 years time.

9 Given the uncertainty that a sound case can be made for the NDR and its funding viability, and that the local community are hostile to it, our view is that this opportunity should be grasped now to ensure that a ‘right from the outset’ plan is developed. Our proposal of starting work now on a genuine Plan B is the only way to ensure this.

10 We request that the Inspector holds a further day’s public hearing to consider such an alternative Plan B as this important matter was not discussed at the hearing on 9 December, and the Inspectors’ concerns from the beginning about the soundness of the NDR in the plan have not been satisfactorily resolved.

⁴ RF97, section 7.

⁵ <http://www.gndp.org.uk/downloads/RF-107-Barton-Willmore-letter-7-Dec-2010-re-GNDP-Plan-B.pdf>

⁶ <http://www.gndp.org.uk/downloads/RF-107-Barton-Willmore-letter-7-Dec-2010-re-GNDP-Plan-B.pdf>, page 7, shows Phase 2 of 3 (of a modified Postwick junction design) delivers 3,200 dwellings.

2 Why the JCS remains flawed with the Proposed “Inspectors’ Changes”**2.1 The Proposed “Inspectors’ Changes” do not comprise a “partial alternative Plan B”**

11 In RF75, the Inspector invited the GNDP to consider what extent “*there could be potential for a Plan B partial alternative to the NDR*”. However, the proposed “Inspector’s Changes” on IC1 do not amount to genuine changes to the JCS in response to this. This is because they comprise **only a re-timing of NDR to 2016/17 with a more explicit scheduling of housing developments that were already planned within the original submitted JCS.**

12 This explicit scheduling solely intends to reinforce the original submitted JCS (ie Plan A), and does not provide any genuine alternatives to the Postwick Hub junction, the Northern Distributor Road and the distribution of housing through the JCS area, particularly the Growth Triangle. They do not form a “partial alternative Plan B” that is recognisable as such to developers, the community and other stakeholders, which is what the GNDP were asked to consider. We further note that they are not ‘Inspector’s Changes’ but rather text provided by the GNDP to the Inspector at his request.

2.2 The GNDP position on the role of NDR in the plan (EIP88 document) is disputed and remains unresolved

13 The justification for Postwick Hub and the NDR is still based in EIP88, the response to the Inspector’s soundness concerns at the Preliminary Hearing, despite the fact that this document is disputed by community and environmental groups, and by some developers. The dispute has not been resolved by RF92. RF92 was requested by the Inspector as a Statement of Common Ground between GNDP and NNTAG, but actually raises more points of disagreement.

14 This author was involved in the discussions between NNTAG and GNDP leading to RF92, and that process raised a number of other issues relating to the validity of the conclusions in EIP88 and inconsistency with other results of NDR modelling.

15 Evidence presented below makes this issue even more pertinent to the soundness of the Plan. The submission shows when a NATSIP with an NDR transport policy is compared against a “DoMinimum” transport policy for the expected growth in the JCS that by 2031:

- From data presented in EIP88, **5%** additional traffic is generated on main radial roads (and excluding NDR traffic) in the Growth Triangle by NATSIP/NDR
- From data presented in NDR Major Scheme Business Case (MSBC), over **45%** additional Peak time traffic is generated on main radial roads and NDR segments in the Growth Triangle
- the idea that the NDR is needed to create the space for the sustainable measures in NATSIP is not supported by analysis of the data in the EIP88 or the MSBC
- particular roads such as Wroxham Road, Salhouse Road and Plumstead Road suffer significant adverse effects with NATSIP/NDR.
- the traffic increases that arise from NATSIP/NDR over having no policy **are transport policy dependent rather than house growth dependent**. This is not a tautological statement but an empirical one: it arises from the same congestion and traffic increase patterns being observed in the Growth Triangle at 2016 (with only limited new housing) and at 2031 (with full Growth Triangle). Therefore the amount of housing is not the key determining factor.

2.3 No alternatives have been tested against the singular NDR-centric model and Growth Triangle conceptual model

16 There was considerable discussion at the Inspection that alternative options, both for the overall growth models and for the transport policy, have not been properly tested as the JCS evolved. Crucially, all three options given to the public in the Regulation 25 public consultation of March to June 2009 were based on an NDR-centric model for transport and the growth triangle model for housing development. As has been emphasised, again and again during the Examination, stakeholders and people in the Norwich area were denied any opportunity to evaluate alternatives to this singular conceptual model of transport strategy and growth distribution.

17 PPS12, section 4.38, is clear on the advantages of evaluate alternatives:

The ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy.

18 It is clear from the Examination that there is little confidence in the soundness of the JCS for many community groups and developers: in large part, this lack of confidence results from the plan being developed solely around the Growth Triangle/NDR-centric model from the outset.

19 It is not possible to determine if the Plan is the most appropriate strategy when considered against the reasonable alternatives, as the alternatives have never been developed, nor presented for scrutiny. However, this submission shows that the only safe conclusion with the data currently available is that a transport policy based on no transport intervention (“DoMinimum”) will lead to considerable less congestion, traffic increases than the policy based on NATSIP/NDR as proposed in the JCS.

2.4 The JCS remains a high carbon growth plan with the proposed “Inspectors’ Changes”

20 The proposed “Inspectors’ Changes” to Policy 10 and Policy 20 remain unacceptable because they freeze the development of Norwich around a high carbon growth plan. The Green Party submissions to the EiP (HS18⁷) included these points on the long term environmental sustainability of the JCS:

- The JCS omits a genuine low carbon transport policy and plan. This point was discussed in detail at the Examination with the key points being made:
 - the JCS does not fit the national policy framework on Climate Change, as per the Climate Change Act 2008, the UK Committee on Climate Change (UKCCC), and the interim and 2050 carbon reduction targets set by the Act and the UKCCC.
 - carbon accounting, particularly in the transport sector, has been designed out of the GNDP JCS
 - carbon emission reduction has not been properly address by the JCS Sustainability Appraisal (SA) and the SA is illegitimate in the context of the UK Climate Change Act 2008

21 The proposed NDR, in being modelled to generate 25000 additional tonnes of CO2 emissions annually, is also not consistent with recently published national “Creating Growth, Cutting Carbon” transport policy which is to cut carbon emissions as the same time as promote

⁷<http://www.gndp.org.uk/downloads/Matter-1-35-and-8-8018-Green-Party.pdf> and <http://www.gndp.org.uk/downloads/Matter-3-and-4-8018-Green-Party.pdf>

economic growth^{8, 9}. Also, it is not consistent with national planning policy guidance on the need to reduce carbon emissions through appropriate land use planning (PPS1 and PPS1 Supplement on Climate Change) and to reduce the need to travel (PPG13).

22 Although restated here because of the vital national and international significance of seriously reducing carbon emissions in all sectors, including strategic planning (and therefore to the transport policy within the JCS), these points are not expanded further in this submission.

3 A NATSIP/NDR transport policy creates the problems that it is purported to be designed to solve

3.1 Background

23 At the Exploratory Meeting, the Inspector raised ‘preliminary soundness concerns’ around the NDR. In response to these, the GNDP presented the Inspector with a paper on “Public Transport and the Northern Distributor Road” [EIP88]: an overview of the Norwich Area Transport Strategy (NATS) Implementation Plan (NATSIP) and the NDR. The content and conclusions of this paper are disputed by NNTAG and the Green Party, and other community and environmental groups (CPRE, SNUB etc).

24 Further, several developers at the EiP have also questioned the necessity of a Postwick Hub and an NDR, as either being necessary for Broadland based developments, or as being a good strategic transport policy, or in providing a sound and flexible JCS. For example, Barton Willmore¹⁰ say:

It appears that there is the potential for flexibility to be introduced into the JCS. However, it is the GNDP's slavish adherence to the NDR as the only solution that appears to be limiting the achievement of that flexibility.

and they have proposed alternative junction changes at Postwick (see below). Similar approaches have been endorsed by Savills and BlueLiving/Beyond Green. Building Partnerships stated at the Inspection that their eco-town proposal for Rackheath does not depend on a NDR.

25 EIP88 (section 3.1) sets out an overall NATSIP/NDR package of :

1. Bus Rapid Transit (BRT)
2. Core bus network improvements
3. City Centre traffic management
4. Walking/cycling improvements
5. Rail service improvements
6. Smarter Choices and travel planning
7. NDR

26 The EIP88 of sets out ‘traffic flows’ on Radial roads in North Norwich (Table 4) and claims that the

⁸ As in the DfT “Creating Growth, Cutting Carbon” White paper of 19th January 2011 - <http://www.dft.gov.uk/press/speechesstatements/statements/baker20110119>

⁹ <http://www.official-documents.gov.uk/document/cm79/7996/7996.pdf>, section 3.13, “A new National Planning Policy Framework will streamline national planning policy bringing social, environmental and economic priorities together in one place. The new Framework will include transport and will set out how national planning policy for new developments should address the need to reduce carbon and other environmental impacts and tackle congestion.”

¹⁰ RF107, <http://www.gndp.org.uk/downloads/RF-107-Barton-Willmore-letter-7-Dec-2010-re-GNDP-Plan-B.pdf>

“NDR will provide relief to key radial routes and therefore additional capacity for the implementation of enhanced priority for buses, cyclists and pedestrians”.

27 NNTAG, the Green Party, and other stakeholders believe that the evidence points to the opposite conclusion, and that the above statement is essentially false.

3.2 Fundamental problems with EIP88

28 There are two key problems with the above statement:

1. the data in Table 4 actually shows that vehicle movements on radial roads increases with the NATSIP/NDR package. **It therefore does not provide relief to key radial routes.**
2. the NDR and Norfolk County Council have never presented data that indicates how much the NDR contributes to traffic movements compared to the other six NATSIP measures listed above. **No meaningful statement can be said about the influence of the NDR on traffic levels until this data is available (see below).**

29 As understanding the congestion causation in NATSIP/NDR is crucially important to the success of the public transport proposals in NATS, the Inspector asked NNTAG and the GNDP to write a ‘Statement of Common Ground’. NNTAG employed the services of a nationally respected transport consultant to assist with this, and this author was also involved in discussions on behalf of the Green Party.

30 This process did not resolve the fundamental positions of disagreement and resulted only in the anodyne document RF92: “Statement from NNTAG and GNDP setting out their respective views on Table 4 of EIP88 and the extent of their agreement and disagreement”.

3.3 New available information

31 However, two categories of further information analysis emerged from this process:

1. additional analysis of Tables 1 and 4 from EIP88 that GNDP refused to be included in the RF92 statement.
2. additional analysis of relevant data from the revised Major Scheme Business Case (MSBC) for the NDR that NNTAG that also could not be included in RF92. The County Council had not made this data previously available to NNTAG¹¹, or Green Party councillors, before the EiP which is why it is only possible to present it now.

32 Whilst it is acknowledged that this analysis would ideally been available at the EiP itself, the process of generating RF92 at the EiP, and data availability from the Council did not make this possible.

¹¹ NNTAG requested the MSBC around the time it was delivered to the DfT (early December 2009). The DfT provided many hundreds of pages of raw traffic modelling data and gave NNTAG three days in which to supply comments for inclusion in a note to the Transport Minister. As a result, NNTAG was able to provide only very brief observations. Norfolk County Council later placed the MSBCs for the three quarters route and the half route on its website but did not inform relevant stakeholders including NNTAG. By then, Norfolk County Council had received the NDR Programme Entry conditions letter from the DfT dated 8 February 2010 which set the requirement for a new traffic model. NNTAG looked ahead to the production of a new model rather than spend resources on analysing the soon-to-be superseded model.

33 This analysis is presented in the following sections and it is fundamental to the uncertainties around the NDR and why it would be unwise now for the JCS to be frozen around an NDR-centric transport strategy. This additional analysis shows that EIP88 and the MSBC base their investigation of the congestion in the NE Norwich on different datasets. The analysis of both datasets shows that congestion increases with the NATSIP/NDR “DoSomething” model over no transport interventions.

3.4 The incomplete modelling of transport strategy options

34 In both the MSBC and the EIP88, two extreme transport models are presented:

- “DoMinimum” [DM] or “DoNothing”: this models traffic at different projected dates, and housing projections, with no NATSIP or other transport interventions
- “DoSomething” [DS] : this models traffic at different projected dates, and housing projections, with all the transport interventions of the NATSIP, including the NDR.

35 [A point on terminology: the MSBC refers to “Do Something” where the EIP88 refers to NATSIP or NATSIP/NDR It is understood that these are fundamentally the same transport policy].

36 Community and environmental groups have long pointed out that that these two extremes do not allow for the non-NDR elements of NATSIP (the six of the seven elements listed above) to be properly appraised. No test has been made available in the public domain with NATSIP and maximum sustainable measures, but excluding the NDR, despite persistent requests to Norfolk County Council from NNTAG over several years. This test is required to understand the separate influence of the NDR and the non-NDR NATSIP elements.

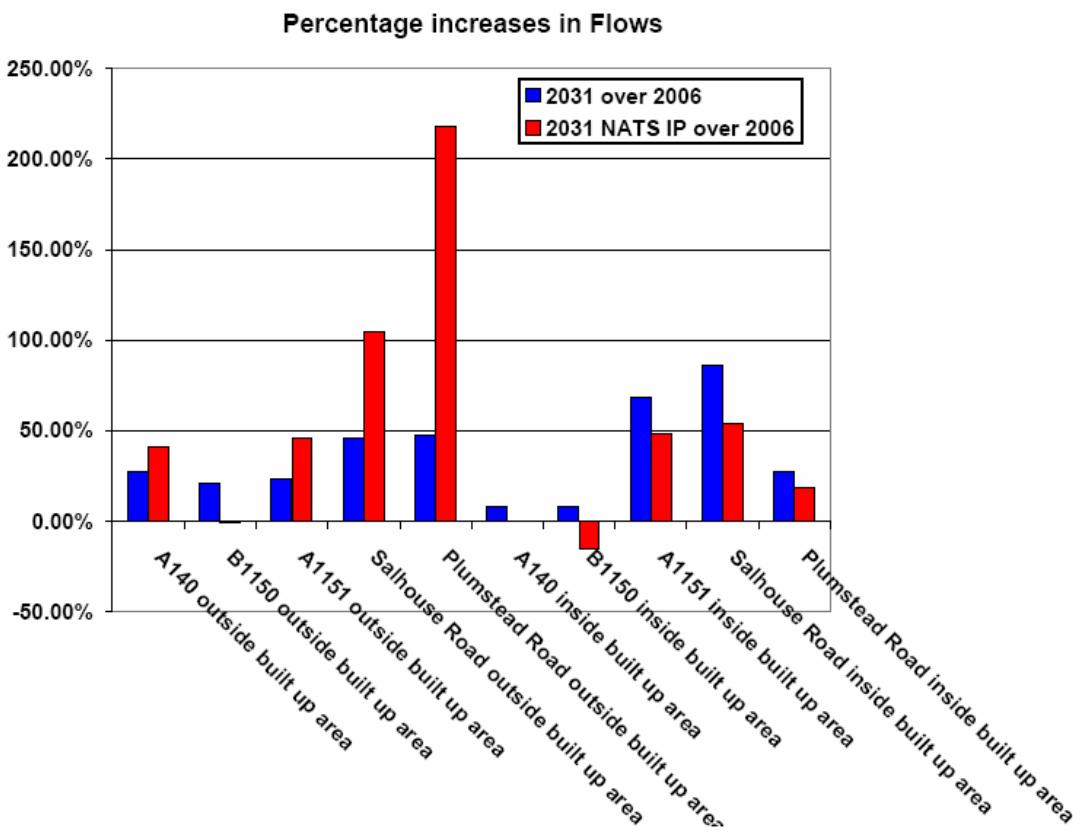
37 As this author stated at the EiP, it is not possible to know the benefits and disbenefits of the NDR and of the non-NDR NATSIP elements until such modelling has been done and has been scrutinised by all relevant stakeholders. And until this time, it is unwise for the JCS to be finalised as a strategic planning document as there can be no confidence that the transport policy contained within it is viable, or that all reasonable alternatives have been appraised.

3.5 Congestion causation from NATSIP/NDR inherent in Table 4 from EIP88

38 First, NNTAG, and their transport consultant, have identified that there are limits to the interpretability of the data presented for a number of reasons in the footnote¹².

39 Despite these concerns, this was the only relevant data made available by GNDP to the Inspector in EIP88 so we proceed with it. A graph of *Percentage increases in Flows* between 2006 and 2031 on the main Growth Triangle radial roads using the GNDP’s data from EIP88 Table 4 is shown below:

¹² 1. Flow is defined in Table 4 as numbers of vehicles passing a single point not “vehicle kilometres”, the accepted scale for congestion measurement. No data has been presented which directly measures congestion, for example model outputs such as hours or pcu (passenger car unit) kilometres spent in congested conditions, or at congested junctions.
2. No data on peak hour traffic is presented, which is when most congestion occurs.



40 The graph above compares the 2031 figures against the 2006 baseline for two scenarios: “Do Minimum” (blue) and with NATSIP/NDR (red). The graph shows:

- All the locations, except for the B1150 inside and A140 inside the urban area, show significant increases in vehicles in 2031 compared to 2006 for both scenarios.
- In 2031, all locations outside the urban area *show more traffic with NATSIP/NDR than without (“DoMinimum”)* except the B1150.
- Salhouse Road traffic outside the urban area *more than doubles with NATSIP/NDR* compared to 2006 baseline – this is against a less than 50% increase with “DoMinimum”.
- Plumstead Road traffic outside the urban area *more than trebles with NATSIP/NDR* compared to 2006 baseline – this is against a less than 50% increase with “DoMinimum”.
- In 2031, all locations inside the urban area show vehicle reductions with NATSIP/NDR in place compared to no NATSIP/NDR, but the relative differences are much smaller than on the roads outside the urban area.

41 Without data in units of vehicle kilometres, it is difficult to assess overall traffic. However, if the column totals from EI88 Table 4 are added together to provide an estimate, the totals are 120000 for 2006, 157300 for 2031, and 163700 for 2031 NATSIP. **This indicates that, on the given measure, total traffic on existing roads in this sector rises in 2031 by 31% with “DoMinimum” and 36% with NATSIP/NDR. The conclusion is that the NATSIP/NDR**

current transport policy within the JCS generates at least 5% additional traffic, even excluding NDR traffic, over having no policy at all.

42 It is important to note that this 5% figure does not include the increased traffic generated in the area that would be on the proposed NDR itself, as only data for the radial roads have been provided in EIP88, Table 4. The corresponding figures with the NDR traffic at different times of day will be derived below from the MSBC data.

43 This data alone shows that the increased traffic levels on the NE quadrant radial roads caused by the development of NATSIP/NDR will hinder the implementation of the proposed NATS public transport schemes.

44 The massive traffic increases on the radial roads outside the existing urban area, right within the area of the proposed growth triangle, will also be a detriment to resident's quality of life.

3.6 Congestion causation from NATSIP/NDR inherent in the latest MSBC

45 The latest version (December 2009) of a Major Scheme Business Case (MSBC) of the NDR was latterly made available from the Norfolk County Council website¹³. The section "Sensitivity Tests - DfT - Core Scenario Volume 2 Appendices"¹⁴ includes an Appendix C on Traffic Flows. **46**

This appendix comprises a map of 38 'Traffic Flow Locations' across Norwich is given on page 20 of the document, and a corresponding table of 37¹⁵ modelled flows at these locations are presented on page 21. It includes traffic flows for AM Peak, IP (between peaks), and PM Peak for five transport policy scenarios:

- 2006 Baseline
- 2016 DoMinimum (DM) and DoSomething (DS) (NATS plus NDR)
- 2031 DoMinimum (DM) and DoSomething (DS) (NATS plus NDR)

47 This is the base data for the analysis below.

48 This data was processed according to the following methodology. . The remaining data was placed in a spreadsheet for graphing. The following location points were selected for the Norwich N/NE Quadrant:

- 1,2,9,10,20 [Inner/Outer Ring Roads+Thorpe Rd], and
- 7,8,11,12,31,32,33 [7 Radial locations], and
- 34, 35 [NDR NE locations].

49 4 points: 12, 32, 8, 36 (yellow circles on the map below) were selected also as the four Growth Triangle radial roads for which data was provided.

50 The inconsistency between the EIP88 and MSBC in selecting location points is discussed later. For comparison now, the data that has been previously discussed from EIP88 Table 4

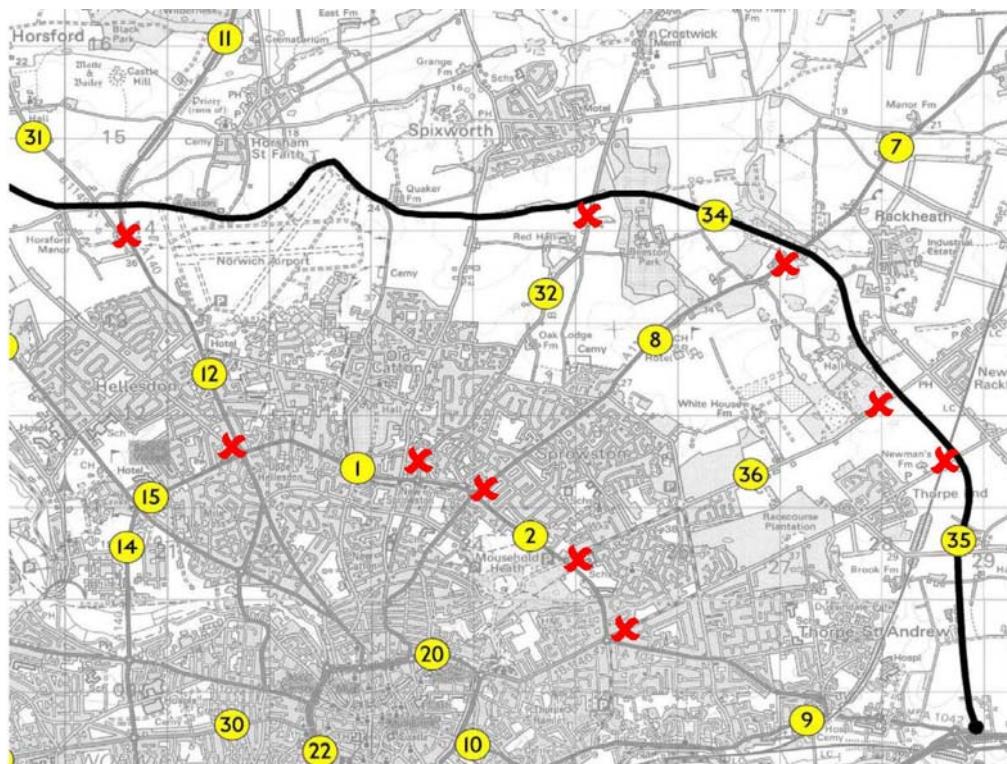
¹³http://www.norfolk.gov.uk/Travel_and_transport/Transport_future_for_Norfolk/Norwich_Area_Transport_Strategy/Northern_Distributor_Road/Major_Schemes_Business_Case/index.htm

¹⁴http://www.norfolk.gov.uk/Travel_and_transport/Transport_future_for_Norfolk/Norwich_Area_Transport_Strategy/Northern_Distributor_Road/Major_Schemes_Business_Case/NCC074266

¹⁵ we note an error in the MSBC data: there are 38 locations are on the map, but there is no data for location 38 (for Costessey) in the table

Norwich Green Party Written Submission Response

provides ten points which are marked below on the map with red crosses: none of the yellow circle (MSBC) and red cross (EIP88) location points are the same.



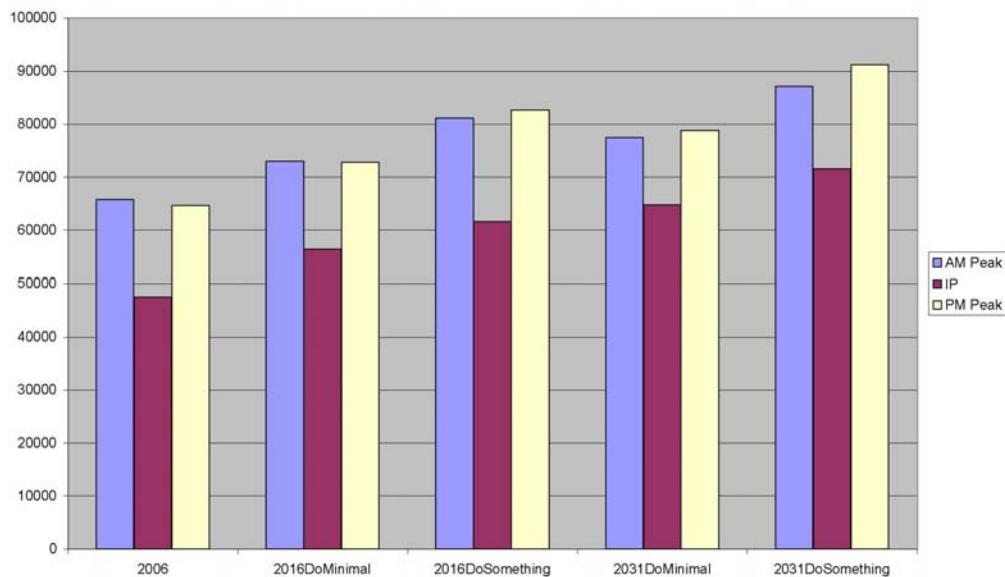
51 Resultant graphs are shown below for 'Overall Traffic at 37 Traffic Flow Locations' and the 'Norwich NE Quadrant' locations as selected above. It can be seen that:

- the NATSIP/NDR "Do Something" (DS) increases traffic levels more than "DoMinimum" in both 2016 and 2031 across the whole of Norwich.
- the effect is particularly prevalent in the NE Quadrant where the additional traffic levels from NATSIP/NDR "DoSomething" [DS] over "DoMinimum" are modelled to increase by the following percentages:

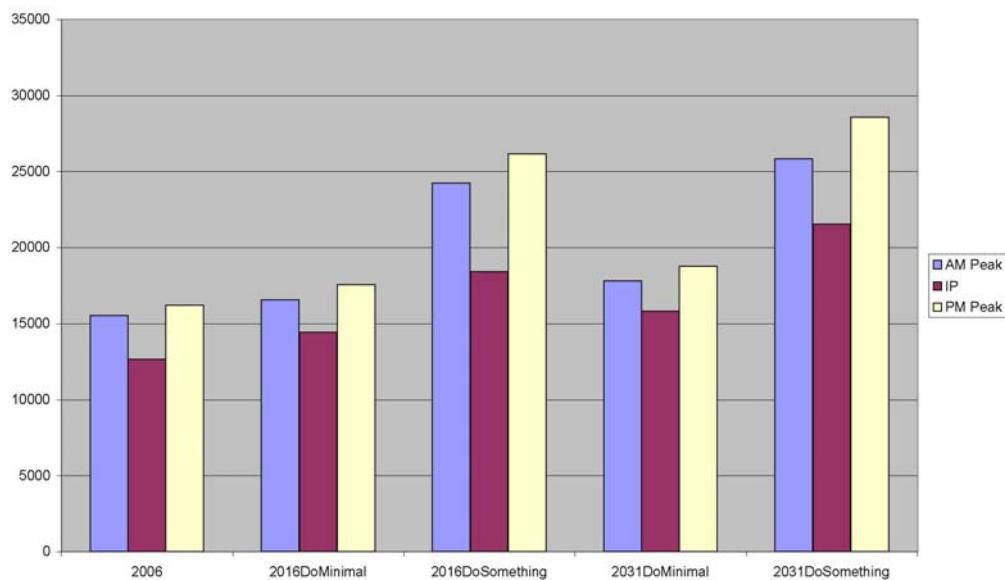
	2016	2031
AM Peak	46.26%	44.96%
IP	27.48%	35.97%
PM Peak	48.90%	52.37%

- **The clear conclusion is that the current transport policy within the JCS generates peak time traffic increases of at least 45% additional traffic over having no policy at all, both at 2016 and 2031.**
- **It is also clear that these traffic increases result largely from the transport policy itself rather than from the additional housing growth.** The relative percentage increases between NATSIP/NDR and "DoMinimum" are similar at 2016 and 2031, although at 2016, there will have been only modest housing developments within the NE Quadrant compared to those proposed in the JCS by 2026 (and 2031).

Overall Traffic at 37 Traffic Flow Locations



Traffic Levels in NE Quadrant - E of A140, N of Thorpe Rd, incl NDR

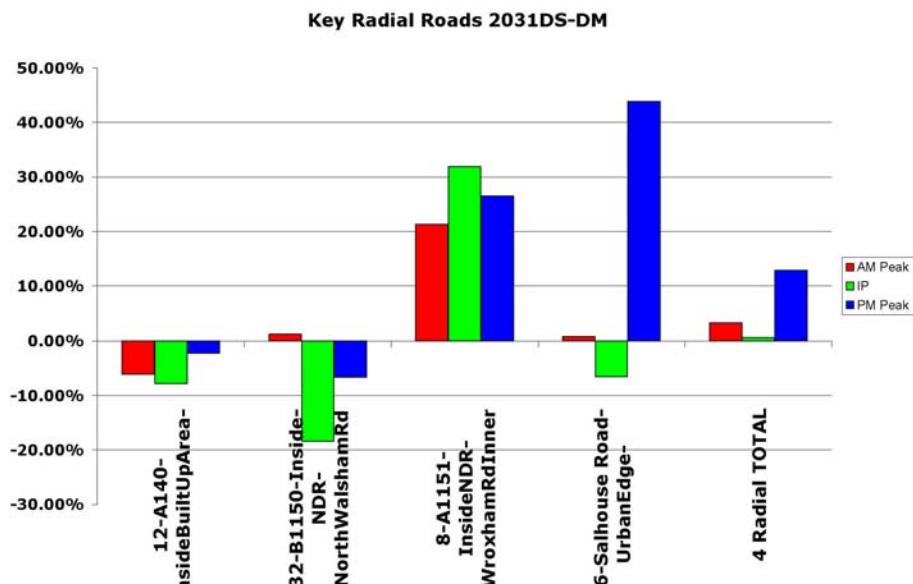


52 These results, along with the EIP88 analysis above, indicate that the idea that NATSIP/NDR is needed to create the space for the sustainable measures in NATSIP is not supported by the evidence provided. Although there is no modelling evidence available for NATSIP without an NDR, it is intuitive that the sustainable NATSIP measures such as BRT, rail, cycling and pedestrian schemes are unlikely to be responsible for these traffic increases, therefore, they must result from the NDR itself. And, therefore, the evidence points to the opposite conclusion to EIP88 that an NDR-centric transport policy will lead to greater vehicle use,

greater journeys and greater congestion that will prevent any future development of a transport strategy that integrates sustainable modes and modal shift.

3.7 NATSIP/NDR Impacts to Radial Roads

53 The following graph is derived from the same data and shows the relative AM Peak, IP, and PM Peak flows on the 4 radial road location points (selected by the County Council for the MSBC).

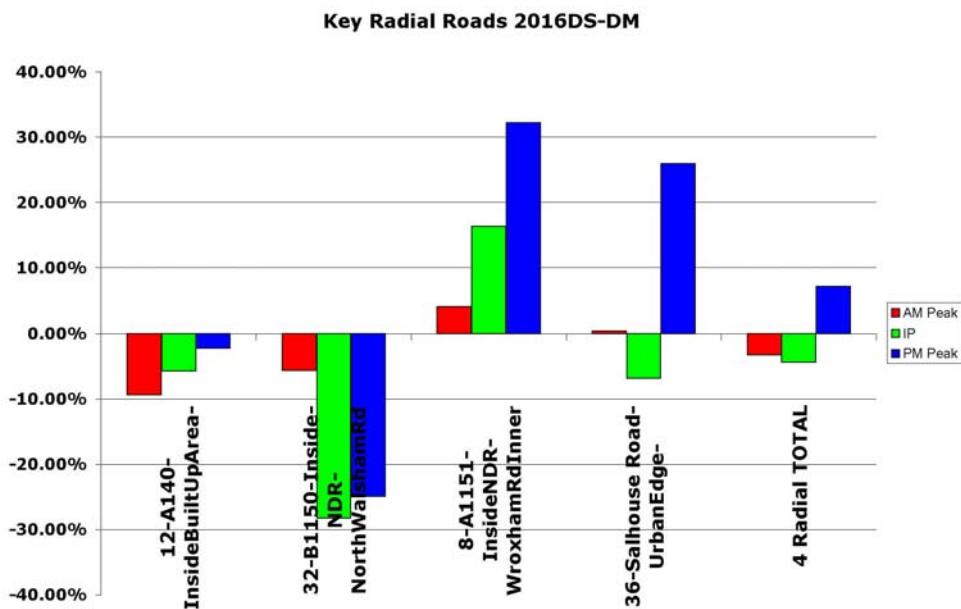


54 The above graph shows that, although there are modest improvements (largely Interpeak(IP)) on some flows between NATS/NDR “DoSomething” over “DoNothing”, **there is significant congestion generated on 2 key radial roads in the Growth Triangle:**

1. Inside the NDR on the Wroxham Road (location 8) in all periods – this is a location central to the growth triangle and to developing a proposed bus rapid transit (BRT) system.
2. The Salhouse Road in the PM Peak period.

55 The EIP88 data shown previously also displayed an even greater effect on the Plumstead Rd, but figures for this road have been omitted from the MSBC data submitted to DfT.

56 The graph below [the equivalent data for 2016], again, shows that the traffic increases are transport policy dependent rather than housing growth dependent as the pattern is much same at the 2016 projection with the effects on Wroxham Road (at all times) and on Salhouse Road (PM Peak).



3.8 Traffic flow data uncertainties raised by different and conflicting data models between EIP88 and MSBC

57 Despite both the traffic flow data from EIP88 and the MSBC showing increased congestions due to an NDR-centric transport plan, it is of great concern that different data has been presented by the Council Council (to the Department of Transport) and the GNDP (to the EIP). This is confusing both to the public trying to understand a complex decision process, and to key stakeholders in the assessment processes, such as the Planning Inspectorate and Department of Transport.

58 With respect to the provenance of the EIP data, GNDP has agreed¹⁶ that EPI88, Table 4 presents *annual average daily traffic flows derived by interrogating output from a run of the strategic SATURN model dated January 2010 and called “NATS Plus”*. However, they have not provided clarification as to how this relates to the NDR models presented to the DfT before December 2009, as part of the MSBC, and as to why different location points are used.

59 This section highlights differences found.

60 Different traffic flow location points are given in EIP88 and the MSBC:

- EIP88, Table 4, gives figures for ‘outside built up area’ and ‘inside built up area’ for the A140, B1150, A1151, Salhouse Road and Plumstead Road (ie *a total of 10 locations – the yellow circles in the map above*). RF92 indicates the GNDP view that:
 - point locations “outside urban area” are *just within* the line of the proposed NDR
 - point locations “inside urban area” are *just outside* the existing Outer Ring Road
The red crosses on the map above are based on this description from GNDP.
- For the same area, the MSBC Appendix, gives figures for single locations between the outer ring road and proposed NDR for 4 of these roads: A140, B1150, A1151, and Salhouse Road (ie *a total of 4 locations – the red crosses in the map above*). The map shown above clipped from this document would indicate that the ‘Inside the NDR’ locations are outside the urban area, but

¹⁶ RF92, point 1

not as far out as to be *just within* the line of the proposed NDR, and therefore do not correspond with the EIP88 “outside urban area” point locations.

3. No data is presented for Plumstead Road in the MSBC although the EIP88, Table 4 data shows this road to be the most affected with traffic outside the urban area *more than trebling with NATSIP/NDR* compared to 2006 baseline.

61 Despite the different point locations, the A1151, Wroxham Road demonstrates similar result between the two datasets. Table 4 shows 16000 vehicle flows outside built up area in 2031”DoMinimum” and 19000 2031”DoSomething” on this road, an 18% increase in traffic in NATSIP/NDR compared to no transport policy. The MSBC modelling at location point 8 shows a greater than 20% increase with NATSIP/NDR ”DoSomething” at all times of day (2031 graph above) for the road.

3.9 Unresolved issue with EIP88, Table 1

62 Further uncertainties are raised by EIP88, Table 1. This purports to show how traffic “is predicted to grow to 2031”. GNDP have agreed that “Table 4 is derived from the same information base as Table 1 in EIP 88”¹⁷. GNDP have not defined in EIP88 over what area the figures in Table 1 apply.

63 However, the key point is that the figures presented for 2031 (“DoMinimum”) and 2031 NATSIP (and the equivalent columns for 2016) are identical – this is shown in the clip from EIP88 below:

- 4.7. **Table 1** shows how traffic is predicted to grow to 2031, with increases of at least 30% being predicted at all times through the day.

Table 1 - Total trips in the strategic model (passenger car units)

Total trips	2006 base year	2016	2016 NATS IP	2031	2031 NATS IP
AM peak	64500	73500	73500	86500	86500
Inter peak	44500	51000	51000	60500	60500
PM peak	59500	67000	67000	77500	77500
Increase from 2006					
AM peak		14%	14%	34%	34%
Inter peak		15%	15%	36%	36%
PM peak		13%	13%	30%	30%

64 Table 1 shows no difference in overall vehicle flow between NATSIP/NDR and no NATSIP/NDR in both 2016 and 2031. This is in stark contrast to the data in Table 4 that shows overall traffic increases in 2031 between NATSIP/NDR and no NATSIP/NDR (and the equivalent for 2016).

¹⁷ RF92, point 3

65 Despite this being raised with GNDP¹⁸, no satisfactory explanation has been given by them, although there may be an obvious explanation, such as a “transcription” error in moving the data from the model output to Table 1.

3.10 Summary of NATSIP/NDR modelling

66 There remains a great deal of uncertainty about the perceived benefits of the NDR and its role with NATSIP/NDR and the JCS. There is no proven case that the road will relieve congestion in NE Norwich. The evidence presented above shows that the opposite conclusion is more likely, based on the GNDP (EIP88) and County Council (MSBC) datasets themselves. Large increases of traffic are highlighted with the NATSIP/NDR on radial roads outside the built-up area but within the proposed NDR route by the EIP88, Table 4 data and corresponding graph above. Further, significant percentage (>20%) increases in A1151 Wroxham Road traffic are indicated with the NDR at all times of day.

67 The GNDP's notion that the NDR is needed to create road space for the sustainable measures in NATSIP is not supported by the evidence. The evidence points to the opposite conclusion. An NDR generates considerable traffic and increased flows on radial roads in NE Norwich from its inception. The principal causation of these changes is the NATSIP/NDR transport policy itself, not the projected increase of housing in the area.

68 The data and the consequential claims made of it by the GNDP would not be found *sound* if scrutinised by a scientific peer review process until the inconsistencies could be explained and the data integrity established.

69 A greater concern is that the figures in EIP88 were used at the Inspection to make a flawed and pseudo-scientific presentation as justification of a critical strategic planning decision. It is unacceptable that such ‘flaky’ working has been used to draw conclusions that are shown above to be false in an attempt to justify a plan that PPS12 requires to be sound in planning terms, and that will affect the lives of thousands of people in NE Norwich.

4 Postwick Hub

70 In RF97, GNDP state that modifications to Postwick junction based upon the Postwick Hub gyratory design could start in 2012. However, the previous DCLG based CIF2 funding for Postwick Hub is no longer available and Norfolk County Council has to re-apply to the DfT for a single NDR/Postwick Hub scheme under the ‘development pool’.

4.1 A stand alone Postwick Hub is not sound, economically or in engineering design

71 DfT have previously indicated that they do not view that it is sound to develop Postwick Hub unless the NDR can also be delivered. A letter from 27 March 2009 DfT letter to Norfolk County Council states:

Without the NNDR being in place, it is commonly agreed that the proposed CIF scheme at Postwick would be significantly over-engineered and is doubtful it would offer value for money. All parties do, however, agree that some improvements are needed at Postwick, regardless of whether or not the NNDR proceeds.

¹⁸ At a meeting between NNTAG and GNDP discussing a draft of RF92.

4.2 A DfT funded Postwick Hub cannot proceed until full NDR Planning Consent (2014 at earliest)

72 It is clear from the above that the DfT would be unlikely to fund the Postwick Hub without the NDR. Even if the funding status of the NDR is clarified by December 2011, no DfT funded development of it, including the Postwick Hub element, could precede until the NDR had completed a separate statutory planning process and gained planning consent. The clear risk here of any other course is that a stand alone Postwick Hub is built, but the NDR does not obtain planning consent – this scenario would have left the DfT having funded a structure that is neither sound in economic(value for money) or engineering terms.

73 The NDR planning application is not scheduled until Spring 2014 according to the County Council's timetable in its latest NDR-bid application form to the Department for Transport submitted at the end of December. Given the risk of developing a Postwick Hub before full NDR planning consent, work on the Postwick Hub could not proceed until 2014 at earliest. **The GNDP proposal to start Postwick Hub in 2012 is therefore unsound and high-risk.**

4.3 Proposals in RF117 to locally fund a Postwick Hub are un-evidenced and unsound

74 In RF117, GNDP express an enthusiasm, but no worked out financial plan, to self-fund the Postwick Hub in this situation:

“The Postwick Hub can be delivered as a separate scheme and is not necessarily dependent on DfT funding.”

75 Given there is no financial planning evidence given, the soundness of this statement, and the implications for its deliverability as part of the JCS, are extremely questionable. This is even more so given the current fiscal situation at Norfolk County Council, where £155m of savings need to be made over 3 years. On the 24th January 2011, Councillor Graham Plant, Cabinet Member for Travel and Transport, acknowledged the severe financial constraints at Norfolk County Council and the necessity to avoid risk, when he responded to a question (on the NDR/Postwick Hub scheme) from the author saying:

I will continue to ensure that we balance the need to deliver this critical piece of infrastructure, with the need to minimise the financial exposure to the County Council.

76 The underlying fiscal mechanisms for a possible self-fund route suggested by GNDP in RF117, such as Community Infrastructure Levy and New House Bonus, can not be expected to raise anything close to the £21m required over one or two years now to build a Postwick Hub before an NDR that has funding and planning consent at earliest Spring 2014. Using Council's own funds is almost out of the question in the current crisis of council funding – there are no budgets available that could provide new funding on this scale, and such an approach would clearly place the Council to unacceptable financial exposure.

4.4 A stand alone Postwick Hub is high risk and unsound strategic planning

77 Therefore, the GNDP's position to build the Postwick Hub 'come what may' is **an unnecessary high-risk approach and cannot be a sound basis for the JCS**. This further justifies our call for a Plan B, which it not based on an NDR-centric transport policy including a

Postwick Hub gyratory, but instead implements "appropriate improvements to Postwick Junction" to deliver housing and growth. Such junction improvements could be at a scale that could be funded from developer contributions and other sources.

5 Viable alternatives exist to improve the Postwick junction

78 Stand alone, the Postwick Hub design is over-engineered, and, in RF97, the GNDP acknowledge that acceptable alternatives for improving the Postwick junction could be devised¹⁹. They have also stated:

"The GNDP intends to set up a Postwick junction forum to work together in the same way as the successful Thickthorn forum to help progress development." [para 6.4]

79 Two such alternatives already exist. In RF107, Create Consulting acting for Barton Willmore summarise many potential design issues with Postwick Hub²⁰, and propose an alternative design based on three phases of delivery. The first two phases deliver 3200 new homes plus committed developments in Broadland without an NDR.

80 NNTAG and CPRE Norfolk have also proposed a design (without an NDR), originally proposed to DfT in December 2008²¹, that:

- maintains the existing topology of the traffic flows at Postwick so avoiding the very circuitous routes around its gyratory design (documented elsewhere²²) that the Postwick Hub imposes on some key routes, such as Norwich to Yarmouth.
- allows the expansion of further business development at Postwick
- joins to an orbital link road to allow housing development (more detail below)
- has a much smaller land footprint than the Postwick Hub gyratory

81 The NNTAG/CPRE design would also require widening of the existing bridge over the A47 as does the Create Consulting design.

82 Although, both these proposals require further refinement, there are merits in both of them and that they should be taken seriously by GNDP and Norfolk County Council at the proposed Postwick junction forum. They reflect what the author stated at the Inspection: "*that it is not beyond the wit of man to develop a smaller scale and appropriate alternative to the Postwick Hub*". We propose that such an alternative should form part of the transport policy for a Plan B JCS. Given the unnecessary high risk approach that Postwick Hub imposes on the GNDP JCS, such a Plan B will be much sounder than the existing JCS and be more resilient to the changed economic circumstances.

¹⁹ RF97, section 6.7

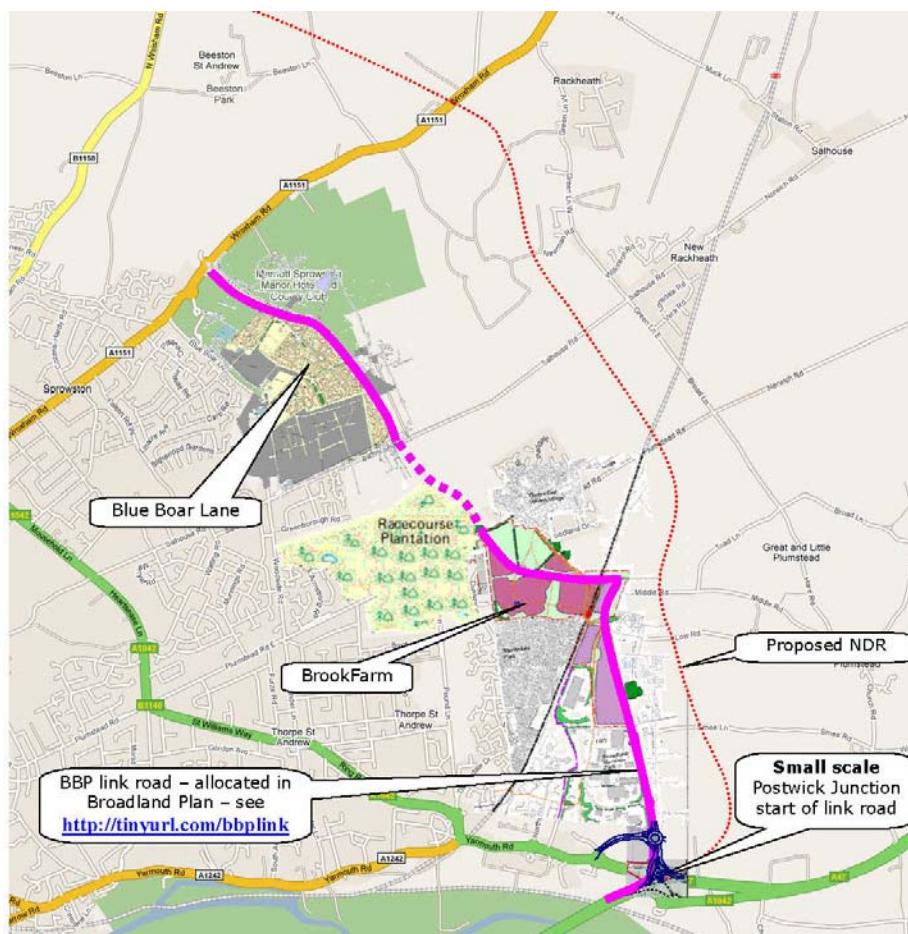
²⁰ <http://www.gndp.org.uk/downloads/RF-107-Barton-Willmore-letter-7-Dec-2010-re-GNDP-Plan-B.pdf>, pages 4 and 5

²¹ RF82A, <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/11/RF-82A-NNTAG-and-CPRE-note-to-Inspectors-re-Landstock-Plan-B.pdf> and RF82B, <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/11/RF-82B-Slides-attached-to-doc-RF-82A.pdf>

²² RF113, Response to GNDP RF97 re Plan B, NNTAG <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/12/RF-113-NNTAG-Response-to-GNDP-Plan-B-RF-97.pdf>

5.1 Modest Postwick junction modifications and an inner link road can open up housing development

83 Alternative proposals for Postwick junction can also link to a developer funded single carriageway inner orbital road link between A47 Postwick Interchange and A1151 Wroxham Road as proposed by NNTAG. This shown on the map below: all elements of the route are already in the Broadland plan except for short and easily closed gap between Salhouse Road and Plumstead Road East, alongside Racecourse Plantation



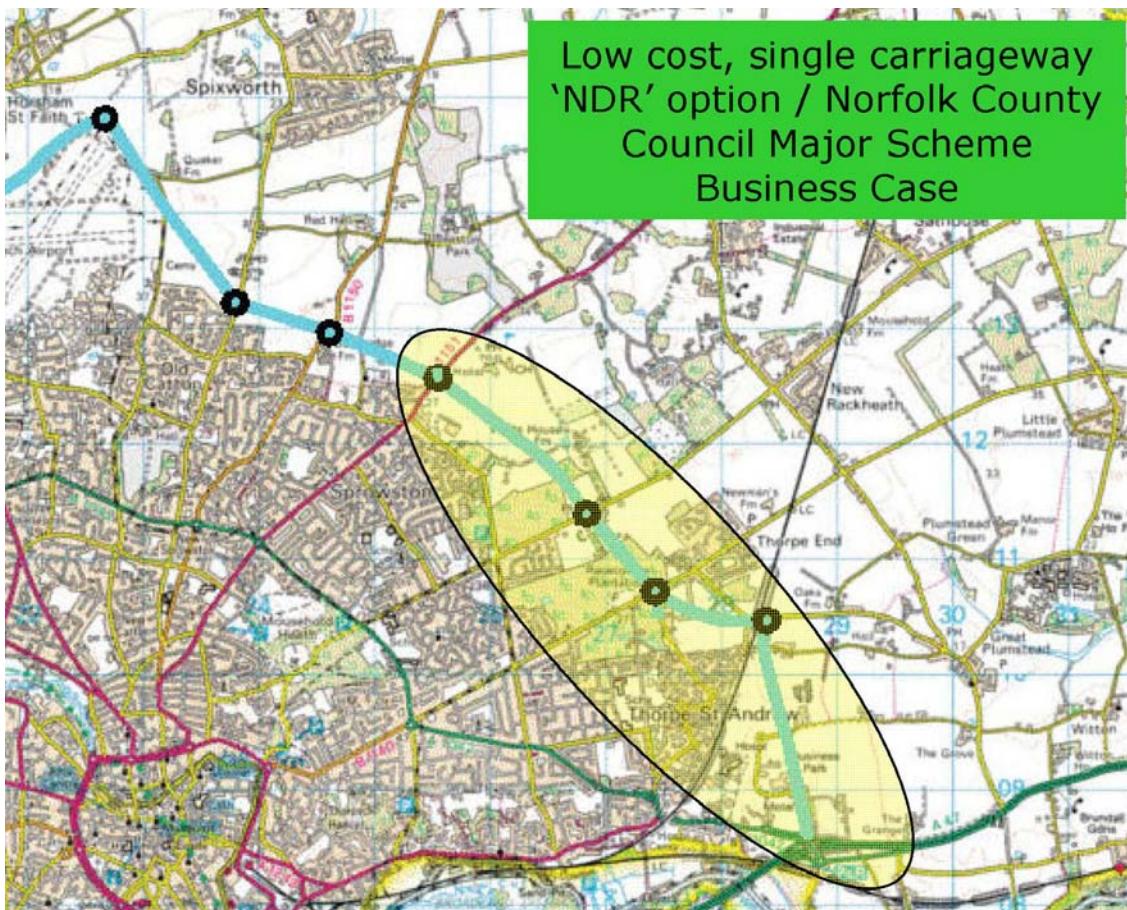
84 This transport link would serve the next stages of new housing and employment in the vicinity of Postwick and directly north of it. This route gives access to the north-east Norwich closer to where it is actually needed than the NDR: the proposed NDR route is considerably further out of the city and would run where there is currently little employment and housing.

6 Similarity of Postwick junction alternatives to Council's single carriageway NDR option

85 The NNTAG/CPRE inner link road proposal is very similar to the Postwick to Wroxham Road part of the "Low Cost, single carriageway NDR" option outlined in the Norfolk County Council MSBC (July 2008, and updated December 2009) – it corresponds to the shaded area road in the map below.

86 This inner single carriageway (40 mph) route using a combination of existing roads and new alignments was one of the original NDR consultation options. The map below from the MSBC also shows how such an inner link road could eventually be extended from the Wroxham Road to the A140 north of the Airport.

87 A single carriageway, 40mph, road extension North West from the Wroxham Road is very pertinent because it would open up housing developments proposed on the urban fringe south of Spixworth and immediately east of Norwich Airport. It would open up this development much more directly than the proposed dual carriageway NDR as it would pass through the development area rather than 'hanging loose' to the North. It is believed that this would comprise a further 800 or more dwellings in additional to the 3200 opened up by modest Postwick junction alterations and the inner link road ie a total of at least 4000 dwellings.



6.1 Inner link road is likely to offer more direct congestion relief than an NDR

88 Sections 7.6-7.8 of EIP88, and Figure 1 within, describe the congestion in NE Norwich and current rat running problem. The NDR is suggested as a solution. However, most rat running comprises only short orbital movements, for example, between two radial roads or local journeys between two destinations either side of a radial road. Such rat running orbital movements are

unlikely to be replaced by motorists taking a journey of several miles out to an NDR and then back into Norwich. The inner link road proposal runs much closer to the area suffering rat running, and therefore, offers much more direct and motorist-convenient relief of it. Clearly traffic modelling work would be required to demonstrate this, but it is plainly intuitive that an inner link road would offer much more success in tackling rat running.

7 Freezing the NDR route in 2005 prejudiced all GNDP JCS consultations

89 The NDR route consultation of October – December 2004²³ contained three routes for the NDR East of Norwich. The most outer (“blue”) route consulted on²⁴ was selected by the Cabinet of Norfolk County Council in August 2005 as their preferred route, and was passed by Council in September 2005. This predated all the consultations on the JCS including the initial “Issues and Options” consultation of Winter 2007/2008.

90 The single lane, 40 mph, option shown above is much closer to the existing urban area and appears to be a similar route to the ‘Pink route’ in the Autumn 2004 NDR route consultation. This single lane route was modelled in the July 2008 NDR MSBC and presented as an option in that document. **However, critically, no strategic housing options were ever presented based on this inner route to the public in the GNDP JCS consultation process, once again adding to the concerns raised throughout the Examination of the lack of real conceptual options being provided in the GNDP JCS consultation process.**

91 It is of great concern that the GNDP have only offering the public consultation options based on a dual carriageway NDR, whilst in July 2008, they were still testing options for the Department of Transport based around a single lane inner road, similar to the inner link road proposed by NNTAG. PPS12 (4.19 and 4.20 reproduced below) stresses the need for transparent and accessible community engagement in producing Development Plan Documents (DPDs):

Participation

4.19 *The UK government has signed up to the UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the Århus Convention). Article 7 states:*

"Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public."

4.20 *The production of core strategies should follow the Government's principles for community engagement in planning. Involvement should be:*

- appropriate to the level of planning;*
- from the outset – leading to a sense of ownership of local policy decisions;*
- continuous – part of ongoing programme, not a one-off event, with clearly articulated opportunities for continuing involvement;*
- transparent and accessible – using methods appropriate to the communities concerned; and*
- planned – as an integral part of the process for making plans.*

92 Community engagement was, once again, overridden by the GNDP in offering the public very limited choices whilst still discussing with the Government (DfT) other transport options.

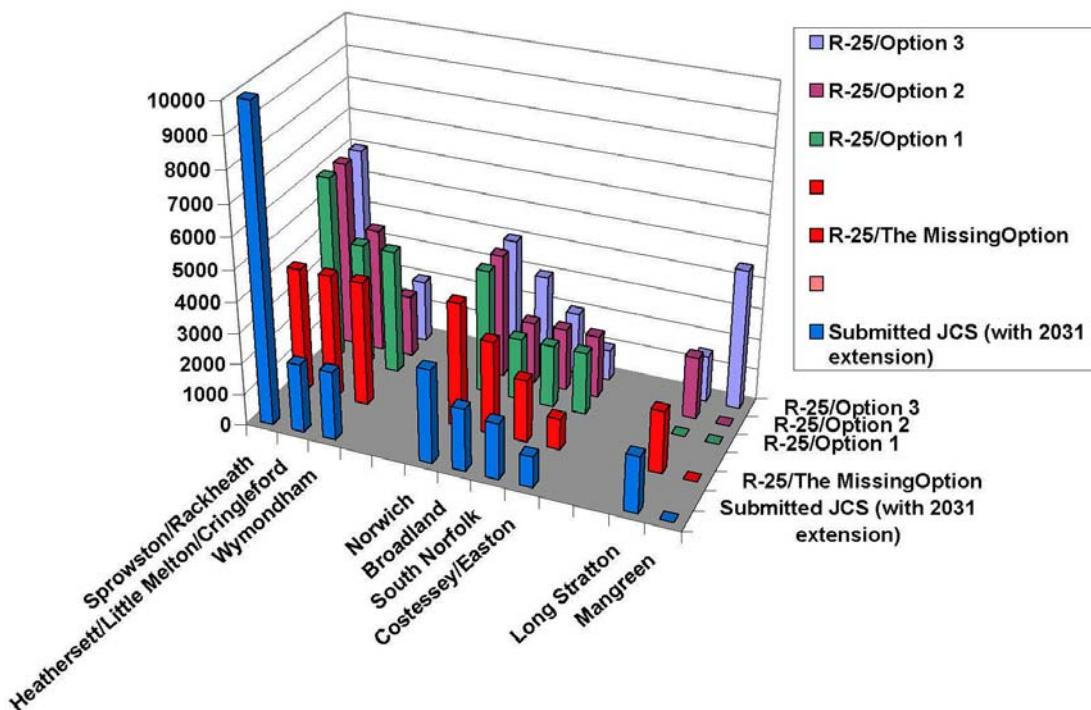
²³ http://www.norfolk.gov.uk/Travel_and_transport/Transport_future_for_Norfolk/Norwich_Area_Transport_Strategy/Northern_Distributor_Road/Public_consultations/index.htm

²⁴ See map at <http://www.norfolk.gov.uk/Consumption/groups/public/documents/article/ncc054449.pdf>

Norwich Green Party Written Submission Response

7.1 The inner link road can deliver at least 4000 homes

93 Such an inner link road from Postwick to the A140 with its potential to open up at least 4000 housing allocations could have been the basis for the ‘Missing Option’ to which this author referred on the first day of the Examination and is shown below graphically in comparison with the 3 Regulation 25 (R-25) consultation options. This proposed option limits Growth Triangle development to 4000 homes whilst using housing allocations in every other area that are no larger than in one of the three R-25 options.



94 It is worth noting that this option does not limit the growth to 4000 homes in the ‘Growth Triangle’ area as this ‘Missing Option’ does not include proposed developments outside the proposed NDR route. It emerged in the Examination that homes outside the proposed NDR route could be developed without the NDR when Building Partnerships stated it could develop the 4,200 dwelling Rackheath eco town without an NDR.

95 The map of the single carriageway NDR shows clearly that development at Rackheath can be supported by the inner link road as this gives the necessary links via Wroxham Road to the A140/Airport to the NW, Broadland Business Park to the SE, and the strategic highway network via Postwick junction

96 The Green Party are not supporting or objecting to the eco-town at this point: however, with these further housing allocations, a total of 8200 homes in the Growth Triangle have been identified as being potentially buildable without an NDR, but with modest extensions to Postwick junction and an inner link road.

97 We are also not endorsing an inner link road and its associated housing as our preferred Plan B. We are, however, proposing that there needs to be a Plan B, and that the consultation process needs to be reopened. A strong potential starting place for one such Plan B is phased development up to 4000 homes in the Growth Triangle (the “Missing Option”) based around modest Postwick

junction improvements and an inner link road to the A140 if it were found to be acceptable through a genuine public consultation.

8 Final Conclusions

98 The proposed Changes IC1 are not a satisfactory response to the Inspector's original concerns about the soundness of the NDR in the JCS. These concerns can only be addressed now by the creation of an authentic Plan B that has no dependencies on an NDR and Postwick Hub gyratory.

99 Detailed concerns are that:

- the justification for the NDR and the associated Postwick Hub is flawed, and has not been properly tested against alternatives.
- the GNDP's notion that the NDR is needed to create road space for the sustainable measures in NATSIP is not supported by the evidence. The evidence points to the opposite conclusion.
- an NDR generates considerable traffic and increased flows on radial roads in NE Norwich from its inception. The principal causation of these changes come is the NATSIP/NDR transport policy itself, not the projected increase of housing in the area.

100 There is a 'window of opportunity' in which existing permissions would allow housing development to continue whilst a true JCS Plan B were developed. There are viable smaller scale options for Postwick junction that would enable up to at least 3200 new homes plus committed developments to be built in Broadland without an NDR. If an inner link road were developed between Postwick and the A140, this would potentially open up at least 4000 homes: this could form the basis of an authentic and evidence-based Plan B for further public consultation.

101 Such a Plan B JCS is a sounder and more realistic proposal in the current economic situation, it would relieve community distress and uncertainty, and it would not leave the JCS open to a likely redesign and review in just 5 years time.

102 We request that the Inspector holds a further day's public hearing to consider such an alternative Plan B as this important matter was not discussed at the hearing on 9 December, and the Inspectors' concerns from the beginning about the soundness of the NDR in the plan have not been satisfactorily resolved.

Councillor Andrew Boswell
February 3rd 2011

Norfolk County Councillor

Home: 23, Havelock Road,

Dr Andrew Boswell

Norwich,

Norfolk, NR2 3HQ.

Green Party Spokesperson for

01603-613798

Environment, Transport and Development

07787-127881

andrewboswell@fastmail.co.uk

30th January 2011

Inspector Roy Foster

c/o The Programme Officer

Istjohnhowe@hotmail.co.uk

Dear Inspector,

Joint Core Strategy for Broadland, Norwich and South Norfolk – Inspector's Possible Changes: Flexibility and Resilience of the JCS in relation to the Norwich Northern Distributor Road (NNDR) – issued 5 January 2011

This letter is in addition to a separate submission that I will be sending separately.

I wish to object to the proposed changes to the Joint Core Strategy **Policy 10 and Policy 20** because the transport strategy they outline for north-east Norwich and the adjacent area of Broadland District is not the most appropriate when considered against the reasonable alternatives. They also leave the Joint Core Strategy open to review in just five years time create and uncertainty for local people.

You requested these changes as a 'partial alternative Plan B'. However, the changes amount only to a scheduling of housing developments to deliver the original Plan A and a re-timing of the NNDR to 2016/17. As such they do not form a 'Plan B' which you invited the Greater Norwich Development Partnership to consider due to the uncertainty over NNDR funding at the time of the strategy's adoption in March.

Community and environmental groups oppose the Postwick Hub and NNDR within the Joint Core Strategy as they have not been properly tested against alternative transport policy options and it has not been satisfactorily demonstrated that they will reduce congestion and deliver a sustainable transport system. They would require substantial public money (c.£130m) at a time of spending restraint. Continuing with these schemes places undue reliance on them as 'critical infrastructure' when funding is unknown.

The uncertainty surrounding the NNDR/Postwick Hub will continue to create uncertainty for the local communities affected by a proposed NDR.

Further, keeping alive the possibility of a NNDR/Postwick Hub through the Joint Core Strategy has encouraged Norfolk County Council to spend more public money on them. In January 2011, the County Council agreed to spend up to £1.5 million over the next two years on further NNDR work. These funds have been taken from budgets originally intended for safety and community transport schemes planned across Norfolk.

Norwich Green Party Written Submission Response

The GNDP propose a review in 2016 if the NDR has not been built. I urge you to consider the alternative of creating, at this stage, a real Plan B that has no dependency on an NNDR and Postwick Hub. Whilst this may take time, there are enough existing permissions for housing development not to be delayed during this period. A plan B is a more realistic proposal in the current economic situation, it would relieve community uncertainty, and it would not leave the JCS open to a likely review in just five years time.

Please will you hold a further day's public hearing to consider such an alternative Plan B as this important matter was not discussed at the hearing on 9 December.

Yours faithfully

Councillor Andrew Boswell