

Transport Strategy
Department of Planning and Transportation
Norfolk County Council
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TRANSPORT FOR NORWICH CONSULTATION RESPONSE BY CPRE NORFOLK

INTRODUCTION

CPRE Norfolk comments on the strategy underlying the Transport for Norwich consultation, and as such respond to Questions 1, 2, 15 and 16.

However we first want to make some comment on the relationship between this consultation, the Norwich Area Transportation Strategy (NATS) and the Greater Norwich Development Partnership (GNDP) Joint Core Strategy (JCS) now out for consultation at the submission stage.

THE GNDP CORE STRATEGY AND NATS

The consultation booklet refers to an interaction between it and the GNDP JCS, and the updating of NATS. However, it appears that each one is used to justify the other, and each quote the other in a cyclical manner as the authoritative source for what they say. It is particularly obvious in relation to the status of the proposed Northern Distributor Road (NDR).

There are no questions on the NDR in the consultation, but at page 12 is shown the map of the route and with it the statement that '*the NDR is the key piece of major infrastructure required to enable the implementation of the agreed NATS*'.

The press release for the 9th October launch of Transport for Norwich speaks of '*The up-dated NATS - developed alongside the Joint Core Strategy drafted by the Greater Norwich Development Partnership - looks ahead to the next 15-20 years....*'.

Although the impression is given by the press release that we have a new NATS, the strategy shown on the web site is the one that was adopted in October 2004 as NATS4. The only up-dating that appears to have happened is the picture of the NDR route shown at Policy 2, at page 19. The left hand side of this has been replaced due to the change that had to be made on the western side, the $\frac{3}{4}$ route rather than the full route, which happened on the 24th September 2005 as the EiP for the East of England Plan started. Policy 2 of the 'up-dated' NATS says *An NDR is proposed as part of the strategy*'. This is very different from this Transport for Norwich consultation (page 12) that the NDR is 'agreed'.

The JCS says at Policy 6, Access and transportation, at the first bullet point: *implementation of the NATS, including the construction of the NDR*'. It goes on to say at paragraph 5.44 *Implementation of the NATS is fundamental to the delivery of the strategy*'.

The Transport for Norwich consultation does not say who 'agreed' the NATS, or what standing the 'updating' through the GNDP JCS has, given that the JCS is also not as yet 'agreed'. It seems that since 2004 there has been an on-going ramping up of the status and importance of the NDR proposal, circulating around the progression of the JCS, and now again in this consultation and press release.; but with no sound evidence for the necessity or benefits for an NDR, including with the levels of growth proposed for the north east sector of Norwich. Further the NATS is out-dated; and leads with a weak Policy 1, *taking due regard of environmental objectives*', with no support text.

We argue that the Transport for Norwich consultation is flawed on the way it treats the NDR; and so is the JCS in turning the NDR as such a central point of the whole strategy. This is compounded by the JCS extending beyond 2021 to 2026 while the outcome of the review of the RSS beyond 2021 to 2031 is still at an early stage.

QUESTION 1. MODE OF TRAVEL

The question is posed to the individual responding to *How often do you use each of the following modes of transport?* We take it in a more general way and state that there is a pressing need to accelerate a shift away from high dependency on the car to a high use of public transport in the Norwich Policy Area, and the infrastructure and incentives to do this must be in place. This is necessary to achieve reductions in congestion, and also carbon dioxide emissions.. The imperatives of the Climate Change Bill and a supplementary PPS to PPS1 push us in this direction. There is also the longer term prospect of declining supplies and increased costs of fossil fuels

QUESTION 2. TRANSPORT ISSUES FOR NORWICH

The question asks *Which do you think needs to improve the MOST?* CPRE acknowledges that there have been a number of improvements in recent years in the provision of public transport, and also some improvements for walking and cycling. But there is a long way to go yet, and the biggest issue for Norwich Transport is how residents and visitors can become less dependent on use of the car in accessing the city and within the Norwich Policy Area as a whole.

The proposals discussed in this consultation (and the developing JCS, and the up-dated NATS) do not address the above requirement in a satisfactory way; indeed they will all continue and embed high levels of car dependency.

QUESTION 15. THE CONSULTATION AND OVERALL PROPOSALS

The question asks *'From the information in the booklet, do you think the overall proposals will help deliver improvements to the transport in the Norwich area?'*

The answer to this has to be 'no', and can be seen by looking at the deficiencies in the 'up-dated' NATS, and the more particularly the detailed information provided in the submission draft JCS, the subject of a parallel consultation.

The 'overall proposals' fail because the pivotal position of the NDR and other road infrastructure, some a 'knock-on' of the NDR proposal. This is both as regards costs and competing claims within the transport sector (and more widely with a range of other hard and soft infrastructure), and the timescale and programme timescales to deliver them. The strategy is one of roads first, and public transport proposals later.

As we show below, the costs of NDR and associated schemes are prohibitively expensive, and the later phasing of key public transport proposals (with much more modest costs) mean the increased traffic level generated by the NDR and car dependency will be very difficult if not impossible to reverse at a later stage; at best we will have continued in the wrong direction for another ten years or so.

It is wrong to say that the NDR will give space to allow for public transport use to expand, it is more likely to choke it out. The strategy goes for the last resort option, rather than the first resort, which will arrive too little and too late.

In the GNDP JCS consultation we have the following major road proposals:

- the NDR, estimated cost £110m, delivery at 2013-2015
- the Postwick Hub, estimated at £25m., an integral part of the NDR; delivery date 2011
- improvements on the A47 southern bypass junctions, costing £40m. that at the A11 Thickethorn and £20m. at the A1074 Longwater, delivery 2016 and 2011-2016 respectively; both linked to the building and operation of the NDR
- a bypass on the A140 for Long Stratton, cost of £35m., delivery 2011-2016.

In contrast, for the Bus Rapid Transit routes to the City Centre we have:

- Fakenham Road, A1067, an estimated cost of £10m., delivery 2011-2026
- Dereham road, estimated cost of £6.5m., delivery 2009-2021 (nb shown as 2010-2015 in the consultation booklet, page 14)
- Yarmouth road: £10m., 2021-2026
- Salhouse Road/Givey Road: £5m., 2011-2016
- Norwich Airport/A140: £10m, 2011-2026.

Finally for rail:

- Wymondham rail station improvements: estimated costs of £3m for 2011
- Widening the rail bridge at Wymondham: £7m., for 2011-2016
- Relocated rail station at Rackheath: cost £25m., no delivery date available.

This consultation does not mention the costs of any of the above schemes, but should have given at least some consolidated costs for road proposals and public transport proposal to enable consultees to give a better response to the question.

The indicative timeline chart at page 14 does give some feel for timescale to delivery for the main types of transport infrastructure, but does not clearly show the way in which road infrastructure leads public transport measures.

The statement on cost will be self-evident to consultees: *'Funding availability is an important issue in delivering our transport proposals and may control the speed at which we can develop these improvements'*.

On timing we have: *'It will not be possible to deliver all of the schemes at once and many key elements will be dependent on the completion of the Northern Distributor Road'*. We agree with the first half of the second, but profoundly disagree with the second.

QUESTION 16. IS THERE ANYTHING DIFFERENT WE SHOULD CONSIDER FOR DELIVERY OF TRANSPORT IMPROVEMENTS IN NORWICH?

The BRT and rail schemes should be the priority for delivery, and within this a BRT and rail to serve the north east sector of Norwich, whether the proposed very high levels of growth are accepted or reduced, and whether a settlement at Rackheath is planned as an eco-town or not. In the event of an eco-town, these proposals clearly represent a holistic rather than a dysfunctional approach.

In a period of recession it makes sense for the lower cost public transport schemes to receive the priority, and this gives additional support to over-riding requirement of not embedding car dependency and increasing further into the future carbon dioxide emissions from personal transport.

We consider that NATS and the GNDP JCS need a major re-casting of transport policy and priorities, and in particular the abandonment of the NDR proposal.

A letter sent to the Transport Minister local environmental and transport bodies summarises the collective views on the NDR (copy enclosed).

Yours sincerely,

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Policy Co-ordinator