

Tuesday 8 Feb – Matter 5: Strategic Infrastructure

Issue 1: Is Policy 4 Strategic Infrastructure justified and effective?

1. Policy 4 identifies a number of transport schemes and projects and says that they will be brought forward to support the aims of the Plan. Is Policy 4 an effective policy or a statement of a number of transport infrastructure schemes and projects which may be implemented? Should these schemes or projects (or some of them) be listed in supporting text rather than in the policy?

Green Party response:

Policy 4 comprises a mix of policy aims, transport infrastructure schemes and projects and aspirations for future unspecified infrastructure schemes. Policy 4 is not effective because:

- i) It would not create an integrated sustainable transport strategy for Greater Norwich. There is a distinct difference in the approach to transport infrastructure planning between the Norwich urban area (modal shift to non-car modes) and the wider Greater Norwich area (enhance Major Road Network, develop park and ride, improve public transport accessibility). The wider area approach, combined with the GNLP proposal for distribution of housing in market towns and rural areas would result in greater reliance on private car use, longer journeys and increased carbon emissions. This would increase traffic pressures on feeder roads and road interchanges around the periphery of Norwich and across the whole road network in general. Improving public transport accessibility to market towns and rural areas is seen by the GNLP as more about improving choice than as part of a concerted effort to achieve modal shift.
- ii) Whilst effectiveness in the Norwich urban area would be measured by modal shift to sustainable modes, there is no metric for measuring the effectiveness of Policy 4 outside the urban area. Instead, traffic growth is viewed as an indicator of economic growth and road improvements based on predict and provide are viewed as the preferred transport solution for supporting strategic growth. To achieve sustainable development, it is essential to de-couple support for the economy from traffic growth and manage demand for transport in ways that include modal shift across the whole of Greater Norwich and pricing such as workplace parking charges.
- iii) Policy 4 is incompatible with the need to contribute to the UK legal target of net zero carbon emissions by 2050. The Sixth Carbon Budget sets in law a cut in emissions by 78% by 2035 compared to 1990 levels. [‘Net Zero Strategy: Build Back Greener’ \(BEIS, Oct 2021\)](#) suggests a pathway in which residual emissions from domestic transport would need to fall by around 34-45% by 2030 and 65-76% by 2035, relative to 2019 levels. In Norfolk, transport is responsible for nearly 40% of emissions in the county which is a larger proportion of emissions than the national average of 27%. Calculation of the carbon footprint per person in Lower Super Output Areas in 2018 shows that several areas around Norwich (for example,

Easton and Great Witchingham) fall into the 10% of worst performing places in England for carbon emission from car and van driving.¹

'[Decarbonising Transport: A better, green Britain](#)' (DfT, July 2021) sets out actions necessary for de-carbonising the entire transport system that include:

- Make public transport, walking and cycling the natural choice of travel, with half of all journeys in towns and cities walked or cycled by 2030.
- Reduce traffic in urban areas and reduce or stabilise traffic more widely.
- Make quantifiable carbon reductions in line with carbon budgets and Net Zero a fundamental part of local transport planning and funding. Four main elements which will be considered for inclusion in the forthcoming Transport Decarbonisation Toolkit for local authorities are: changing travel options, reducing the need to travel, influencing behaviour and decarbonising the transport fleet.

Norfolk County Council will need to reassess the [Local Transport Plan 4](#) (LTP4) work in progress following the [Transport decarbonisation plan](#) requirement to set carbon reduction targets. The GNLP and LTP4 as it stands rely heavily on electric vehicle use for addressing carbon emissions from traffic growth. However, the 'Net Zero Strategy' insists,

"We cannot simply rely on the electrification of road transport or believe that zero emission cars and lorries will solve all our problems. As we build back better from the pandemic, it will be essential to avoid a car-led recovery." (p.156)

- iv) Policy 4 would create car dependency by locating growth in places with access to road interchanges as well as to sustainable transport networks. This is contrary to the NPPF which says that significant development should be focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (para 105). The Cambridge Norwich Tech Corridor is an example of how growth close to major road interchanges in towns along the A11 has contributed to an increase in traffic and transport emissions. Carbon emissions increased on 'A' roads in South Norfolk in every year over the 2011-18 period except for 2013-14. In 2019, road transport carbon emissions on 'A' roads in South Norfolk reached 243kt, compared to 52.6kt in Norwich and 133kt in Broadland.² Major housing growth at Long Stratton will increase vehicular traffic and carbon emissions along the A140. Unless high quality public transport, walking and cycling networks are provided at the outset of new housing and employment, people will develop the habit of using a car. Frequent, direct public

¹ <https://www.carbon.place/>

² ['Emissions of carbon dioxide for Local Authority areas' data set 2011-19, BEIS, 2020](#)

transport services to Norwich should be developed for market towns. In towns on the railway network, transport hubs should be developed to connect rail to public transport, walking and cycling networks. Within market towns, frequent local public transport services and good walking and cycling networks should be developed for serving internal journeys. The Norfolk Market Towns network improvement strategies highlight the scope for shifting short car journeys to sustainable modes.

- v) Policy 4 refers to transport improvements supporting and embracing new technologies, but there is no explicit reference to the role of digital technology and ultra-fast broadband in reducing the need to travel and allowing more people to work from home or locally.
- vi) Policy 4 lacks clarity over which modes and schemes should be prioritised for design, funding and delivery. The Green Party is concerned that road building will be favoured and prioritised over sustainable transport improvements. For example, Policy 4 lists the Norwich Western Link (NWL) as a scheme for delivery even though growth in the plan is not dependent on a NWL and the Link Road is not a policy of LTP3 nor of the emerging LTP4. On the other hand, two new rail stations planned at Rackheath and Dussindale needed for serving major employment and housing growth are referenced in the supporting text but not in Policy 4. Delivery of these locally significant rail halts requires Community Infrastructure Levy support and policy status would confer higher priority.

Suggested Changes to Policy 4

Reword to read:

Transport improvements and new technologies will promote integrated sustainable transport consistent with meeting net zero carbon emissions by 2050, to develop the role of Norwich as the regional capital, support strategic growth in the Cambridge Norwich Tech Corridor and improve access to market towns and rural areas.

A significant shift towards non-car modes and clean transport will be promoted across the Greater Norwich area over the plan period. In Norwich urban area high density growth will be concentrated in locations with good access to high quality public transport and active travel networks. Growth in main towns and smaller market towns will be focused in locations where high quality provision can be made for non-car modes.

This will be achieved by:

Implementation of the Transport for Norwich Strategy including:

- significant improvements to the bus, cycling and walking networks to promote modal shift.
- Make best use of the park and ride system
- changing attitudes to travel.

Managing the Major Road Network to include development of direct public transport along strategic corridors linking main towns, and smaller market towns to Norwich.

Maximising the development of walking and cycling networks.

Developing ultra-fast digital connections and other technologies..

Protecting the function of strategic transport routes.

Promoting enhancement of rail services, including improved journey times and reliability to London and Cambridge, supporting the East-West Rail Link and innovative use of the local rail network to provide local connectivity, including new rail halts at Rackheath and Dussindale

Continued investigation of and support for rail freight opportunities.

Ensuring growth of Norwich Airport is consistent with UK Aviation and Net Zero.

Delete:

- Delivery of the Norwich Western Link road
- Supporting improvements to the A47, including delivery of the Blofield to North Burlingham, Thickthorn and Easton to East Tuddenham improvement being progressed by Highways England.

2. The Partnership's response to our Initial Questions states that the Western Link Road is not necessary for the delivery of any of the proposed allocations. Should it therefore be shown on the Key Diagram?

The Green Party supports the position of the Wensum Valley Alliance and Bryan Robinson and statements submitted to the examination.

4. Are the listed transport projects compatible with the climate change policies of the Local Plan and with national policy?

The Green Party supports the detailed case submitted to the examination by Dr Andrew Boswell.