

This statement is also relevant to Matter 6: Norwich City Centre and the Remainder of the Norwich Urban Area Parishes.

5A Is the JCS policy for access and transportation principally the Norwich Area Transportation Strategy (NATS) justified, effective and consistent with national policy as reflected in objective 7 of the JCS (ie enhancing transport provision to meet the needs of existing and future populations, while reducing travel need and impact)?

No. The sub text for Objective 7: *“To enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact”*, seeks:

– to encourage greater use of sustainable modes of transport (better public transport, footways and cycle networks.

NNTAG comment: greater use of local rail is missing although rail is seen as essential to delivery of Rackheath eco-town.

- improve the strategic road network and road network.

NNTAG comment: additional road capacity especially in and around urban areas does not support PPG13 objectives.

- reduce isolation in rural areas by encouraging newer communication/information technologies.

NNTAG comment: policy measures should be broadened to include rural transport improvements (local rail, public transport, walking and cycling, demand responsive transport and other transport-related innovations) for supporting different needs eg residential, employment, leisure (including car free leisure opportunities for city residents wanting to access the countryside).

NNTAG overall comment on Objective 7: Aside from NNTAG’s objections to proposed new road capacity (NDR, A47 Southern Bypass junctions improvements, dual carriageway standard Long Stratton bypass), NNTAG is critical of the absence of **demand management measures** in NATS as required by PPG13. We are consider that the **Smart Choices** element in NATS is very weak and will do little to influence travel behaviour or lock in the benefits of road space reallocation as a result of any modal shift and in the absence of any other demand management measures in NATS, traffic will continue to grow. We also question Norfolk CC’s commitment to implementing a smart choices programme having shed most of its travel plan staff.

PPG13 Transport, seeks to integrate land use planning and transport to:

- promote more sustainable transport choices for both people and for moving freight;
- promote accessibility by public transport, walking and cycling, and
- reduce the need to travel, especially by car.

PPG13 sets out a framework for delivering the above objectives:

- Land use planning policieswhich reduce the need to travel, shorten travel distances, allow access to every day facilities and services, reduce car dependence and facilitate the fullest use of sustainable modes.
- Managing travel demand. Measures related to land use planning include:
 - Parking controls.
 - Traffic management such as 20mph zones and home zones.
 - Travel plans
 - Park and ride schemes
 - Allocation of land (including road space) for public transport, walking and cycling and for interchanges to reinforce land use planning policies.
 - Demand management

By meeting PPG13, transport helps to meet objectives in PPS1: Delivering Sustainable Development and in the Supplement to PPS1: Planning and Climate Change as well as supporting the five national transport goals of providing economic growth, addressing climate change, improving health, equality of opportunity and quality of life in the Transport White Paper, Delivering a Sustainable Transport System (DaSTS).

Lack of Parking Controls is Encouraging Car Use in Norwich Built Up Area

A major explanation for a levelling out of a reduction in traffic crossing the Inner Ring Road cordon in 2008/09 (EIP 88 para 4.8) is that Norwich City Council has allowed car parking spaces to increase and city retailers, notably John Lewis, to offer cut price parking.. Norfolk County Council has failed to seek an agreed strategy with Norwich City Council, even though the County recognises that Norwich bus park and ride patronage has fallen as a result, also leading to traffic growth inside the built up area.

Minutes of the County Environment Transport and Development Overview and Scrutiny Panel held on 22 September 2010 refer to:

“The decline in passengers using the park and ride services was a cause for concern. The most likely way to arrest the decline would be to have far stronger alignment of parking policies with Norwich City Council and retail partners to ensure Park and Ride was the ‘first choice’ for visitors to the City”. (15.3)

Local planning policies have permitted substantial levels of car parking on green field site developments around Norwich. For example, the Norfolk and Norwich University Hospital hosts the largest car park in Norfolk. Broadland DC has allowed a significant

amount of out of town development with plentiful car parking. The Broadland Business Park has encouraged a large number of businesses to re-locate from the City centre. The urban area of Broadland has over 90% car ownership, compared to 64% for the City of Norwich, with application of very limited demand management measures, notably travel planning. As noted in NNTAG 7172 EiP Statement for 3B, the NDR Forecasting Report assumed over 90% car commuting to associated new developments.

Effectiveness of Demand Management and Travel Behaviour Measures

Demand management and smart choices for influencing travel behaviour can be far more cost effective at improving access than can providing new road capacity.

For example, at the Inner Ring Road Phase 3 inquiry in 1993, MTRU, commissioned by NNTAG demonstrated that a non-road building alternative would remove through traffic from the city centre (peak hour parking permit scheme). **Ref Appendix 5: (C) Summary in All Change: Demand Management Case Study, Norwich: Research by MTRU, 1994**

Interestingly, an investigation of area-wide charging for the Norwich Area in 2006/07 (based on inner and outer ring road cordons) using the Transport Innovation Fund (TIF) concluded that a package of transport measures for the Norwich area including road pricing could have a positive economic appraisal but that revenues raised would not be sufficient to fund alternative measures. NNTAG pointed out, this was because congestion in the City centre was not high enough to generate adequate revenue.

Travel behaviour Measures

NNTAG's Chair participated in the study 'Sustainable Transport Options to Support and deliver Housing and Economic Growth', (and in the EEDA-led DaSTS steering group overseeing all seven of the East of England studies). The first phase of the Sustainable Transport Options study investigated Luton/Dunstable/Houghton Regis conurbation and King's Lynn. Norwich is programmed for the second phase.

The study found a high percentage of short distance trips in the Key Centres for Development and Change, indicating an opportunity for behavioural change measures. In Norwich, the study reported that 82% of work trips are less than 10 km.

Ref: Department for Transport Regional DaSTS Studies Programme: Sustainable Transport Options to Support and Deliver Housing and Economic Growth: Phase 1 Final Report: Executive Summary, May 2010, Halcrow Group Limited for GO-Eas.t

The study confirmed that sustainable travel measures implemented during the period 2004-2008 delivered a 9% reduction in car driver trips at a modest cost of £3.24 million of Revenue Funding. Interventions in the Sustainable Travel Towns pilot focussed on supporting choice of travel alternatives for encouraging behavioural change rather than 'stick' measures. It concluded that similar low cost interventions to those

emerging both from DaSTS study itself and from the work done in the Sustainable Travel Town of Peterborough, could be applied across growth centres in the UK, particularly at a time when the availability of transport funding is likely to be severely limited.

The Local Transport Minister has signalled the Department's plans for a Local Sustainable Transport fund, with significant revenue funding.

A strong package of travel change measures would release road capacity for sustainable measures and new growth. It would free up road capacity on the Outer Ring Road for longer-distance traffic. Additional traffic demand measures could be implemented for areas in the northern suburbs and rural areas to the north of Norwich; for example, closure of Crostwick Lane, Spixworth, to through traffic would stop rat running.

5B The NDR aside, what evidence is available to give confidence about the planned completion dates of the other 'strategic improvements' and 'supported improvements' said to be necessary to deliver growth and facilitate modal shift (paras 5.46 and 47)?

Given the uncertainty over funding, it is difficult to have confidence in the delivery of supported improvements such as BRT, especially given the large demands placed on developer contributions by a NDR.

In relation to other strategic improvements, the Highway Agency has no plans for funding A47 Southern Bypass junction improvements, contrary to JCS Appendix 8.

Norfolk County Council is unable to identify sources of funding for a Long Stratton bypass, other than developer contributions which are insufficient to pay for the scheme.

5C If the JCS is unsound in relation to aspects and transportation, are there any specific changes that would render it sound?

- NNTAG advocates a public transport-led NATS as opposed to one based on NATS.
- JCS should include a commitment to develop a parking strategy for the NPA to include maximum car parking standards for different types of development and parking charges. A Workplace Parking Charges scheme under Transport Act 2000 should be considered.

JCS should give high priority to implementing a strong package of travel behavior measures in NATS.

Any improvements to A47 Southern Bypass junctions should be undertaken with the sole purpose of accommodating public transport priority measures and not to provide additional road capacity especially for accommodating local road vehicle movements.

Any Long Stratton bypass should be built to single carriageway standard close to the built up edge of the village.