

**Joint Core Strategy for Broadland, Norwich and South Norfolk
Broadland Part of Norwich Policy Area Examination**

Matters and Questions for Examination - May 2013

Norwich and Norfolk Transport Action Group (NNTAG) Res. No. 124224

Matter 2 – The implementation of the submitted JCS proposals

1. Whether policy 10's proposals and associated text for employment and housing are positively prepared, justified by the evidence, consistent with national policy, and effective

1.2. Given the delay in bringing forward the NEG, are the housing delivery figures in the JCS Appendix 6 Housing Trajectory correct? For example, has Rackheath started delivering homes in 2011/12 as stated (is this not a commitment if they are built)? And will the remainder actually start delivery in 2014/15?

The housing delivery figures are incorrect. There has been no planning application for Rackheath (not even for the 200 dwellings exemplary).

In relation to additional smaller sites around Broadland, it remains to be seen whether construction will start on White House Farm and land north of Brooke Farm (dependent on economic circumstances).

1.3. Will the NDR be built in time (in part or in whole?) to meet the projected housing delivery dates and numbers in the Trajectory?

If the A47 Postwick Interchange draft slip and side road orders are not confirmed by the Secretary of State, Postwick Hub as the first stage of a NDR, cannot be built and neither can a NDR.

1.4. What is the status of the application for 3,500 homes in North Sprowston, submitted in October 2012? How does this fit into the Housing Trajectory?

An outline planning application has been submitted for North Sprowston, with a request from the developer that a decision be postponed until after resolution of the Submitted JCS. The NS&OC application comes below the Trajectory figure of 3,850 dwellings on land inside a NDR,.

1.5. Does the above indicate more than a "slight variance" in the Housing Trajectory? Is it of sufficient significance to warrant amending the Trajectory to reflect reality to date?

The above situation does indeed reflect more than a slight variance.

Other sites for housing have been identified by the GT AAP within the Core South East sector inside a NDR, but there is no certainty that these could be delivered in time to make up the shortfall.

1.6. Given the above, and the allowance for smaller sites in the JCS, is the submitted JCS flexible enough to deal with any changing circumstances (JCS para 7.17 and table), even though funding for part of the NDR is now more certain?

Although the Government has approved provisional funding for a half NDR route, Norfolk County Council intends taking a three quarters NDR between A47 East and A1067 through the planning process (as shown in JCS. Preparation of traffic assessments and economic appraisal will be on the basis of a three quarters route. This involves risk; if a NDR should fail at planning inquiry stage, the whole NDR project will fail and not just the extension to A1067.

The Panel amended the JCS to refer to “acceptable improvements to Postwick Junction (in the form of Postwick Hub or a suitable alternative”.

We suggest amending the JCS further to refer to “new inner orbital road links as part of a sustainable package of transport measures for serving growth in north-east sector” in the light of further uncertainty over NDR delivery.

1.7. Exactly what limited capacity in numbers is there for the delivery of homes ahead of the NDR? Is it as the 7.17 table or as the North Sprowston planning application or other?

The Panel amended the JCS Policy 20 to read:

"As part of the preparation of this AAP there will be an investigation of any potential that may exist for further growth to take place (in addition to that shown in the table below) without confirmation of the delivery of the NDR. This will include testing whether interim schemes and /or alternatives to the NDR could help to facilitate growth without compromising the spatial vision and objectives of the JCS". (para 7.17)

In fact, missing alongside the GT AAP Issues and Options Consultation Draft is the information specified above. In response to NNTAG's email inquiring the reason why, Broadland's AAP Team says (10/5/13) that the consultation provides a key stage in gathering evidence representations which will inform the evolution of the plan and also further planning applications within the Growth Triangle may come forward ahead of the AAP process. NNTAG suspects that BDC is stalling on this matter.

NNTAG believes that the ‘traffic neutral’ North Sprowston planning application can go forward without a NDR/Postwick Hub. It is doubtful whether the developers would have submitted an outline planning application in the light of uncertainty over NDR delivery were they not confident that the development could be built without a NDR.

1.8. NPPF paragraph para 48 allows for windfall sites to be included in the housing supply figures provided there is compelling evidence they will continue to come forward. Are the councils now arguing in SDJCS 14 that windfalls should be included in the submitted and adopted JCS, thus taking the housing numbers up to 42,000, which would be at the higher end of the range set out in its Table 1?

We would like windfalls to be included in the housing supply figures because past evidence has shown them to come forward. Also, windfall sites largely tend to occur on brownfield sites, thereby making best use of land, increasing densities and reducing the need to travel.

At the same time, we would like a reduction in the housing target by the same figure (of nearly 5,000 dwellings), otherwise the housing total will continue to stand at 42,000 dwellings (at least – see reply below).

1.11. Given the above SDJCS 14 points, does the housing forecast in SDJCS 14 provide a robust and justified evidential basis for the scale of the proposed development in policy 10?

NNTAG endorses CPRE's statement on housing issues under Matter 2.

We are concerned that the JCS has planned for an over-supply of housing relative to demand and delivery. Ref JCS Appendix 8 p.109 Annual delivery rates and requirement, the figures in the right hand column add up to a total of approximately 53,000 new dwellings in the period 2001 – 2026.

Planning permissions/appeals allowed for residential development on land in rural Broadland and South Norfolk NPA not previously allocated for development (eg Blofield and Mulbarton), are increasing the JCS housing total.

1.13. Does the area indicated in Appendix 5 of the submitted JCS represent a justified and realistic "area of search" within which areas sufficient to accommodate the various components of the proposed growth triangle can be found?

A re-distribution of housing to SW of city justifies a smaller search area. We would like to see deletion of the search area between Wroxham Road out to Rackheath and Plumstead Road. Deletion of a NDR corridor would provide an additional area of search

**Joint Core Strategy for Broadland, Norwich and South Norfolk
Joint Core Strategy for Broadland, Norwich and South Norfolk
Broadland Part of Norwich Policy Area Examination**

Matters and Questions for Examination - May 2013

**Norwich and Norfolk Transport Action Group (NNTAG) Res. No.
124224**

Matter 2 – The implementation of the submitted JCS proposals

Q1.15. What is the councils' evidence-based response (I have seen that in SDJCS 8) to the concerns raised about the impact of traffic from the submitted JCS policy 10 proposals' traffic on Wroxham and the A1151 Wroxham Road? Please would the councils tell me where to find the evidence which lies behind their statement that "overall the growth in the NEGТ is not *predicted* to have a significant impact"?

1.1 Significant growth to the north-east of Norwich linked to a NDR/Postwick Hub would increase traffic pressure and related environmental impacts on Wroxham and Hoveton which lie approximately three miles away to the north along the A1151.

1.2 The A1151 passes through the twin villages, giving access to the holiday area between Cromer and Great Yarmouth. The road crosses the River Bure, the boundary between the two settlements. Tourism and boating industries have grown up around the bridge making Wroxham/Hoveton an important centre for the Broads area.

1.3 The attractive humped road bridge decks an older C17th stone and brick structure, designated a Scheduled Ancient Monument. A 15mph speed limit operates and traffic signs warn of "queues likely". A separate footpath runs parallel to the bridge on a suspension bridge.

1.4 Directly to the south of the bridge, a traffic light controlled crossing provides a pedestrian link from the east side of A1151 to the Broads Activity Centre, the footpath from Hoveton on the west side having been removed. A second light controlled crossing serves Hoveton centre which is dominated by Roys of Wroxham either side of A1151. High volumes of vehicular traffic through Wroxham/ Hoveton, especially in the summer months, conflict with large numbers of pedestrians visiting the shops and river. Congestion, noise and air quality are existing problems.

1.5 NNTAG requested traffic flows for A1151 Wroxham Road between the ORR and north of Wroxham/Hoveton without and with a NDR in the base year, 2017 and 2032 (**Appendix 1.15 A**).

1.6 Traffic flows without a NDR assume committed and JCS development and therefore give some indication of the scale of traffic growth arising from NEGТ.

For example, traffic link south of Wroxham bridge (no 17 without NDR; no 120 with NDR) shows two-way AADT traffic flows as follows:

2006 Base Year	– 14,429
2017 Without NDR	- 15,971
2032 Without NDR	- 18,147
2017 With NDR	- 16,205
2032 With NDR	- 17,689

1.7 Without a NDR, the JCS (and background traffic) increases traffic in Wroxham by over 25% in 2032. The increase is slightly lower with a NDR in 2032. We have requested traffic flows for wider North-East Norfolk in order to consider how traffic would be re-distributed by a NDR. Origin and destination information collected in the NPA traffic survey in winter 2012 has yet to be processed.

1.8 It would also be helpful to examine traffic flows for A1151 Wroxham Road for Saturdays in August in addition to Annual Average Daily Totals and figures for delays and queuing at the river bridge crossing and pedestrian crossings on summer Saturdays and bank holidays.

1.9 The GNDP response is that the increased visitor pressure on the Broads has been considered in the Habitats Regulation Assessment. In relation to Wroxham/Hoveton, we have seen no evidence that the GNDP has considered the impact of NEGТ traffic on the A1151 in relation to impacts on residents and visitors in particular on noise, air quality, road safety, historic assets and the local economy. The Sustainability Appraisal does not assess the impacts of NEGТ option on Wroxham/Hoveton.

1.10 The GNDP response that some traffic would be related to leisure trips to the Broads and the North Norfolk coast is no doubt correct. Some of these trips are likely to have their origins in the NEGТ.

1.11 The GNDP also states that any out-commuting will likely be associated with new employment opportunities north of the Bure, as opposed to the NEGТ. It is far more likely that NEGТ employment sites would attract rural commuters.

1.12 NNTAG is concerned that increased traffic pressure in Wroxham/Hoveton from NEGТ could lead to the resurrection of plans for a bypass. In the Wroxham Parish Plan (April 2011), respondents cited the large

volumes of traffic on A1151 through the village as a major concern, with a bypass as the preferred solution.

1.13 In 1985, Norfolk County Council adopted a bypass route to the east of the villages on the basis of daily traffic flows which varied between 17,000 in the holiday season and 10,000 in the winter months. (Norfolk County Council Transport Policies and Programme 1993/94). A western route was found to cause very large adverse damage to the natural environment. The River Bure bridge scheme and road orders were confirmed in June 1992 following a public inquiry. However, a successful High Court challenge led to County Council rescinding the line of the bypass. Minor route improvements which followed included a new pedestrian footbridge alongside the road bridge.

1.14 In conclusion, a NEGAT would increase traffic pressures on the A1151 through Wroxham/Hoveton and add to pressure for a damaging bypass. The environmental effects on the twin villages have not been considered by the SA and GNDP.

Table 1: 2006 Base Year

Link	Northbound									Southbound								
	Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)			Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)		
	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT
1	532	806	17	4	15	5	564	816	7,797	733	641	17	4	15	5	765	650	7,799
2	415	714	14	4	15	5	444	723	6,661	668	516	14	4	15	5	697	525	6,614
3	415	714	14	4	15	5	444	723	6,661	668	516	14	4	15	5	697	525	6,615
4	464	679	17	5	15	5	496	690	6,682	649	548	17	5	15	5	682	559	6,958
5	464	680	17	5	15	5	496	690	6,682	649	548	17	5	15	5	682	559	6,958
6	464	680	17	5	15	5	496	690	6,682	649	548	17	5	15	5	682	559	6,958
7	418	607	11	4	15	5	445	616	5,946	579	518	11	4	15	5	605	527	6,443
8	458	713	11	4	7	5	476	722	6,382	622	538	11	4	7	5	641	547	6,632
9	458	713	11	4	7	5	476	722	6,382	622	538	11	4	7	5	641	547	6,632
10	851	811	11	4	10	6	872	821	8,519	780	921	11	4	10	6	801	931	9,151
11	648	555	16	4	7	5	671	565	6,548	577	661	16	4	7	5	600	671	6,748
12	372	581	12	4	0	0	384	585	5,132	652	416	12	4	0	0	664	421	5,795
13	375	572	12	4	0	0	387	576	5,108	647	421	12	4	0	0	659	426	5,805
14	353	621	19	6	0	0	372	628	5,114	784	494	19	6	0	0	803	501	6,931
15	367	641	23	8	0	0	390	649	5,226	826	490	23	8	0	0	849	498	7,028
16	334	515	12	4	0	0	346	520	4,553	628	434	12	4	0	0	640	438	5,981
17	465	787	22	10	1	1	489	799	6,463	838	558	22	10	1	1	861	570	7,966
18	446	732	23	10	1	1	470	744	6,020	781	527	23	10	1	1	805	538	7,459

Table 2: 2017 without NDR scenario

Link	Northbound									Southbound								
	Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)			Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)		
	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT
1	638	780	17	5	15	5	670	790	8,761	739	689	18	8	17	7	774	704	8,585
2	535	686	15	5	15	5	565	696	7,633	678	573	16	7	0	0	694	580	7,420
3	535	686	15	5	15	5	565	696	7,633	678	573	16	7	0	0	694	580	7,420
4	658	662	18	6	15	5	691	673	7,844	669	688	17	7	20	9	706	704	8,017
5	658	662	18	6	15	5	691	673	7,844	669	688	17	7	20	9	706	704	8,017
6	658	662	18	6	15	5	691	673	7,844	669	688	17	7	20	9	706	704	8,017
7	612	596	12	4	15	5	639	606	7,014	607	657	14	6	20	9	641	672	7,440
8	691	785	13	5	7	5	711	795	7,725	727	671	14	5	17	7	758	684	7,857
9	691	785	13	5	7	5	711	795	7,725	727	671	14	5	17	7	758	684	7,858
10	986	861	13	5	10	8	1,009	874	9,603	906	1,094	15	6	20	10	942	1,110	10,718
11	774	659	17	5	7	5	798	670	7,760	738	852	12	5	9	7	759	864	8,442
12	357	505	13	4	0	0	370	509	4,874	592	404	11	4	1	1	604	409	5,433
13	361	501	13	4	0	0	373	506	4,869	588	412	11	4	1	1	599	417	5,457
14	360	621	20	9	0	0	379	630	5,298	873	510	29	5	1	1	904	516	7,061
15	404	714	24	10	0	0	428	724	5,849	871	559	35	7	1	1	906	566	7,466
16	393	516	13	4	0	0	406	520	5,006	630	486	23	4	1	1	654	492	6,152
17	535	848	24	11	1	1	561	860	7,333	852	609	45	16	3	3	899	628	8,638
18	522	805	24	11	1	1	547	817	6,924	798	578	42	16	3	3	843	597	8,129

Table 3: 2017 with NDR scenario

Link	Northbound									Southbound								
	Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)			Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)		
	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT
101	639	588	17	4	15	5	672	597	7,713	608	617	13	7	17	7	638	631	6,878
102	538	481	16	3	15	5	569	489	6,566	546	492	11	6	0	0	557	498	5,702
103	538	481	16	3	15	5	569	489	6,566	546	492	11	6	0	0	557	498	5,702
104	562	448	17	3	15	5	594	456	6,558	525	516	11	7	17	7	554	529	6,022
105	562	448	17	3	15	5	594	456	6,558	525	516	11	7	17	7	553	529	6,022
106	562	448	17	3	15	5	594	456	6,558	525	516	11	7	17	7	553	529	6,022
107	564	410	11	2	15	5	590	417	6,122	507	518	10	5	17	7	534	531	5,856
108	594	468	11	2	7	5	612	475	6,351	560	531	10	5	17	7	587	544	6,192
109	594	468	11	2	7	5	612	475	6,351	560	531	10	5	17	7	587	544	6,192
110	724	421	11	2	10	8	745	431	6,797	522	683	9	5	20	10	550	698	6,884
111	765	324	10	1	7	5	782	330	6,553	448	675	5	4	9	7	462	686	6,368
112	710	501	9	1	0	0	719	502	7,292	587	611	6	4	1	1	594	616	7,032
113	721	503	9	1	0	0	731	504	7,357	590	621	6	4	1	1	597	627	7,118
114	721	503	9	1	0	0	731	504	7,357	590	621	6	4	1	1	597	627	7,118
115	595	816	23	15	0	0	619	831	7,859	527	760	12	13	1	1	540	774	8,136
116	595	816	23	15	0	0	619	831	7,859	527	760	12	13	1	1	540	774	8,136
117	459	721	23	14	0	0	482	735	6,666	467	591	11	13	1	1	478	605	7,025
118	463	721	23	14	0	0	486	735	6,675	468	591	11	13	1	1	480	605	7,027
119	450	723	22	14	0	0	473	737	6,667	577	595	15	13	1	1	594	609	7,313
120	525	849	26	17	1	1	552	868	7,578	820	641	48	16	3	3	872	660	8,627
121	515	806	27	17	1	1	543	825	7,136	762	606	46	16	3	3	811	625	8,063

Table 4: 2032 without NDR scenario

Link	Northbound									Southbound								
	Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)			Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)		
	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT
1	832	1,256	23	11	15	5	870	1,273	12,394	996	962	24	13	17	7	1,037	983	11,920
2	766	1,203	22	11	15	5	803	1,219	11,538	969	876	22	13	0	0	991	889	11,011
3	766	1,203	22	11	15	5	803	1,219	11,538	969	876	22	13	0	0	991	889	11,011
4	1,037	1,242	27	14	15	5	1,079	1,262	12,362	964	946	22	15	20	9	1,006	970	11,555
5	1,037	1,242	27	14	15	5	1,079	1,262	12,362	964	946	22	15	20	9	1,006	970	11,554
6	1,037	1,242	27	14	15	5	1,079	1,262	12,362	964	946	22	15	20	9	1,006	970	11,554
7	1,009	1,176	21	13	15	5	1,044	1,195	11,490	917	903	20	14	20	9	957	926	10,953
8	985	1,292	21	14	7	5	1,013	1,311	12,043	1,108	950	21	14	17	7	1,147	971	11,693
9	985	1,292	21	14	7	5	1,013	1,311	12,043	1,108	950	21	14	17	7	1,147	971	11,693
10	1,220	1,357	23	15	10	8	1,253	1,379	14,330	1,400	1,292	27	16	20	10	1,447	1,318	15,619
11	1,095	1,332	26	16	7	5	1,128	1,353	13,047	1,184	1,057	21	14	9	7	1,214	1,079	13,304
12	733	859	22	10	0	0	755	869	8,741	956	801	17	13	1	1	974	816	9,395
13	739	857	22	10	0	0	761	867	8,754	949	808	17	13	1	1	968	822	9,429
14	550	602	22	12	0	0	571	614	6,598	986	787	23	16	1	1	1,010	804	8,577
15	533	664	26	15	0	0	558	679	6,951	801	632	28	11	1	1	830	644	8,068
16	483	469	12	4	0	0	495	473	5,622	588	484	14	6	1	1	603	491	6,202
17	630	846	25	13	1	1	657	860	8,577	826	755	53	17	3	3	882	775	9,570
18	649	843	27	14	1	1	677	858	8,342	771	726	51	17	3	3	824	745	9,041

Table 5: 2032 with NDR scenario

Link	Northbound									Southbound								
	Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)			Cars/Lights		HGVs (vehicles)		Bus (vehicles)		Total (vehicles)		
	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AADT
101	717	867	21	6	15	5	753	878	9,833	802	663	15	8	17	7	834	678	8,472
102	661	777	19	6	15	5	695	788	8,918	781	552	13	7	0	0	794	559	7,490
103	661	777	19	6	15	5	695	788	8,918	781	552	13	7	0	0	794	559	7,490
104	752	748	22	6	15	5	789	759	9,102	740	576	13	8	17	7	771	590	7,813
105	752	748	22	6	15	5	789	759	9,102	740	576	13	8	17	7	771	590	7,812
106	752	748	22	6	15	5	789	759	9,102	740	576	13	8	17	7	771	590	7,812
107	729	711	16	5	15	5	759	721	8,678	696	571	11	7	17	7	723	585	7,675
108	791	845	17	6	7	5	814	856	9,213	843	578	11	7	17	7	871	591	8,349
109	791	845	17	6	7	5	814	856	9,213	843	578	11	7	17	7	871	591	8,349
110	984	796	16	6	10	8	1,010	810	10,066	912	830	11	7	20	10	943	847	9,868
111	916	669	15	5	7	5	938	680	9,737	787	784	9	6	9	7	804	797	9,316
112	860	571	18	3	0	0	878	574	9,751	613	674	8	6	1	1	621	682	8,875
113	872	567	19	3	0	0	891	570	9,826	615	685	8	6	1	1	624	693	9,023
114	872	567	19	3	0	0	891	570	9,826	615	685	8	6	1	1	624	693	9,023
115	1,022	1,426	32	26	0	0	1,054	1,452	13,682	734	1,002	19	16	1	1	754	1,018	11,281
116	1,022	1,426	32	26	0	0	1,054	1,452	13,682	903	1,002	23	16	1	1	928	1,018	11,676
117	601	708	21	17	0	0	622	726	7,724	452	492	15	4	1	1	467	496	6,560
118	584	624	22	17	0	0	606	641	7,483	484	447	16	4	1	1	501	452	6,530
119	569	576	20	15	0	0	589	591	7,340	595	513	22	6	1	1	618	520	7,160
120	594	807	24	18	1	1	618	826	8,544	800	688	52	16	3	3	854	706	9,145
121	618	819	26	20	1	1	645	840	8,314	743	655	49	15	3	3	795	673	8,559