

Our ref: Norwich-LP2020-01
Your ref: Greater Norwich Local Plan – Regulation 18

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**Greater Norwich Local Plan
Stage C - Regulation 18 Draft Plan Consultation, 29 January – 16 March 2020**

Dear Mike,

Thank you for inviting Highways England to comment on the Regulation 18 Draft Review of the Greater Norwich Local Plan (GNLP), which is prepared jointly by three local authorities - Broadland District Council, Norwich City Council and South Norfolk Council through the Greater Norwich Development Partnership (GNDP). This document expresses our views on the Draft Strategy and Site Allocations for future development as mentioned in this GNLP.

Highways England is responsible for the operation, maintenance and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding Norfolk, this relates to the A11 and A47 trunk roads.

Consequently, our comments on the draft Local Plan which are set out below are limited to those aspects/strategies which may have impacts related to these two trunk roads.

Draft Greater Norwich Local Plan – Part 1 The Strategy

Consultation Questions for Section 2 – Greater Norwich Spatial Profile

Q5. Is there anything that you feel needs further explanation, clarification or reference?

Useful if Map 2 Greater Norwich main transport links highlighted the Trunk Road and Major Road networks, together with the major scheme proposals which are programmed for delivery.

Consultation Questions for Section 3 – The Vision and Objectives for Greater Norwich

Q8. Is there anything that you feel needs further explanation, clarification or reference?

Infrastructure

To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity to allow access to economic and social opportunities.

Suggest that this is reworded to highlight the delivery of infrastructure to provide improved connectivity by encouraging modal shift and other carbon reducing measures, and where this cannot be achieved, other physical measures to support existing community to allow access to economic and social opportunities

Consultation Questions for Section 4 – The Delivery of Growth and Addressing Climate Change

Q11. Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?

Funding for the Strategic Road Network will also be provided through the current and future Road Investment Strategies within the Statement of Funds Available

Q12. Do you support, object, or have any comments relating to the Climate Change Statement?

Highways England welcomes the opportunities through land use policy to reduce the need to travel. By maximising these opportunities, such as remote working will reduce capacity pressures on the Strategic Road Network which is essential to ensure ongoing excellent connectivity and facilitate economic growth.

The policies should be sufficiently flexible to adjust to changing government policy, infrastructure needs and innovation, such as the evolving provision of electric vehicles, and provide sufficient measures/indices to monitor delivery at a local level with stretched targets. The referenced policy documents will likely change over the plan period. This link to [Rising to the Climate Crisis - A Guide for Local Authorities on Planning for Climate Change \(2018\)](#) is not available.

Consultation Questions for Policy 1 – The Sustainable Growth Strategy

Q13. Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

The consideration of main towns and service centers within the hierarchy is reasonable. Levels of growth at these locations and associated land use policy should be focused on developing these sites locations as self-sustaining communities and not dormitory estates acting as satellites to the main conurbations. Failure to achieve this will put unnecessary strain on the existing highway infrastructure

Highways England supports the position that robust steps must be taken to prioritise healthy and sustainable travel

It is noted that three new potential future settlement sites have been proposed at Honingham Thorpe, Hethel and Silfield. It should be made clear that the next review of

this plan will not be necessarily limited to those sites and consideration will be focused on sustainability and good connectivity.

Q14. Do you support, object or wish to comment on the approach for housing numbers and delivery?

The proposed long-term future target year is a minimum of 44,340 new homes in twenty years, between 2018 and 2038. The proposed new allocation is 7,840 distributing in Norwich urban areas and in different main towns, key service centres and village clusters. The only thing I could raise is that the number of housing for annual target around two thousand is very high which may become a road junction capacity issue within medium to long term delivery target.

Consultation Questions for Policy 4 – Strategic Infrastructure

Q23. Do you support, object or have any comments relating to approach to transport?

It is suggested that paragraph 205 should be amended stating that delivery timescales are set out in the current Highways England delivery plan. The dates shown are subject to Development Consent Order and other process, and therefore are subject to change.

Highways England is supportive of the general approach to the policy on strategic infrastructure as it accords with a key purpose of the Strategic Road Network which is to facilitate economic growth.

Where there is a need for additional junctions on the Strategic Road Network, this is subject to government policy as set out in DfT Circular 02/2013 *The Strategic Road Network and the Delivery of Sustainable Development* there is a presumption against new junctions except where they can be demonstrated they meet a strategic growth test.

Q24. Do you support, object or have any comments relating to the approach to other strategic infrastructure (energy, water, health care, schools and green infrastructure)?

Wind power is a key element in the delivery of sustainable energy. This is not mentioned in the plan and should be considered for inclusion. The Strategic Road Network provides the opportunity to facilitate and deliver on and off shore wind installations through good connectivity with the ports. A number of proposed development are which are currently subject to planning consent consideration.

Q26 Are there any topics which have not been covered that you believe should have been?

Windfarms – see Q24

Infrastructure to support the charging of electric cars

Consultation Questions for Policy 5 – Homes

Q33. Are there any topics which have not been covered that you believe should have been?

With the move to more sustainable transport, consideration should be given to how cycles and other non car modes of traffic can be stored, and how electric cars can be charged when not in use.

Consultation Questions for Policy 6 – The Economy.

Q34. Do you support, object or have any comments relating to the approach to employment land?

Highways England supports the delivery of employment sites where there is good connectivity with existing and future housing proposals, particularly where their location can minimise the need to travel, particularly by private car.

Consultation Questions for Policy 7.3 – The Key Service Centres

Q43. Do you support or object or wish to comment on the approach for specific key service centres: (Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham, Wroxham)? Please identify particular issues.

Where the proposed growth is located near or close to the Strategic Road Network, appropriate transport assessments will be required to understand the need for essential highway and other infrastructure to support delivery.

Draft Local Plan-Part 2 Site Allocations

Following sections presented comments only for those proposed new allocated sites as well as few of those already committed sites allocated in the last local plan (2016-2026).

Colney Strategic Employment

The proposed sites within the Colney Strategic Employment Zone is likely to have a significant impact on the B1108/A47 Watton Road junction, and it is suggested early assessment on the junction and the A47 at this location is required to ensure that these sites are deliverable.

Costessey

The existing A47 Longwater junction suffers significant congestion at peak times and the proposed sites in and around Costessey will likely to have a substantial impact on its performance. It is suggested early assessment on the junction and the A47 at this location is required to ensure that these sites are deliverable, together with its connections to the proposed Western bypass.

Cringelford (including employment land at Keswick)

It is likely that the proposed improvement of the A47 Thickthorn Interchange will be able to accommodate the proposed 360 dwelling uplift. However this view should be confirmed with a transport assessment

Easton and Honingham

Highways England agrees with the statements that there could be significant constraint to the proposed development with the existing highway infrastructure and further assessment is required. We welcome the provision of a Road Bus Rapid Transit (BRT) to create sustainable transport opportunities.

Acle, Blofield

The proposed sites may have a significant impact on the A47 and it is suggested early assessment on the junction and the A47 at this location is required to ensure that these sites are deliverable.

Hethersett

It is likely that the proposed improvement of the A47 Thickthorn Interchange will be able to accommodate the proposed 360 dwelling uplift. However this view should be confirmed with a transport assessment

Wymondham

The proposed reasonable alternative site (contingency) will require a new junction onto the A11. Whilst this is agreeable in principle it will need further investigation.

We welcome the opportunity to respond to the Local Plan consultation and we look forward to continued participation in future consultations and discussions. In the meantime, if you have any questions with regards to the comments made in my letter, please do not hesitate to contact me.

For further clarification, please contact us PlanningEE@highwaysengland.co.uk

Yours sincerely

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