

Norwich Cycling Campaign

**A47 North Tuddenham to Easton  
Dualling**

**Scheme Number: TR010038**

Submission and objections to the Scheme  
Prepared by Anthony Clarke

14 September 2021

## **Preliminary Note**

Norwich Cycling Campaign request that the Examining Authority consider this submission.

We attended the public consultation on this proposal in 2017 and wrote to Highways England with our observations. We also wrote to Highways England on July 2020 (see Appendix A).

At 2.12.1 and 2.12.2 (page 50) of the Walking Cycling and Horse-riding assessment report. Highways England refer to “Norfolk Cycling Campaign”.

Whatever the reason behind this misrepresentation, it does confirm that Highways England were aware of our interest. Despite this, we were not made aware of the Inquiry and were unable to register as an Interested Party.

## **Summary**

Although this submission is mainly about the WCHR assessment and report,

Norwich Cycling Campaign are concerned about the implications for the proposed extension to the Norwich Northern Distributor Road.

We have identified a number of omissions in the WCHR Assessment and Review which impact on the scheme.

We hope that this will assist the Examining Authority.

## **01 The timing of this Inquiry**

We wish to raise the matter of the timing of this Inquiry in relation to the proposals for the Western Extension to the Norwich Northern Distributor Road. No date has been set for an Inquiry into this proposal.

The proposals under examination at this Inquiry are intimately linked with the Western Extension of the NNDR by the interchange at Wood Lane. We understand that the costs of these particular works could be in the region of £50-80 million.

The current Inquiry (based on the designs submitted) appears to presuppose that the Western Extension to the Norwich Northern Distributor Road is a given fact. If there is no approval given for the construction of the Western Extension in its present form then this Wood Lane interchange will become a very expensive white elephant.

There are several reasons to question if the Western Extension will go ahead in its present form, including:

- Environmental issues. In March 2006 Norfolk CC deferred the decision to consult on the route due to environmental concerns by English Nature and the Environment Agency regarding the Wensum Valley. Many questions have been raised about the impact of the scheme on wildlife and the environment.
- Costs. Norfolk County Council incurred a cost overrun of £68 million on the Norwich Northern Distributor Road which they have refused to explain. Department for Transport have still to agree the funding for the Western Extension.
- An alternative route may have to be considered.

This raises a question: will the approval of the present scheme including the Wood Lane interchange, be used as a lever at the Inquiry into the Western Extension of the NDR?

It also raises another question. Does the manner in which these interlinked proposals are being determined undermine public confidence in the planning system by raising a suggestion of confidential arrangements between public bodies which are not being made public?

## **02 The WCHR ASSESSMENT AND REVIEW**

We refer to DMRB, GG 142 Walking, Cycling and Horse-riding Assessment and Review; we have a number of observations. Extracts from GG 142 are shown in italics.

*Introduction page 5*

*The purpose of this document is to facilitate the inclusion of all walking, cycling and horse-riding modes in the highway scheme development process from the earliest stage, enabling opportunities for new or improved facilities and their integration with the*

*local and national network(s). This could include the creation and/or improvement of facilities for pedestrians, cyclists and equestrians that are separate from the highway.*

*WCHAR is intended to provide increased collaboration, interaction and engagement with key Stakeholders.*

*Terms and definitions p9*

*WCHAR study area - An area surrounding a highway scheme that the Lead Assessor has determined as being relevant to the WCHAR process.*

*4.6.1 p15, 4.6 The Lead Assessor shall define a WCHAR study area on a scheme-by-scheme basis.*

*4.6.1 The WCHAR study area should typically extend 1km surrounding a small highway scheme and 5km surrounding a large highway scheme.*

The choice of 5km seems somewhat arbitrary and has not been supported by evidence. Norwich Cycling Map shows cycling distances from the City centre: 10, 15, 20, 25, 30 and 35 minutes (representing 6.5 km). Various websites and blogs suggest that up to ten miles is a practical commuting distance for a fit, properly equipped cyclist on a route fit for purpose (no objective evidence is offered).

LTN 1/120, Cycle Infrastructure design, Section 3 “Planning for Cycling” states:

**3.1.3** *Planning for cycling should be based around providing a network of on- and/or off-carriageway routes that are suitable for all abilities. Subject to topographical constraints, the aim is to create a densely spaced network (typically with 250m to 1km spacing between routes depending on the density of land use) so that all people can easily travel by cycle for trips within and between neighbourhoods. In addition to this there will be longer distance routes within the local network that may serve leisure, tourism and utility cycling.*

## **02.01**

The WHCR Assessment, Figure 1-1 p3, shows the WCHR area:

- North to Attlebridge A1067
- East to the Barnard Road/Wendene roundabout on the A1074, Dereham Road, New Costessy
- South East to include parts of Bowthorpe and the B1108 Watton Road
- South to include Barnham Broom, Barford, the B1108 and the Yare valley
- West to Etling Green Dereham

Within this area there are important features which are not mentioned in either the Assessment or the Review:

- The Longwater Retail Park (see 02.01.01 below)
- The Longwater Interchange (see 02.01.02 below)
- The Costessey Park and Ride (see 02.03 below)
- The Royal Norfolk Showground (see 02.01.04 below)
- The extension of the Norwich Green Pedal Way to Easton by way of a new bridge over the A47 at Long Lane (see 02.01.05 below)
- Shared cycle path along the Dereham Road, A1074, Norwich (see 02.01.06 below)
- Easton College (brief mention only) (see 02.01.07 below)
- The impact of the Western Extension to the Norwich Northern Distributor Road on WCHR routes in the area of this scheme (see 02.01.08 below)
- The commuter, recreation and tourism route for cyclists along the Yare Valley from New Road, Bowthorpe and extending west to Dereham (see 02.01.09 below)
- The commuter, recreation and tourism routes for cyclists from Easton College West to Honingham, East Tuddenham, Mattishall and Dereham (see 02.01.10 below)
- Industrial and Commercial sites between the Dereham Road, A1074, and Barnard Road (see 02.01.11)
- The Food Enterprise Park at Easton (see 02.01.12)

#### **02.01.01 The Longwater Retail Park**

The Longwater retail park is one of the largest in Norfolk, with supermarkets, clothing and household goods stores, a gym, takeaway food stores, a filling station etc. It is quoted as being within a 15 minute drive of almost 150,000 people.

Access for cyclists is limited; from Ringland Lane by way of Sir Alfred Munnings Way and from the Dereham Road A1047. There is no connection with Low Road to the West.

There has been a long-term plan for a cycle/pedestrian bridge to Easton (see 02.01.02 below).

#### **02.01.02 The Longwater Interchange**

There is no mention of the Longwater Interchange in either of the WCHR Assessment or Review documents.

The double roundabout entry and exit from the A47, has been recognized as a problem for several years.

The “Joint Core Strategy Document for Broadland, Norwich and South Norfolk” June 2014 contains several references to the Longwater roundabouts and the problems with overload and congestion.

The JCS also mentions:

- *T 5 Longwater Junction Improvements (p 121)*
- *T18 Pedestrian/Cycle links to Longwater (p123)*

The “Longwater and Easton Transport Strategy” May 2014, mentions provisions for cycling:

- *1.3 “Further work will be needed to take forward and refine the strategy, including additional work to develop and refine options for sustainable transport: walking, cycling and public transport.”*
- *Table 4.1: List of Options Considered*
  - 1 Easton College to Long Lane Bus/Cycle Link. A public transport/pedestrian/cycle corridor from Easton College running south of the Showground, crossing A47 into Long Lane*
  - 2 Easton College to Long Lane. Pedestrian /Cycle Link as 1. but for cyclists and pedestrians only*
  - 3 Cycle and Pedestrian Bridge over A47 from Easton. A pedestrian/cycle bridge over the A47 linking Easton with the Longwater. Retail Park*
  - 4 Easton village Public Transport Corridor. A new bus/cycle lane between Easton village and the existing Longwater junction south roundabout*

The “Dereham Road/Longwater Lane Traffic Signal Improvements and Widening of Dereham Road, Feasibility Study”, September 2015. Section 5 “Provisions for Pedestrians and Cyclists ...” contains several proposals. There are other mentions of cycling infrastructure in addition.

However, “Longwater and Easton Transport Strategy – further assessment ” October 2015, does not mention cycling, and no explanation is given.

Norfolk County Council website, September 2021, lists the following improvements:

- 1. Free flow left turn slip road from William Frost Way to Dereham Road*
- 2. Widening Dereham Road between the Longwater roundabout and the new traffic lights at Lodge Farm 2*
- 3. Longwater Lane/Dereham Road junction improvement*
- 4. Dereham Road widening to two lanes in each direction (east section)*
- 5. Part signalisation of the Longwater southern (Showground) roundabout*
- 6. Free flow slip road form Dereham Road westbound onto A47 eastbound*

7. *A47 eastbound off slip road improvement*
8. *Easton Village public transport corridor*
9. *Cycle and pedestrian bridge over the A47*
10. *Improvement to the Easton roundabout*

Highways England should have consulted with Norfolk County Council, and other local authorities as stakeholders (p6. GG 142, WCHR process summary). It may have been possible to clarify the exact position on the various plans and proposals referred to above and to provide an explanation of why those for cycling have not been taken forward.

### **02.01.03 The Costessey Park and Ride**

See 02.05 below under Intra Modal

### **02.04 .04 The Royal Norfolk Showground**

The Royal Norfolk Showground is a 150 acre site which hosts major indoor and outdoor events every week:

- 3,000 sqm indoor Arena with capacity for up to 4,000
- 5 conference and meeting rooms
- Range of small and large exhibition areas

### **02.01.05 The extension of the Norwich Green Pedal Way to Easton**

The Greater Norwich Local Cycling and Walking Infrastructure Plan (2021), describes at Reference 29, the “Green Pedalway extension to Easton, a medium/long term [project]. Path connection between Drapers Way and Long Lane; widening Long Lane; cycling walking bridge over A47, off carriageway shared use path to Easton from Costessey Park and Ride. While this project is interesting it does not address the matter of access across the A47 to Longwater Retail Park, or the problems for cyclists trying to navigate the southern roundabout of the Longwater interchange

### **02.01.06 Shared cycle path along the Dereham Road, A1074, Norwich**

The “Dereham Road/Longwater Lane Traffic Signal Improvements and Widening of Dereham Road, Feasibility Study”, September 2015. Section 5 “Provisions for Pedestrians and Cyclists ...” contains several proposals. There are other mentions of cycling infrastructure in addition. It is not clear as to the reasons why these plans have not been taken forward and our general comments at 02.01.02 apply here also.

### **02.01.07 (Easton and Otely) College**

These Colleges were demerged in 2020 and Easton College is now part of Norwich City College. Easton College has 5,000 students, and the website states; “We encourage staff and students to cycle to college if it is safe and appropriate to do so. Switching to cycling for shorter journeys helps to make capacity available for those with longer journeys.”

he new cycle/pedestrian bridge over the A47 at Easton should improve access to the College from the North, but access from Norwich still remains a problem. There is also the potential of the minor roads to the west. described at 02.01.10.

It is somewhat ironic that Easton College is the home of Active Norfolk (Norfolk County Council) who are charged with encouraging active sport and recreation in Norfolk.

#### **02.01.08 The impact of the Western Extension to the Northern Distributor Road**

Most of the works for this major road infrastructure scheme are within the 5km WCHR area (02.01 above). It is difficult to understand why the facilities for cyclists trumpeted by Norfolk County Council are not included in this WCHR if only for information purposes.

#### **02.01.09 The routes for cyclists along the Yare Valley**

This WCHR assessment concentrates on routes separated from the road network such as bridleways. However, cyclists have a general right to cycle on the highway (unless expressly restricted by statute).

The 5km WCHR zone extends in the east to Bowthorpe Hall Road, which provides a connection for cyclists to Norwich City centre. Heading west it connects on a cycle path to Chapel Break Road, and then continues west on New Road to pass under the A47 to Bawburgh where it continues on Harts Lane to the junction with Marlingford Road. After a short distance, a right hand turn onto Bawburgh Road leads to Easton College. Continuing along Bawburgh Road, through Marlingford, Barnham Broom, and Yaxham the route leads to Dereham (the western extent of the WCHR zone).

This is an attractive route used by recreational and tourist cyclists as well as commuters.

LTN 1/20 states on page 22:

*Planning for cycling should be based around providing a network of on- and/or off-carriageway routes that are suitable for all abilities. Subject to topographical constraints, the aim is to create a densely spaced network (typically with 250m to 1km spacing between routes depending on the density of land use) so that all people can easily travel by cycle for trips within and between neighbourhoods. In addition to this there will be longer distance routes within the local network that may serve leisure, tourism and utility cycling.*

#### **02.01.10 The routes for cyclists west from Easton College**

As described above (02.01.09), New Road provides a connection between the centre of Norwich and Easton College. College Drive, through the centre of the campus, connects Bawburgh Road with Broom Lane (heading west). Broom Lane is described as a “maintained unsurfaced road”; the western section surface needs attention. Red Barn Lane connects with Grange Lane which is another “maintained unsurfaced road” which needs attention as it is overgrown. From here there are connections via minor roads to Colton, Honingham, East Tuddenham, Mattishall, Yaxham and Dereham.



### **02.01.11 Commercial sites between the Dereham Road, A1074, and Barnard Road**

Described on Open Street Map as Bowthorpe Park Industrial Estate, this is an important industrial and commercial site providing employment for a wide area. Access for cyclists from the West is possible using New Road but a more direct route would be via the Dereham Road except that the Interchange at Longwater is dangerous for cyclists.

### **02.01.11 The Food Enterprise Park at Easton**

The Food Enterprise Park is a 100-acre site which sits inside Greater Norwich Food Enterprise Zone, located just outside Norwich at Honingham Thorpe Farms, adjacent to the A47 in the Dereham Road/Church Lane area. The first 46 acres has Local Development Order status with fast track planning to encourage and support food production, processing and agriculture through the co-location of commercial enterprises. Plots are available to buy or lease to accommodate facilities of 5,000 sq ft to 500,000 sq ft.

Access from the A47 for vehicles is mentioned on the website, and there is a requirement from cycle access to Dereham Road.

### **02.03 Policy Documents Consulted**

*Assessment of walking, cycling, and horse-riding policies and strategies*

*4.8 The assessment report shall contain an analysis of walking, cycling and horse-riding policies and strategies relevant to the WCHAR study area.*

Some important policy documents have been overlooked in Table 2-1 “Summary of legislation and policy ...”; there is no mention of the following:

- “Gear Change” July 2020
- DfT Local Transport Note 1/20 July 2020
- Greater Norwich Local Cycling and Walking Infrastructure Plan May 2021
- Highways England Licence 2015
- Design Manual for Roads and Bridge
  - CD 195 Design for Cycle Traffic May 2020
  - CD 143 Designing for Walking Cycling and Horse Riding May 2020
  - CD 239 Footway and Cycleway Design May 2020 .

With regard to Government policy, “Gear Change” and “Local Transport Note 1/20”, the Highways England Licence April 2015 states:

5.29 In exercising its role as a strategic highways company and complying with the requirements in Part 4, the Licence holder **must** comply with or have due regard to relevant Government policy, as advised by the Secretary of State, with full regard to any implications for the Licence holder's ability to deliver the Road Investment Strategy.

5.30 For the purposes of this section, "relevant Government policy" means all current policies which:

- a. Relate to the activities of the Licence holder, and
- b. Have been:
  - i. Published in England by or on behalf of Her Majesty's Government, or
  - ii. Indicated to the Licence holder by the Secretary of State.

## **02.04 Multi-modal transport services**

*P16, 4.11 Multi-modal transport services, associated infrastructure and interchanges within the WCHAR study area shall be identified and recorded.*

There is no mention of the Costessey Park and Ride which is accessed by motor vehicles and busses from the Longwater interchange which contribute to the congestion at peak times and the dangers perceived by cyclists.

## **02.05 Key Trip Generators**

*p17 4.12 The assessment shall include an analysis of local trip generators and amenities in the WCHAR study area to identify likely desire lines for pedestrians, cyclists and equestrians.*

Omissions include

- The Longwater Retail Park (see 02.01.01 above)
- The Costessey Park and Ride (see 02.01.03 above)
- The Royal Norfolk Showground (see 02.01.04 above)
- Easton College (see 02.01.07 above)
- Industrial and Commercial sites between the Dereham Road, A1074, and Barnard Road. (see 02.01.11 above)
- Dereham Road A1074 for Norwich (see 02.01.06 above)
- The recreation and tourism route for cyclists along the Yare Valley (see 02.01.09 above)
- The recreation and tourism routes for cyclists from New Road, Bowthorpe, west via Easton College (see 02.01.10 above)
- Food Enterprise Park at Easton (see 02.01.12 above)

## **02.06 Future Development**

*4.12.1 The assessment should include an assessment of committed future development in the WCHAR study area, including any improvements to multi-modal transport services, interchanges and facilities.*

Omissions include

- The Food Enterprise Park at Easton (see 02.01.12 above)

## **02.07 WCHR facilities**

*Existing WCHR facilities p17-18*

*NOTE 2 A crucial element of the strategic network assessment is to establish the longer term plans for county-wide and town/city-wide strategic networks.*

The extension of the Norwich Green Pedal Way to Easton by way of a new bridge over the A47 at Long Lane and the improvements to the Longwater interchange should have been considered here. (see 2.01.05 above)

## **03 Consultation and liaison with stakeholders**

### **03.01 Highways England and Stakeholders**

We have referred to several matters which point to a lack of engagement by Highways England with stakeholders, including:

- The Longwater Interchange (see 02.01.02)
- The extension of the Norwich Green Pedal Way to Easton by way of a new bridge over the A47 at Long Lane (see 02.01.05)
- Shared cycle path along the Dereham Road, A1074, Norwich (see 02.01.06)
- The impact of the Western Extension to the Norwich Northern Distributor Road on WCHR routes in the area of this scheme (see 02.01.08)
- The commuter, recreation and tourism route for cyclists along the Yare Valley from New Road, Bowthorpe and extending west to Dereham (see 02.01.09)
- The commuter, recreation and tourism routes for cyclists from Easton College West to Honingham, East Tuddenham, Mattishall and Dereham (see 02.01.10)

These problems may not be unique to this particular scheme.

The report, "Review of Highways England's engagement approach with local and regional partners" June 2020, (Annex B, Stakeholder Survey Results, p 58) , lists some of the problems experience in relationships between Highways England and stakeholders.

The key findings and recommendations are detailed in section 5, p44.

Under “Going the extra mile”, (p46) the foreword to Highways England licence is quoted:

The Licence emphasises that the role of Highways England is about more than just complying with the letter of the law. We expect the company to go the extra mile in the way it engages with road users and collaborates with other organisations to develop shared solutions. And they must take a lead in promoting and improving the role and performance of roads in respect of broader communal responsibilities, such as the aesthetics of design, safety and the environment, as well as driving forward wider progress on technology and innovation.”

## **GG142 WCHR**

There are several mentions of stakeholders; collaboration, input, interaction and engagement. As Terms and Definitions” (page 8) does not mention stakeholders, there is no definition of “Key Stakeholder” or the difference with a “Stakeholder”. We assume that the definition in the present context is “interested, concerned” (Oxford Pocket Dictionary).

For the benefit of the Examining Authority, could Highways England provide information on the following extracts from GG 142 are (shown in italics).

**03.01** *P5 WCHAR is intended to provide increased collaboration, interaction and engagement with key stakeholders.*

**03.02** *P6 “Stakeholder input“ is indicated at the WCHR assessment, review (preliminary design) and review (detailed design) stages.*

How were stakeholders involved in the preliminary and detailed design stages?

**03.03** *P16 Table 4.7 Information requirements for large and small highway schemes: Information gathered during liaison with key stakeholders.*

What information was gathered during liaison with key stakeholders?

**03.04** *P17 Liaison with key stakeholders*

*4.14 The assessment report shall contain a record of liaison with key stakeholders to understand their specific needs and concerns.*

Please supply the record of liaison with key stake holders

*4.14.1 Liaison with key stakeholders should include representatives for walking, cycling and horse-riding from all local authorities for which the highway scheme is within or extends across their boundaries.*

Which representatives (position or official title will suffice) were involved in liaison?

*4.14.2 Liaison with key stakeholders other than local authorities should be determined by the Lead Assessor in the context of the highway scheme.*

*NOTE Key stakeholders other than local authorities can include walking, cycling and horse-riding organisations as well as disability groups, local businesses and transport operators.*

As there is no mention of “walking, cycling and horse-riding organisations” in the WCHR reports can the Lead Assessor provide evidence of the decision made at that time. A retrospective decision or explanation is not sufficient

**03.05 P18 4.19.3** *The Lead Assessor should assess the latent demand potential by examining existing usage patterns and likely trip generators in the WCHAR study area and through local key stakeholder liaison.*

With reference to the omissions listed at 02.01.05 above can the Lead Assessor provide information on the latent demand potential

**03.06 P21** *Liaison with key stakeholders*

*5.8 The Lead Assessor shall determine the need for further liaison with key stakeholders during the review phase and record the outcomes in the review report.*

*5.8.1 Liaison with key stakeholders at the review phase should be targeted in order to prevent unnecessary delay to a highway scheme or a repetition of liaison at the assessment phase.*

*NOTE Liaison with key stakeholders at the review phase can be useful in identifying new opportunities and reviewing any opportunities resulting from the progression of the highway scheme design.*

Please provide the information required in 5.8, also details of any decision made on “Targeting”.

**03.07 P25 Table B.6** *Liaison with key stakeholders*

*Provide details of liaison with key stakeholders - including organisation details of those contacted.*

*Provide a summary of stakeholder discussions. e.g. agreed meeting minutes or opportunities of interest identified by each stakeholder.*

Please provide the information as required.

**03.08** *P25 Table B.8 Liaison with local user groups and wider public*

*Provide details of liaison with local user groups and the wider public - including organisation details of those contacted.*

*Provide a summary of discussions. e.g. agreed meeting minutes, or opportunities of interest identified by each stakeholder, details of exhibitions held and feedback received.*

Please provide the information as required.

**03.09** *P26 Table B.9 Identified user opportunities*

*Provide details of identified opportunities that are general to the highway scheme and user type – this could include opportunities for matched funding projects with key stakeholders.*

Please provide the information as required.

*I regret that I have run out of time. Anthony Clarke 12 September*