

Norwich  
Cycling Campaign

**A47 Blofield to North Burlingham Dualling  
Scheme Number: TRO10040**

Submission and objections to the Scheme

July 2021

Author Anthony Clarke

## **A personal note**

I began riding a bicycle in 1947 (aged 7) and I have continued ever since. I have cycled in many parts of the UK and Europe and as far afield as the USA, India, the Bahamas, Costa Rica, Uruguay, Israel, and South Africa. I organised tours of up to 20 cyclists in the UK, Holland, Belgium, France and Israel. I have even ridden a bicycle in Antarctica. In the 1960s and from 1988-1995 I was a regular cycle commuter in central London.

When I first started cycling in the middle 1950s, it was usual to see dozens of groups of up to 20 cyclists heading for Great Yarmouth and the coast on a summer weekend, along the A47 (including the Acle straight).

In the period after Christmas, young racing cyclists would have training runs from Norwich to Acle, Great Yarmouth, Caister in the evenings leaving at around 7 pm.

In 2020, the third wave of the National Travel Attitudes Study (NTAS) showed that 66% of adults aged 18+ in England agreed that "it is too dangerous for me to cycle on the roads".

How things have changed in seventy years.

## Summary

This submission has been prepared by Anthony Clarke on behalf of Norwich Cycling Campaign.

The A47 road from Norwich to Great Yarmouth via Acle, has been the subject of many “improvements” which have resulted in the closure of junctions and crossing points. There are only three safe crossing points for cyclists, North-South, along the West East Axis, from the Postwick interchange to Acle a distance of eight miles. The increased speed, and volume, of traffic on the West-East axis has made it too dangerous for cyclists to use.

My submission examines central, and local Government documents, which set out policy on cycling, and compares these policies against the proposals by Highways England for the dualling of the A47 Blofield to North Burlingham (TRO10040).

I shall also refer to the technical documents which set out the requirements for the design of cycle routes including Local Transport Note 1/20 and the relevant sections of the Design Manual for Roads and Bridges.

By reference to these documents I will demonstrate the deficiencies in the proposals submitted by Highways England and make some suggestions as to how some could be remedied.

My submission is mainly concerned with cycling and centres on the “Walking, cycling and Horse-riding Review” (HE551490-GTY-HKF-000-RP-CH-3002 PO2 dated 11/08/20 produced for Highways England. It will address various issues including:

- The schedule and timing for the origination, research and publication of the WCHR Review
- How this schedule does not comply with the WCHR process summary set out on page 6 of DMRB GG142 Walking, cycling and horse-riding assessment and review.
- How this has led to the WHCR Review being a commentary on the final design rather than being the basis of the design process.
- Identifying the other deficiencies in the WCHR Review.
- Setting out a number of proposals as to how the WCHR Review could be improved.

Norwich Cycling Campaign believes that the plans and proposal for this project submitted by Highways England represent a direct challenge to Government policy as set out in “Gear Change”, and if approved by the Examining Authority may be used to subvert this policy.

Version 1.3 18/07/2020

### 3.1 Government Policy

The latest summary of Government policy on active travel is: Hirst, David: House of Commons Library Briefing Paper, number 8615 7 August 2020

#### 3.1.1 National Planning Policy Framework (Appendix 1 G.01 (February 2019))

Page 27, 3.17 There is a direct role for the national road network to play in helping pedestrians and cyclists. The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes. The Government also expects applicants to identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use ..

- The requested underpass at North Burlingham appears to address the issue of a barrier which: "...severs communities and acts as a barrier".
- the planned cycle route on the overbridge is not "easy and safe".

#### 3.1.2 Gear Change July 2020

The Government published "Gear Change: A bold vision for cycling and walking for 2020-25" in July 2020. This plan was described by the Prime Minister as "most ambitious plans yet to boost cycling and walking".

It has been suggested that "Gear Change" is concerned only with the Urban environment and does not apply to Rural areas. I can find no statement within the document to this effect, although the emphasis is on the towns and cities . However:

P 43: "We will ensure that new local and strategic A road schemes include appropriate provision for cycling The new cycling budget is the largest sum ever committed to active travel in this country. But if we are serious about putting cycling at the heart of transport policy, we must further shift the balance between projects for motoring and projects for cycling. To receive Government funding for local highways investment where the main element is not cycling or walking improvements, there will be a presumption that all new schemes will deliver or improve cycling infrastructure to the new standards laid down, unless it can be shown that there is little or no need for cycling in the particular road scheme."

- If the Applicant. or others, wish to make the case that "Gear Change" is concerned only with the Urban environment and does not apply to Rural areas, they should submit a statement to the Examining Authority, supported by evidence.

"A bold new future vision for a new era", (diagram p2), sets four objectives:

- Healthier, happier and greener communities
- Safer Streets
- Convenient and accessible travel
- At the heart of transport decision making

"Key Design Principals" (diagram p21), sets out nine principals:

1. Cyclists must be separated from volume traffic;
  2. Cyclist must be separated from pedestrians;
  3. Cyclists must be treated as vehicles, not pedestrians
  4. Routes must join together;
  5. Routes must feel direct;
  6. Take account of how users actually behave;
  7. Cosmetic alterations should be avoided;
  8. Barriers should be avoided;
  9. Designed only by those who have experience on the road on a cycle.
- The proposals by Highways England do meet these requirements in particular:
    4. There is no West-East connection for cyclists
    5. The route using the overbridge is not direct and does not feel direct
    9. We have seen no evidence of this requirement being complied with

These Design Principals are supplemented by the statements in Theme 2 (pages 24-27).

Appendix p40-49 provides a further 22 summary principals derived from Local Transport Note 1/20.

### **Cycling and Walking Investment Strategy 2016-2020**

The Government published its Cycling and Walking Investment Strategy for 2016-20 in April 2017. This Strategy set out the Government's "ambition that cycling and walking are the natural choices for shorter journeys, or as part of a longer journey." The Strategy set an objective to double cycling rates and to increase the number of children aged 5 to 10 that usually walk to school from 49% to 55% by 2025.

- The issue of connections to Lingwood primary school and Acle Academy have not been addressed in these proposals

At 3.24, "Strategic Road Network" the document states:

"The Department will continue to work closely with Highways England to maximise the impact of their Cycling Strategy, which was published in 2016.

This will enable cycle-proofing of the strategic road network and reduce any severance from new road schemes by enhancing access for a variety of users, including pedestrians, horse riders, and people with disabilities or health conditions. Highways England is also committed to upgrading and increasing the number of safe crossings on the network in the interests of the safety and convenience of more vulnerable road users, as well as ensuring they integrate with other networks, including local roads, and existing and emerging rail links. "

- These proposals by Highways England do not directly address the issue of severance
- The proposed route on the overbridge at N Buringham is not a "safe crossing" as it does not address the issue of perceived safety and the high volume of HGVs which will use the bridge. (See Appendix A).

At 1.16 it states: "Importantly, two out of every three personal trips are within five miles, the government considers this "an achievable distance to cycle for most people, with many shorter journeys also suitable for walking.

- Five miles is eight km – the WCHR survey area is five km. Should the WCHR assessment and review take this into account?

### 3.1.3 Cycle Infrastructure Design Local Transport Note 1/20 July 2020

p 6 states: “This guidance should be applied to all changes associated with highway improvements, new highway construction and new or improved cycle facilities ...”.

- There is no evidence that LTN 1/20 has been considered in relation to these proposals.

1.12.3 (page 6) The guidance contains tools which give local authorities flexibility on infrastructure design and sets a measurable quality threshold to achieve when designing cycling schemes. The Cycling Level of Service (CLoS) at Appendix A and the Junction Assessment tools (JAT) at Appendix B are new mechanisms introduced to set minimum quality criteria. Only schemes with a minimum score of 70% under the CLoS, no critical fails and under the JAT no red-scored turning movements will generally be considered for funding. Where schemes are proposed for funding that do not meet these minimum criteria, authorities will be required to justify their design choices. It still gives local authorities flexibility on design of infrastructure, but sets an objective and measurable quality threshold.

- It does not seem that the Cycling Level of Service (CLoS) has been applied to these proposals.
- Neither has the Junction Assessment tools (JAT) .

1.1.3 To effectively apply this guidance those designing cycling and walking schemes should have an appropriate level of of experience and training. An example would be the Institute of Highway Engineers’ Professional Certificate & Diploma in Active Travel that allows applicants to demonstrate their experience and produce work to the required standard.

- What qualifications have those designing the present scheme?

P7 Core design principles:

1.5.2 Networks and routes should be **Coherent; Direct; Safe; Comfortable** and **Attractive**.

1.5.3 Inclusive design and accessibility should run through all five of these core design principles. Designers should always aim to provide infrastructure that meets these principles and therefore caters for the broadest range of people.

#### **Coherent**

Cycle networks should be planned and designed to allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality.

#### **Direct**

Cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles.

#### **Safe**

Not only must cycle infrastructure be safe, it should also be perceived to be safe so that more people feel able to cycle.

### **Comfortable**

Comfortable conditions for cycling require routes with good quality, well maintained -smooth surfaces, adequate width for the volume of users, minimal stopping and starting and avoiding steep gradients.

### **Attractive**

Cycle infrastructure should help to deliver public spaces that are well designed and finished in attractive materials and be places that people want to spend time using.

There are subtle differences in the interpretation of the five Core principals given in GG 195 Designing for walking, cycling, and horse-riding, Table 2.1.2 page 8. In particular, the statement in 2.1.2, “designed to achieve the best balance” which seems to allow scope for the designers to give priority to motor traffic.

### **Summary Principals** pages 9-14

There are 22 Summary Principals which are to be applied.

- While these design principals do not contradict the similar statement on p8 of DMRB CD 195 they are more detailed.

### **3.1.4 DfT Road Investment Strategy 2: 2020-2025**

P41 Investment in the SRN can support this agenda by improving cycling and walking provision along trunk ‘A’ roads, and reducing severance effects where local cycling and walking routes cross the SRN or are separated completely by it.

In the long-term, our vision will mean that non-motorised users will be able to access good quality routes for their journeys segregated from an SRN that primarily serves long-distance, higher speed traffic.

- The issue of severance has been raised above.

## **3.2 Norfolk County Council**

Norfolk County Council, the local transport authority, have published a number of policy documents which support and implement Government policy.

### **3.2.1 Greater Norwich Infrastructure Plan June 2021**

Page 6: 1.13 Many elements of key infrastructure can be implemented incrementally to reflect emerging patterns of growth. This includes: Providing better cycling and walking infrastructure to maximise the benefits of active travel, extending cycle and walking networks that are already established.

- How do the present proposals support this policy in particular in “extending cycling and walking networks that are already established”?

Page 16: 3.14 Strategic priorities: To support the development of safer walking and cycling routes to schools.

- How do the present proposals support this policy in particular with regard to Lingwood Primary School and Acle Academy.?

Page 49: Norwich/Broadland, Yarmouth Road Sustainable Transport Corridor (including BRT and cycling)

- How do the present proposals support this ambition – a West -East strategic route?

### **3.2.2 Greater Norwich - Local Cycling and Walking Infrastructure Plan May 2021**

This document quotes from “Gear Change” at p5, and LTN 1/20 at p 9. It also provides at pages 7 and 8 a comprehensive list of local policies to be consulted. The core study area (page 11) includes the 5km WCHR area around the current proposals for the A47 and extends through Acle to Great Yarmouth.

- Although published after the WHCR Review was signed off, has this document been considered by Highways England?

### **3.2.3 Great Yarmouth Cycle Map 2-17**

Published by Norfolk County Council and Great Yarmouth Town Council, shows a cycle route (Acle Adventure Cycle) from the centre of Acle, along the A1064, to Stokesbury, Runham and Caister to Great Yarmouth. An alternative route is shown via Maultby to Ormesbury.

This route could link via Mill Lane Acle and The Windle to the present scheme. See also 3.2.1 above and Page 49: Norwich/Broadland, Yarmouth Road Sustainable Transport Corridor (including BRT and cycling).

- How do the present proposals support this ambition – a West -East strategic route

### 3.2.4 Norfolk Cycling and Walking Strategy 2017

Section 2 (no page number) Our vision is that by 2025 :

- More people walk and cycle to get to places of work and education, and for leisure;
- Walking and cycling are normal activities for most people, most of the time, and routes are direct, convenient and pleasant.
- Norfolk provides high quality facilities for active travellers, who will be welcomed as valuable customers for business, and as positive contributors to the community;
- Barriers to walking and cycling (such as concerns about safety and security) will have been addressed to ensure that residents and visitors are not put off from active travel;
- Norfolk delivers safe and attractive opportunities for cycling and walking for all types of user, including the elderly, those with chronic health conditions including physical and mental disabilities, people with visual impairment and young families;
- People can transfer between active travel modes to other public transport services easily due to well-designed interchanges and facilities

- How do the present proposals support these six points?

Section 12 (no page number) Public Consultation

Norfolk County Council ran a public consultation between March and April 2016 to gauge public reaction to the plan.

- 90% of respondents agreed with the plan's vision
- 80% agreed with suggestions to improve cycle routes
- 85% agreed with our recommendations to improve cycle parking facilities
- 83% agreed with our suggestion for improved design of public spaces to better accommodate cyclists
  - 77% agreed with calls for improved signage
  - 77% agreed that cycle routes should integrate better with public transport
  - 70% agreed that cycle hire schemes would be beneficial
  - 83% agreed that it is important to "cycle proof" the strategic road network
  - 78% agreed that improvements to Norfolk's walking network should be done at a strategic, 'whole network' level
  - 85% agreed that new developments should be designed to encourage people to cycle and walk more.

These results from a large scale public consultation give an indication of public support for improvements to cycle and walking infrastructure. This should be compared with the mediocre efforts at public consultation by Highways England on the present proposals and the conclusions of "no demand etc".

### 3.2.5 Norfolk Access Improvement Plan

This plan supports and confirms the plans set out in other local strategy documents.

However, in addition, it identifies opportunities for cycle and other green tourism:

Section 3 Future User Needs: " Collaborate with the National Trust, bird reserves, the Broads Authority, the Norfolk Coast Partnership, the Marine Partnership., and others to develop linked trails and cycle routes which encourage tourists to visit popular areas out of season..."

- As tourism is not mentioned in the WCHR review, how do the present proposals support this important local industry?

### **3.3 Broadland District Council**

#### **3.3.1 East Broadland Green Infrastructure Project Plan Dec 2015**

##### **3.3.1.1 Neighbourhood Plans**

A number of Local Neighbourhood plans in the East Broadland area are in the process of or have been adopted:

Acle Neighbourhood Plan highlights the need for improving the footpaths, cycleways and bridleways connecting Acle to the surrounding villages and countryside,

The Brundall Neighbourhood Plan identifies the improvement and joining up of the network of footpaths and cycleways to help the safe movement by foot and bicycle of residents or visitors and reduce car reliance, forming an orbital route around the village.

The 'Plumsteads' Neighbourhood Plan highlights the provision of walking and cycling opportunities between Great Plumstead, Little Plumstead and Thorpe End Garden Village, the improvement of the footpath and cycleway along Water Lane, the extension of the woodland walk around Thorpe End Garden Village, and a safe cycling and walking NDR crossing point at Low Road.

The Blofield Parish Neighbourhood Plan mentions the creation of facilities to encourage walking and cycling within and between Blofield and Blofield Heath. construction of a footpath or cycleway between Blofield and Blofield Heath, alongside Woodbastwick Road or Ranworth Road. The development of a connected network of high quality footpaths or rights of way, for better cycling and walking links from new developments to village amenities and the countryside,

The Strumpshaw Parish Council Neighbourhood Plan mentions the completion of the footpath along Norwich Road in Strumpshaw between Beech Drive and Goat Lane

- How do the present proposals support these Neighbourhood plans?

##### **3.3.1.2 The 16 Projects**

The Plan details 16 Projects to be considered of which the following are particularly relevant to the present proposals:

###### *Project 5: A47 Safe Foot and Cycle Crossing*

A safe foot and cycle crossing over the A47 between Lingwood and North Burlingham. This will provide a vital link between the settlements and the Burlingham Trails to the north and south of the A47, as the fast road severs access for active transport, while it is difficult for cars to cross. The 2015-2021 A47 dualling plans for the Blofield and Burlingham section will increase the severance effect. This crossing would provide a way to integrate communities on both sides of the road, whereby at present pedestrian crossings are at Blofield and Acle. North of the Blofield crossing, there is currently no formal walking link (see Project 8).

###### *Justification*

- Consideration should be given to the project, as it is in a central location within the East Broadland area making it a key site for a safe crossing point to link the settlements on the north and south sides of the A47.
- The A47/A12 Feasibility Study (AECOM, 2015b) highlights that between Blofield and North Burlingham, the average daily speed is 72km/h and average daily traffic volume is approximately 27,000 vehicles. This presents a significant barrier to pedestrians, cyclists and wildlife. With predicted traffic growth of 21% by 2021 and 45% by 2031 (from a base year of 2013) and the impact of dualling is considered, there is a greater need for a safe crossing point.
- Since there is growth expected in the region, especially in the Blofield area which currently has no formalised walking and cycle links North of the A47, the crossing will form a crucial link between settlements either side of the A47. It would also form a green corridor for wildlife and people by connecting both sides of the Burlingham Trails network.

#### *Project 8: Link from Blofield to Blofield Heath*

Conduct a feasibility study into the creation of a link between Blofield and Blofield Heath. This would provide a crossing point over the A47 with the potential further links from Blofield Heath East to the Burlingham Trails and West to the 'Plumsteads'. Since Blofield has good PROW links to the settlements south of the A47, it would be key in integrating the communities both north and south. A potential route could follow north from the new development sites in Blofield over the A47 using the bridge with an existing path, then along a new path by the side of road which turns right onto Bullacebush Lane and then left onto Ranworth Road until it joins with the pavement in Blofield Heath. In the project development stage, a feasibility study will investigate the possible routes and costs and involve landowner consultation to identify the best route.

#### *Justification*

- In the stakeholder meetings, the project was a high priority for Blofield Parish Council.
- A feasibility study to assess the potential of the project and provide a detailed understanding of the advantages and disadvantages in which to make an informed decision can be achieved at a low cost.
- It follows Theme 4 of the GI Strategy (GNDDP, 2007) by encouraging people to adopt low-carbon lifestyles with minimal requirements for car use.

- How do the present proposals support these two plans?

### **3.3.2 Local Impact report**

LOCAL IMPACT REPORT BROADLAND DISTRICT COUNCIL APPLICATION BY:  
Highways England for an Order Granting Development Consent for the A47 Blofield to  
North Burlingham project PLANNING INSPECTORATE REF: TR010040 District Council  
Ref: 20210720

To support the delivery of green infrastructure in the District in the short, medium and long term, Broadland District Council has had prepared, on its behalf, the East Broadland Green Infrastructure Project Plan (See appendix 2 of the LIR). The plan is intended to support the future growth of the region by proposing green infrastructure projects with the capacity to accommodate future developments. Project 5 of the plan "A47 Safe Foot and Cycling Crossing" seeks to deliver a safe foot and cycle crossing over the A47 between

Lingwood and North Burlingham. This will provide a vital link between the settlements and the Burlingham Trails to the north and south of the A47. The project plan identifies that the A47 dualling plans would increase the severance of the A47 and that a new crossing would provide a way to integrate communities on both sides of the road.

Highways England has dismissed these projects, despite the comments by Broadland District Council. It can be seen from the Stakeholder meetings, and the detailed submissions from members of the public there is considerable local support for these projects. Also, the results of the Public Consultation published in the Norfolk Cycling and Walking Strategy 2017 show that there is majority support in the wider Norfolk community for improvements to cycling facilities.

- How do Highways England, a body with limited local responsibilities, knowledge, commitment, and no democratic mandate justify the dismissal of the concerns of the representatives of local people?

### 3.4.Highways England “Cycling Strategy Our Approach” 2016

“Our Cycling Strategy shows how our planned roads improvements programme will provide integrated schemes which improve cycling facilities. This will contribute towards the development of an integrated, safe, comprehensive and high quality cycling network. For our network this means cycling facilities which are safe, separate from traffic and that enable users of all abilities to cycle, encouraging cycling as a sustainable form of transport. “

- How do the present proposals meet these requirements?

“Progressively creating comprehensive and coherent cycle networks with our key stakeholders and delivery partners.”

“In particular, we want to contribute to a connected, comfortable, attractive and high quality cycling network, suitable and safe for use by people of all ages and abilities.”

Our guiding principles

To support the delivery of this vision, we have identified a number of key principles:

Planning for cycling – we will improve our capability to ensure the needs of cyclists are considered.

Improving cycling facilities – we will plan and deliver an investment programme to improve cycle facilities which are safe and separate from traffic.

Over time we will improve the safety, convenience and environment for cycling.

Partnership working – we recognise the role of our partners and stakeholders in helping us to identify and support the delivery of cycling facilities and will work closely with them.

Impact – our cycling improvements will have a positive impact on communities, such as improving connections across roads that divide communities and providing an integrated and safe cycling network.

Direction of travel – we will play our part in delivering the Government’s ambition.

- How do the present proposals meet these principals in particular:
  - “safety, convenience and environment”
  - “Partnership working”
  - Impact”
  - “Direction of Travel” - does this mean accepting and implementing Government policy as set out in “Gear Change” and “LTN 1/20”.

#### **4.1 WCHR Assessment and Review**

GG 142 page 6 a diagram, sets out the WCHR process and shows the Assessment and Review as separate stages. Paragraphs 4.2 and 4.6 appear to confirm the Assessment and Review are separate stages.

We have asked Highways England for sight of the Assessment on several occasions with no response except an indication that it may not exist.

- Can Highways England provide the WCHR Assessment for the Inquiry or a copy of the exemption notice (GG 142 1.3)

#### **4.2 The WCHR review**

We refer to the Highways England, A47 Blofield to North Burlingham Dualling, Walking Cycling and Horse-riding Review. HE551490-GTY-HKF-000-RP-CH-3002, signed of 10/08/2020.

Page I of the document contains a statement headed "Notice", which describes it's somewhat convoluted origins and includes statements restricting the use that can be made it.

- Will the Examining Authority accept this document as evidence?

This document is dated 10/08/2020. However, as set out in detail below it does not appear to take into account the policy documents which were published in 2020, including;

“Gear Change” July 2020

Local Transport Note 1/20 July 2020

DMRB

CD 143 March 2020

CD 195 March 2020

CD 239 March 2020

- Can Highways England explain how the requirements of these policy documents were applied to the preparation of the WCHR assessment and review.

The WHCR Review, includes at Appendix B, a diagram , Figure 1-1 which illustrates the WHCHAR study area. However, it excludes, on the West side, the area adjacent to the NDR (A1270) which is within 5 km zone. The excluded area contains several roads which were severed by the NDR and have affected cycling access to the area of the scheme.

The WCHR Review contains at Appendix B drawing HE551490-GTY-EPC-000-DR-LX-30002 which shows the various opportunities. However, it is difficult to understand how these fit in with the scheme as the diagrams in the series HE1490-GTY-EPC-000-DR-CH-30001 seem to be incomplete and do not show all the cycling and walking provisions.

- Can Highways England supply detailed diagrams which show the width and elevation, and segregation provision for the cycling infrastructure. Also the design, and full information, on the highway crossing points for cyclists.

### 4.3 DMRB, GG 142

p5. "Introduction"

"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.

The WCHAR process is not an independent audit of walking, cycling and horse-riding matters related to the highway scheme."

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- Can Highways England provide evidence of inclusion of all walking, cycling and horse-riding modes in the highway scheme development process from the earliest stage of this project.
- Can Highways England provide evidence of increased collaboration, interaction and engagement with key stakeholders.
- Much of the WCHAR review document (HE551490-GTY-HKF-000-RP-CH-30002 11/08/20) is devoted to what appears to be for all intents and purposes an audit of opportunities. How is this justified?

GG 142 Strategic Networks p 18

4.16 The assessment of existing walking, cycling and horse-riding facilities shall include information on all of the main walking, cycling and horse-riding strategic networks within or connecting to the WCHAR study area for large highway schemes.

*NOTE Assessment of strategic walking, cycling and horse-riding networks can include a county-wide or a town/city-wide area for large highway schemes.*

*NOTE 1 Walking, cycling and horse-riding strategic networks can include National Cycle Network (NCN) routes, public rights of way, bridleways and byways open to all traffic.*

*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.*

- Can Highways England provide the information as required by GG 142 para 4.16 and the accompanying notes

DMRB, GG 142 p6. "WCHR process summary"

Box top left; "Design team leader appoints Lead Assessor". There is no allowance here for sub-contracting or delegation of this authority. This raises questions about the sub-contracting process.

- As this WCHR review has been produced by subcontracting is the appointment of the lead assessor valid?

It also raises questions about the "Lead Assessor and expected competencies" (see GG 142 p 13, 3 Assessment and review team competencies, Table 3.1.1). We have an assertion by the Design Team Leader (3.1.3 WCHR review team statement) but an assertion unsupported by evidence is a fallacy. The list of competencies is long and demands a broad range of skills and experience. A typical candidate would have particular strengths and weaknesses and a balance view in making the appointment would be logical.

- Can the Design Team leader refer to his records and provide a brief summary of the facts which support the appointment of the Lead Assessor. Dates and times of interviews may also be helpful. Personal information on the candidate list may be restricted to a reference such as “Candidate A” etc.

Box centre right “WCHAR review (preliminary design)” indicates that the WCHAR should be a primary document in the design process and should be available before design work commences. In the case of the current document, the dates indicate that it was prepared after design work has commenced.

- The timetable for the production of the WCHAR review should be made available to the Inquiry. It should include details of all meetings and correspondence in which the WCHAR assessment and review stages were mentioned and any decisions taken.

If as it seems that the WCHAR review was produced after the design work commenced then it is virtually a review. DMRB, GG 142 p5. “Introduction”, states; “The WCHAR process is not an independent audit of walking, cycling and horse-riding matters related to the highway scheme.”

DMRB, GG 142 p5. “Introduction”, states: “WCHAR is intended to provide increased collaboration, interaction and engagement with key stakeholders”. It appears that Highways England have had very little, “ collaboration, interaction and engagement with key stakeholders”, as there is no mention of such activities in the WCHR Review.

- Can Highways England provide details of the “Key Stakeholders” and the extent of the collaboration.

DMRB, GG 142, p16 para 4.8 “The assessment report shall contain analysis of the walking, cycling and and horse-riding policies and strategies relevant to the WCHAR study area.” The relevant policy statements to be considered should include those covered in Section 3 Policy above.

DMRB, GG 142, p16 para 4.9, states, “Personal injury collision data shall be obtained ...” and at 4.10, “Where damage only collision data is available it should be analysed ...”

No information is included in the WCHAR review. It is well-established that there is considerable under-reporting of collision and accident data relating to cyclists and pedestrians. There are available processes and methodologies which attempt to address this problem. There is also the issue of near miss and the effect on cyclists. If required we are prepared to supply detailed information on these matters.

- Can Highways England explain why this information has been omitted.

DMRB, GG 142, para 4.11, states. “Multi-modal transport services , associated infrastructure and interchanges within the WCHAR study area shall be identified and recorded.”

**4.11.1** Access to and from multi-modal transport services, interchanges and facilities should be assessed in the context of the proposed highway scheme.

4.11.1 Destinations for multi-modal transport services, together with their frequencies and interchange facilities, should be identified and assessed as part of the assessment. “

There is limited coverage of the railway stations and the Park and Ride

para 4.12 states, “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.”

Very little information is included in the WCHAR review. There are two schools within the study area of which are likely to be relevant:

- Lingwood Primary Academy
- Acle Academy

There are many other desire lines mentioned in the 67 submissions by members of the public.

The present road structure, with the dominance of the A47, acts as a constraint on recreational cycling and Green (cycling) tourism. The Foreword to the “Norfolk Walking and Cycling Strategy” states: “We want to encourage visitors that add significantly to the economy whilst having a low impact on our overall costs. Both cyclists and walkers fit this criteria admirably. Both also have a low impact on the infrastructure and tend to spend proportionately more than some other types of tourist. In particular they spend locally providing much needed support for Small and Medium Enterprises (SMEs). Increased diversity in the range of tourist-specific interests helps to increase the diversity of SMEs.” (see also tourism at 3.2.5

Para 4.13 states: “The Lead Assessor shall conduct a site visit to the WCHAR study area during the assessment.”

- Can Highways England provide details of the site visit and the mode of transport used

4.14, Liaison with key stakeholders. There is limited evidence of liaison with key stakeholders – the 67 private submissions make no reference to liaison with Highways England. Also there is no evidence of liaison with groups or organisations representing cyclists. The national cycling organisations, British Cycling and Cycling UK would be able to supply details of local clubs etc or a Google search would bring up many.

Section 5. Walking, cycling and horse-riding review. (page 20).

As we have pointed out above, the Review stage seems to have been undertaken after the detailed design work was started. which is not in accordance with Table 5.3.

It is not possible to comment on paras 5.3.1 to 5.13 as we do not have the Assessment to refer to.

## GG 119 Road Safety Audit

WE have been unable to obtain a copy of the Road Safety Audit, Stage 1 - Completion of preliminary design, or Stage 2 – Completion of detailed design.

These documents should be available at this time as they would be useful in establishing the safety for cyclists of the scheme.

They will also be helpful in understanding the Walking, Cycling and Horse-riding review in particular the implications for cyclists safety.

## **5 An alternative WCHR Assessment**

### **5.1 The WCHR area**

This area of Norfolk is dominated by the River Bure to the North and East and the River Yare to the South. There are roads crossing the Bure; the A1151 at Wroxham and the A1064 at Acle . Road crossings of the Yare are at the Southern Bypass at Postwick and the Reedham Ferry.

There is a summer-time ferry for pedestrians and cyclists at Horning/Woodbastwick on the Bure and cyclists use the footway on Southern Bypass bridge at Postwick to cross the Yare.

The landscape is open rolling countryside with few hills and many minor roads. The road network is dominated by the A47 which cuts the area in two on the east-west axis. In the sugar beet season, from October to February, the B1140, Wroxham to Cantley Road is dominated by HGVs and is avoided by cyclists (see Appendix A).

Two railway lines pass through the area; Norwich to Sheringham and Norwich to Great Yarmouth and Lowestoft. There are railway stations at:

- Brundall Gardens
- Brundall
- Lingwood
- Acle
- Buckenham

A new station has been planned for Dussingdale to serve the Broadland Business Park area but it has been delayed in favour of more road construction on several occasions.

The 5 km survey area begins at the Western edge (as the crow flies) just short of the important Postwick interchange on the A47, but includes part of the Norwich Northern Distributor Road (aka Broadland Northway), A1270. Further to the West, and strictly outside of the 5 km zone, is the NDR, and the Broadland Business Park.

### **5.2 Intra modal sites**

The relevant WCHR area (5km around the scheme) includes the following:

#### West

Postwick interchange of the A47 and the NDR  
Cycleway on the East side of the A1270  
Great Plumstead  
Little Plumstead  
Blofield Corner  
Blofield Heath

#### North

Paxworth  
Ranworth  
South Walsham  
Pilson Green

Cargate Green  
Upton

East

Acle  
Acle Bridge  
Stokesbury  
Tunstall  
Halvergate

South

Blofield  
Brundall including the Cucumber Lane roundabout  
Lingwood  
Strumpshaw

To the south, and north of the A47 at the Postwick Interchange is a Park and Ride site.

### **5.3 Dedicated cycling provision**

A hard surfaced cycleway runs south, parallel to the NDR, from the over-bridge on Middle Road to the signalised junction with Yarmouth Road. At this point the cycleway turns east to the junction with Church Road. This gives access to Brundall via Postwick Lane.

This cycleway also runs parallel to the NDR, north from the over-bridge on Middle Road to Rackheath and beyond.

The signalised junction at the NDR and Yarmouth Road has no provision for a direct north-south cycle crossing to give access to the Park and Ride, or the cycleway which runs parallel to Yarmouth Road westward on the overbridge over the A47.

This section of shared/cycleway gives access to the Meridian Business Park, the Broadland Business Park, St Andrews Business Park, the Yarmouth Road to Norwich, and the Green Pedalway to Norwich. Immediately beyond the roundabout (A1194/A1042) heading south west is a section of paved path leading down the A47 over the Yare where it connects with the maintenance footway on the bridge. This gives access to Whittingham Country Park, County Hall, the Trowse area, and National Cycleway Route 1. This path has an ambiguous status as it is not defined as a PROW, however a survey conducted by Norwich Cycling Campaign some years ago as part of the DCO Inquiry into the Postwick Interchange recorded 20 plus cyclists using this route in a morning.

To the south of the signalised junction at the junction of the NDR and the Yarmouth Road is a recently constructed cycleway which leads south and then turns east to run parallel to the railway line to a junction with Oaks Lane to give access to Brundall. Although pleasant to ride along at the western side there is a steep incline at Cuttings Hill which can be avoided by using the Church Lane route.

It is also possible for cyclists to use the exit road (heading east) from the Park and Ride to the roundabout at Oaks Lane and the cycle path beside the A1042 (Yarmouth Road) to the junction with Church Lane and onwards to Brundall.

Between Middle Road and the signalised junction at the junction of the NDR and the Yarmouth Road there is no crossing available to cyclists to access the Broadland Business Park. From time to time cyclists can be seen pushing their bikes on the grass verge northwards which indicates a desire line.

As part of the construction of NDR, the minor roads at Smea Lane and Low Road, which were used by cyclists travelling west-east, were stopped up.

Water Lane, which runs from Middle Road/Church Road, north-east to Little Plumstead has two unconnected sections of separated cycle way on the west side which lead to the junction with Hospital Road. The cycle way continues parallel to Hospital Road and turns left to continue north parallel beside Salhouse Road to Little Plumstead.

Church Road leads south from Great Plumstead to the A47. This junction is impassable for cyclists wanting to continue south.

The junction between Hall Road and the A47 is indicated as a track which purports to connect with the bridleway/track running east parallel to the A47 to join Cucumber Lane for access to Brundall. This junction is too dangerous for cyclists to cross.

The roundabout at Cucumber Lane is the subject of consideration by Norfolk County Council at the present time for "improvement". At present this roundabout offers no advantage to cyclists and my recent attempt to navigate around it following the advice given in "Bikeability" training resulted in threatening behaviour by motorists.

Until the late 1950s, there was a ferry at Coldham Hall connecting Surlingham to Brundall railway station. There was talk of reviving this ferry in 2009. There is potential for a hand cranked ferry (following the Dutch design) which is worthy of further investigation as there is no proper crossing of the Yare available for cyclists between Carrow Bridge in Norwich and Reedham Ferry (approx 15 miles by road). It would also connect with National Cycle Route 1 at Surlingham.

The present north south junction of the A47, High Noon Lane and Hamblington Road is almost impossible for cyclists to navigate.

The next section of the present A47 is too dangerous for cyclists, as are the junctions at Lingwood Road, Dell Corner Lane and the eastern exit from Main Road to the A47. The crossing at Lingwood Lane has been stopped up, thus severing the connection between North Burlingham, Lingwood and the railway station.

The next junction at the South Walsham Road (B1140) and Acle Road is dangerous for cyclists at anytime and is particularly intimidating during the Sugar Beet Campaign from October (see Appendix A ).

#### **5.4 West-East strategic cycle route**

The basis of strategic west-east cycle routes already exist. The Green Pedalway runs from the centre of Norwich to Broadland Business Park and there are cycleways and minor roads that lead to the centre of Brundall. The minor road network then leads to Blofield (to connect with the proposed scheme through North Burlingham and north over the North Street/Plantation Road to link with the cycleways described above at 5.3 above. It would also connect with Project 2: Burlingham Trails Cycling and Walking Routes and Project 4:

Long Distance Cycle Loop described in the East Broadland Green Infrastructure Plan.

An alternative route would be through Strumpshaw and Lingwood and using the proposed under-pass to North Burlingham. It would also offer a route through Freethorpe to the ferry crossing at Reedham

### **5.5 The strategic cycle route on the A47**

At approximately 500 metres east of the point where the Main Road (North Burlingham) joins the present A47 there is a lay by (the original Yarmouth Road) of about 430 metres and at an additional 70 metres is The Wendles (a road running north-south). The junction of The Wendles must present a safety hazard for vehicles on the proposed dual carriageway. Traffic wishing to turn left into The Wendles must slow down as this is a dead 90 degree turn and this risks shunt collisions. Similarly traffic exiting The Wendles will enter the 70mph traffic stream on the A47 and present a risk of collisions. I have been reminded by friends of the problems with the Station Road junction on the A47 at Hethersett after the dual carriageway was opened.

If The Wendles was stopped up it could present an opportunity for an ingenious design to allow cyclists to use this route to Acle.

At 400 metres on The Wendles, on the right is Mill Lane (bridle way), which connects to the centre of Acle. The surface of Mill Lane is poor having been damaged by motor vehicles. Mill Lane gives a direct connection to Acle Academy and the centre of Acle.

On the Great Yarmouth Cycle map 2017, a Green cycle route is shown through Acle along the A1064, passing over Acle bridge and turning right to Stokesby, Runham and Caister to Great Yarmouth.

Thus we have a strategic route from Norwich to Great Yarmouth

### **5.6 “Green Tourism”**

In the south west of the area there are tourist attractions which are accessible by cycle.

Strumpshaw Fen is a nature reserve managed by the Royal Society for the Protection of Birds, and offers free entrance to cyclists. It is situated at Strumpshaw on the River Yare in the English county of Norfolk around 6 miles east of Norwich. The Buckenham Marshes RSPB reserve borders the reserve to the east.

Strumpshaw Hall Steam Museum, at Old Hall, Strumpshaw, Norwich NR13 4HR, is an attraction easily reached by cycle.

The marinas on the Yare south of Brundall could benefit from a cycle path connection to the railway station and the centre of the village. The potential of a ferry to Surlingham has been covered above in 5.3.

The issue of the link between North Burlingham and Lingwood is covered in Section Policy Broadland, as are the other significant cycle based projects at 3.3 Policy Broadland District Council.

## 6 The plans for the North Burlingham overbridge

We refer to the documents Drawing Numbers:

- HE551490-GTY-LSI-000-DR-ZL-30001 to 30008 inclusive [WORKS PLANS REGULATION 5(2)(j)]
- HE551490-GTY-EPC-000-DR-CH-30001 to 30007 inclusive [RIGHTS OF WAY AND ACCESS PLANS REGULATION 5(2)(k) and 5(2)(o)]
- HE551490-AME-HGN-BBFXB-DR-HE-0102 [A47 CORRIDOR STAGE 1]

If these drawings have been amended or superseded we would like to have sight of the current drawings.

### 6.1 “Gear change” 27 July 2020

It has been suggested that this policy document applies only to the urban environment however, the following statement is on page 24:

“We will ensure that new local and strategic A road schemes include appropriate provision for cycling

The new cycling budget is the largest sum ever committed to active travel in this country. But if we are serious about putting cycling at the heart of transport policy, we must further shift the balance between projects for motoring and projects for cycling.

To receive Government funding for local highways investment where the main element is not cycling or walking improvements, there will be a presumption that all new schemes will deliver or improve cycling infrastructure to the new standards laid down, unless it can be shown that there is little or no need for cycling in the particular road scheme. “

“Gear Change”, page 21 Diagram design principles -

- Cyclists must be separated from volume traffic, both at junctions and on the stretches of road between them.[a]
- Cyclists must be separated from pedestrians.[b]
- Cyclists must be treated as vehicles, not pedestrians.[c]
- Routes must join together; isolated provision are of little value.[d]
- Routes must feel direct, logical and be intuitively understood by all road users.[e]
- Routes and schemes must take account of how users actually behave.[f]
- Purely cosmetic alterations should be avoided.[g]
- Barriers, such as chicane barriers and dismount signs should be avoided.[h]
- Routes should be designed only by those who have have experience on the road on a cycle.[i]

These principles will be referred to as in comments below. See also Appendix pages 40 – 48; 22 principles derived from LTN 1/20 (see below).

Page 25 We will make sure the railways work better with cyclists Cycles and trains should be ideal partners, complementing each other and extending the range of both. Cycling can

make public transport journeys door-to-door, matching the convenience of the car. We will invest substantial sums on safe cycle routes to stations, particularly in commuter towns such as Guildford, and increase cycle storage at stations, including at city-centre termini, where it is currently limited.

- The links to the stations have been dismissed by Highways England – can they explain how their policy is superior to Government policy

Page 31 Funding only schemes which meet the new standards

We will not fund or part-fund any scheme that does not meet the new standards and principles described in theme 1 and in the Appendix. We will not allow any other agency or body to fund such schemes using any of our money.

- How does Highways England justify the expenditure of many millions on these proposals that do not meet the new standards

## **6.2 Cycle Infrastructure Design Local Transport Note 1/20 July 2020**

To effectively apply this guidance those designing cycling and walking schemes should have an appropriate level of experience and training. An example would be the Institute of Highway Engineers' Professional Certificate & Diploma in Active Travel that allows applicants to demonstrate their experience and produce work to the required standard.

- Can highways England provide information on the appropriate level of experience and training relating to the designers of this schemes/

LTN 1/20 1.5 Core design principles

1.5.1 There are five core design principles which represent the essential requirements to achieve more people travelling by cycle or on foot, based on best practice both internationally and across the UK.

1.5.2 Networks and routes should be Coherent; Direct; Safe; Comfortable and Attractive. Inclusive design and accessibility should run through all five of these core design principles. Designers should always aim to provide infrastructure that meets these principles and therefore caters for the broadest range of people.

Figure 1.1: Core design principles

Coherent Cycle networks should be planned and designed to allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality.

Direct Cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles.

Safe Not only must cycle infrastructure be safe, its should also be perceived to be safe so that more people feel able to cycle.

Comfortable Comfortable conditions for cycling require routes with good quality, well maintained -smooth surfaces, adequate width for the volume of users, minimal stopping and starting and avoiding steep gradients.

Attractive Cycle infrastructure should help to deliver public spaces that are well designed and finished in attractive materials and be places that people want to spend time using.

### **6.3 The North Burlingham Bridge**

This document refers to drawing. HE551490-GTY-EPC-000-DR-CH-30007

#### **6.3.1 Origins of the design**

It is not clear how and when the design originated. As far as can be understood so far the design was probably established before the Assessment stage (if it was ever undertaken) was available and the process was not in accordance with WCHR process summary (p 6 GG142).

This proposal does not support the strategic cycle route from Norwich to Great Yarmouth as described at section 5 WCHR alternative. The requirement in GG142, Table B.9 p 26 “Strategic Opportunities” applies here.

There does not appear to be an acknowledgement of the danger (real and perceived) to cyclists of the large numbers of HGVs using this junction – see appendix A.

The proposal does not meet the requirements of DMRB CD 143 and CD 195. It falls short of the statements of Government policy set out in “Gear Change” and “LTN 1/20” (see above). It does not meet the standards set out in “Greater Norwich Local Cycling and Walking Infrastructure Plan”.

#### **6.3.2 DMRB CD143 p8 2 General Design principals**

**Coherence and Directness** The proposal does not link trip origins and destinations giving an advantage in terms of distance and journey time:

- Lingwood and Acle railway stations
- Reedham Ferry
- Schools at Lingwood and Acle
- Acle local economic centre

**Comfort and Attractiveness** The proposal does not offer comfort or attractiveness for cyclists. They will have to ride on what appears to be a segregated cycle path, beside a road with up to 700 HGVs a day (for half the year). They will be subjected to risk of injury from overruns. They will be subject to air and noise pollution, aggravated by the HGVs climbing up to the bridge, with gear changes, manoeuvring etc

**Safety** The B1140 is a no-go area for cyclists for six months of the year due to the large numbers of HGVs using this road (see Appendix A – HGVs and cyclists). Cyclists will be required to cross the carriageway at the exit road to the new A47 (indicated by SU10 and SU11 on the plan). CD 195 p 24, Table E4/4.1 sets out the requirements for cycle crossings and indicates that a signal controlled crossing will be required. After a few metres cyclists will be required to rejoin the carriageway which they will have to share with 700 HGVs a day before turning left (and crossing the carriageway on Acle Road to access Lingwood. Although Highways England may argue that this plan is safe for cyclists it is the

perception of safety that really matters if the Government's policy to increase cycling is to be met.

- How does this plan address the fact that about two thirds of the population think that the roads are too dangerous to cycle on?
- Would you allow an unaccompanied 12 year old to use this bridge?

## **7 Appendix A HGVs and cyclist's safety**

### **7.1 Policy statements**

2Gear change2 27 July 2020

Page 39 We will mandate higher safety standards on lorries. A highly disproportionate number of cyclists are killed and seriously injured by lorries.

2Cycling Strategy Our Approach2 Highways England 2016

Consider how we can improve cycling safety across a broad range of initiatives, such as improving cycling safety measures for construction vehicles working on our network.

### **7.2 Cantley sugar beet factory**

During the Sugar Beet Campaign, October to February, large numbers of HGVs arrive at the Cantley sugar beet factory via the A47; some use the South Walsham Road (B1140). We have heard that more HGV drivers may choose to use the B1140 from the junction with the A1150 via the roundabout due to the congestion at the roundabout junction with the A1270 NDR.

“I can confirm that at the peak of our operational period, we potentially have up to 500 Beet delivery lorries per day, and a further 200 lorries per day for items such as Sugar Collection, Liquid Sugar Collection, Animal Feeds Collection and Various Deliveries.”

Email British Sugar to Ms C. Pye (Chair N Burlingham and Lingwood PC) 27 May 2021

This could mean 1400 HGVs per day using the North Burlingham over-bridge: about one per minute in each direction, not comfortable for cyclists.

### **7.3 Large scale construction projects involving HGV movements**

There are a number of large scale construction projects, planned in Norfolk, with time scales that could overlap, or have knock on effects, including:

- Western Extension to the NDR
- Thickthorn Interchange
- Dualling of the A47:
  - Kings Lynn area
  - N Burlingham
  - Tuddeham to Easton
- New Bridges at Great Yarmouth and Lowestoft
- Colmans site redevelopment in Norwich
- 10,000 houses NE of Norwich (see below)
- Offshore electricity distribution network
- Long Stratton bypass
- County Hall renovation
- Food Enterprise Park Easton

The transport plan for these projects will probably be approved by the District authority but We can find no evidence that Norfolk County Council, as the Transport Authority, have an

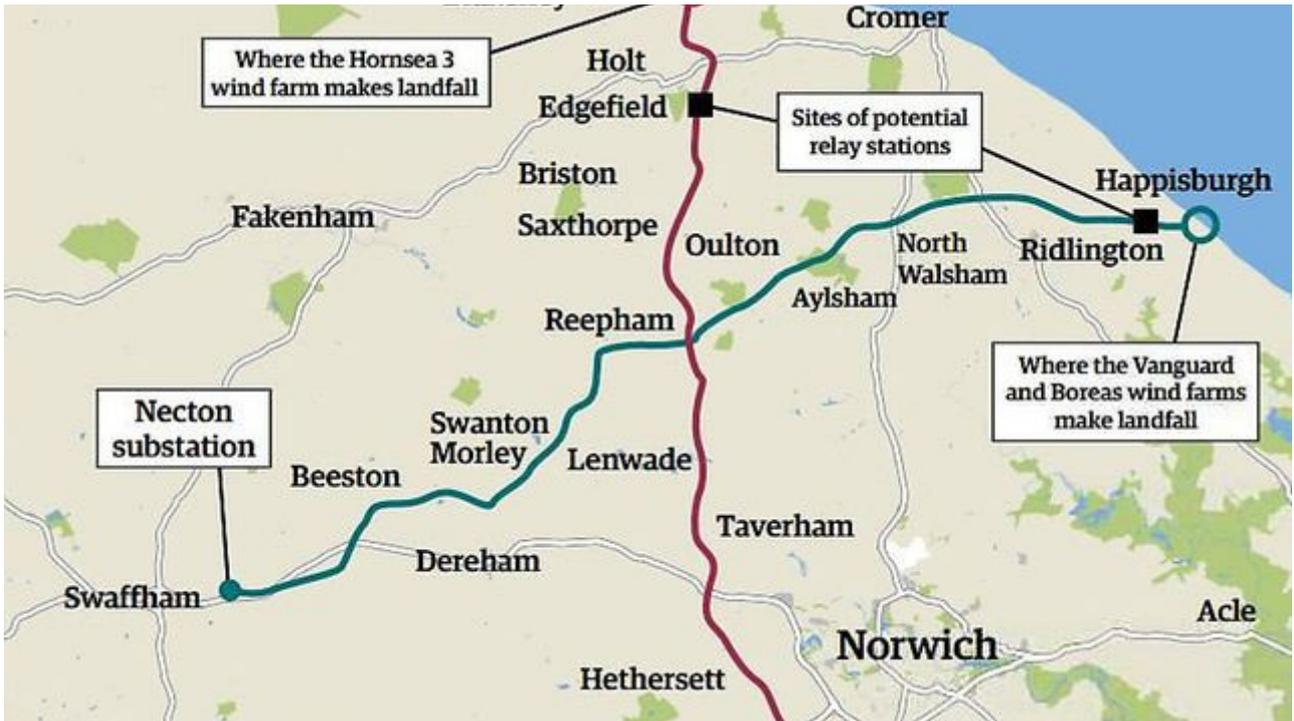
overall plan.

There are two railheads for aggregates and other construction materials in the Norwich area:

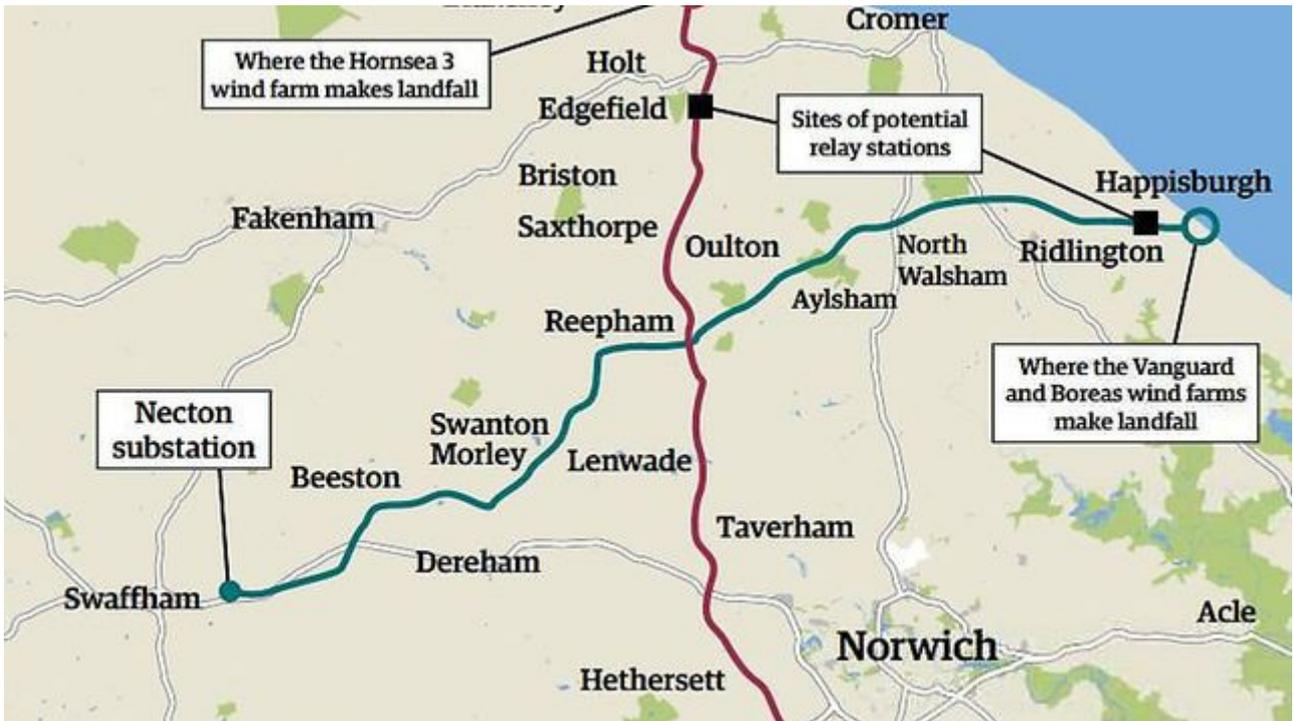
- Thorpe Station, Carrow Road Norwich
- Former Trowse Station, Bracondale, Trowse

These two sites feed HGVs onto the local road network which then leads to the Southern bypass and the Northern Distributor Road.

There are many important junctions and roundabouts which are already overloaded at peak times that could be affected. Most of these junctions and roundabouts do not have crossings for cyclists which meet the standards set out in the Design Manual for Roads and Bridges and Local Transport Note 1/20.



Housing developments in the Greater Norwich area



The proposed routes for the electricity cables associated with offshore wind farms.

## 7.4 Cycling UK Campaigns Briefing on Goods Vehicles January 2018

Heavy goods vehicles (HGVs) account for only around 3.6% of non-motorway motor traffic mileage on British roads, yet are involved in around 17.5% of cyclist fatalities.

HGVs on average account for around 2% of urban and 5% of rural motor traffic, yet are involved in almost a quarter of cyclist urban fatalities and just over 12% of cyclist rural fatalities.

Cyclists' collisions with HGVs are far more likely to prove fatal than those involving cars: the cyclist is killed in about a fifth of serious injury cyclist/HGV collisions. This figure is around 2% for cyclists/cars.

The figures for rural roads should be noted.

## 7.5 Vehicle speed compliance 2020

DfT figures for 2020 (DfT. *Vehicle speed compliance statistics for GB: 2020*. July 2021 )

Table 1: Proportion of vehicles exceeding the speed limits by road class

	Articulated HGVs	Rigid HGVs
Motorways	2	..
National Speed Limit Single Carriageways	35	41
30mph roads	46	49

These latest figures are a stark reminder of the danger that HGVs present to cyclists.

## 7.6 Operation Tramline, Norfolk 4-6 May 2021 *report in local newspaper*

Police in Norfolk stopped 125 vehicles (including 43 HGVs and 63 LGVs) on the A47 and A11, and detected 191 offences, between Tuesday 4 May and Thursday 6 May.

A total of 191 Traffic Offence Reports were issued:

- 36 for not wearing a seatbelt
- 72 for construction and use
- 14 for using a mobile phone
- 36 for an insecure load
- 12 weight offences
- 4 for no insurance or no licence
- 10 for number plate offences
- 2 for driving without due care and attention
- 5 for excess speed

Again these figures show the risks to cyclists/

## **7.7 Cyclists and HGVs air and noise pollution**

The information above sets out the physical risks that HGVs present to cyclists but there are two other risks which should be taken into account; air pollution and noise pollution.

HGVs are significant contributors to air pollution in particular PM 2.5 and PM10 – WHO states that there is no safe level for Particulate Matter.

Noise could be a problem on the Burlingham bridge with HGVs climbing the incline and turning bends.

Although it may be claimed by road engineers that there is no risk from air and noise pollution these two pollutants affect the comfort and experience of cyclists. Cyclists will avoid riding in areas where this problem exists.

Of course it breaches the Core principles (CD 143 2.1.2 p 8) of:

Attractiveness – noise reduction

Safety – how safe the environment is

- We are not qualified to give evidence on these matters but the Examining Authority may consider seeking advice from suitably qualified experts.

## **7.8 Real and perceived danger to cyclists**

We know from a number of surveys that about two thirds of people in the UK think that the roads are too dangerous to cycle on.

If the Government is to meet its target for increasing cycle use then this issue must be addressed.

HGVs frighten people, even those who are not aware of the facts as set out in 7.4, 7.5 and 7.6 above.

- What steps have Highways England taken to address the issue of perceived danger in the plans

## **7.9 The Clocs Scheme for construction industry vehicles**

HGVs are disproportionately involved in collisions with Vulnerable Road Users. In 2015, HGVs comprised only 4% of urban traffic miles in London but involved with 20% of pedestrian fatalities and 78% of cyclist fatalities; HGVs were involved in 53% of Vulnerable Road User fatalities across Great Britain in 2016.

Contrast that with the 30 fatalities on all UK construction sites. Considerable and sustained corporate and regulator effort has seen fatalities and reportable injuries on construction sites fall significantly from 154 in 1990, to 105 in 2000 to 30 in 2016.

Over half (54%) of the 463 vulnerable road users that were Killed or Seriously Injured in collisions with HGVs were injured on urban roads in 2016 – compared to just 17% of other

## KSI casualties in the same collisions

Local authorities already have powers to regulate lorry traffic. Under the *Road Traffic Regulation Act 1984*, they can introduce lorry control measures such as weight and loading restrictions or restrictions/prohibitions on movements by vehicles of certain widths, heights and weights, in certain streets/areas, at certain times of day etc. They can also insist on limiting lorry movements as part of the conditions for planning permission for construction depots and sites, and new developments.

CLOCS is a national Standard that requires all stakeholders in construction to take responsibility for health and safety beyond the hoardings.

It demands collaborative action to prevent fatal or serious collisions between vehicles servicing construction projects and vulnerable road users: pedestrians, cyclists, and motorcyclists.

*CLOCS Standard, Version 3, January 2019* states:

Regulators (particularly planning and highways authorities) shall

- embed the requirement to operate to the CLOCS Standard into policy and guidance documents
- ensure the planning process requires submission and approval of an outline and/or detailed CLP that addresses the main transport impact/risks in delivering the project safely before consent is granted]
- require a project to have effective CLOCS implementation monitoring mechanisms and to provide to the authority (if requested) CLOCS compliance performance data
- have in place effective enforcement mechanisms to secure prompt action by the project team should a breach occur

The objectives of the scheme are:

- Zero collisions between construction vehicles and the community
- Improved air quality and reduced emissions
- Fewer vehicle journeys
- Reduced reputational risk

The London Borough of Camden saw a 47% reduction over two years when it implemented CLOCS, though absolute cause-effect cannot yet be proved.

Norfolk County Council and Highways England could implement the Clocs scheme at minimal costs to themselves.

All information above relating to the CLOCS scheme, except as stated, is taken from: CLOCS The Crown Estate Summary Report, [No date but c. 2020]

- Have Highways England adopted the CLOCS scheme please give reasons if not adopted.



Norwich  
Cycling Campaign

**A47 Blofield to North Burlingham Dualling  
Scheme Number: TRO10040**

Appendix B Illustrations

July 2021

Author Anthony Clarke

**Figure 5.3 (01) – section 5.3 refers**



Mary Last being ferried to Brundall from Coldham Hall [Surlingham] by her father Harry to catch the train to Norwich, where she attended Notre Dame school. 1950s.

**Figure 5.3 (02) – section 5.3 refers**



The Surlingham Ferry in the early 20<sup>h</sup> century

**Figure 5.3 (03) – section 5.3 refers**



Dutch hand-cranked ferry, unmanned, a fairly common sight in the Netherlands

**Figure 5.5 (01) – section 5.5 refers**



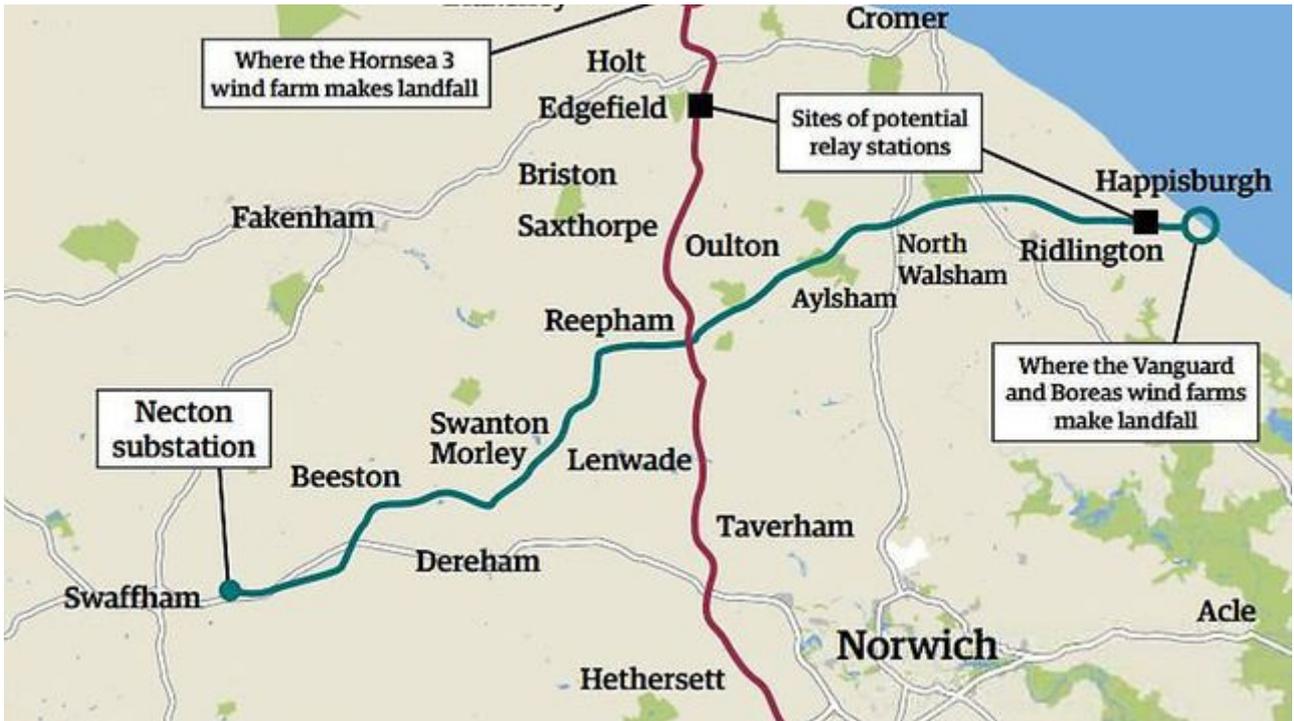
The junction of The Wendles and the A47; there is space for a 3.5 metre cycleway here (as per Table E/3, p 12, DMRB CD 195 Cycle route design)

Figure 5.5 (02) – section 5.5 refers



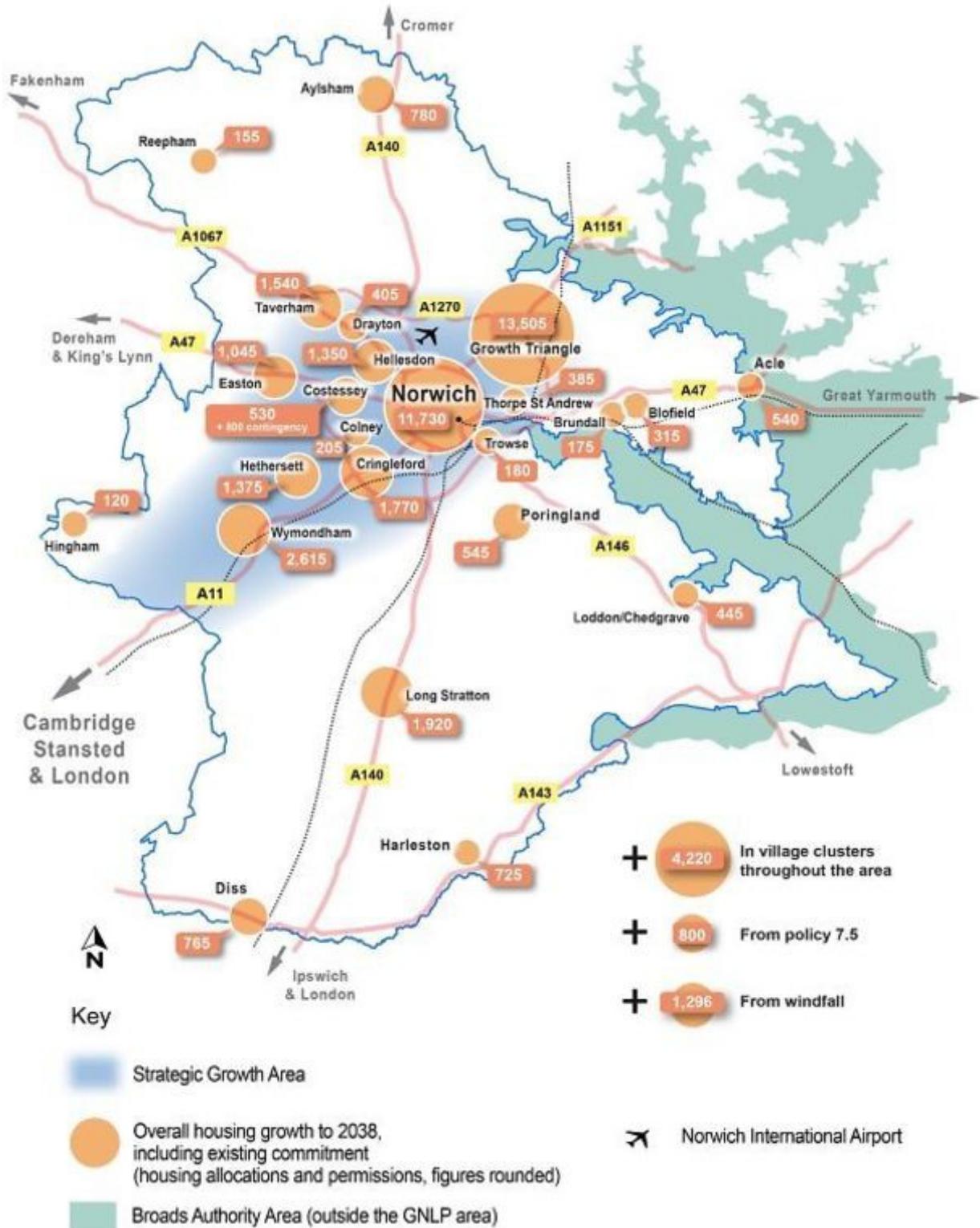
Taken from the, *Great Yarmouth Cycle Map 2016*, the green cycle route linking Acle to Caister-on-sea and Great Yarmouth.

Figure 7.3 (01) Appendix A refers



This map shows the routes of the electricity distribution cables which will link power generated off-shore to the National Grid. While the present WHCR area is not directly affected, this major project involving hundreds of HGV movements, is one of the several major construction projects in Norfolk planned in the next few years.

Figure 7.3 (02) Appendix A refers



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This diagram appeared in the local press and gives a graphic impression of the housing projects in Norfolk planned in the next few years. Additional schemes have been announced since this diagram first appeared.