

Place Shaping Policy Development Panel

Agenda

Members of the Panel:

Cllr J M Ward (Chairman)

Cllr I N Moncur (Vice Chairman)

Cllr N J Brennan

Cllr K G Leggett MBE

Cllr S M Clancy

Cllr G K Nurden

Cllr N J Harpley

Cllr D M Thomas

Cllr D G Harrison

Cllr J L Thomas

Cllr S Lawn (ex officio)

Date & Time:

Monday 4 October 2021 at 6.00pm

Place:

Council Chamber Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich, NR7 0DU

Contact:

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PUBLIC ATTENDANCE:

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Rules on Public Speaking

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- In person at the Council offices

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AGENDA

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| 1. | To receive declarations of interest under Procedural Rule no 8 | 4 |
| 2. | Apologies for absence | |
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| 4. | Transport for Norwich (TfN) Strategy Consultation Response | 9 |

DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

<p>Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.</p>
<p>Does the interest directly:</p> <ol style="list-style-type: none"> 1. affect yours, or your spouse / partner's financial position? 2. relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner? 3. Relate to a contract you, or your spouse / partner have with the Council 4. Affect land you or your spouse / partner own 5. Affect a company that you or your partner own, or have a shareholding in <p>If the answer is "yes" to any of the above, it is likely to be pecuniary.</p> <p>Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.</p>
<p>Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?</p> <p>If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but you should not partake in general discussion or vote.</p>
<p>Is the interest not related to any of the above? If so, it is likely to be an other interest. You will need to declare the interest, but may participate in discussion and voting on the item.</p>
<p>Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.</p>

**FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF.
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST
INSTANCE**

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Agenda Item 3

PLACE SHAPING POLICY DEVELOPMENT PANEL

Minutes of a meeting of the Place Shaping Policy Development Panel of Broadland District Council, held on Monday 28 June 2021 at 6pm.

Committee Members Present:	Councillors: J M Ward (Chairman), N J Brennan, D G Harrison, K G Leggett MBE, I Moncur, G K Nurden, J L Thomas, D M Thomas
Other Members in Attendance:	Councillor: S Lawn (ex officio)
Officers in Attendance:	The Assistant Director Planning, the Democratic Services Officer (DM)
Also attending:	Mike Burrell – Greater Norwich Local Plan Team Manager

1 APOLOGIES FOR ABSENCE

An apology for absence was received from Cllr Harpley.

2 MINUTES

The minutes of the meeting held on 8 April 2021 were agreed as a correct record.

3 GREATER NORWICH LOCAL PLAN (GNLP) – SUBMISSION TO THE SECRETARY OF STATE FOR INDEPENDENT EXAMINATION

The Greater Norwich Local Plan Team Manager, Mike Burrell, introduced the report, which sought members' agreement to recommend Cabinet that the Council agrees to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination, subject to the caveats and delegations specified in the recommendation.

Mr Burrell advised members that the representations received arising from the Regulation 19 consultation had been reviewed and examined and, save for the matters specifically addressed in the recommendations, it had been concluded that they identified no significant issues that could not be addressed or were such

a risk that the GNLP should not be submitted. He reminded members that the Regulation 19 consultation provided an opportunity for stakeholders to make representations in respect of whether the Plan was legally and procedurally compliant, was sound, and was in compliance with the duty to cooperate.

Mr Burrell took members through each of the recommendations which had been considered by the Greater Norwich Development Partnership and received unanimous support.

With regard to recommendation 1, following representations from Natural England regarding visitor impact on internationally protected habitats, there was a need for an agreed Statement of Common ground prior to the submission of the Plan. Work was underway on seeking such an agreement and it was hoped this would be resolved in time for the submission by 30 July.

With regard to recommendation 2, whilst the Plan included policy provision for assessing applications for gypsy and traveller sites, no such sites had been submitted through the Plan making stage and failure to provide for the evidenced need through specific sites was a risk to the soundness of the Plan. There was therefore a need to proactively identify sites and work was underway in this respect. It was noted that the necessary provision equated to a need for approximately 68 pitches (4 sites) and early investigations had identified 1 potential major site and extensions to a number of existing sites to meet the need.

Recommendations 3 and 4 were standard practice when submitting a Plan and dealing with any necessary modifications arising to ensure the Plan was sound and legally compliant. Any amendments put forward by the independent inspector would be subject to consultation.

With regard to the representations received, the main issues raised and likely to be the main areas of discussion related to housing numbers, locations, deliverability of sites, impact on climate change, transport, infrastructure, housing type and a number of process queries on specific sites for example Acle, Aylsham, Foulsham and Lingwood. In answer to a question, members' attention was drawn to the figures in the report for the number of responses received to the consultation: a total of 1316 representations had been made - 263 in support and 1053 objecting. All the representations received would be submitted to the independent inspector with the Plan. Mr Burrell reiterated that all submissions had been reviewed and he was satisfied that there were no significant matters which could not be addressed.

In response to a concern about the provision for Aylsham, Mr Burrell stated that objections received relating to the process had been considered and he was satisfied that due process had been followed. Housing numbers had been increased following the release of the Government's "Planning for the Future" document and, as part of the proposals to meet the increase, the additional site in Aylsham previously not included had subsequently been assessed and deemed a sustainable site and included in the Plan.

It was then proposed, duly seconded and

RESOLVED TO RECOMMENDED TO CABINET

To

1. Agree that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination subject to reaching an agreement in principle with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations;
2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria based policies of the current and emerging Development Plans;
3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;
4. Delegate authority to the Assistant Director for Planning, in consultation with the Portfolio Holder for Planning, and in conjunction with Norwich City and South Norfolk Councils, to:
 - (a) agree minor modifications to the GNLP prior to its submission;
 - (b) negotiate any main modifications necessary to make the GNLP Sound as part of the Independent Examination.

(The meeting concluded at 6:30pm)

Chairman

Transport for Norwich (TfN) Strategy Consultation Response

Report Author(s): Paul Harris
Place Shaping Manager
01603 430444
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Portfolio: Planning

Ward(s) Affected: All

Purpose of the Report:

To agree Broadland District Council's response to Transport for Norwich (TfN) Strategy Consultation.

Recommendations:

Place Shaping Policy Development Panel to recommend that the Portfolio Holder for Planning and Leader agree the proposed response to the Transport for Norwich (TfN) Strategy Consultation as set out at Appendix A.

1. Summary

- 1.1 Norfolk County Council is currently consulting on the Transport for Norwich (TfN) Strategy.
- 1.2 The TfN Strategy will set out transport policies for Norwich and the Strategic Growth areas around it, together with consideration of the longer distance trips from the county or beyond will be where there strategy and the action plan have their main focus. Once adopted the TfN Strategy will replace the current Norwich Area Transport Strategy (NATS).
- 1.3 To help shape the final version of the TfN Strategy, it is proposed that the Place Shaping Policy Development Panel agrees the Council's response to the TfN Strategy consultation. The proposed consultation response is set out as appendix A of this report.

2. Background

- 2.1 Norfolk County Council maintains a suite of documents that set out transport policies for Norfolk. These document include the Local Transport Plan (LTP), which sets out policies for the whole of Norfolk.
- 2.2 The LTP is supported by a range of area specific, or detailed plans and policies. This includes a specific strategy for the Norwich area: the Norwich Area Transport Strategy (NATS).
- 2.3 Norfolk County Council has recently reviewed the LTP. The new version of the LTP, LTP4, was agreed by Norfolk County Council's Cabinet on 2 August 2021. LTP4 is expected to be adopted in due course subject to the agreement of Norfolk County Council's full Council meeting in September 2021.
- 2.4 Norfolk County Council is currently consulting on the Transport for Norwich (TfN) Strategy. Once adopted, the TfN Strategy will replace NATS.
- 2.5 Broadland District Council's Overview and Scrutiny Committee and Cabinet considered the proposed Council response to the TfN strategy on the 7 and 14 September respectively. Cabinet resolved to delegate the final response to the Director of Place, in consultation with the Portfolio Holder for Planning and the Leader and subject to further consultation with the Place Shaping Policy Development Panel.

3. Current position

- 3.1 The current NATS was adopted in 2004 and set out the transport strategy for the Norwich area until the year 2021. Minor amendments were made to NATS in April 2010 as part of the development of the Joint Core Strategy. The most significant amendment was to seek step-change in the provision of public transport through the creation of bus rapid transit (BRT) routes connecting major growth areas to the city centre and employment sites. Proposals to implement NATS were set out in

an Implementation Plan (NATSIP). NATSIP was adopted in 2010 and rolled forwards in 2013.

- 3.2 The production of the TfN Strategy will ensure transport policies remain up-to-date. In addition, the scope and timetable for the review responds to a number of driving factors:
- The progress of the Greater Norwich Local Plan;
 - Progress on LTP4, which set a context for the TfN review;
 - The receipt of funding for, and delivery of the Transforming Cities Fund (TCF) Programme;
 - Amendments to the Climate Change Act that include a target to achieve net zero carbon by 2050.
 - Addressing air quality issues within the Norwich City area; and,
 - Increased emphasis on active travel and healthier lifestyles.
- 3.3 In the short term, an updated strategy will also give a wider context for:
- The regeneration of key sites in Norwich, including East Norwich and Anglia Square;
 - Post-pandemic economic recovery;
 - The examination of the Greater Norwich Local Plan;
 - Delivery of the Transforming Cities Programme;
 - Maximising opportunities to secure other external funding; and,
 - Taking advantage of planned strategic improvements, such as the Norwich Western Link and on the A47 at Blofield/Burlingham, Thickthorn and Easton / North Tuddenham.
- 3.4 The Transport for Norwich (TfN) Strategy itself takes the form of a high-level strategy setting out a vision, objectives and longer-term aspirations.
- 3.5 The proposed vision, objectives and longer-term aspirations are set out in the TfN consultation documents, which have been provided as background papers to this report. For the sake of brevity these have not been repeated in detail within this report. However, the core policy messages to which the Strategy seeks to react are described in the documentation as covering the following themes:
- The environment:
 - Reducing carbon emissions, particularly from transport by facilitating zero emission vehicles, active travel, public transport and reducing the demand for travel;
 - Protecting and improving the environment;
 - Improving air quality, particularly in the built up urban areas
 - The economy:
 - Supporting economic growth and recovery, including from the impacts of the Covid-19 pandemic;
 - Providing and enhancing connectivity between key hubs and locations such as key employment sites, rail stations, ports and airports, and key cities and places both within the county as well as nationally and internationally.

- Society, health and equality
 - Improving access to education, training and employment opportunities and tackling deprivation;
 - Encouraging equality and equal access to travel for all;
 - Improving the health of communities and increasing levels of physical activity;
 - Improving air quality for the health of communities;
 - Providing access to green space;
 - Encouraging and enabling active travel by providing safe, continuous, direct and comfortable routes;
 - Providing a safe, healthy and attractive environment for people to live and work in.
 - Technology
 - Adapting to and embracing of new technologies in transport. For example, electric vehicles, micromobility and autonomous vehicles.
- 3.6 The TfN strategy will be accompanied by an action plan that will set out commitment to the major actions that will be undertaken to achieve the vision, objectives and aspirations of the plan. This will effectively replace NATSIP. The action plan does not form part of this consultation. Norfolk County Council intends to produce an action plan to accompany the final version of the TfN Strategy to be published at the end of 2021.
- 3.7 In terms of geographical coverage, NATS has a defined geographical area that covered the city of Norwich, the built-up fringe parishes and the first ring of surrounding villages.
- 3.8 It is not currently intended that the extent of the TfN Strategy is defined as rigidly, recognising that the city of Norwich is important for people and businesses across a large area. Nonetheless, transport within Norwich and the Strategic Growth areas around it, together with consideration of the longer distance trips from the county or beyond will be where there strategy and the action plan have their main focus.
- 3.9 Outside of this area, interventions will be taken forward underneath LTP4, and a number of market towns including Aylsham, Diss and Wroxham and Hoveton already have a local network improvement plan that has been developed.
- 3.10 A separate implementation plan will be developed by Norfolk County Council to accompany LTP4.

4. Proposed action

- 4.1 To help shape the final version of the TfN Strategy, it is proposed that the Place Shaping Policy Development Panel recommend that the Portfolio Holder for Planning and Leader agrees the Council's response to the TfN Strategy consultation. The proposed consultation response is set out as appendix A of this report.

4.2 The Consultation response includes additional points of emphasis requested by the Overview and Scrutiny Committee. These are shown in underlined bold text in the section that relates to Chapter 10 of the TfN Strategy: Meeting Local Needs, paragraphs 10.1 to 10.15.

4.3 Individual Members also have the opportunity to make their own representations to Norfolk County Council in response to the TfN Strategy consultation.

5. Other options

5.1 Place Shaping Policy Development Panel may recommend that the Portfolio Holder for Planning and Leader amend the response if they consider that further matters should be included, or if they do not agree elements of the response proposed.

5.2 Place Shaping Policy Development Panel may also recommend that the Portfolio Holder for Planning and Leader do not respond on behalf of the Council, relying on individual members to make their own representations as they see fit.

6. Issues and risks

6.1 **Resource Implications** – Broadland District Council has agreed to make a financial contribution to the TfN Strategy to help its development and delivery. These commitments can be met within existing budgets. Ongoing officer engagement in the development of the TfN Strategy will be met by the existing resources of the Council's planning department.

6.2 **Legal Implications** – None.

6.3 **Equality Implications** – The TfN Strategy will be subject to its own equalities impact assessment. No specific impact assessment has been completed in respect of the Council's response, but regard has been had to equalities implications in drafting the proposed response. It can be expected that the Council Council will comply with any requirement for further EqIA of individual projects and schemes as necessary.

6.4 **Environmental Impact** – The TfN strategy is subject to Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA) and a Habitat Regulations Assessment (HRA). These assessment will inform the final strategy. It can be expected that the Council Council will comply with any requirement for further environmental assessment of individual projects and schemes as necessary.

6.5 **Crime and Disorder** – there are not considered to be any crime and disorder risks associated with this report.

6.6 **Risks** – none other than those already set out.

7. Conclusion

- 7.1 Place Shaping Policy Development Panel should recommend that the Portfolio Holder for Planning and Leader agree the proposed response to the Transport for Norwich (TfN) Strategy Consultation as set out at Appendix A.

8. Recommendations

- 8.1 Place Shaping Policy Development Panel to recommend that the Portfolio Holder for Planning and Leader agree the proposed response to the Transport for Norwich (TfN) Strategy Consultation as set out at Appendix A.

Background papers

[Transport for Norwich \(TfN\) Strategy Consultation Document \(Item 10 of Papers\)](#)

Response to the Transport for Norwich Strategic Consultation

Chapter / Section	Commentary
Chapter 1, Spatial Portrait, Paragraphs 1.1 to 1.7.	<p>The Council notes the references to the Indices of Multiple Deprivation. The Council supports the County Council's identification of specific areas of deprivation in Norwich. It is also important to recognise that issues of deprivation also effect Broadland. For example, Broadland ranks significantly worse than Norwich in the key metric of Barriers to Housing & Services, a ranking of 165 compared to 287 in Norwich. This is important as this measure for a Transport Strategy as it takes into account "geographical barriers", which relate to the physical proximity of local services.</p> <p>The relatively lower ranking is self-evidently related to rural nature of large parts of Broadland, which in many way to be expected. Accepting that the measure is based on local services, the ranking is indicative of the ongoing importance of the services and facilities provided by the City of Norwich and the built-up Fringe Parishes that surround it to those living in the wider rural hinterland. The Council therefore supports the specific references in the plan to recognising the needs of those who need to travel to Norwich from the rural hinterland where access to non-car modes of transport may be limited.</p> <p>Looking beyond the IMD, the reliance on private transport in Broadland is further underlined by the 2011 census data on Car or van availability. This highlights that the vast majority of households across Broadland own at least one car, with 1 or 2 cars per household being most common. There is a very low percentage of households with no car. This high percentage of car ownership likely illustrates that many residents consider access to a car is important to meet their needs, this will be particularly significant for those living in the more rural parts of the district where services and facilities are more widely dispersed as indicated by the IMD ranking.</p> <p>Considering Method of Travel to Work information, it is clear that the vast majority of residents in Broadland/ commute to work using a private vehicle. Levels of cycling are below 3%, even in the more urban areas with levels in the more rural areas sitting below 1.5%. Walking is relatively stable across the whole district at around 6%, this likely reflects those that work in close proximity to their homes.</p> <p>The use of buses is highest in the most urban areas, although still lies below 7%. The use of Buses is significantly less in rural areas, and diminishes noticeably between larger and smaller rural locations. Bus patronage no doubt reflects the quality and frequency of service, with the significant drop off in rural areas reflecting relatively sparse services within these areas.</p>

Chapter / Section	Commentary
	<p>As part of the underlying analysis that will inform the specific interventions to be included in the action plan and which will achieve the overall outcomes of the strategy, it will be important to identify the barriers, real or perceived, to how people are able to move around, the barriers to sustainable transport and how and where these might be addressed and where they cannot be addressed. This will be essential if continued reliance on private transport is going to be reduced in areas where alternative modes is a realistic alternative and also to plan for how to reduce the impact of private transport where alternative options cannot realistically be achieved.</p> <p>To address the expected ongoing need for reliance on private transport there should be a dovetailing of the strategy with any wider LTP interventions to support EV infrastructure in the rural areas, the EV strategy within TfN, any proposals to prioritise particular roads to specific modes of travel and the strategy in terms of parking within the City.</p>
Chapter 1, About the Transport Strategy, Paragraphs 1.8 to 1.10	<p>The Council notes the intention to develop an action plan that will set out how the strategy will be implemented on the ground. Given the timetable under which the TfN Strategy has been produced the Council understands why this has not been prepared and published for consultation. This document will of course be critical and the Council looks forward to working with the County Council in the preparation of the action plan.</p> <p>The Council also looks forward to working with the County Council on the development of the Implementation Plan for LTP4 now that the strategy is close to adoption. It will be important that the two implementation plans dovetail where appropriate to ensure joined up transport planning across the Broadland areas. In due course the Council would welcome clarity on Norfolk County Council's timetable for the production of the LTP4IP and how the County Council intends to engage with the Council on its production.</p>
Chapter 1, Geographical Coverage of the Strategy, paragraphs 1.11 to 1.18.	<p>The Council recognises the benefits of a strategy that focuses on Norwich and its Strategic Growth area. The Council also agrees that it is critical that such a strategy considers how of longer distance trips to Norwich that originate from elsewhere in the County and beyond will be managed and consideration of how implementation measures within the city will effect such trips.</p> <p>The Council is however concerned that the final sentence of paragraph 1.18 appears to seek to limit the strategy to an area that does not effectively capture the full extent of the Strategic Growth area as expressed through the Greater Norwich Local Plan (GNLP).</p> <p>In the Council's view it is important that the Strategy should genuinely reflect the extent of the strategic growth area within Greater Norwich. This approach will ensure that the strategy is best placed to guarantee joined up planning for the strategic growth area and provides an opportunity to present a clear articulation of transport priorities within this</p>

Chapter / Section	Commentary
	<p>area to support funding applications. The extent of the strategic growth area is defined in paragraph 193 of the Greater Norwich Local Plan. It is explained as incorporating 74% of planned growth and includes:</p> <ul style="list-style-type: none"> • The main Cambridge Norwich Tech Corridor area, including Norwich, the North East Growth Triangle, the remainder of the Norwich Fringe, Hethersett and Wymondham; • All the key strategic employment areas in the plan (key strategic employment areas are set out in Policy 6 of the GNLP); • All but one of the strategic scale housing growth locations (the exception is Long Stratton); • High quality public transport, road and cycling infrastructure (both existing and planned); and, • The great majority of brownfield sites in the area. <p>The Council also notes that the consultation document identifies that a local strategy has been produced for Wymondham within the paragraph that references LTP4. As explained above, Wymondham forms part of the Strategic Growth area of Greater Norwich as set out within the Greater Norwich Local Plan (GNLP). In addition, interventions improving connectivity between Wymondham, Norwich and NRP/NUH/UEA are a key part of the TCF programme. The Council therefore considers the Wymondham network improvement plan to be more detailed plan and policy that supports the TfN Strategy and that should be incorporated into the plan in the same way as the Local Cycling and Walking Infrastructure Plan.</p> <p>The Council would re-emphasise that whilst a strategy that focuses on Greater Norwich's strategic growth area, and which recognises wider movements into the area is an appropriate approach it remains critical that the wider hinterland is not left behind. This makes effective progression of the LTP4IP essential.</p>
Chapter 1, Current Progress and Achievements, paragraphs 1.19.	<p>The Council welcomes the recognition of the significant achievements that have been delivered through the NATS Strategy. The Council considers that a key component of delivering these achievements has been effective integration between the District Councils' development plans, the County Council's transport plan and the role of the Greater Norwich Growth Board partnership in providing strategic direction and coordination of the growth programme, securing cooperation between parties and in identifying, lobbying for and coordinating funding.</p>

Chapter / Section	Commentary
	<p>For these reasons that Council considers that it is essential that the TfN Strategy effectively reflects the Strategic Growth Plans for the area in the way set out above and that its implementation is embedded in the GNGB framework for partnership working.</p>
<p>Chapter 2, Policy Context, paras 2.1 to 2.4</p>	<p>The Council welcomes the Policy context being set out in the document. The Council would recommend that comprehensive review referred to in the document would benefit from being broadened to cover plans, projects and strategies.</p> <p>This could capture items such as the TCF programme, the Wymondham Network Improvement Strategy, the Local Cycling and Walking Improvement Plan or other bid proposals such as the Town's Fund, Levelling Up Fund or Active Travel Fund applications. Such as document could usefully be kept up-to-date to help inform the iteration and evolution of the TfN action plan.</p> <p>Aside from this, and accepting that this isn't intended to be an exhaustive list, the Council also considers that key policies should specific consideration of NALPs economic plan, industrial strategy and economic recovery and renewal plan. This ensures the plan relates effectively to key economic themes.</p>
<p>Chapter 3, Problems Issues and Challenges, paragraphs 3.1 to 3.12</p>	<p>The Council recognises the scale of the challenge to meet government's commitment to achieve net zero by 2050. This is likely to be a particular challenge in more rural areas where opportunities for travel without the use of the private car is much more restricted. This again reinforces the need for effective integrations between LTP4 and TfN.</p> <p>It is recognised that there are locations within the built-up area that demonstrate high levels of active travel, but there will be some areas that have much lower levels. In developing the action plan that accompanies the Strategy it would be a useful for the County Council to focus infrastructure investment in areas that do not meet their potential, particularly where such areas correspond to areas of major growth and change.</p> <p>The Council welcome recognition that routes into the city centre may also be adversely impacted by air quality. The Council considers that it is essential that any knock on impacts of additional restrictions for vehicular traffic need to be properly understood. This will ensure that any expected impacts on air quality are understood before action is taken. The potential impact on air quality that may occur from further restricts may well dictate careful consideration being given to the phasing of intervention or restrictions.</p> <p>The Council would also note that deprivation also effects rural areas, with access to services being a particular issue. Therefore impact on access to Norwich, as the county town for Norfolk, from wider rural area needs to be given careful consideration. The Council would suggest that, if it not already the case, that Place (including rurality), Health and Low</p>

Chapter / Section	Commentary
	<p>Income and Poverty should also be taken into account in the County Council's EqlA. This is in line with the best practice approach adopted by Broadland.</p> <p>The Council support the statement that new strategic growth areas have the opportunity to be planned to facilitate and encourage sustainable transport. This will require sustainable transport interventions beyond individual site boundaries. It will also requires effective co-ordination across the whole of the strategic growth area for interventions to maximise effects.</p> <p>One of the challenges is of course the potential changing nature of the city centre, which may have been accelerated as a result of the Covid-19 Pandemic. It will therefore be important that the Action Plan that accompanies the strategy is regularly reviewed and updated to reflect any changes to the nature of the city centres, and any resultant impacts on travel patterns. Similarly, the fact that a significant number of peoples travel habits have changed as a result of the pandemic, for example increase propensity for remote working, may also impact on travel habits. It will be important that short, medium and long term changes are understood and that opportunities that they present are capitalised upon.</p>
Chapter 4, Vision and Themes	<p>Vision</p> <p>The Council is generally supportive of the vision statement, in particular the recognition that consideration needs to be given to Norwich and the Strategic Growth Areas around it. In the Council's view the correct interpretation of the Strategic Growth Area is as set out in the GNLP. The Vision might be usefully expanded to recognise the need to provide access options that minimise the environmental impact of those traveling in from the surrounding areas.</p> <p>Themes</p> <p>The Council broadly supports the identified themes. Some specific comments on the individual themes has been given below.</p> <p>Norwich and Norfolk</p> <p>The Council considers that this theme would benefit from a stronger reference to the need to ensure high quality connections for longer distance trips to Norwich that originate elsewhere in the county or beyond.</p> <p>A Zero Carbon Future</p>

Chapter / Section	Commentary
	<p>The Council notes that the County Council has included in this section an intention to help achieve carbon neutrality by 2030, ahead of government's 2050 target. This appears to be different to the target expressed in the Zero Carbon policy. It would be helpful for the County Council to clarify the relationship between the two targets.</p> <p>Assuming the 2030 target is what is intended. The Council notes that the ban on petrol and diesel vehicles will not come into force until 2030, and clearly not all those using private transport will have been able to transition to a zero carbon vehicle by the point. If a target for 2030 is to be included the Council are of the view that a more achievable outcome maybe achieving carbon neutrality across all trips originating and ending within the built-up area of Norwich by 2030 with wider carbon neutrality by 2050 for those trips starting or ending outside the built-up area. This remains consistent with the NCC objective of working towards Carbon Neutrality by 2030 but also reflect the necessary change over to Elective Vehicles or other zero carbon technologies for private vehicles. Private vehicles are likely to remain necessary for those travelling into Norwich from the wider rural area.</p> <p>Air Quality</p> <p>The Council support the theme. It is important that consideration is given to locations and routes that have air quality issues but have not reached the AQMA threshold and/or those that are at risk of reaching this threshold.</p> <p>As set out elsewhere, it is also important that the knock-on impacts of further restrictions for general traffic in regards pollution in the short, medium and long needs to be given proper consideration to ensure interventions are justified and phased appropriately.</p> <p>Changing attitudes and behaviours</p> <p>The Council support the theme but notes that not everyone who travels longer distances into Norwich are likely to have the option to primarily travel around by active travel. Such trips are also within the remit of the strategy. It is suggested that the text under this theme would be better focused on those that are starting and ending their trip within the Strategic Growth area. This theme could also be usefully expanded to say choose to primarily travel by active or zero-carbon transport.</p> <p>Meeting Local Needs</p> <p>It is important that the transport systems meet the needs of everyone. This require that account is taken of the those travelling from outside of the built-up area that will not readily have access to means other than private vehicles. Close and easy access to the city, with close proximity parking, will also be need not just for persons registered as disabled,</p>

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	<p>important as this is, but also for the elderly or other with limited mobility. The Council trusts that the impact of interventions on age and disability should be considered as part of the EqIA process.</p> <p>Reducing the dominance of traffic</p> <p>Full consideration should be given to the knock-on implications of further traffic restrictions in the city centre, including whether these would result displace noise and air quality impacts to other areas and if so whether interventions are still justified or whether they should be phased to account for greater uptake of zero emission vehicles.</p> <p>Making the Transport system work as one</p> <p>The Council strongly supports this theme. Effective transport planning across the whole of the Strategic Growth area within the TfN strategy will provide the best opportunity to achieve these outcomes for existing population centres and the areas of significant growth and change.</p> <p>Making it Happen</p> <p>The Council supports the theme. In order to achieve this, Council considers that it is essential that the TfN Strategy effectively embedded in the GNGB framework for partnership working.</p>
Chapter 5, Norwich and Norfolk, Paragraphs 5.1 to 5.11	<p>The Council support for the policy that seeks to promote strategic connections and hinterland access that support Norwich's role.</p> <p>The Council would suggest that the words "and the role of the wider Norwich area a key driver of economic growth" or something similar could usefully be added to the policy given the importance of the wider Norwich area, and in particular the Cambridge to Norwich tech corridor to the prosperity of the area.</p> <p>In respect of supporting action, the Council would be grateful if the County Council could confirm whether it is the intention to incorporate unfunded Transforming Cities Fund (TCF) schemes, if they're deemed to support the objectives of the plan? Also whether the objectives of the plan would be considered to be the items expressed as themes?</p> <p>If it is intended that there is to be a wider review, the Council would suggest that it may be better to express this as TCF measures being reviewed and incorporated into the action plan where they remain consistent with achieving the intended outcomes of the plan.</p>

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Chapter 6, A Zero Carbon Future, paragraphs 6.1 to 6.5	<p>The Council support the proposed policy approach that sets out the clear proposal to reduce carbon emissions from transport in line with national targets.</p> <p>The Council also strongly supports the proposal to develop an Electric Vehicle (EV) strategy. An EV strategy will also be essential across the wider rural area, where opportunities for active or other sustainable modes of transport will be less than either the built-up area or the wider Strategic Growth area. The Council notes that an EV strategy for Norfolk is proposed within the updated version of the Local Transport Plan (LTP4). The Council considers that it is extremely important that the two strategies are aligned and complement each other. The Council would also note the need, as expressed by members at a recent Norfolk Strategic Planning Forum, to more widely engage at a strategic level to ensure adequate energy supplies for the county to support roll out of an EV strategy and change over to electric heating in homes.</p>
Chapter 7, Improving Air Quality, paragraphs 7.1 to 7.9	<p>The Council supports the intention to improve air quality. Restrictions of petrol and diesel traffic in the centre are important to explore. Consideration will also need to be given to ensuring equality of access for those who have mobility issues and need to be able to park within the city, but will not have access to zero emission vehicles and for whom public transport or other means are not a viable option.</p> <p>A careful balance will need to be struck between bringing in significant interventions, such as those listed in paragraph 7.8 of the document to ensure people have viable alternatives for accessing the city so as not to restrict Norwich's ability to thrive in line with the Vision.</p>
Chapter 8, Changing Attitudes and Behaviours, paragraphs 8.1 to 8.12	<p>The Council supports the proposed programme of influencing attitudes and behaviours to utilise sustainable transport choices. In the Council view this work will need to be focused on areas where sustainable transport is a viable alternative for people. Also, influencing behaviour will only be successful where supported by high quality sustainable transport infrastructure. This will include considerations of affordability. The Council also notes the significant pressure that the public transport sector has been under as a result of the Covid-19 pandemic, improving public transport services against this backdrop will be a particular challenge for the action plan.</p> <p>In the Council's view, the development of Strategic Growth Areas provides an opportunity that shouldn't be missed to influence people's travel behaviour from the outset. Providing high quality infrastructure that supports these areas should be a key and urgent focus of the forthcoming action plan.</p>

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Chapter 9, Supporting Growth Areas, paragraphs 9.1 to 9.8	<p>The Council welcomes the policies intent to proactively meeting the transport requirements of planned growth. Providing sustainable transport solutions from an early stage of the development will be key to influencing sustainable transport behaviours.</p> <p>As stated elsewhere in this response, providing high quality infrastructure that supports these areas should be a key and urgent focus of the forthcoming action plan.</p> <p>The Council support the commitment to implementing the planned interventions within the agree Transforming Cities Fund (TCF) Programme.</p>
Chapter 10, Meeting Local Needs, paragraphs 10.1 to 10.15	<p>The Council supports the principle of including a section on meeting peoples’ needs. In the Council’s view, within the policy “Local” should be taken as including those that rely on Norwich for educational, employment or other services as well as those that are resident in the area.</p> <p>The Council considers that this a key section where the need to consider longer distance trips to Norwich that originate from elsewhere in the County should be considered. This currently appears absent from the context section, albeit access from the rural hinterland is specifically identified in 10.14. As set out elsewhere access to services is a key area of deprivation within Broadland.</p> <p>In the Council’s view, the transportation barriers to accessing employment and education opportunities can be every bit, if not more acute in the rural areas. However, the policy and its contextual/supporting focuses mainly on Norwich. This could be usefully expanded to recognise this issue, and the fact that this will be a major factor influencing the number of trips to Norwich, and the method of transport that will be used to make these trips.</p> <p>The Council supports the “Overcoming Barriers” policy statement. Ensuring that the transport system of the Norwich area meets needs of those that rely on Norwich for educational, employment or other services is key to ensuring an inclusive transport system within which everyone can benefit from the prosperity of Norwich and its Strategic Growth area. <u>The importance of achieving high quality connections between rural areas and Norwich for those seeking to access employment, education and training opportunities, particularly where there are currently limited transport opportunities other than private vehicles, is a particular area of concern for Broadland Council.</u></p> <p><u>Noting that this may be more related to the implementation of the policies in the Local Transport Plan as opposed to the Transport for Norwich Strategy, the Council would also like to emphasise the importance of improving transport connections between rural areas and services in larger settlements and/or built-up areas. The Council</u></p>

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	<p><u>recognises that this aim is reflected in Policy 10 of the emerging Local Transport Plan and look forward to seeing outcomes from the County Council's policy on this matter.</u></p> <p>As set out elsewhere, the Council would recommend that matters of Place (including rurality), Health and Low Income and Poverty to be included as part of the EqIA that accompanies the final strategy.</p> <p>The Council supports the policy statement on reducing road traffic harms.</p>
Chapter 11, Reducing the Dominance of Traffic, paragraphs 11.1 to 11.15	<p>The Council supports the policy approach to seek to enhance places when changes to the transport network are made. The Council looks forward to working with NCC in the development of Design Guides and Codes.</p> <p>The Council also support the co-ordination of the approach to managing freight and deliveries. The Council would welcome the opportunity to work with the County Council and commercial partners to identify suitable opportunities for freight consolidation facility.</p> <p>The Council supports the proposal to work with local communities to address traffic issues and improve connections that support active travel. The Council would also encourage NCC to work with communities in Market Towns to delivery the outcome of the Network Improvement Strategies through the implementation plan for new Local Transport Plan (LTP4).</p>
Chapter 12, Making the Transport System Work as One, paragraphs 12.1 to 12.29	<p>The Council supports the proposal to adopt a road network and travel mode hierarchy that supports mobility requirements of people as opposed to vehicles and recognises the contribution to place that elements of the highway network can make. The Council would note that it is important that the role and function of all main radial and orbital routes are clearly defined. This will ensure that it is obvious where a particular routes sits within the hierarchy, and how residents who are reliant on those routes will be served in the future should the function and prioritisation of the roads on which they rely be changed.</p> <p>The Council would note that the prioritisation of corridors for certain modes of travel will have knock-on impacts for how general traffic will use the road network. As set out elsewhere, the congestion and pollutions impacts of knock-on impacts will need to be carefully considered to ensure that interventions are appropriate phased to ensure people have viable travel options, and so that pollution impacts can be minimised.</p> <p>The Council supports the statement that parking restriction need to take account of ensuring the ongoing economic vitality of the city, and that the essential needs of those without viable transport alternatives or those that need direct access to the city for mobility reasons continue to be met.</p>

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	<p>The Council also supports the ongoing role of the Park and Ride network and the intention to work with bus operators to deliver services that meet needs and the complementary measures to improve journey times and reliability. Providing high quality services to major areas of growth and change is critical to establishing travel patterns of residents at an early stage.</p> <p>The Council support the encouragement of active travel where this is a viable option for residents. The Council would also note that to make the transport system work as one, it is important to ensure interventions take account of emerging Local Transport Plan (LTP4) policy 10, which seeks to improve connectivity between rural area and services in urban areas.</p>
Chapter 13, Making it Happen, paragraphs 13.1 to 13.4	<p>The Council support the proposal to ensure appropriate governance. As set out elsewhere, the Council considers that it is essential that the Transport for Norwich (TfN) Strategy effectively embedded in the Greater Norwich Growth Board (GNGB) framework for partnership working.</p>

End.