Norwich Cycling Campaign response to the Norwich Western Link planning application FUL/2024/0022

Please accept this response to the planning application for the Norwich Western Link road (NWL) from the Norwich Cycling Campaign.

We object to this scheme

General

The NWL is intended to unlock development land to the north of the city. What this means is creating extensive car-dependent suburbs. This is already happening along the Broadland Northway (commonly known as the NDR) already constructed. Such development will only serve to increase car dependency, creating places hard to serve by public transport, cycling or walking.

The route of the proposed NWL is very damaging environmentally, running as it does through delicate and irreplaceable ecosystems such as ancient woodlands, the home of endangered species including barbastelle bats and featuring a large, intrusive viaduct over the river.

If this road is to be built, it should take a route further west where its impact could be significantly less.

Access to the road

However, if the road is to be built it should be open to all forms of traffic, the NWL is not a "special road" and should therefore be open to all the forms of transport entitled to use it.

Norfolk County Council and their agents WSP have repeatedly made the point that the NWL is specifically intended only to provide for high volumes of fast motor traffic, with slower vehicles and non-motorised users (NMUs) deliberately excluded by design and simply not provided for. They have refused to even consider providing a cycle track on several occasions, claiming it is not the intention of the scheme.

The current proposals therefore work so as to discourage the use and development of such forms of sustainable transport.

This would seem to work against the government's policy to both encourage the development of such low-impact travel modes and also to work against the aims of increasing the use of active travel, with all the health benefits that would provide.

E-bikes have a significantly larger range than conventional cycles and are very much a growth area, with battery technology improving rapidly. It is reasonable to expect the use of such technology to increase greatly in the coming years for both domestic and commercial use. Cargo bikes are capable of carrying ever greater loads, both for transporting goods and for conveying people, yet all of these are proposed to be deliberately excluded from the NWL.

Definition of the term "NMUs"

For the purpose of this submission, the term "NMU" is far wider than simply bicycles. It includes standard bikes of course, but also:

- non-standard pedal cycles such as adapted bikes and recumbents
- e-bikes
- e-cargo bikes
- micro-transport such as e-scooters
- disabled transport such as mobility scooters

Definition of the term "cycle track"

For the sake of this submission the term "cycle track" would be a continuous route with a smooth hard wearing running surface designed to cater for all types of NMUs. It would need to be a minimum of 3m wide with a design speed of at least 40 Km/h (25 mph) away from junctions. This should be a properly segregated route, with a parallel 2m wide footpath.

The cycle track should conform to the latest best principles for Cycle Infrastructure Design as contained in Local Transport Note 1/20, July 2020. These principles of design for cycle networks and routes are detailed under the heads of: **Coherent; Direct; Safe; Comfortable; and Attractive** (LTN 1/20 p30-31).

Therefore, should it be built, a route for NMUs is required along the entire route of the NWL from the start at the A1075 Fakenham Road where it would connect with the existing provision alongside the NDR to the proposed A47 junction at Honingham.

It should be noted that this is a very hilly area and many of the existing roads, especially to the south of the valley, have very steep hills and are thus not suited to NMU traffic. The NWL will make use of cuttings and embankments to provide a route with gentle grades more suited to NMUs.

The cycle track would, unlike the NWL, have intermediate junctions, which would be a key and integral part of the planned local sustainable travel network. It would link local communities to each other, opening up a network of shorter distance routes ideal for easy cycling.

The comments below are made in the context of those principles.

We will look at the route in three sections: The northern section, from the A1067 Fakenham Road with its junction with the NDR to Ringland Lane, the middle section from Ringland Lane to The Broadway and the southern section from The Broadway to the A47 junction.

Northern section – A1067 Fakenham Road to Ringland Lane

There is no proposed cycle track along this section, which includes the river crossing.

The requirement

The cycle track along the NWL should join in a coherent way with the cycle infrastructure on the NDR, involving properly grade-separated crossings of the carriageways if or where necessary.

There are two options:

1: Across the viaduct

Running alongside one of the carriageways with a crash barrier, and ideally a noise barrier, between the traffic and the cycle track.

2: Surface crossing

A route across the valley floor has been suggested, formed by linking the proposed maintenance tracks below the viaduct and upgrading them to cycle track standard. This would require a small bridge over the river to carry the cycle track and footpath.

This would be by far the cheaper option; a large portion of the cost is already to be spent. It could be a far more pleasant cycle route than one across the viaduct, although perhaps less direct.

Both options should enable cyclists to join Ringland Lane and connect in a coherent manner to the next section of cycle route.

Middle section – from Ringland Lane to The Broadway

There is a route which can be cycled already proposed for this section, however the standard of construction is uncertain and the route is far from direct with no concern regarding having been paid to topography.

The preferred route from Ringland Lane to The Broadway would be one that is more direct and closer to the line of the NWL than presently proposed, however as far as the route is concerned and as long as the track is properly constructed throughout it could suffice.

Looking at the proposed routes away from the NWL:

- **Ringland Lane to Church Hill Lane (Blackbreck Lane)**

  The route should be upgraded to a cycle track. i.e. with a proper surface and a parallel footpath.

- **Church Hill Lane to Telegraph Hill**

  The proposed restricted byway should be upgraded to a cycle track, alongside space for horse riders.

Southern Section, The Broadway to the A47 junction

On the approach to the roundabout at the junction with an upgraded A47 between North Tuddenham and Easton, the route swings east along the northern side of the new A11, there is no connection across the NWL to the west side of old A47 toward Wood Lane nor a direct route through to Honingham.

A direct, grade-separated route from Honingham to the NWL cycle track is required.

Walking and cycling measures across the wider area

Apart from the decision not to close Ringland Lane, the other measures to improve cyclists safety are welcomed, particularly the point closure of Honingham Lane to motorised vehicles, and the improved safety of the route to the proposed Easton Pedestrian and Cycle Bridge, should it go ahead as a part of the A47 National Highways upgrade.

The categorisation of roads with less than 2,500 motor vehicle per day as being suitable for cycling is overly simplistic (Transport Assessment Part 1 of 2, section 4.14.2). Most country lanes will easily fulfil this criteria but cannot be considered safe for cycling on account of the speed of traffic, the narrowness of the road and the lack of any safe cycling infrastructure. More needs to be done to make country roads safe for people cycling.

Norwich Cycling Campaign
August 2024