

Sent by e-mail to nwlplanning@norfolk.gov.uk

Planning application FUL/2024/0022

Response by Norwich City Council

Please find below the response of Norwich City Council to the above application. This response was agreed by the City Council's cabinet on 11 September 2024.

Summary

Norwich City Council does not support the NWL scheme as presented in the planning application. In the context of the Transport for Norwich Strategy and programme, it is not supported by sufficiently convincing evidence that the NWL is a critical part of an environmentally progressive and deliverable transport strategy for the city that delivers:

- a. Considerable air quality and decongestion benefits in the city;
- b. A comprehensive investment package in public transport, cycling and walking that is commensurate with the investment being considered for the NWL capable of delivering against internationally agreed carbon reduction targets;
- c. The completion of complementary schemes before the NWL is completed;
- d. A political mechanism to ensure the governance is in place to ensure that these commitments are implemented; and
- e. Evidence that the wildlife and landscape impacts of the scheme can be satisfactorily mitigated.

In the light of this position the City Council would not be prepared to support any proposal for the pooled funding resources of the Greater Norwich Growth Board being used to assist with delivery of the scheme.

1.0 Introduction and approach

- 1.1 The proposed Norwich Western Link road (NWL) is a strategic infrastructure project that would result in important changes to the way people move around the Greater Norwich area. Its construction and use will lead to significant social, economic, and environmental effects.
- 1.2 Norwich City Council [henceforth referred to as "we" and "us"] is closely involved in the planning of development, transport infrastructure and environmental initiatives across the Greater Norwich area through our participation in the Greater Norwich Growth Board, Greater Norwich Development Partnership and Transport for Norwich (TfN).

- 1.3 We have not been formally consulted on the NWL by Norfolk County Council because the NWL would not be within our administrative area, and we are therefore not a “consultation body” under the terms of the EIA Regulations 2017. However, we have decided to respond to the consultation on the planning application [henceforth referred to as “the application”] because of the strategic significance of the project and our interest in the planning of the Greater Norwich area.
- 1.4 This consultation response is provided corporately rather than as a local planning authority because we are not a “consultation body”. We recognise that some of our comments may not be material to the decision that the County Council makes as planning authority when determining the application and may be more relevant for you to consider in your capacity as scheme promotor.
- 1.5 We have not attempted to comment on many of the issues that are material to the determination of this application or the planning policies associated with them because they either extend beyond our areas of expertise, other authoritative bodies will comment these matters that are within their core competence, or we have not had the staff resources to review the material associated with those matters. We cannot therefore offer an overall conclusion on the “planning balance” and have not attempted to mirror the task of the County Council as planning authority to weigh the benefits against the harms of the project.
- 1.6 What we have done is concentrate on issues that we have previously indicated are of particular importance to us and that we have said our support for the scheme would be tested against when the application is submitted. Annex 1 reproduces the main statements that we have made about the NWL since the start of 2021. In Cabinet on 20 January 2021, Cllr Mike Stonard, then Cabinet Member for Sustainable and Inclusive Development, said we would require:

“Convincing evidence that the NWL is a critical part of an environmentally progressive and deliverable transport strategy for the city that delivers:

- a. Considerable air quality and decongestion benefits in the city;*
- b. A comprehensive investment package in public transport, cycling and walking that is commensurate with the investment being considered for the NWL capable of delivering against internationally agreed carbon reduction targets;*
- c. The completion of complementary schemes before the NWL is completed;*
- d. A political mechanism to ensure the governance is in place to ensure that these commitments are implemented; and*
- e. Evidence that the wildlife and landscape impacts of the scheme can be satisfactorily mitigated.”*

2.0 Transport strategy

- 2.1 The main transport strategy document guiding decisions in the Norwich area is the [TfN Strategy](#). We worked with the County Council on this document, which was adopted by their Cabinet on 6 December 2021. We decided at our Cabinet meeting on 12 January 2022 *“that the strategy as adopted by the County Council is not sufficiently ambitious in moving the city toward a sustainable future for transport in the absence of an agreed action plan or approved Local Cycling and Walking Infrastructure Plan and with a capital investment programme that devotes a higher proportion of funds to road building by comparison with schemes that support sustainable transport; and therefore the City Council cannot currently endorse the strategy or support the proposal for the Norwich Western Link that is contained within it”*.
- 2.2 In the period since the adoption of the TfN Strategy several positive developments have occurred. The [Local Cycling and Walking Infrastructure Plan](#) for Greater Norwich was adopted by the County Council in March 2022, successful schemes have been implemented through the Transforming Cities Fund programme (including at the Heartsease roundabout) and considerable progress has been made on boosting bus passenger numbers by amplifying the benefit of the temporary national £2 fare cap through the introduction of electric buses and introducing new services through Bus Service Improvement Plan subsidies.
- 2.3 We explain below why we consider that the Norwich area still does not have a sufficiently “environmentally progressive and deliverable transport strategy for the city” through which the NWL could be justified.
- 3.0 Carbon reduction targets
- 3.1 The UK’s Climate Change Committee (CCC) has said in its latest Progress Report to Parliament published on 18 July 2024 that the transport sector, as the sector that emits the most greenhouse gas (GHG), needs to be at the forefront of decarbonisation over the next three carbon budgets (2028-42), along with buildings, agriculture, and land. They say that the *“annual reduction in surface transport emissions across the rest of the decade must be more than four times what we have seen in 2023”*. A principal element of the national strategy for decarbonising surface transport has been converting the fleet of cars and vans to EV but one of the CCC’s key messages is that the uptake of electric vehicles is off track.
- 3.2 These observations by the CCC, coupled with the accelerating rate of climate change, mean that investment decisions concerning transport projects should be carefully scrutinised for their greenhouse gas (GHG) emissions.
- 3.3 Chapter 15 of the Environmental Statement (ES) accompanying the application says that the NWL will result in 129,724 tCO₂e emissions from the construction phase and 293,616 tCO₂e from the operational phase of the road (calculated as 60 years). It describes this as a moderate adverse (significant) effect.
- 3.4 Although there are no statutory requirements for a local authority such as the County Council to meet a carbon target that aligns with the UK Nationally Determined Commitment to the Paris Agreement 2015, it is instructive to frame the emissions as

a proportion of the County Council's own target for reducing emissions from transport.

- 3.5 The Local Transport Plan target (see ES chapter 15 table 15-5) entails reducing GHG emissions by 1,113 ktCO₂e between 2025 and 2037. The GHG emissions arising from the NWL during that period are forecast in ES chapter 15 to be 183.102 ktCO₂e (construction 129.724 ktCO₂e + operation emissions 53.378 ktCO₂e). This means that 16.45% of the County Council's own emissions reduction targets for transport would be reversed by this one scheme, making it harder to make the necessary contribution to the UK's legal obligations under the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- 3.6 The TfN Strategy contains a net zero carbon policy to *“reduce carbon emissions from transport in Norwich to make the necessary contribution to the national target of reducing emissions from all sources by 78% by 2035 compared to 1990 and achieving net zero emissions by 2050. A carbon budget will be developed for the transport programme to demonstrate how it will ensure emissions are contained within the budget.”* Since this policy was adopted there have been no calculations produced about whether the suite of transport measures planned during the life of the TfN Strategy will be sufficient to meet the carbon reduction target. The ES says that there will be no monitoring of the carbon emissions arising from building the NWL. Therefore there is currently no evidence that delivery of the TfN strategy incorporating the NWL will fulfil the above policy objective nor is there any intention to produce this.
- 3.7 The government has recently revised the National Policy Statement for National Networks (March 2024) (NPS / NN). The NPS / NN governs the approach to determining development consent orders for Nationally Significant Infrastructure Projects (NSIP). It says in para 5.40 that *“given the important role national network infrastructure plays in supporting the process of economy wide decarbonisation, the Secretary of State accepts that there are likely to be some residual emissions from construction of national network infrastructure.”* The Planning Statement contends in para. 5.6.13 that this principle can be applied to the NWL, which is not a NSIP. It does not cite any legislation, guidance or case law that supports this extension of the principle. The logical implication of extending this principle down the hierarchy of roads would be that all schemes to build or enlarge roads that feed the strategic road network could justify generating significant carbon emissions even if they are not part of an overall transport strategy that results in balancing decarbonisation or necessary for implementation of a sustainable development proposed through an adopted development plan.

4.0 Sustainable transport investment package commensurate with the NWL

- 4.1 In January 2022 our Cabinet criticised the *“capital investment programme that devotes a higher proportion of funds to road building by comparison with schemes that support sustainable transport”* reinforcing the point made by Cllr Stonard in January 2021 that we need to see a *“comprehensive investment package in public transport, cycling and walking that is commensurate with the investment being considered for the NWL”*.

- 4.2 The costs cited by the County Council and National Highways for major road building schemes within the TfN area that are being developed for implementation in the decade since the opening of the Broadland Northway (A1270) in 2018 amount to £569m-£779m (see table 1).

Table 1 – Road schemes		
Scheme	Promoter	Published cost¹
NWL ²	Norfolk County Council	£273m
Long Stratton bypass	Norfolk County Council	£46m
Hethel Innovation Park access improvements	Norfolk County Council	£10m
A47 North Tudenham to Easton	National Highways	£100m-£250m
A47 Blofield to North Burlingham	National Highways	£90m-£100m
Thickthorn junction	National Highways	£50m-£100m
Total		£569m-£779m

¹ Rounded down to the nearest £1m.

² Excluding the cost of any further traffic mitigation works that might be required under the 'monitor and manage' regime to be secured by planning condition.

- 4.3 It is difficult to calculate a comparable figure for dedicated sustainable transport schemes but table 2 suggests that (taking into account funding sources that we have not been able to disaggregate at TfN level) approximately £75m-£80m of public money has been allocated to capital expenditure on sustainable transport projects in the Transport for Norwich area over the same time period. This suggests a financial bias of between 7 and 11 to 1 towards schemes that are principally about providing new capacity for vehicular traffic (albeit sometimes with subsidiary benefits for sustainable transport) over schemes that are primarily devoted to making it more attractive to use buses, walk and cycle.

Table 2 – Sustainable transport schemes		
Programme	Promoter	Estimated funds to be spent¹
Transforming Cities Fund	Norfolk County Council	52,100,000
Zero Emission Bus Regional Access	Norfolk County Council / First	14,700,000
Infrastructure Investment Fund	Various	3,800,000
Cycle City Ambition	Norwich City Council	1,800,000
Active Travel Fund	Norfolk County Council	600,000
Total		73,000,000

¹ Includes match funding associated with main funding source, rounded up to nearest £100k, does not include Bus Service Improvement Plan funding, some section 106 funding and some Local Transport Plan funding.

- 4.4 There is little prospect of this situation improving because the work to define future schemes or traffic demand management measures that was promised through the adoption of the TfN Strategy has been too slow. Furthermore, in the last year some

schemes that were in the TfN programme have been cancelled by the County Council and the future of others is unclear, meaning funds for sustainable transport may be lost to Norwich. This reflects an apparent concern (echoing the policy shift indicated in the last government's "Plan for Drivers", that was published in Oct 2023) about implementing schemes that would lead to short-term disadvantage for motorists, regardless of the benefits for the economy of the city arising from investment in good quality public space, decongestion through more efficient use of highway space and improved public health from active travel and reductions in air pollution. Schemes in the City Council's area that have been cancelled or have an uncertain future are:

- Connecting the Norwich Lanes programme (including Exchange Street, Guildhall Hill, St Andrew's Street, Duke Street and the riverside walk between Duke Street and St Georges Street)
- Sprowston Road
- Ketts Hill bus lane

- 4.5 This bias is hard to justify when research published by the DfT in November 2014 (Claiming the Health Dividend by Dr Adrian Davis) found that walking and cycling interventions in the UK offered an average benefit cost ratio of 5.62:1. By comparison the NWL's indicative benefit cost ratio is much worse at between 1.5 and 2 to 1 (transport assessment (TA) para. 4.15.1).
- 4.6 A principal objective for the NWL is to remove traffic from rural roads to the west of Norwich and alleviate the problems that arise for residents there. The TA observes in para 1.2.9 that *"There are existing single-track sections of road through villages such as Weston Longville and Ringland which have a theoretical capacity of about 300 vehicles per hour (based on research referred to in DfT Traffic Advisory Leaflet TAL 2/04). This translates to an Annual Average Daily Traffic (AADT) equivalent to around 3,600 vehicles per day. Strategic modelling indicates that the AADT capacity threshold is likely to be exceeded in the opening year of 2029 if the Proposed Scheme does not proceed."* Whilst accepting that current traffic patterns create genuine impacts for the people living in those communities it should be noted that this demonstrates that these roads are still operating within their capacity. It is also worth questioning both whether the scale of the problem warrants the expenditure of such large sums of money or whether it may be possible to implement other more cost-effective methods of addressing them.
- 4.7 A Sustainable Transport Strategy document accompanies the application. This Strategy is divided into the Non-motorised User Provision (a series of committed measures) and the Complementary Sustainable Transport Measures (CSTM) (facilitated by the implementation of the NWL but without a commitment to implement them). The application makes the case that the road will remove traffic from other roads and provide links in the public right of way network that will encourage people to walk and cycle and bus operators to run orbital services that are not currently viable. On some routes in the vicinity of the NWL traffic levels will significantly reduce and people will feel safer walking and cycling, which is a positive benefit. However, the benefits of the Sustainable Transport Strategy have been overstated in the application and will be undermined by other factors, for the reasons explained in the remainder of this section.

- 4.8 The proposals in the CSTM package are modest in scope and scale, have not been developed in detail and are not guaranteed to be implemented if the NWL is built. The “cycle friendly routes” plan within it disregards the established policy in the Greater Norwich Cycling and Walking Infrastructure Plan to extend the green pedalway west from Bowthorpe to Easton via an alignment closer to Longwater, opting for a more circuitous and undulating route via Bawburgh. The CSTM does not meet our requirement that measures should be completed before the NWL is completed.
- 4.9 The construction of new roads and the provision of extra traffic capacity makes driving motorised vehicles easier and this induced demand will mean that there will be more vehicles on other parts of the network that will adversely affect users of sustainable transport modes. It is acknowledged in para 1.4.1 of the TA that National Highways’ A47 North Tuddenham to Easton Improvement Scheme will draw more traffic through the area between the A1067 and A47 and it will close off several existing roads through the area, increasing pressure on those that remain. This will also happen if the NWL is built and exemplifies the process whereby creating road space of this nature generates additional traffic that is then used to make the case for more road building in future.
- 4.10 The level of development planned in the recently adopted Greater Norwich Local Plan (GNLP) is cited in the application as a reason why the extra road capacity is needed. In fact, the GNLP did not allocate land for the NWL and none of the development in the plan relies on the building of the NWL to be considered acceptable. The danger of building the NWL in the absence of the CSTM is that occupants of development on the sites allocated within the GNLP become excessively dependent on use of the private car. Providing better road access to Longwater Retail Park and Norwich Airport, which are cited as benefits para 2.6.10-2.6.11 of the Planning Statement, may make it harder to achieve modal shift away from the private car and towards sustainable modes at these highly car dependent places.
- 4.11 The TA suggests in para 4.12.1 that one way the NWL will improve access to public transport is by facilitating access to the Airport P&R site by linking the A1067 and A47 radial corridors into Norwich to avoid the outer ring road. This claim lacks credibility because it is not clear why a motorist driving towards the city along the A47 would drive around the NWL, part of the Broadland Northway and the Holt Road (A140) to reach the Airport P&R when they could use Thickthorn P&R to reach the city centre more quickly.
- 4.12 If a piece of infrastructure is built it needs to be maintained. The County Council will need to maintain the NWL at considerable expense. Its maintenance budgets for sustainable transport infrastructure and place quality, which are already insufficient to achieve satisfactory standards, will be placed under even greater strain.
- 4.13 The Planning Statement says in paras 5.3.35-37 that that the NWL is aligned with the environmental and carbon emissions aims of the TfN Strategy through facilitating active travel and public transport and alludes to the CSTM. Any beneficial effects arising from the CSTM (if implemented) will be completely outweighed by the effect

of the carbon emissions that are forecast to arise from the NWL. The TfN Strategy and the GNLP provide heavily qualified support the NWL to the extent that it enables sustainable transport measures to be implemented as part of a balanced package of measures. It clearly does not in its current form with the limited range of associated measures.

5.0 Air quality and decongestion benefits in the city

- 5.1 Our response to the County Council's consultation on the draft Local Transport Plan agreed at Cabinet on 16 December 2020 included the statement that *"The combination of the Western Link and the Broadland Northway would produce a third ring of orbital strategic traffic routes encircling Norwich. We do not regard this as sustainable development, even if it is proved that the local environmental harm can be mitigated, unless the new road capacity is used to re-purpose existing road space for more sustainable uses. We therefore expect to see proper investigation of how the NWL can take traffic off the outer ring road, which in turn could take traffic off the inner ring road, allowing the inner ring road to be downgraded and redesigned."*
- 5.2 To avoid or curb induced traffic demand the road space that is freed up needs to be devoted to dedicated infrastructure for sustainable modes. When a large amount of additional road space is created through a strategic scheme such as the NWL the benefits for sustainable modes should be strategically important. However, it appears that the NWL only guarantees the provision of localised benefits for walking and cycling. The benefits for bus passengers from predicted lighter volumes of traffic on parts of the local network will likely be undermined through future traffic growth due to a lack of measures to lock-in road space reallocation in association with the NWL.
- 5.3 We have stated that one test for our support is achieving *"considerable air quality and decongestion benefits in the city"*. It is therefore disappointing not to see significant reductions of traffic forecast on parallel routes crossing the Wensum Valley within the city or any proposals to provide benefits for non-motorised users on those routes, which would encourage greater use of the NWL by motorised vehicles rather than routes within the city where they conflict with non-motorised users. The particularly applies to:
- Marl Pit Lane and Hellesdon Road, which carries the purple pedalway. The Planning Statement says in para. 2.4.20 that *"Hellesdon bridge, located approximately 800m west of Sweet Briar Road, crosses the River Wensum. This narrow bridge has a carriageway width of about 4m and is subject to a 3T weight restriction. Surveys identify that this bridge is popular among local cyclists, who will be negatively impacted when cars and vans opt to use this crossing as a short cut"*. It is regrettable that no solution is proposed through the NWL Sustainable Transport Strategy.
 - West section of the A140 / outer ring road which causes severance for residential communities and radial roads e.g. blue pedalway at Newmarket Road, pink pedalway at The Avenues, green pedalway at Earlham Road and neighbourhood routes at Dereham Road.

5.4 The opportunity to improve radial routes into the west of the city have also not been built into the project. The Planning Statement at para 2.5.4 says *“There is forecast traffic reduction on A47 southern bypass east of A11 and south western radial routes into central Norwich (A1074 and B1108) as traffic switches to use available capacity on the A1270 with the Proposed Scheme in place”*. It is therefore a missed opportunity that there are no schemes proposed on Watton Road (B1108), Earlham Road (B1108) or Dereham Road (A1074) in association with the NWL for cyclists, pedestrians or bus passengers that would lock in the benefits and avoid inducing traffic growth.

6.0 Political governance mechanism

6.1 In January 2021 we sought *“a political mechanism to ensure the governance is in place to ensure that these commitments [to a comprehensive investment package in complementary measures] are implemented”* as a condition of our support for the NWL. This derived from the discontent felt by politicians representing the city about the County Council’s unilateral decision to end our successful and long-standing Highways Agency Agreement and disband the Norwich Highways Agency Committee that was associated with it in March 2020.

6.2 We were keen to ensure that a publicly transparent and accountable decision-making process was retained, and it was agreed that a new committee would be set up with decisions made by elected members from Norfolk County Council, Norwich City Council, Broadland District Council and South Norfolk Council. That committee worked well, and its members voted on decisions in relation to published reports. It was later discovered that the committee was not legally constituted to make decisions. Rather than correcting the legal status and giving the committee the power to make decisions the County Council decided that the committee should have advisory status instead. Soon afterward the County Council abolished the advisory committee and there is now no open public forum where decisions are made.

6.3 We were clear throughout this sequence of events that it represented an unacceptable diminution of democratic accountability and influence by councillors who have been elected to represent constituents in the city who will be most affected by schemes that are built and the policies that are adopted. A political mechanism therefore does not currently exist that would give us the confidence that sustainable transport measures would be implemented to make the building of the NWL acceptable.

7.0 NWL Wildlife and landscape impact

7.1 The comments in this section focus on the landscape impact of the scheme, and are largely an assessment of whether the proposal fulfils our test that there is *...“evidence that the ... landscape impacts of the scheme can be satisfactorily mitigated.”*

- 7.2 Our review of the documents has focused on the landscape and visual impact of the proposals, and the degree to which the landscape proposals are an appropriate response to the scheme and the receiving landscape. Whilst landscape matters do overlap with ecology and biodiversity, these comments do not cover ecological matters.
- 7.3 We have decided not to make any comment on wildlife impacts because we know this will be a subject that is thoroughly reviewed and discussed with the County Council by other organisations, such as Natural England. It is also a highly technical issue that is covered by a huge amount of information in the planning application, and we lack the resources and in-house expertise to provide a robust commentary on such an important scheme.
- 7.4 The analysis in this section is based on a review of the following documents within the application:
- Design and Access Statement
 - ES Chapter 9 – Landscape and Visual (inclusive of appendix 1-5)
 - ES Chapter 21 – Non-Technical Summary
 - Landscape Ecological Key Plan
 - Landscape Ecological Plans Sheets 1-5
 - Landscape Key Plan
 - Landscape Layout Sheets 1-10
- 7.5 The NWL will affect the landscape character, physical landscape and visual amenity of what is currently a relatively unsettled and tranquil stretch of land. Comprehensive efforts have been made to mitigate these impacts, with a relatively sensitive approach to creating new varied habitats, working with surrounding land to screen and integrate the proposals into the landscape, and minimising the visual intrusion of the proposals with the design, detailing and use of materials. Despite this, it is also clear that residual impacts will remain.
- 7.6 Chapter 9 of the ES contains a Landscape and Visual Impact Assessment (LVIA). It references the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition 2013 (GLVIA3), which is the relevant industry standard for undertaking LVIA's. Other relevant industry standards for the assessment of highways projects are also referenced, however we are less familiar with these standards and the methodology recommended within them.
- 7.7 Although ES chapter 9 refers to GLVIA3 it does not conform to the general format of LVIA's. Landscape sensitive receptors and visual sensitive receptors are identified as part of the baseline, but the assessment of effects is not fully defined and separated. As a result, many of the potential landscape effects are only discussed in the context of what can be seen, and not in the context of what permanent changes would result on the landscape itself. The landscape features and characteristics identified within the baseline are not taken forward for assessment in terms of landscape effects and this has not been justified. The level of consideration given to landscape receptors is

not sufficiently thorough given the large scale of the proposed development. It is usual practice to identify landscape character (using national and local level landscape character areas (LCAs)), along with a more tailored individual considerations of the direct context of the site. In addition, it is usual practice to identify receptors such as the physical landscape fabric and individual features that could be impacted by the proposed development. We are concerned that these omissions have led to the magnitude of effects being understated and some potential receptors not being identified.

- 7.8 ES chapter 9 states in para 9.10.6 and 9.10.7 that the predicted residual effects during operation will be “slight adverse” (or “minor adverse” in appendix 1) in relation to LCA1: A1 Wensum River Valley and LCA2: D2 Weston Green Tributary Farmland. Our methodological concerns mean that we think these professional judgements understate the potential effects of the development on landscape receptors and that the consideration of landscape effects in relation these and adjacent LCAs is not comprehensive.
- 7.9 In relation to visual effects, the ES non-technical summary says that these are expected to be of “neutral to moderate-large adverse”, reducing to “slight moderate adverse” by year 15. Four close distance viewpoints were considered to experience “moderate adverse effects” (or above), reducing to “slight-moderate adverse effects” by year 15 once planting and mitigation is established.
- 7.10 The LVIA in chapter 9 of the ES concludes that there will be no significant effects resulting from the proposal by year 15 once mitigation is established, in relation to assessed LCAs and visual receptors. LVIAs inherently rely on professional judgement based on the application of a particular methodological approach. We have concluded that this LVIA lacks a proper consideration of the impact that the proposal will have on the physical landscape and lacks a more detailed consideration of contextual site-specific landscape character (including perceptual qualities of place). This has led to the potential impacts of the proposals being understated and we therefore cannot fully agree with the conclusion that the proposals would result in no significant effects at year 15, particularly in relation to landscape character and physical features, without further consideration and assessment of these by the applicant. For this reason, we have concluded that there is not sufficient evidence to demonstrate that the landscape impacts of the scheme can be satisfactorily mitigated.
- 7.11 The treatment of adjacent LCAs is confusing within the LVIA, being discounted in para 9.6.3 of ES chapter 9 as an unnecessarily disproportionate area of analysis, yet referred to in the section on cumulative effects under para 9.8.2. GLIVIA3 encourages analysts to be proportionate, however in this instance some of the more impactful elements of the scheme, such as roundabouts and connections to other roads at the ends of the NWL that fall within or adjacent to LCAs, do not appear to have been given the consideration they deserve.
- 7.12 Beyond the obvious impact that the proposal will have on the physical landscape, landscape character and visual amenity, there appears to be other negative changes that would result from the NWL that are relevant to a landscape commentary

because they affect the ability for people and nature to experience good connectivity and access to the existing environments within the area. Habitat degradation of ancient woodland and veteran trees, specific issues relating to bat populations, severance of public footpaths, disturbance to historic field patterns and even minor changes such as the culverting of small water courses would have negative impacts on the landscape, both in terms of its value and perceptual qualities.

Norwich City Council
September 2024

Annex 1 – Earlier statements and decision by Norwich City Council about the NWL

7 October 2022 – Letter responding to NWL pre-planning application consultation from Norwich City Council Executive Director of Development and City Services to Norfolk County Council Highway and Major Projects Manager

Thank you for the opportunity to respond to your consultation on the Norwich Western Link (NWL) ahead of the submission of a planning application.

Our Cabinet member Cllr Stonard explained at a Council meeting on 20 January 2021 the circumstances under which our council could support the NWL. These were summarised in a Cabinet report on 12 January 2022 as being:

- Considerable air quality and decongestion benefits in the city
- A comprehensive investment package in public transport, cycling and walking that is commensurate with the investment being considered for the NWL capable of delivering against internationally agreed carbon reduction targets
- The completion of complementary schemes before the NWL is completed
- A political mechanism to ensure the governance is in place to ensure that these commitments are implemented
- Evidence that the wildlife and landscape impacts of the scheme can be satisfactorily mitigated.

We had hoped that the combined development of the Transport for Norwich Strategy and actions flowing from it and the investments in sustainable transport measures associated with the NWL would help to satisfy us that the NWL sat within a balanced and environmentally progressive overall transport package for the Norwich area.

Unfortunately our Cabinet concluded, in approving the main recommendation in the January 2022 report, "that the strategy as adopted by the County Council is not sufficiently ambitious in moving the city toward a sustainable future for transport in the absence of an agreed action plan or approved Local Cycling and Walking Infrastructure Plan and with a capital investment programme that devotes a higher proportion of funds to road building by comparison with schemes that support sustainable transport; and therefore the City Council cannot currently endorse the strategy or support the proposal for the Norwich Western Link that is contained within it.

Nine months have elapsed, and we have not seen any changes that would alter this position. In fact, our concerns have deepened for the following reasons:

- Insufficient progress has been made on implementing the actions in the Transport for Norwich Strategy.
- The increased cost of the NWL has widened the disparity in the level of investment planned in road schemes in the Norwich area (over £600m) compared to the investment planned in sustainable transport. Once the TCF programme is completed the only committed funds for sustainable transport are a share of the £49.5m BSIP allocation, sums in the hundreds of thousands annually from Active Travel England and a share of pooled CIL through the Infrastructure Investment Fund.
- The traffic modelling presented through the NWL public consultation does not demonstrate that traffic levels will be reduced within Norwich in a way that would facilitate any schemes to improve active travel or public transport. The improvements to cycling and walking associated with the project are modest and local to the scheme. The welcome adoption of the Local Cycling and Walking Infrastructure Plan (LCWIP) by the County Council earlier this year does not appear to have informed the proposals. For example, the LCWIP commits to extending the green pedalway beyond Bowthorpe over the A47 via Long Lane to connect with Easton whereas the NWL consultation disregards this. The NWL promotes the enhancement of New Road between Bawburgh and Bowthorpe instead. This would need to be informed by likely increases in traffic volumes should the contingency site in the Greater Norwich Local Plan GNLP2043/0581 between New Road and Long Lane be developed that could make New Road intimidating for cyclists without the severance of this route for general traffic. It is also disappointing that the consultation is silent on the western arc bus route proposals and lack any detail of other public transport measures that might be facilitated by the NWL.
- The County Council has revised the political governance arrangements for Transport for Norwich that were set up following the termination of the highways agency agreement so that the joint committee does not have decision making powers.

As a result, the City Council cannot support the proposal for the Western Link. However, it remains keen to continue working with the County Council on the co-ordination of transport policy and investment in Norwich.

12 January 2022 Cabinet report extracts - TfN Strategy

Approved recommendation: “that the strategy as adopted by the County Council is not sufficiently ambitious in moving the city toward a sustainable future for transport in the absence of an agreed action plan or approved Local Cycling and Walking Infrastructure Plan and with a capital investment programme that devotes a higher proportion of funds to road building by comparison with schemes that support sustainable transport; and therefore the City Council cannot currently endorse the strategy or support the proposal for the Norwich Western Link that is contained within it”

5. The Norwich Western Link (NWL) is being promoted by County and reference is made to it in the TfN strategy. On 20 January 2021 Cllr Mike Stonard made a statement to Council in response to public questions on the NWL setting out the City Council’s conditions for supporting that project. These included seeing clear and convincing evidence of the NWL being a critical part of an environmentally progressive and deliverable transport strategy for the city

11. On 20 January 2021 Cllr Stonard sought convincing evidence that the NWL is a critical part of an environmentally progressive and deliverable transport strategy for the city that delivers: a. Considerable air quality and decongestion benefits in the city b. A comprehensive investment package in public transport, cycling and walking that is commensurate with the investment being considered for the NWL capable of delivering against internationally agreed carbon reduction targets c. The completion of complementary schemes before the NWL is completed d. A political mechanism to ensure the governance is in place to ensure that these commitments are implemented; and e. Evidence that the wildlife and landscape impacts of the scheme can be satisfactorily mitigated.

12. The TfN strategy contains an action to “Carry out strategic assessments of the traffic impacts as a consequence of completing the committed strategy schemes (including improvements to the A47, the committed transforming cities programme and the Norwich Western Link) to identify the opportunities to deliver enhanced sustainable transport measures to support public transport and active travel”. There is no clarity about the scope of these assessments, when they will be done and why this has not already happened, given the advanced state of planning for these schemes. There is a risk that the construction of the road will promote car-dependency in the area, worsening rather than alleviating traffic in Norwich.

13. Investment levels are important in determining outcomes. The County and National Highways are planning to spend about half a billion pounds on new and expanded roads within the TfN strategy area, including £198m on the NWL. In contrast, once the Transforming Cities Fund and Town Deal programmes end there is a risk of much less funding being available for sustainable transport schemes than now or by comparison with road schemes. The Bus Service Improvement Plan hopes to secure £107m from the Department for Transport over five years matched by £65m of local money for the whole county. The LCWIP has not been costed and dedicated funds from DfT for cycling are small by comparison with the roads investment programme.

14. None of conditions outlined in January 2021 for supporting the NWL have been fulfilled. Whilst the possibility exists that evidence could be provided as part of the planning application submission for the NWL that the wildlife and landscape impacts of the scheme can be satisfactorily mitigated, all the tests needed to be

met for the City to support the NWL and it is clear, following the adoption of the TfN strategy, that the prospect is remote. The NWL is a project of such significance that it is considered the City Council should make its position clear and in light of the information above it is recommended that the Council should resolve not to support the NWL at this stage.

15. It should be noted that the relationship between the NWL and growth is very different to the circumstances that existed in relation to the previous Norwich Northern Distributor Road (now Broadland Northway), which was necessary to deliver growth proposals set out in the Joint Core Strategy, and that the County Council have not sought to access any infrastructure funds over which the City Council has control to deliver the NWL. However, it follows from the paragraph above that should such a request be received it would not be agreed by the City Council.

16. The TfN Strategy and NWL are mentioned in the Greater Norwich Local Plan (GNLP) policy 4 and paragraphs 237-245, which was agreed for submission by Council in July 2021. The evidence supporting the plan is clear that no development delivery in the GNLP is dependent on the completion of the NWL road. However, it is considered that the text of the GNLP will need to be updated to reflect both the County Council's adoption of the TfN strategy and the City Council's current position on it. Should the recommendations of this report be agreed, officers will seek to agree an appropriate main modification with partners in the GNLP to reflect the updated position.

17. The Norfolk Strategic Infrastructure Delivery Plan includes a supportive reference to the NWL. If the recommendations are accepted the City will need to make it clear to the County that the recent discussions at the Norfolk Leaders meeting should not be taken to signify any agreement by the City to the NWL.

20 January 2021 Cabinet – Response by Cllr Mike Stonard, then Cabinet member for sustainable and inclusive development, to questions

Thank you for the multiple questions about the city council's position on the proposed Norwich Western Link (NWL).

Clearly the Western Link scheme is a very major and controversial proposal and, if built, it will have significant implications for Norfolk's carbon emissions, its environment, traffic conditions across the city and economic activity in the north of the city. However, it should be remembered that the scheme proposed is entirely outside our administrative area and that the city council is not a transport authority. Therefore, we are not part of the decision making process on the NWL, which is entirely a county council matter.

The city council has always been consistent that any support for the scheme would be dependent on it being satisfied that certain conditions were fulfilled. This is consistent with the content of the emerging Greater Norwich Local Plan that is on the agenda for consideration at this meeting. In particular, we have demanded that the NWL needs to be set in the context of a clear and environmentally progressive strategy for the development of transport in Norwich.

This strategy needs to be the foundation for a clearly defined and comprehensive set of schemes with funding attached which would demonstrate that, when viewed as a package, public transport, cycling and walking would be prioritised and promoted over the use of the private car. In particular, evidence of the decongestion benefits of the NWL in the city was sought as the basis for some of these measures to promote modal shift and road space reallocation.

Since the city council expressed conditional support for the strategic outline business case, almost no progress has been made on the Transport for Norwich Strategy, and the Local Cycling and Walking Infrastructure Plan has not been published for consultation. The award of £32m for the Transforming Cities Fund project last year was welcome but a far smaller award than the original high value package that would have been comparable in value to the estimated £153m cost of the NWL. We have as yet received no evidence that traffic levels in the city's streets will be eased in a way that would improve air quality or enable modal shift or road space reallocation as a result of the construction of the NWL.

In December, cabinet approved a detailed and considered response to the draft Local Transport Plan. At the time of writing this answer, we have not received an acknowledgement or a response to that submission, which was sent on 17 December. The response explained the types of principles and interventions that we would like to see implemented to improve transport in the city.

The city council's response to the Local Transport Plan sets out our bold and radical vision for transport in Norwich. It was drafted in the context of the Council's 2040 City Vision, the Covid-19 Recovery Plan and the Norwich City Centre Public Spaces Plan. It sets out thirteen policy principles, the very first of which is to respect climate limits. It supports the county's carbon neutrality target of 2030 and proposes tough carbon reduction targets for transport, supported by an immediate and radical reduction in emissions. It demands that the Local Transport Plan should set a carbon budget for transport in Norfolk and Greater Norwich, supported by strong policies to contain emissions within that budget.

The second principle of the city council's bold vision for transport is that health and wellbeing and fairness must be at the centre of transport policy. Access to transport directly impacts life chances but it is the poorest in society who tend to live beside busy roads or in polluted city centres, with a consequent impact on life expectancy and general health and wellbeing, so transport must be clean and transport policy must promote social justice by reducing inequalities and promoting fairness.

The third policy principle is that non-car access from homes to places where people work, learn, shop and are entertained must be affordable. This will require an approach to land use and transport planning which creates compact mixed-use clusters and directs development and calibrates density towards them.

The city council's fourth principle is to prioritise the different modes of transport on the basis of efficient energy and space use. We need to continue to induce demand for more sustainable travel behaviour by designing Norwich around the needs of pedestrians, cyclists and buses. We propose the prioritisation of different modes of transport according to a hierarchy which is based on their energy efficiency, with walking and cycling at the very top.

There are a further nine policy principles for transportation in Norwich, which are freely available to peruse. They cover vital issues such as the equality impact of transport policy and design; the need to actively manage the delivery of goods, which has increased dramatically as a consequence of the rise of online shopping; the use of technology to support our goals; and the generation of revenue to invest in sustainable transport and to make us less reliant on central government grants.

Our ambitious transport vision also makes radical proposals of interventions for delivery, including a workplace parking levy; a gradual reduction in the space available for fossil fuel vehicles to park; the allocation of spaces for autonomous vehicles; the reallocation of road space and time from cars to more sustainable modes; measures to free the city centre and neighbourhoods from polluting vehicles; a reduction in traffic levels in the vicinity of schools; the setting of 20 mph as the default speed limit across Norwich; and the creation of Mobility Hubs, which would facilitate smooth transfers between shared and clean modes of transport and to ensure people can be confident that there are hubs places in the city where they can access and smoothly switch between buses, trains, car club vehicles and hire bikes.

All of these ambitious and radical policies and measures would transform the city into a safer, cleaner, more sustainable and more equitable place. This is now the city council's main focus for influencing the county council on transport matters.

But, this vision must be seen in the context of the city council's diminished influence on the development and implementation of transport policy and projects in and around the city. This reduced role is a direct consequence of the county council's unilateral decision to terminate the Highways Agency Agreement. Therefore, the city council can propose ambitious and radical policies and measures, but we no longer have any role in the decision-making and implementation process.

In terms of the Western Link, the termination of the Highways Agency Agreement and the diminution of the city council's role in transport matters has combined with a lack of progress on the part of the county council in developing a new transport

strategy. This slowness has served to undermine our confidence that the county is serious about providing sufficient complementary measures to satisfy our conditions for supporting the project. As I say, the termination of the Highways Agency Agreement means the city council does not have a formal role in this process; a role which would have helped ensure confidence that such complementary transport policies and schemes in the city were being planned, funded and implemented in a timely way and as agreed.

However, our final position will await the outcome of work that is being undertaken to prepare for the submission of the planning application for the NWL and the adoption of the Transport for Norwich Strategy. On a decision as important as this it is only right that we wait until we are in full possession of all the relevant information.

In order for the city council to consider supporting the proposal we will need to see clear and convincing evidence of the NWL being a critical part of an environmentally progressive and deliverable transport strategy for the city delivering:

- considerable air quality and decongestion benefits in the city;
- a comprehensive investment package in public transport, cycling and walking that is commensurate with the investment being considered for the NWL capable of delivering against carbon reduction targets in the Paris agreement or any successor agreements;
- the completion of complementary schemes before the NWL is completed;
- a political mechanism to ensure that the governance is in place to ensure that these commitments are implemented; and
- evidence that the wildlife and landscape impacts of the scheme can be satisfactorily mitigated.

We are an evidence based council, which has consistently requested both the evidence and the answers to our questions before a decision of support could be considered. This evidence has not been forthcoming and we can only surmise. However, meanwhile, the actions of the Tory-run county council have removed from the city any meaningful power in decision making on city transport and highways matters through the removal of the Highways Agency Agreement. But, we have not waited idly for the county council to respond. Instead, our alternative is clear. We have produced a Norwich transport plan that is bold, radical, evidence based and decisive. If implemented, it would give our city a better future in making practical real life improvements to people's day to day transport needs while safeguarding our precious environment. So, our message is simple, but I'll repeat it again for those who have chosen not to listen. If the Tories at county want us to change they'll need to answer the questions, provide the evidence, reinstate the Highways Agency, or something very much like it, deliver on our bold transport plan and give us a meaningful say in transport and highways matters in the city. Until then, just as before, we cannot consider support.