



Weston Homes plc

REDEVELOPMENT OF ANGLIA SQUARE, NORWICH

Ref: WH 7/1: Proof of Evidence of Martin J Paddle BSc CEng
CWEM MICE FCIHT MCIWEM in regard Transport, Highway
and Accessibility Matters: PINS ref:
APP/G2625/V/19/3225505; LPA ref: 18/00330/F



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**OUR REF. NO. ANGLIA SQUARE, NORWICH: WH 7/1 PROOF OF EVIDENCE OF
MARTIN J PADDLE**

DATE: 3 DECEMBER 2019



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CONTENTS

	QUALIFICATIONS	1
1	STRUCTURE OF MY EVIDENCE	2
2	BACKGROUND AND POLICY CONTEXT	3
3	DISCUSSIONS WITH NORWICH CITY COUNCIL AND NORFOLK COUNTY COUNCIL	5
4	MOVEMENT STRATEGY	6
5	ASSESSMENT METHODOLOGY AND DEVELOPMENT IMPACT	7
6	MITIGATION	12
7	THIRD PARTY REPRESENTATIONS	14
8	SUMMARY AND CONCLUSIONS	20

APPENDICES (*BOUND SEPARATELY AS: WH 7/3*)

QUALIFICATIONS

Martin James Paddle will say:

- i) I am a Director with WSP where I direct Transport and Development Planning services for a broad range of property sector clients.
- ii) I am registered with the European Federation of National Engineering Associations and hold the title of European Engineer. I am a Chartered Civil Engineer, a Member of the Institution of Civil Engineers and a Fellow of the Chartered Institution of Highways and Transportation.
- iii) I am also a Chartered Water and Environmental Manager and a Member of the Chartered Institution of Water and Environmental Management and hold the degree of Bachelor of Science in Civil Engineering.
- iv) I have been engaged in the practice of civil, municipal, highway and traffic engineering for over forty years in both the public and private sectors. I joined Mouchel (part of WSP since October 2016) in March 1993, having previously worked as an Associate for Transport and Infrastructure consultants, The Noble Lewis Partnership (formally F.E. Noble Associates) and prior to that, with the Greater London Council.
- v) I have worked on numerous development and regeneration projects throughout the UK providing transport, highway and infrastructure advice in support of planning applications for a range of land uses and have given expert evidence at numerous Public Inquiries and Tribunals.
- vi) I am familiar with the Application Site and the surrounding area having visited it on several occasions following WSP's appointment by Weston Homes plc in 2015. This evidence has been prepared in accordance with the guidance of my professional Institutions and the opinions expressed are my true professional opinions.

1 STRUCTURE OF MY EVIDENCE

- 1.1 Subject to those matters previously agreed with the Rule 6 Parties in advance of the Public Inquiry and subsequently included within a Statement of Common Ground (SoCG), my evidence considers the transport, highway and accessibility issues associated with the redevelopment of Anglia Square (hereinafter referred to as the Application Site) and the wider connectivity with the external transport network. Where appropriate, my evidence will draw on relevant sections of the Transport Assessment (TA) of March 2018¹ and the Transport Assessment Addendum (TAA) of August 2018², completed by WSP in support of the planning application submitted by the Applicant Weston Homes plc, in addition to any other relevant supporting documents that may help to illustrate and clarify matters.
- 1.2 My evidence is also supported by Appendices denoted as ‘MJP’ (bound separately as WH 7/3) and is structured as follows:
- i) Background and Policy Context;
 - ii) Discussions with Norwich City Council and Norfolk County Council;
 - iii) Movement Strategy;
 - iv) Assessment Methodology and Development Impact;
 - v) Mitigation;
 - vi) Third Party Representations; and
 - vii) Summary and Conclusions

¹ Core Document CD4.86 ES Volume 3 (h)

² Core Document CD7.81 SEI (r)

2 BACKGROUND AND POLICY CONTEXT

- 2.1 The letter from the Planning Inspectorate (PINS) dated 26 April 2019 sets out the Secretary of State's (SoS) relevant matters to be considered at a 'call in' Public Inquiry. The letter is also the SoS's Rule 6 Statement of Case (SoC) and does not specifically raise matters in regard to Chapter 9 of the National Planning Policy Framework (NPPF) February 2019 - 'Promoting Sustainable Transport.'³
- 2.2 Furthermore, the Inspector's note and agenda dated 25 October 2019 that informed the pre-Inquiry meeting held on 5 November 2019 and his subsequent note of that meeting, dated 6 November 2019, excludes transport/highway matters as either a 'main issue' or 'other relevant matter.' Notwithstanding this, I believe that relevant transport issues in the context of the NPPF are still likely to be raised by third parties and submitted as evidence. In this regard, I note that the Norwich Cycling Campaign (NCyC) is a Rule 6 Party and has requested that, inter alia, Chapter 9 of the NPPF 2019 should also be considered. I have therefore prepared this Proof on a precautionary basis and to assist the Inquiry.
- 2.3 The salient matters relating to transport and highway issues will be explained in my evidence to ensure that the SoS, Rule 6 parties and other interested bodies are fully aware of the extensive work that has been completed hitherto in support of the planning application currently before this Inquiry and the agreements which have been reached with the planning authority Norwich City Council (NCiC) and the highway authority Norfolk County Council (NCoC). I also refer to relevant national and Local Plan policies as comprehensively detailed in the TA⁴ and TAA.⁵
- 2.4 I explain how WSP in advising the Applicant on transport and highway matters, scoped the requirements⁶ for a TA and subsequently agreed the same with both NCoC and NCiC. WSP subsequently prepared the TA in accordance with the requirements of the approving authorities and local/national policies and assessed the movement issues that would potentially arise from the redevelopment of the Application Site for a residential led mixed use scheme.

³ Core Document CD1.1

⁴ TA, Section 4, pages 4-15; Core Document CD4.86 ES Volume 3 (h)

⁵ TAA, Section 2, page 2; Core Document CD7.81 SEI (r)

⁶ TA – Appendix D; Core Document CD4.86 ES Volume 3 (h)

- 2.5 Sustainable travel options are considered within the context of Framework Travel Plans⁷ for the residential and commercial elements of the proposed development and to consider the impact on the masterplan, including: vehicle access, car parking, routes for pedestrians and cyclists, servicing and public transport accessibility. The Travel Plans will ultimately act as the catalyst to influence the future behaviour of residents and employees and thereby encourage the use of more sustainable modes of transport.
- 2.6 NCiC Officers address transport related matters as 'Main Issue 10: Transport', in paragraphs 483 – 508 of their report to the Planning Applications Committee.⁸ The Council provides its conclusion on transport and highway matters at paragraphs 505 and 506 and indicates that the proposed development would not have a severe impact on the Norwich strategic highway network and major changes to roads and junctions are not justified. NCiC and NCoC also indicate that the proposed Travel Plans are acceptable and will assist in reducing the use of the private car and promote sustainable travel.

⁷ TA, Appendix X; Core Document CD4.86 ES Volume 3 (h)

⁸ Report to Planning Applications Committee, 6 December 2018; Core Document CD 9.1

3 DISCUSSIONS WITH NORWICH CITY COUNCIL AND NORFOLK COUNTY COUNCIL

- 3.1 Comprehensive discussions have been held with NCiC and NCoC from inception of the project leading through to the development of the agreed masterplan.⁹ Further to the scoping of the TA, progress meetings were held with Officers at NCiC and NoCC, to address the extent of traffic modelling of key junctions on the local road network surrounding the Application Site and to incorporate sustainable travel options. In this regard, the TA explains the requirements of both NCiC and NCoC and the broad methodology adopted by WSP¹⁰.
- 3.2 The TAA responds to comments received from both authorities on the original planning submission and ‘third party’ objections, which relate broadly to issues on pedestrian/cycling connectivity, permeability and road safety which will be addressed in evidence. The comments received from NCiC and NCoC (i.e: included within the TAA), address the proposed highway related improvements which I summarise in Section 6 of my evidence. Matters concerning air quality are addressed separately on behalf of the Applicant by Melanie Hobson of consultant Aether.

⁹ TA, Appendix B; Core Document CD4.86 ES Volume 3 (h)

¹⁰ TA, Section 7, Assessment Methodology, pages 64-78; Core Document CD4.86 ES Volume 3 (h)

4 MOVEMENT STRATEGY

- 4.1 The broad movement strategy is explained in the TA.¹¹ The principles have sought to ensure accessibility and permeability for all sustainable modes of transport to influence the future travel behaviour of residents and employees and in doing so, create a 'sense of place' that is an attractive, safe and secure environment. Future residents and employees will have access to a range of travel choices as explained in the TA,¹² with significantly enhanced connectivity to the surrounding transport infrastructure which exemplifies the sustainable characteristics of the Application Site.
- 4.2 The regeneration of Anglia Square will create an opportunity to improve permeability and enhance connectivity with the surrounding cycle and pedestrian network and provide future access to the existing public transport facilities located along Magdalen Street.¹³ In this regard, the proposed development masterplan has evolved to accommodate the shared use of infrastructure by pedestrians, cyclists and service vehicles in a safe and controlled manner.
- 4.3 Residential parking is based on 0.75 spaces per dwelling unit and is comparable to other city centre consented schemes and compliant with current planning policy.¹⁴ In addition, the Applicant has agreed to: i) the imposition of the recommended planning condition 9 in the NCiC SoC, which requires approval of a scheme for monitoring of residential parking space sales in the proposed development and the reporting thereof, to ensure appropriate levels of car parking are available and to establish whether the overall provision could be reduced in later development phases; ii) provision of car club vehicles and spaces on Edward Street; and iii) Electric Vehicle (EV) charging points. It is on this basis, that NCiC consider the proposed number of residential parking spaces are acceptable¹⁵.

¹¹ TA, Section 4, pages 38-63; Core Document CD4.86 ES Volume 3 (h)

¹² TA, Section 4, pages 38-63; Core Document CD4.86 ES Volume 3 (h)

¹³ TA, Section 9.5, Section 278 Highway Improvements; Core Document CD4.86 ES Volume 3 (h)

¹⁴ Development Plan policy, DM31; Core Document CD2.3

¹⁵ Report to Planning Applications Committee, paragraph 501, 6 December 2018; Core Document CD 9.1

5 ASSESSMENT METHODOLOGY AND DEVELOPMENT IMPACT

- 5.1 The TA includes an assessment of the base transport and highway position and compares the total vehicle trip generation of the proposed development with the scheme previously granted planning permission in October 2009 (i.e: NCiC planning reference 08/00974/F).¹⁶ That consent was partially implemented following the construction of the ‘one way’ system comprising, Edward Street/ New Botolph Street/St Augustines Street/ Magpie Rd. The TA also compares the total vehicle trip generation with a second planning application for the redevelopment of the Application Site¹⁷, which had been previously granted planning permission in March 2013 (i.e: NCiC planning reference 11/00160/F, 11/00161/F and 11/00162/O). The generated traffic considered for these previous planning applications is summarised in the TA.¹⁸
- 5.2 Following detailed scoping with NCiC and NCoC, WSP completed traffic surveys at key junctions around the local road network in November 2016,¹⁹ to identify the current base position without the proposed development. A trip generation model identifying the characteristics of the proposed development of the Application Site is included within the TA.²⁰ This demonstrates that the proposed development would generate significantly less vehicle trips²¹ when compared with the previously consented schemes, during the weekday AM and PM peak periods and on a Saturday between 1200 and 1300 hours.
- 5.3 The TA includes modelling of key junctions on the local road network for the proposed opening year of phase 1 and the completion and full occupation of the development in 2028, for a weekday AM, PM, Friday PM and Saturday periods.²² The results demonstrate that the regeneration of the Application Site with the proposed development would have a ‘minor’ impact on the operation of the surrounding highway network, in the anticipated year of opening of Phase 1 in 2020 and the full occupation of the development as originally anticipated in 2028.

¹⁶ TA, Section 7.8, pages 70-71; Core Document CD4.86 ES Volume 3 (h)

¹⁷ TA, TA, Section 7.8, pages 70-71; Core Document CD4.86 ES Volume 3 (h)

¹⁸ TA, Section 7.8, Table 16, page 71; Core Document CD4.86 ES Volume 3 (h)

¹⁹ TA, pages 34- 37; Core Document CD4.86 ES Volume 3 (h)

²⁰ TA, Section 7.7, pages 68-70; Core Document CD4.86 ES Volume 3 (h)

²¹ TA, Table 16, page 71; Core Document CD4.86 ES Volume 3 (h)

²² TA, Section 7.12, pages 77-101; Core Document CD4.86 ES Volume 3 (h)

- 5.4 The modelling within The TA does not consider the impact of a scenario that assumes the comprehensive proxy re-use of the Application Site, including the re-opening of the Multi Storey Car Park (MSCP) (i.e: referred to as the planning ‘proxy re-use case’). In this regard, a further assessment has been completed to demonstrate the level of traffic that could be generated, assuming the full occupation of existing commercial units and the potential reuse/refurbishment of the existing MSCP. The results of this review demonstrate how the currently suppressed base line traffic flows would in fact be considerably higher with the Application Site fully operational. The planning ‘proxy re-use’ Annual Average Daily Traffic (AADT) flows are compared with the trip attraction of the proposed development and included as Appendix MJP1.
- 5.5 The modification of the proposed development as detailed in the TAA (i.e: referred to as the Amended Scheme), does not affect the conclusions detailed within the TA, as the modelling assumes a maximum number of 1250 dwellings as included within the original planning application. This maximum remains unaltered, even though the number of units illustrated on the revised application drawings is reduced to 1209. The slight decrease in the proposed maximum number of residential parking spaces from 950 to 940, further ensures that the trip generation forecasting and traffic demand modelling are robust.
- 5.6 The adopted movement principles serve to demonstrate how the proposed development masterplan would encourage cycle use and create permeability through the Application Site and connect with the existing network of footways and cycleways. This includes a connection to the new controlled crossing of St Crispin’s Road, the existing crossing at New Botolph Street and a raised ‘table’ crossing of Edward Street linking to the wider Yellow ‘Pedalway’ network across the city.²³
- 5.7 Given the locational characteristics of the proposed development and its permeability for cyclists, the TA identifies this as a potential opportunity to influence behavioural change for future residents and employees and encourage cycling as a sustainable mode of travel.²⁴ This is particularly relevant given the level of secure cycle parking that is to be provided as part of the proposed development and the proximity to other local amenities. In addition, ‘north – south’ and ‘east – west’ cycle links would be provided across the Application Site to link up with the existing cycle routes,

²³ TA, Appendix B; Core Document CD4.86 ES Volume 3 (h)

²⁴ TA, Section 5.9, page 26 and Section 6.7, pages 54-58; Core Document CD4.86 ES Volume 3 (h)

supported by a new alternative north – south route along Pitt Street to avoid the commercial heart of the scheme.

- 5.8 The rationalisation of the existing car parking on the Application Site would reduce the potential number of public car parking spaces from 1192 to 600 (ie: these will be provided within a new MSCP). This reduction in the parking provision is also compliant with NCiC’s Local Plan policy DM29 and is addressed in the TA²⁵ and the Council’s report to the Planning Applications Committee.²⁶
- 5.9 Following the originally anticipated completion and full occupation of the proposed development in 2028, there would be a ‘negligible’ effect on traffic and severance along the majority of road links surrounding the Application Site as detailed in the TA²⁷, the Environment Statement (ES)²⁸ and Supplementary Environmental Information.²⁹ The exceptions are Edward Street where the proposed development is indicated to have a ‘major’ effect; and Magpie Road and Esdelle Street/Edward Street (one way), where the development is indicated to have a ‘minor’ effect. The forecast ‘major’ effect on Edward Street is simply due to the current low traffic volumes arising from the existing MSCP which is currently unused; hence, the percentage increase in traffic would be disproportionately large.
- 5.10 The TAA includes a further assessment of trip generation to assist with the assessment of air quality and to establish the impact in the forecast year. In this regard, WSP agreed with NCiC that the application of the agreed residential Travel Plan could result in a 10% reduction in vehicle trips. In addition, a further 5% reduction has been applied to account for the introduction of Electric Vehicles (EVs) to the proposed development.
- 5.11 As a direct consequence of the Inquiry ‘call in’ process and assuming planning permission is granted by the SoS, there would now be a delay to the start of construction on the Application Site until 2021. To assist with the review of future air quality predictions for the revised anticipated year of final occupation plus a further five years, WSP completed a subsequent assessment to extrapolate

²⁵ TA, pages 45-46; Core Document CD4.86 ES Volume 3 (h)

²⁶ Report to the Planning Applications Committee, paragraphs 495 – 501, 6 December 2018; Core Document CD9.1

²⁷ TA, Sections 8 and 9, pages 79-108; Core Document CD4.86 ES Volume 3 (h)

²⁸ ES, Chapter 6, March 2018; Core Document CD4.86 ES Volume 2 (f)

²⁹ Supplementary ES, Chapter 6, September 2018; Core Document CD7.81 SEI (f)

2031 and 2036 traffic data respectively (MJP2), based on previously modelled assumptions for Local Plan growth, as originally assessed within the TA.

- 5.12 In this regard, I consider that the introduction of EV technology and cleaner more efficient energy sources, will make a significant contribution towards influencing the growth in trip making and realising Government's objective of achieving Carbon Net Zero by 2050 by ensuring that every car and van has zero emissions³⁰.
- 5.13 Of the circa 39 million vehicles currently on UK roads, the Department of Transport (DfT) seek to reduce emissions by taking the following actions:³¹ i) increasing the use of low carbon fuels; ii) improving existing vehicles by retrofitting new technology; and iii) influencing driver behaviour. The introduction of Battery Electric Vehicles (BEVs) and Hydrogen Fuel Cell Electric Vehicles (FCEVs), will greatly assist in reducing harmful tail pipe emissions and the DfT is clear that these developing sources of energy will deliver both air pollutant and green house emission reductions in all driving conditions.³² The introduction of both BEV and FCEVs have zero tail pipe NOx emissions³³ and will significantly influence the projected air quality outcomes for major urban centres such as Norwich.
- 5.14 In the longer term, FCEV technology may be better suited for Heavy Goods Vehicles (HGVs) and fleet operators³⁴. In this regard, evidence will be presented by Melanie Hobson of Aether on behalf of the Applicant, to address how the use of smarter technology and cleaner fuels would potentially influence and reduce the levels of harmful pollutants over the course of the planned development period, through to final occupation and positively contribute towards achieving Government's objective for 2050.

Capacity Assessment

- 5.15 Using the projected assignment data derived for 2031, I completed a further review of all the key junctions around the local road network as originally scoped and agreed with NCoC.³⁵ I include a
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³⁰ The Road to Zero, Next steps towards cleaner road transport and delivering our Industrial Strategy, Department of Transport, July 2018: Policies at a glance, page 2; Core Document CD10.7

³¹ The Road to Zero, Next steps towards cleaner road transport and delivering our Industrial Strategy, Department of Transport, July 2018: part 2a, page 34; Core Document CD10.7

³² The Road to Zero, Next steps towards cleaner road transport and delivering our Industrial Strategy, Department of Transport, July 2018: page 44; Core Document CD10.7

³³ Transport Energy Model, Department of Transport, 2018; paragraph 2.15, page 14; Core Document CD10.6

³⁴ The Road to Zero, Next steps towards cleaner road transport and delivering our Industrial Strategy, Department of Transport, July 2018: page 44; Core Document CD10.7

³⁵ TA, Table 20, Method of junction Analysis, pages 77-78; Core Document CD4.86 ES Volume 3 (h)



summary of the results in my evidence (MJP3) to assist the Inquiry and broadly indicate the variances over the extended time horizon.

6 MITIGATION

- 6.1 The extent of mitigation has been determined following a detailed appraisal of the current and future movement issues both within and surrounding the Application Site. The TA, TAA and subsequent discussions with NCiC and NCoC, has enabled appropriate mitigation to be identified.³⁶
- 6.2 The NCiC Planning Applications Committee report addresses Transport as ‘Main Issue 10’³⁷ and identifies the agreed improvements to transport and highway infrastructure that would be required to mitigate impact of the proposed development in compliance with the NPPF February 2019 and comprises broadly:
- Widening and improving the nature of roads surrounding the Site;
 - A more direct east – west route through the development which effectively reinstates the historic route of the former Botolph Street
 - A new north – south route through the development which effectively reinstates and extends to Edward Street the historic route along the former St George’s Street;
 - Improved pedestrian and cycle crossings to improve wider connectivity;
 - Significant secure cycle storage across the proposed development;
 - Extension of the Yellow ‘Pedalway’, connecting with the shared facility along Edward Street;
 - Shared pedestrian/cycle route along Pitt Street;
 - Provision of a new bus lay by along Magdalen Street south of the St Crispin’s Road flyover and relocation of a bus stop from Edward Street to Magdalen Street;
 - Access to a new MSCP form Edward Street;
 - Provision of charging points for Electric Vehicles (EVs);
 - Variable Message Signs to advise motorists of the availability of parking spaces; and
 - Provision of seven car club vehicles with five spaces in a lay-by on Edward Street.
- 6.3 ‘Third party’ representations suggest that the proposed access strategy should incorporate greater segregation of pedestrians and cyclists to minimise conflict³⁸ which I discuss later in my evidence. Notwithstanding this point, the local highway authority (NCiC) is satisfied that the proposed

³⁶ TA, Section 9, pages 104-108 and TAA Section 4, pages 7 and 8; Core Document CD4.86 ES Volume 3 (h)

³⁷ Report to Planning Applications Committee, Paragraphs 483 – 508, 6 December 2018; Core Document CD9.1

³⁸ Report to Planning Applications Committee, Paragraph 490, 6 December 2018; Core Document CD9.1

masterplan is acceptable and consistent with the movement principles adopted elsewhere across the city centre³⁹ and that it would be unrealistic to provide segregated facilities through the Application Site.

- 6.4 Following detailed discussions with NCoC and NCiC, a 3m wide shared cycleway/footway is proposed along Edward Street up to the junction with Esdelle Street. This would also provide additional width along the route and appropriate landscaping. NCoC also indicated a desire to have this improvement implemented early in the development programme.
- 6.5 NCiC requested that the Pitt Street footway should incorporate ‘shared’ use for pedestrians and cyclists as an alternative route as opposed to travelling through the Application Site. A 3m cycleway/footway is preferred by NCiC, subject to the provision of the servicing laybys and the landscaping on Pitt Street. In this regard, the principle of a route shared by pedestrians and cyclists is accepted by NCiC.⁴⁰
- 6.6 The Amended Scheme masterplan⁴¹ increases the number of EV charging points in the residential car parks to 5% of spaces, with provision for an additional 5% in the future. In this regard, the nine houses would each have EV charging points. In addition, from the outset, each residential car park would be provided with two fast charging bays with access available for all residents, thereby ensuring that every residential parking space could be permanently occupied by an EV. In the public MSCP, EV charging stations would be provided pursuant to details to be approved by the recommended planning condition 6 included within the NCiC SoCG.

³⁹ Report to Planning Applications Committee, paragraph 490, 6 December 2018; Core Document CD9.1

⁴⁰ Report to Planning Applications Committee, paragraph 489, 6 December 2018; Core Document CD9.1

⁴¹ Amended Scheme Masterplan; Core Document CD7.12

7 THIRD PARTY REPRESENTATIONS

- 7.1 The Norwich Society (NS) and the Norwich Cycle Campaign (NCyC) have been granted Rule 6 status and previously raised transport related concerns which are addressed in the TAA⁴². Other transport related objections have also been raised by Cathedral Magdalen and St Augustine's Neighbourhood Forum Steering Group and Councillor Martin Schmierer. The concerns and issues raised hitherto have been largely addressed in responses to the formal consultation and contained within the TAA.⁴³
- 7.2 The NCyC has raised a number of objections in their Statement of Case⁴⁴ to the Applicant's proposals to redevelop the Application Site; these include:
- **Objection 1**, overall view of the development regarding height, mass and design.
 - **Objection 2**, air pollution resulting from the proposed development presents a threat to people living in the area, and those working and travelling in the area.
 - **Objection 3**, the cycle and pedestrian routes are poorly planned and have scope for conflicts between pedestrians, cyclists and vehicles.
 - **Objection 4**, failure to reduce the air pollution may result in cyclists avoiding this area. Any reduction in walking and cycling will be contrary to government policy.
- 7.3 The NCyC has also requested that the Secretary of State (SoS) should consider Chapter 9 of the NPPF February 2019⁴⁵ and specifically identifies paragraphs 102 and 110. In regard to paragraph 102 (i.e: and by using the same annotation), I comment as follows:
- a) The potential impacts of the proposed development have been appropriately assessed and are contained within the TA and TAA; further junction modelling has been completed and a summary of the results is included at MJP3 for the revised forecast years;

⁴² TAA, Appendix E, August 2018; Core Document CD7.81 SEI (r)

⁴³ TAA, Appendix E, August 2018; Core Document CD7.81 SEI (r)

⁴⁴ NCyC Statement of Case, 22 May 2019, Summary, page 2; Core Document CD11.8

⁴⁵ NCyC Statement of Case, 22 May 2019, page 5; Core Document CD11.8

- b) The Application Site is located within easy reach of bus stops along Magdalen Street which currently caters for a number of services linking the Application Site with Norwich rail station and the wider community.⁴⁶ A new bus lay-by for southbound buses is proposed along Magdalen Street which will prevent future blocking of the bus lane when passengers alight and also incorporate the relocation of the existing stop from Edward Street. In regard to new and emerging technology, the proposed development will include the provision of EV charging points. Initially 57 parking spaces will include electric vehicle charging points with scope to increase this to 105 spaces, along with the two fast charging stations within each residential car park from the outset. The development phasing will incorporate a further review of the demand for electric charging infrastructure to ensure that additional points could be introduced if required.⁴⁷ The overall take up and future provision would be monitored by the development Management Company within the context of the Framework Travel Plans. The management contractor appointed to control and manage public parking spaces would no doubt wish to take advantage of EV technology to maximise occupancy and potential revenue in the context of the provision that will be required by NCiC from the outset, pursuant to recommended planning condition 6;
- c) The TAA identifies how the proposed development would incorporate opportunities for walking, cycling and public transport use. Pedestrian and cycle access would connect the Application Site with St Crispin's Road, New Botolph Street and Edward Street and would provide high quality identifiable routes for future residents and visitors.⁴⁸ St George's Street would extend through the proposed development as a 'shared area/space' for pedestrians, cyclists and limited service vehicles. An east west route would also extend from St Augustine's Street through the Application Site to Magdalen Street. In addition, the Yellow 'Pedalway' north of the Application Site would be widened to improve the quality of the shared pedestrian/cyclist route between Edward Street and the junction with Esdelle Street. A 3m wide shared route is also planned along the eastern side of Pitt Street, as an alternative for pedestrians and cyclists who do not wish to use St George's Street through the Application Site. Overall, the connectivity and permeability of the Application Site with

⁴⁶ TA, Section 5.7, pages 19-23; Core Document CD4.86 ES Volume 3 (h)

⁴⁷ TA, paragraph 4.5.21; Core Document CD4.86 ES Volume 3 (h)

⁴⁸ TA, Section 6.6, pages 50-58; Core Document CD4.86 ES Volume 3 (h)

the surrounding network would be vastly improved to cater for journeys by sustainable travel modes;

- d) The environmental impacts of traffic have been fully assessed as detailed by the Environmental Statement⁴⁹ and the Supplementary Environmental Information.⁵⁰
- e) Patterns of movement have been fully assessed within the TA and TAA to effectively reinstate previous key routes through the Application Site. These will contribute towards creating a 'sense of place' through the implementation of high quality street design that will be attractive, safe and secure to pedestrians, cyclists and the mobility impaired.⁵¹

7.4 Paragraph 109 of the NPPF states that:

“Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

7.5 The TA and the TAA address the extent of the transport and highway impacts that would potentially arise as a consequence of the proposed development and establish that the residual cumulative impacts on the surrounding road network would not be severe, which is confirmed in the report to the NCiC Planning Applications Committee⁵². Further modelling has been completed as indicated earlier in my evidence (MJP3).

7.6 In regard to paragraph 110 of the NPPF (i.e: and by using the same annotation), I comment as follows:

- a) The proposed development masterplan is designed to prioritise pedestrian and cycle movements to incorporate permeable routes and enhance connectivity with the surrounding network. The locational characteristics of the Application Site and close proximity to bus services along Magdalen Street, will serve to influence travel behaviour and maximise the opportunity to access public transport services;

⁴⁹ Environmental Statement, Highways, Traffic and Transport, March 2018; Core Document CD4.86 ES Volume 2 (f)

⁵⁰ Supplementary Environmental Information, Chapter 6 – Transport, September 2018; Core Document CD 7.81 SEI (f)

⁵¹ TA, Section 6.6, pages 50-58; Core Document CD4.86 ES Volume 3 (h)

⁵² Report to Planning Applications Committee, Paragraphs 505 and 506, 6 December 2018; Core Document CD9.1

- b) The needs of people with disabilities and reduced mobility would be catered for by incorporating low and flush kerbs, discrete location of drainage gullies, tactile paving at all road junctions and accessible public transport facilities;
- c) The designated routes through the proposed development would enable the use of shared space by pedestrians and cyclists, with controlled use by service vehicles that would minimise conflicts. The proposed development would create a place that is safe, secure and attractive with minimum street clutter that responds to the guiding principles established by national and local design standards;^{53 54}
- d) Service deliveries would be able to access to designated loading areas via Edward Street and St Crispin's Way. In addition, servicing would also be provided 'on street' in lay-bys along Pitt Street and Edward Street. Refuse vehicles would collect from central waste and recycling points. There would be some 'front door' servicing, but this would be limited outside a core period. Emergency vehicles would access the Application Site as shown in the TA;⁵⁵
- e) The infrastructure to accommodate EV charging and other ultra – low emission vehicles would be provided as an integral part of the proposed development, with the flexibility to introduce additional charging points should the demand arise.

7.7 The objections 1, 2 and 4 raised by NCyC, will be addressed by other witnesses on behalf of the Applicant. I now address objection 3, insofar as it relates to highway safety, the choice of routes for pedestrians and cyclists and the promotion of these sustainable travel modes to influence travel behaviour as part of the overall movement strategy.

7.8 'Objection 3' by NCyC appears to acknowledge that the proposed routes would be popular with pedestrians and cyclists⁵⁶ and broadly follow the original routes prior to the development of the current Anglia Square. Contrary to the assertion by NCyC, the proposed development masterplan does comply with the NPPF paragraph 110 (c) for reasons previously explained.

⁵³ Manual for Streets 2, Section 2.9, pages 027-028, Department of Transport, September 2010; Core Document CD10.9

⁵⁴ Creating Better Streets: Inclusive and Accessible Places – Reviewing shared space, Section 8, pages 19-23, Chartered Institution of Highways and Transportation, January 2018; Core Document CD10.5

⁵⁵ TA, Appendix I; Core Document CD4.86 ES Volume 3 (h)

⁵⁶ NCyC Statement of Case, page 14; Core Document CD11.8

- 7.9 NCyC refer to several publications, including: i) Creating Better Streets: Inclusive and Accessible Places⁵⁷ and ii) Local Transport Note 1/11 (LTN 1/11),⁵⁸ which the Department of Transport (DfT) withdrew from circulation on 8 August 2018. This had been preceded by the publication of Government's Inclusive Transport Strategy in July 2018.⁵⁹
- 7.10 The report Creating Better Streets (CBS) examined eleven schemes at various locations throughout England and categorised them into three separate selected types: pedestrian prioritised streets, informal streets and enhanced streets. The document also refers to LTN 1/11 and Manual for Streets (MfS)⁶⁰ and is intended as a precursor to further research. The CBS review considers five key areas that should be included: Inclusive environment, ease of movement, safety and public health, quality of place and economic benefit.
- 7.11 In this context, the proposed development masterplan for the Application Site⁶¹ would create an environment that would primarily cater for pedestrians and cyclists. St George's Street and Botolph Street would be fully inclusive to cater for slow modes of travel and the mobility impaired. Controls would be imposed at the connecting points of access to the external road network in the form of either transponder operated rising bollards or smart card entry to restrict access.
- 7.12 Other points addressed by CBS include pedestrian crossings, kerbs, tactile paving and the use of technology. In regard to crossing points on the external road network, the improvements are addressed in detail in the TA and TAA.⁶² These include a new controlled combined crossing over St Crispin's Road to accommodate desire routes into the wider city centre; St Botolph Street, where the existing controlled crossing would be modified to improve signal staging and traffic flow but within a controlled environment for pedestrians and cyclists; and Edward Street, via a raised crossing, that would effectively link the Application Site with the Yellow 'Pedalway' further to the north.
- 7.13 It is intended that the shared space through the proposed development would define legible walking and cycling routes and where practicable, utilise low kerbs to minimise potential trip hazards for

⁵⁷ Creating Better Streets: Inclusive and Accessible Places – Reviewing shared space, Chartered Institution of Highways and Transportation, January 2018; Core Document CD10.5

⁵⁸ Local Transport Note 1/11 – Shared Space, Department of Transport, October 2011; Core Document CD10.10

⁵⁹ The Inclusive Transport Strategy – achieving equal access for disabled people, Department for Transport, July 2018; Core Document CD10.11

⁶⁰ Manual for Streets, Department for Transport, 2007; Core Document CD10.8

⁶¹ TA, Appendix B; Core Document CD4.86 ES Volume 3 (h)

⁶² TA section 6.6, pages 50-54; Core Document CD4.86 ES Volume 3 (h) and TAA, Appendices, A, B and C; Core Document CD7.81 SE1 (r)

visually impaired people. A variation in material surfacing would also assist in delineating ‘desire routes’. The proposed masterplan identifies the common areas that would be shared by pedestrians and cyclists.⁶³ ‘Way finding’ through the development would be aided by landscaping, street furniture and signage. Tactile paving and dropped kerbs would be provided where desire routes cross the external road network to comply with Government’s Inclusive Transport Strategy.⁶⁴ EV infrastructure would be provided in the manner previously described.

- 7.14 Potential conflict between pedestrians, cyclists and vehicles would therefore be minimised through quality of design, choice of materials and signage. Service vehicles would only access the proposed development outside of a core period as indicated in the TA.⁶⁵ This would ensure that the north – south and east – west routes through the proposed development create a quality of place that is safe, fully functional and conducive for the joint use of pedestrians and cyclists.
- 7.15 Should cyclists decide to use the designated north – south route through the proposed development (i.e: as opposed to Pitt Street), then the route would be clearly signed and adequately delineated without undermining the overall design of the public realm. Should vehicles enter the central part of the development area, then speeds would be very low, typically well below 20mph,⁶⁶ which is consistent with an environment and place that is fully useable by pedestrians and cyclists without creating dedicated facilities. Mindful of the controlled and restricted access by vehicles, CBS confirms that conflicts between pedestrians and cyclists in fully pedestrianised streets are rare, with cyclists slowing and dismounting as pedestrian volumes increase.⁶⁷

⁶³ TA, Appendix B; Core Document CD4.86 ES Volume 3 (h)

⁶⁴ The Inclusive Transport Strategy – achieving equal access for disabled people, paragraphs 8.9-8.18, Department of Transport, July 2018; Core Document CD10.11

⁶⁵ TA, Section 6.8, paragraphs 6.8.1 – 6.8.14, pages 58 -60; Core Document CD4.86 ES Volume 3 (h)

⁶⁶ Creating Better Streets (CBS): Inclusive and Accessible Spaces, CIHT, 2018, first paragraph, page 12; Core Document CD10.5

⁶⁷ Creating Better Streets (CBS): Inclusive and Accessible Spaces, CIHT, 2018, fourth paragraph, page 12; Core Document CD10.5

8 SUMMARY AND CONCLUSIONS

8.1 Subject to those matters that may have been agreed with the Rule 6 Parties in advance of this Inquiry and subsequently included within a SoCG, my evidence proves conclusively that:

- a) The Application Site is in a sustainable and accessible location and would provide a range of travel choices for future residents and employees to use alternative modes, with less reliance on the use of private vehicles, in accordance with the NPPF 2019;⁶⁸
- b) The level of trip generation and the potential impact on the local road network is acceptable to NCiC and NCoC and the proposed improvements are proportionate and acceptable and meet the appropriate tests as required by paragraph 56 of the NPPF 2019;
- c) The introduction of pedestrian and cycling infrastructure both within the Application Site and on the external road network would provide a wide range of travel mode choices to influence the behaviour of future residents and employees;
- d) The use of 'shared' space to accommodate pedestrians, cyclists and vehicles is safe and acceptable to NCiC and NCoC and is consistent with their current approach to the planning and design of public urban spaces elsewhere within the city centre and is also mindful of current Government guidance and research. Given the nature of the proposal currently before this Inquiry, the potential for conflict between pedestrians, cyclists and vehicles would be low;
- e) The implementation of residential and commercial Travel Plans will provide the movement framework for the proposed development. This will maximise the opportunity to influence the behaviour of future residents and employees and increase the use of sustainable travel modes incorporating EV infrastructure to minimise vehicle emissions;
- f) NCoC confirm that the residual cumulative impact of traffic on the highway network would be minimal due to the reduced parking provision for the residential element of the scheme, the implementation of development Travel Plans and the proximity to local facilities⁶⁹;

⁶⁸ National Planning Policy Framework (NPPF), 2019, Chapter 9 'Promoting Sustainable Transport'; Core Document CD1.1

⁶⁹ Report to Planning Applications Committee, paragraph 506, 6 December 2018; Core Document CD9.1

- g) NCiC confirm that the TA and the TAA are considered robust⁷⁰ and that the proposed development would not have a severe residual cumulative impact on the surrounding highway network, in accordance with paragraph 109 of the NPPF 2019; and
- h) Finally, I am therefore of the opinion that based on my evidence presented to the Inquiry, there are no sustainable reasons on transport, highways and accessibility grounds that should prevent the Secretary of State subsequently granting planning permission.

⁷⁰ Report to Planning Applications Committee, paragraph 505, 6 December 2018; Core Document CD9.1



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