



Weston Homes plc

REDEVELOPMENT OF ANGLIA SQUARE, NORWICH

Ref: WH 7/2: Summary 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 7/2 SUMMARY PROOF OF
EVIDENCE OF MARTIN J PADDLE**

DATE: 3 DECEMBER 2019



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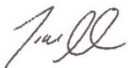



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APPENDICES (*BOUND SEPARATELY AS: WH 7/3*)



QUALIFICATIONS

Qualifications are set out in my main Proof.

1 STRUCTURE OF MY EVIDENCE

1.1 My evidence 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

2 BACKGROUND AND POLICY CONTEXT

- 2.1 The salient matters relating to transport and highway issues are explained in my evidence to ensure that the Secretary of State (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).
- 2.2 NCiC Officers address transport related matters as 'Main Issue 10: Transport', in paragraphs 483 – 508 of their report to the Planning Applications Committee.¹ The Council provides its conclusion on transport and highway matters at paragraphs 505 and 506 and indicate 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.

¹ 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.² In this regard, the Transport Assessment (TA) explains the requirements of both NCiC and NCoC and the broad methodology adopted by WSP.³ The Transport Assessment Addendum (TAA)⁴ 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.

² TA, Appendix B; Core Document CD7.81 SEI (r)

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

⁴ TAA, Core Document CD7.81 SEI (r)

4 MOVEMENT STRATEGY

- 4.1 The broad movement strategy is explained in the TA.⁵ 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,⁶ with significantly enhanced connectivity to the surrounding transport infrastructure which exemplifies the sustainable characteristics of the Application Site.
- 4.2 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.⁷ 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 acceptable⁸.

⁵ TA, Section 4, pages 38-63; Core Document CD4.86 ES Volume 3 (h)

⁶ TA, Section 4, pages 38-63; Core Document CD4.86 ES Volume 3 (h)

⁷ Development Plan policy, DM31; Core Document CD2.3

⁸ 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 modelling of key junctions on the local road network for the originally proposed opening year of phase 1 (2020) and the completion and full occupation of the development in 2028, for a weekday AM, PM, Friday PM and Saturday periods.⁹ 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 and the full occupation of the development as originally anticipated in 2028.
- 5.2 The rationalisation of the existing car parking on the Application Site would ultimately reduce the potential number of public car parking spaces from 1192 to 600 (ie: which will be provided within a new Multi Storey Car Park - MSCP). This reduction in the parking provision is also compliant with NCiC's Local Plan policy DM29 and is addressed in the TA¹⁰ and the Council's report to the Planning Applications Committee.¹¹
- 5.3 The TAA includes a further review 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.
- 5.4 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 (i.e: 2031) plus a further five years, WSP completed a subsequent assessment to extrapolate 2031 and 2036 traffic data respectively (MJP2), based on previously modelled assumptions for Local Plan growth.

⁹ TA, Section 7.12, pages 77-101; Core Document CD4.86 ES Volume 3 (h)

¹⁰ TA, pages 45-46; Core Document CD4.86 ES Volume 3 (h)

¹¹ Report to the Planning Applications Committee, paragraphs 495 – 501, 6 December 2018; Core Document CD 9.1

Capacity Assessment

- 5.5 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.¹² I include a summary of the results in my evidence (MJP3) to assist the Inquiry and broadly indicate the variances over the extended time horizon.

¹² TA, Table 20, Method of junction Analysis, pages 77-78; Core Document CD4.86 ES Volume 3 (h)

6 MITIGATION

- 6.1 The TA, TAA and subsequent discussions with NCiC and NCoC, has enabled appropriate mitigation to be identified, including:¹³
- 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.
- 6.2 NCiC requested that the Pitt Street footway should incorporate ‘shared’ use for pedestrians and cyclists as an alternative route to travelling through the Application Site. A 3m cycleway/footway is preferred by NCiC, subject to the provision of the servicing laybys and appropriate landscaping on Pitt Street.
- 6.3 The Amended Scheme masterplan¹⁴ 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

¹³ TA, Section 9, pages 104-108 and TAA Section 4, pages 7 and 8; Core Document CD4.86 ES Volume 3 (h)

¹⁴ Amended Scheme Masterplan; Core Document CD7.12



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.

7 THIRD PARTY REPRESENTATIONS

- 7.1 The Norwich Cycling Campaign (NCyC) has raised a number of objections in their Statement of Case.¹⁵ The NCyC has also requested that the Secretary of State (SoS) should consider Chapter 9 of the National Planning Policy Framework (NPPF) February 2019¹⁶ and specifically identifies paragraphs 102 and 110. In this regard, I believe that the proposed development does fulfil these policy objectives which I explain in more detail in my main Proof.
- 7.2 NCyC refer to several publications, including: Creating Better Streets (CBS): Inclusive and Accessible Places.¹⁷ In this regard, 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 and incorporate other street features to aid the visually impaired.
- 7.3 Potential conflict between pedestrians, cyclists and vehicles would therefore be minimised through quality of design, choice of materials and signage. 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.¹⁸

¹⁵ NCyC Statement of Case, 22 May 2019, Summary, page 2; Core Document CD11.8

¹⁶ NCyC Statement of Case, 22 May 2019, page 5; Core Document CD 11.8

¹⁷ Creating Better Streets: Inclusive and Accessible Places – Reviewing shared space, Chartered Institution of Highways and Transportation, January 2018; Core Document CD10.5

¹⁸ Creating Better Streets (CBS): Inclusive and Accessible Spaces, CIHT, 2018, fourth paragraph, page 12; Core Document CD10.5

8 CONCLUSIONS

I conclude my evidence as follows:

- 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;¹⁹
- 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 urban spaces elsewhere within the city centre; and is also mindful of current Government guidance and research;
- e) The implementation of residential and commercial Travel Plans will provide the movement framework for the proposed development and maximise the opportunity to influence the behaviour of future residents and employees;
- 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 facilities²⁰;
- g) NCiC confirm that the TA and the TAA are considered robust²¹ 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

¹⁹ National Planning Policy Framework (NPPF), 2019, Chapter 9 'Promoting Sustainable Transport,' Core Document CD1.1

²⁰ Report to Planning Applications Committee, paragraph 506, 6 December 2018; Core Document CD9.1

²¹ Report to Planning Applications Committee, paragraph 505, 6 December 2018; Core Document CD9.1



- h) Finally, I am therefore of the opinion that based on my evidence presented to this Inquiry, there are no sustainable reasons on transport, highways and accessibility grounds that should prevent the Secretary of State subsequently granting planning permission.



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