

# Submission to the Public Inquiry into the Anglia Square Development, Norwich

Prepared by Tony Clarke on behalf of Norwich Cycling Campaign,  
22 May 2019.

## SUMMARY

Norwich Cycling Campaign has a number of objections to the plan to redevelop Anglia Square:

- **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 reduce the air pollution may result in cyclists avoiding this area. Any reduction in walking and cycling will be contrary to Government policy.

In the event that the development is approved we would ask for the following conditions to be applied:

- A comprehensive Air Quality Assessment be commissioned for the whole area.
- A plan for cycle and pedestrian routes meeting the advice set out in *Local Transport Note 1/11 'Shared Space' (LTN 1/11)* and best practice from other sources, should be required
- The long-term security for access and maintenance must be assured by a legal agreement.
- Sovereign House - demolition of Sovereign House should be completed before any other work is begun.
- Traffic Planning measures should be put in place to manage the cumulative impact of HGVs working on multiple developments in the Norwich Area.
- Introduction of Construction Logistics and Community Safety Standards measures for HGVs operating on all new developments.



## **List of documents**

in order of referral in the text

*National Planning Policy Framework Conserving and enhancing the natural environment Feb 2019*

*Air Quality. A Briefing for Directors of Public Health. March 2017*

*The Town and Country Planning (Environmental Impact Assessment) Regulations 2017*

*Communication from Norfolk Director of Public Health to Norwich Planning re Anglia Square Development [No date]*

*Air Quality Assessment for the proposed re-Development at Anglia Square, Norwich. Report to Weston Homes Plc. February 2018.*

*Air Quality Impact Assessment for St. Mary's Works Development Norwich Harrison Environmental December 2016*

*Land East of St James' Mill and land South of Barrack Street, Norwich Air Quality Assessment. Ramboll UK August 2018*

*ALL CHANGE? The First Report of the Commission on Travel Demand. May 2018*

*Norwich City Council Planning Committee Minute 6 December 2018.*

*Communication from Norfolk Director of Public Health to Norwich Planning re Anglia Square Development [No date]*

*Creating better streets: inclusive and accessible spaces, Chartered Institution of Highways and Transportation, January 2018*

*Local Transport Note 1/11 'Shared Space' (LTN 1/11)*

## **Application to extend the scope of the Inquiry**

The letter from the Planning Inspectorate ref APP/G2625/V/19/3225505 26 April 2019 states:

" ... the following matters are likely to be relevant to the consideration of this application:- National Planning Policy Framework Chapters 5, 6, 7, and 16."

We would respectfully ask for Chapters 9 and 15 of the National Planning Policy Framework to be considered in addition as they cover the substance of our objections.

### **Chapter 9. Promoting sustainable transport:**

102. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

110. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

### **Chapter 15 Conserving and enhancing the natural environment**

181. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure

provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

*National Planning Policy Framework 15 Feb 2019*

**We would like to offer the following additional reasons:**

"Air pollution is a serious public health issue. The Department of Health's (DH) Committee on the Medical Effects of Air Pollutants (COMEAP) estimated the burden of particulate matter (PM) air pollution in the UK in 2008 to be equivalent to nearly 29,000 deaths ..."

*P11 Air Quality. A Briefing for Directors of Public Health.  
March 2017*

"There is no evidence of a safe level of exposure to PM or a threshold below which no adverse health effects occur". Negative health impacts have been found well below current EU & UK limits."

*P13 Air Quality. A Briefing for Directors of Public Health.  
March 2017*

"Nitrogen dioxide (NO<sub>2</sub>) was associated with adverse health effects at concentrations that were at or below the current EU limit values".

*P14 Air Quality. A Briefing for Directors of Public Health.  
March 2017*

"On average around 80% of oxide of nitrogen (NO<sub>x</sub>) emissions in areas where the UK is exceeding NO<sub>2</sub> limit values are due to transport ..."

*P17 Air Quality. A Briefing for Directors of Public Health.  
March 2017*

**Extending the scope of the Inquiry to surrounding areas**

Norwich Cycling Campaign would also request the Inquiry to consider the impact of this development on the surrounding areas and the new developments:

- St Mary's Works
- St Crispins House
- Barrack Street
- Established housing and businesses in the area
- Cyclists and pedestrians passing through the area

Taking into account the following:

"The EIA Regulations 2017 require an ES to describe the likely effects of development on the environment when taken cumulatively with other environmental effects and any current or prospective ('reasonably foreseeable') development in the vicinity. There are two types of cumulative effect, which are commonly known as 'Type 1' and 'Type 2' effects, respectively. These are generally defined as follows:

Type 1 Cumulative Effects: The combined (or interactive) effects of individual effects resultant from the development upon a set of defined sensitive receptors, for example noise, dust and visual effects; and

Type 2 Cumulative Effects: The combined effects arising from another development site or sites, which when considered together could create a significant cumulative effect."

*The Town and Country Planning (Environmental Impact Assessment) Regulations 2017*

The following should also be taken into account:

" We would also support an assessment of the impacts on the wider air quality adjacent to the site, in particular St Augustine's Street which is predicted to have 3,000 additional daily traffic movements and already has two sites regularly exceeding current DEFRA levels of NO<sub>2</sub>, also Magpie Rd which has a number of residential properties along it."

*Communication from Norfolk Director of Public Health to Norwich Planning re Anglia Square Development [No date]*

**Objection 1: Overall view of the development**

Norwich Cycling Campaign support objections by Historic England and Save Britain's Heritage and local bodies including the Norfolk branch of the Campaign to Protect Rural England and The Norwich Society, regarding height, mass and design of the proposal.



## **Objection 2: Air Quality**

The air pollution resulting from the proposed development of Anglia Square presents a threat to the health of people living in the area, and those working and travelling through the area. The solutions proposed focus on amelioration rather than dealing with the problem at source.

If the threat to the health of local residents and others passing through the area cannot be resolved then the development should not be allowed to proceed

Anglia Square is within the Norwich Air Quality Management Area. There are in addition three major developments in the vicinity:

- St Mary's Works 400m SW
- Barrack Street 400m E
- St Crispins House 200m SW

St Mary's Works and Barrack Street have both been the subject of an Air Quality Assessment.

*Air Quality Assessment for the proposed re-Development at Anglia Square, Norwich. Report to Weston Homes Plc. February 2018.*

*Air Quality Impact Assessment for St. Mary's Works Development Norwich Harrison Environmental December 2016*

*Land East of St James' Mill and land South of Barrack Street, Norwich Air Quality Assessment. Ramboll UK August 2018*

Norwich Cycling Campaign have read these separate Air Quality Assessments and it appears that different methodologies have been used. We request that the Inquiry seek an overall consistent view of Air Quality in the area.

We also note that a traffic forecast is a vital input into these calculations. We request that the Inquiry consider the quality of this data, as there is body of evidence that there is a high level of error.

"We demonstrate that the assumptions, developed during decades of planning for growing car ownership which underpinned our understanding of travel demand growth, are now limited and sometimes wrong."

"The current dependence on a 'core' or 'most likely' demand scenario with which all of our main decision-making bodies work with is mistaken."

*P6 ALL CHANGE? The First Report of the Commission on Travel Demand. May 2018*

Within the evidence that Norfolk County Council submitted to the Inquiry into the Norwich Northern Distributor Road (NDR now Broadland Northway A1270) is the diagram MMD - 2339006 - T.0802 which shows roads that would be affected – either with decreased or increased traffic. The Norwich Inner Ring Road, which traverses the three sites centered on Anglia Square from East to West, was predicted to have increased traffic.

A member of the Norwich Cycling Campaign recently submitted a Freedom of Information Request for data on vehicle movements after the opening of the NDR. This request was refused on the basis that the information was incomplete. However it was complete enough for Cllr Martin Wilby to be given access to make a party political statement on the front page of the "Eastern Evening News" 23 April 2019.

Some recent traffic measurements relating to this have come into the possession of Norwich Cycling Campaign which show considerable variations between predictions and actual current measurements.

It is not clear from the information available if the impact of the large scale housing developments to the north of Norwich (Broadland District) have been fully taken into account. Roads leading to the Norwich from these developments (8,500+ dwellings) converge at the St Augustines' gyratory system to the north of Anglia Square.

One source states that on-site parking at these new housing developments will allow for 1.1 vehicles per household. The 2011 Census showed very high levels of car and van ownership in Broadland District.

The potential level of error in the traffic forecast data used to calculate future Air Pollution levels suggests that a "what if", or "worst case", possibility should be considered as a measure to protect public health.

**Norwich Cycling Campaign asks the Inquiry to consider the following statement:**

"There is no evidence of a safe level of exposure to PM or a threshold below which no adverse health effects occur". Negative health impacts have been found well below current EU & UK limits."

*P13 Air Quality. A Briefing for Directors of Public Health.  
March 2017*

The demolition of the existing buildings, due to their height, the proximity of existing housing, and pedestrians and cyclists using the roads around the site will be challenging and complex and presents a risk to health from particulate matter.

**"3.4 Mitigating the Impacts of the Construction Phase**

The measures appropriate to the construction of the Development are set out in the Construction Environmental Management Plan, which will be agreed by NCC. This will also cover the proposed monitoring and the protocol to address any exceedance of agreed targets."

*P18 Air Quality Assessment for the proposed re-Development at Anglia Square, Norwich. Report to Weston Homes Plc. February 2018*

Norwich Cycling campaign asks, "what is the "agreed target"; will it be zero to avoid the risks to health set out in *Air Quality. A Briefing for Directors of Public Health. March 2017?*

Matters concerning air quality were not discussed at the Norwich City Council Planning Committee meeting 6 December 2018. It appears from the minutes that all issues regarding air quality and pollution were delegated to officials.

*Norwich City Council Planning Committee Minute 6 December 2018.*

This matter is too serious to be delegated to officials to decide – it is a matter for this Inquiry.

"Nitrogen dioxide (NO<sub>2</sub>) was associated with adverse health effects at concentrations that were at or below the current EU limit values".

*P14 Air Quality. A Briefing for Directors of Public Health.  
March 2017*

"Based on the evidence, it is also estimated that there will be exceedances of the short term objective for NO<sub>2</sub> at the ground floor locations adjacent to Magdalen Street and on the corner between Edward Street and New Botolph Street; ..."

*Air Quality Assessment for the proposed re-Development at Anglia Square, Norwich. Report to Weston Homes Plc. February 2018.*

The following was sent to the Planning Officials at Norwich Council:

"AQ concerns from Env Protection

I have reviewed the scoping opinion relative to potential issues of air quality.

The requirement of the AQ assessment would need to include the impact of air pollution on current local residents and those introduced by the development.

Consideration also needs to be given to occupants of the commercial units.

ADMS modelling [Atmospheric Dispersion Modelling System] will be required to assess the impact of the development and mitigation measures presented where air quality is determined to be compromised.

Keen consideration needs to be given to the AQMA and ensuring pollution levels are not further compromised as a result of the proposed development where air quality objectives are not met.

22 Jan 2019

Lesley Oldfield

Environmental Protection Officer"

"We would also support an assessment of the impacts on the wider air quality adjacent the site, in particular St Augustine's Street which is predicted to have 3,000 additional daily traffic movements and already has two sites regularly exceeding current DEFRA levels of NO<sub>2</sub> and Magpie Rd which has a number of residential properties along it."

*Communication from Norfolk Director of Public Health to Norwich Planning re Anglia Square Development [No date]*

### **The New Multi-storey Car Park**

The new car park will present problems including Air Pollution on the site and in the areas to the North and East, and traffic congestion in Edward Street.

Very little research is available on the internet about air pollution associated with multi-storey car parks, however there are mentions of the following, which contribute to the problem:

- PM pollution from tyres, brakes and exhausts
- "Cold start" which increases NO2 pollution
- Low gear driving, increased braking and acceleration
- Queuing in Edward Street to enter the car park

The Air Quality Assessment (p13) does not address these issues. The ambiguous statements are difficult for the layperson to interpret and indeed even by an expert we have consulted:

"IT [sic] should be noted that the 'without' modeling does not include an allowance for the multi-storey car park and office floorspace not in use, which, if all back in use, would result in greater baseline traffic. This would reduce the scale of increase in the 'with Development' scenario."

"Accordingly, since full use of the accommodation and car parking on the site would undoubtedly result in greater traffic generation related to the Site, the "current" results should be understood to be lower than they would otherwise be."

*Air quality assessment for the proposed Development at Anglia Square, Norwich. Aether February 2108*

Edward Street is barely 100 metres in length and it appears that the entrance to the planned car park is at about half way along. Assuming that the average size for cars and vans is about 4 metres and allowing 2 metres each end for clearance when queuing indicates a limit of 6 cars before the tail-back will reach back to the South-North section of Edward Street (St Augustines' gyratory).

The right hand turn to enter from Edward Street will also cause congestion for vehicles heading west from Magdalen Street.

Both of these congestion points will present risks and inconvenience to cyclists on Edward Street which is a popular route

Vehicles entering and leaving the car park will cause disruption of bus routes using Edwards Street.

### **Public Transport and the impact on Air Pollution**

In the various documents submitted by the developers there are mentions of improvements to public transport. Norfolk County Council and Norwich City Council have a poor record on Public Transport measures:

- Rapid Bus Transit - not implemented  
As part of an agreement with Department of Transport to finance the Norwich Northern Distributor Road, Norfolk Council agreed to introduce a Rapid Bus Transports system. Three years on and there is no sign of this system.

- Cuts to bus subsidies and diversion of funds to roads: Norfolk County Council agreed a cut of £500,000 in bus subsidies to be used to finance the planning of the westward extension of the Northern Distributor Road. This cut was reversed after a public outcry. No doubt NCC will come back to this in due course.
- Old buses not being replaced in Norwich  
It has been reported in the local press that old buses are not being replaced – resulting in a delay of several years in introducing lower emission vehicles.
- Older buses recycled to Norwich  
It has also been reported that bus companies are recycling older high emission vehicles from other towns and cities to Norwich.

#### Other measures

Only six electric car-charging points located in the high rise car park. There is an indication that others may be introduced at a later stage.

### **Objection 3: Routes through the development**

The Cycle and pedestrian routes are poorly planned. The proposed routes actually recreate the original routes through the site which were severed by the construction of Anglia Square and the inner ring road. They are thus having the potential to be very popular with pedestrians and especially cyclists

The design and development process does not appear to follow the advice give in official documents such as:

- *National Planning Policy Framework 9 110(c)*
- *Creating better streets: inclusive and accessible spaces, Chartered Institution of Highways and Transportation, January 2018*
- *Local Transport Note 1/11 'Shared Space' (LTN 1/11)*

"Core design principles

4.2 The core design principles are:

- Convenience;
- Accessibility;
- Safety;
- Comfort; and
- Attractiveness.

5.2 It is recommended that site assessment is carried out by someone experienced in planning and designing for pedestrians and cyclists. Such experience is valuable in gauging the relevance of particular site characteristics and deciding what to record.

5.3 Site assessment can take place at any time leading up to the design process. Some site assessment will be required during the initial appraisal stage when various route options are being identified. A more detailed assessment will be required when applying the hierarchy of provision to decide whether shared use would be appropriate or not.

5.4 The assessment process can create:

- a record of baseline information;
- an opportunity to identify key design issues for pedestrians, and cyclists, including older and disabled people, at an early stage;
- an opportunity to identify potential problems, especially those that might affect the viability of the scheme; and
- an audit trail that documents the reasoning behind the scheme.

6.37 It is important that maintenance requirements are considered from the outset. Proper maintenance is essential if a shared use route is to remain attractive to pedestrians and cyclists. Unswept routes and surfaces in poor condition can create trip or skid hazards, and surface defects can reduce the effective width of the route.

6.44 Ideally, a well-designed shared use scheme would not require separate user audits for cyclists or pedestrians, because the designer should be taking their needs fully into consideration as a matter of course. However, there are many examples of shared use routes that fail in this respect. It is therefore recommended that practitioners conduct user audits in some form as part of the design process to help ensure that scheme objectives are being delivered.

6.45 Where shared use schemes form only a part of much larger projects, such as new housing developments or general road improvements, user audits assume greater importance.

6.46 Community street audits involving a range of pedestrians with different needs can be an effective way of informing the design and getting community 'buy-in' for the scheme. Living Streets provide advice on conducting community street audits ([www.livingstreets.org.uk](http://www.livingstreets.org.uk)). Cycle audits are particularly useful where the route connects frequently with the road network, such as at side road crossings or points of access from the main carriageway."

#### *Local Transport Note 1/11 'Shared Space' (LTN 1/11)*

The present plans have scope for conflicts between pedestrians, cyclists and vehicles.

There seems to be an allowance for emergency vehicles to enter the pedestrian/cyclist routes using a rising bollard. However, no mention is made of delivery and service vehicles:

- Grocery, Amazon and other online deliveries
- Deliveries of furniture, white good etc
- Utilities and Maintenance vehicles

The illustrations in the Design and Access statement are misleading as they show only one or two cyclists and none actually riding bikes. The illustration on page 118 shows a drain cover with slots parallel to the direction of travel which endangers cyclists. This indicates that the designers have no training in design of cycling facilities.

The phasing of the demolition of Sovereign House is a threat to the Yellow Pedalway which could be closed or rerouted permanently.

The levels of air pollution to cyclists using the cross development routes and routes in the local area is a threat to health. Cyclists may avoid the area to protect themselves as public awareness of the risks develops.

#### **Objection 4 Failure to address and reduce the air pollution**

Failure to address and reduce the air pollution in this area may result in cyclists avoiding the Yellow Pedalway, Edward Street and Magdalen Street. Public information by the Director of Public Health will help the health implications of pollution become better understood by the public. Any reduction in walking and cycling will be contrary to the Government's widely publicised policy of encouraging these modes of transport.

*Cycling and Walking Investment Strategy. Department for Transport. 2017*

*Air Quality. A Briefing for Directors of Public Health. March 2017*

## Conditions

In the event that the development is approved we would ask for the following conditions to be applied.

**1. A comprehensive Air Quality Assessment** is commissioned for the whole area which meets the concerns set out in *Air Quality. A Briefing for Directors of Public Health. March 2017*

### **2. Cycle routes across the site.**

A survey and traffic plan meeting the advice set out in *Local Transport Note 1/11 'Shared Space' (LTN 1/11)* and taking into account best practice from other sources, should be prepared and published for consultation.

The long-term security for access must be assured by a legal agreement between the developers (and their successors) and Norwich City Council. We recall that at some point in the 1980s cyclists were banned from riding across the present site.

Also the agreement should ensure maintenance of the route and updated signage.

### **3. Demolition of Sovereign House**

The Demolition of Sovereign House should be completed before any other work is begun.

Under the present proposals, housing on the main site, and at St Mary's and St Chrispin's will be occupied when the demolition is planned. This increases the threat to public health from PM and asbestos.

Mention is made of precautions to mitigate risk from PM during demolition and construction which will probably involve water spraying and vehicle washing.

The river Wensum is about 500 metres from the site – what will prevent the river becoming polluted with PM and asbestos?

The construction of the building, together with the presence of asbestos, make demolition a potentially expensive, difficult and dangerous operation. The costs were mentioned at a public consultation (£8 – 11 million) – these costs will only increase as landfill disposal sites become more difficult to find. There is also the possibility of new techniques such as glassification becoming mandatory, also increasing costs.

We recall that the developers of the present site never completed the whole scheme but were allowed to walk away. What measures will be in place to prevent a similar situation developing with Sovereign House, leaving Norwich City Council with a public health issue to deal with?

*Air Quality Assessment for the proposed re-Development at Anglia Square, Norwich. Report to Weston Homes Plc. February 2018.*



#### **4: Traffic**

Planning measures should be put in place to manage the cumulative impact of HGVs working on multiple developments in the Norwich Area:

- Anglia Square
- St Marys Works
- Barrack Street
- St Crispins
- Beeston Park
- Rackheath New Town
- A47 Dualling
- Cable corridors for offshore wind farms
- New Bridges at Great Yarmouth and Lowestoft

Introduction of Construction Logistics and Community Safety Standards measures for HGVs operating on these developments.

Measures to improve bus performance in the area

- Additional stands
- Modern low emission vehicles
- Time table revisions to reduce bus congestion
- Priority for busses at Magdalen Gates and Edward Street traffic lights
- Alternative entry car park rather than Edwards Street