

North Norfolk Local Plan Examination

Examination Hearing Statement for Matter 5

Response on behalf of Broadland District Council

5 January 2024

Contents

Introduction ... 2

Matter 5.6 – North Walsham ... 3

Questions 5.63 and 5.64: Standard Question d) ... 3

Question 5.6.6 ... 4

Question 5.6.7 ... 5

Conclusions ... 6

Introduction

1. This Hearing Statement has been prepared by Broadland District Council, in respect of the Council's representations submitted in response to the Regulation 19 Publication of the North Norfolk Local Plan Proposed Submission Version (Publication Stage – Regulation 19).
2. Broadland District Council had previously submitted representations to the Regulation 18 consultation on the North Norfolk First Draft Local Plan (Part 1) in June 2019. Substantively, the content of these initial representations related to the same issue subsequently addressed in the Council's Regulation 19 representations.

Matter 5 – North Walsham

Questions 5.63 Land at Norwich Road & Nursery Drive (NW01/B) and 5.64 Land West of North Walsham (NW62/A): Standard question d) Have the impact and effects of development been properly taken into account?

3. Paragraph 31 of the NPPF (July 2021), document L1 of the North Norfolk Examination Library, states that:

“the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”

4. Paragraph 110 states, amongst other things, that:

“In assessing sites that may be allocated for development in plans it should be ensured that:

(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”

5. As submitted, North Norfolk District Council appears to continue to rely on document D21: North Walsham Western Link Road Feasibility Study (Addendum) as its evidence to meet these two requirements. Broadland District Council, hereafter “the Council” does not consider that this evidence is adequate or proportionate as it relates to the assessment of off-site impacts on the highway network in Coltishall, which lies on the primary route between North Walsham and Norwich and the trunk road network (A11 and A47). Indeed, in its own summary document D21 concludes:

“the data used for the analysis to assess the impacts of growth in North Walsham on the Coltishall area has its limitations and is unable to quantify these impacts to an adequate level of accuracy” (emphasis added).

6. On the basis of this evidence, the Council does not agree that it can be considered that the impacts and effects of development have been properly taken into account in deciding to allocate sites NW01/B and NW62/A, or as a result, in drafting the policy text for those allocations.

7. Notwithstanding the above, the Council is aware that an additional Transport Impact Assessment (TIA) is being prepared by AECOM on behalf of the “Client Consortium” of ESCO Developments, Lovell Partnerships and Flagship Housing Group. A draft of this TIA (November 2023) has been published on North Norfolk Council’s website: [Home | North Walsham West Sustainable Urban Extension \(north-norfolk.gov.uk\)](https://www.north-norfolk.gov.uk), but does not yet appear to have been added to the Council’s examination website. The Council notes that paragraph 1.11 of this

assessment states that the previous highway modelling undertaken was not considered appropriate to be reutilised as “*it did not provide the level of detail required, was not based on up-to-date traffic data, nor did it cover the full area to be assessed*”. This appears to affirm the Council’s conclusions as set out in paragraphs 5 and 6 of this Hearing Statement.

8. AECOM has engaged with the Council and other stakeholders in the preparation of this additional TIA. The Council accepts that this additional TIA is significantly more detailed than the information contained in D21. Subject to the finalisation of the TIA and confirmation from Norfolk County Council as Highways Authority of the validity of its TIA’s conclusions, the Council accepts that this additional evidence would be sufficient to meet the requirements of paragraphs 31 and 110 of the NPPF as far as they relate to the consideration of off-site impacts at Coltishall associated with allocation NW62/A and subject to the further limitations set out below.
9. The further limitations referred to above relate to the additional TIA only assessing the impact of the link road between the B1150 and plot immediately to the southwest of the railway bridge and not to any potential extensions to/alternatives to the link road, as covered by question 5.6.6. As such, it is not possible to conclude that off-site impacts of different link roads, such as one connecting to Cornish Way, have been adequately considered and assessed through the additional TIA. Further commentary is made in relation to this point under question 5.6.6.

Land West of North Walsham (NW62/A) Question 5.6.6. What is the vision for the western link road? Would it function as a town by-pass taking heavy goods vehicles away from the town centre? Given expected traffic flows, would suitable environment and connectivity between the housing on each side and the town centre be achieved? Would it include a northern extension over the railway to connect to Cornish Way, or a southern extension to the A149 south. Are these essential to the effectiveness of the road, and if so, would they be a requirement of developing the allocation? If not, how might they be funded?

10. The Council does not consider that the off-site impacts resulting from a link road have been adequately assessed beyond those which have been considered in the North Walsham Western Urban Extension Draft Transport Assessment (November 2023). Therefore, if the policy NW62/A includes a requirement for the delivery of link road that goes beyond that modelled in the November 2023 Transport Assessment, then it will be necessary to undertake further modelling to ensure that the impacts and effects of development have been properly taken into account.
11. Notwithstanding the above, should there be any policy reference to further extensions of the link road beyond the A149 Cromer Road to Lyngate/Folgate Road industrial estate then the policy should make clear that any works that

improve access for HGV traffic to the B1150 will need to assess, and adequately mitigate, any significant off-site impacts, including impacts on the road network at Coltishall.

Land West of North Walsham (NW62/A) Question 5.6.7. What would be the impact of traffic generation on the wider area, for example through the village of Coltishall, what improvements or traffic management might be required if needed to mitigate the effects of the scheme, are these costed and deliverable and has any effect on viability been taken into account?

12. Whilst the Council has significant concerns about its overall adequacy, North Norfolk District Council's own evidence, as set out in examination document D21, identifies that planned growth in North Walsham would increase traffic volumes by 18% and 13% in the AM and PM peak hour respectively. The Council considers such increases in Coltishall to be significant.
13. No further analysis is included in North Norfolk District Council's submitted evidence about the implications of such increases for particular junctions or locations in Coltishall and Horstead.
14. The North Walsham Western Urban Extension Draft Transport Assessment (November 2023) recognises that the average increase in the volume of through traffic in Coltishall as a result of planned development in North Walsham would be significant. Alongside general increases in levels of traffic and associated impacts on the ability of pedestrians to safely cross the B1150, these significant impacts include significant queuing and delays at the B1150 Norwich Road / B1354 Church Road gyratory (the Filling Station Island) and on the B1150 High Street.
15. In order to address this impact, the study identifies a range of traffic measures to mitigate the impact of growth, these include:
 - highway improvements in the form of a right turn facility at the B1150 Norwich Road / B1354 Church Road junction and provision of a new bus stop cage on the B1150 High Street;
 - contributions towards, and delivery of, pedestrian crossing facilities on High Street, at Ling Way and at the Recruiting Sergeant;
 - further signage and lining to reduce speeds on the entry to Horstead from the south along the B1150; and
 - investigation of a range of other issues at the planning stage.
16. The additional TIA produced to support that allocation provides a clear indication of the significant impact that planned growth in North Walsham will have on Coltishall and the consequent need for additional transport infrastructure. In order to ensure that the policy reflects the most up-to-date evidence, and therefore that sufficient provision is made for transport infrastructure and that the infrastructure

is aligned with growth, the Council considers that amendments are needed to policies NW62/A and NW01/B and associated supporting text.

17. For the purposes of NW62/A, such amendments should recognise that:

- development will have a significant impact on the B1150 at Coltishall (and various local junctions within the settlement)
- clearly set out requirements for the anticipated infrastructure likely to be needed to mitigate the impacts of development:
- ensure that any extension of a link road north of the railway bridge adequately assesses and mitigates the additional impacts; and
- that infrastructure is appropriately phased in association with growth.

18. For the purposes of NW01/B specific reference should be made to making a proportionate contribution to any off-site impacts of growth at North Walsham in Coltishall.

Conclusions

19. In the context of the NPPF, the Council does not consider that the transport evidence for the growth planned at North Walsham is adequate or proportionate in terms of its assessment of off-site impacts at Coltishall. It would therefore not be possible on the basis of this evidence to conclude that the allocation is Justified and Effective.

20. Subject to its finalisation and agreement by the Highway Authority, the North Walsham Western Urban Extension Draft Transport Assessment (November 2023) can be considered adequate and proportionate evidence necessary to underpin the policies for North Walsham.

21. Notwithstanding the Council's reservations about the transport evidence submitted by North Norfolk in Document D21, whether document D21 or the emerging transport evidence prepared by AECOM is considered it appears that there would be a significant impact on Coltishall as a result of planned growth in North Walsham.

22. In order to make the plan sound it is necessary to amend policy NW62/A to recognise those significant impacts, reflect the mitigation identified in the transport evidence and ensure that infrastructure is delivered at an appropriate point. It is also necessary to amend policy to ensure that proportionate contributions to off-site transport impacts are required as part of the delivery of NW01/B.

23. The Council is currently engaging in good faith with the promoter of NW62/A, Norfolk County Council and North Norfolk District Council to agree a Statement of

North Norfolk Local Plan Examination
Examination Hearing Statement Jan 2024

Common Ground that will include amendments that the Council considers are necessary to make the policy NW62/A sound.