

Report to Cabinet
16 December 2020
Report of Director of place
Subject Consultation response to draft Local Transport Plan

Item

10

Purpose

To consider the City Council's response to the County Council's consultation on the draft Local Transport Plan.

Recommendation

To approve the City Council's response to the County Council's Local Transport Plan.

Corporate and service priorities

The report helps to meet the corporate priority Inclusive economy

Financial implications

Changes to parking tariffs would have financial implications but these would be modelled before any changes are agreed.

Ward/s: All Wards

Cabinet member: Councillor Stonard - Sustainable and inclusive growth

Contact officers

Ben Webster, Design conservation and landscape manager 07741 103253

Graham Nelson, Director of place 07979 516835

Background documents

None

Report

Background

1. On 31 March 2020 the City Council lost most of its ability to directly affect transport and highway matters following the County's decision to terminate the highway agency agreement that had existed for many years. Nevertheless, the City Council understands that fulfilment of its corporate objectives for the health, wellbeing and prosperity of its citizens is strongly influenced by having a good transport system. This means that the City will seek to influence the policies and priorities of the County Council. This is especially important because the transport needs of a city are very different to those of a predominantly rural county.
2. The County Council has invited the City Council to respond to its consultation on the Local Transport Plan for Norfolk. Local Transport Plans (LTP) provide a strategy and policies for transport and guide investment priorities. A new 4th iteration of the LTP has been drafted by County that will cover the period 2020-36. The document can be found [here](#). The City Council's draft response is attached at appendix 1. Approval is being sought to for the response so it can be sent to the County.
3. Recognising that the LTP is only one element of the transport policy architecture that will apply to Norwich, the draft response offers a set of policy principles that the City Council would like the County Council to incorporate into the suite of policy documents that it is producing. Interventions are also proposed for consideration that would fulfil the policy principles. The response also goes beyond a critique of the detail of LTP policy to cover issues of governance, asset management and how transport policy is structured which are all important to create a well-functioning transport system.
4. Parking needs highlighting in this covering report because it is the main element of transport activity that the City Council retains a direct influence over and is an important source of revenue for the council. Paragraphs 3.3-3.4 of the draft response contain proposals for a new approach to the cost and availability parking in the city. The intention behind those proposals is to facilitate the development of redundant or badly located parking areas and incentivise the use of Park & Ride while maintaining revenue from the City Council's off-street parking. In common with all the interventions, these would need further development and testing in terms of their costs and benefits.

Integrated impact assessment



NORWICH
City Council

Report author to complete

Committee:	Cabinet
Committee date:	16.12.20
Director / Head of service	Graham Nelson
Report subject:	Consultation response to draft Local Transport Plan
Date assessed:	30.11.20

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Changes to parking tariffs would have financial implications but these would be modelled before any changes are agreed.
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Supports an approach to economic development that recognises that the efficient use of land and energy results in better access and productivity within the city and saving resources that can be invested in projects that create more jobs.
Financial inclusion	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Supports principles of fair and affordable access through the transport system and a reduction in pollution affecting people living in more deprived circumstances. If the cost of long-stay parking was increased this would have a greater impact on people on lower incomes although the revenue raised would be spent on the provision of services that would be disproportionately used by people in the lower socio-economic groups.
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
S17 crime and disorder act 1998	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Encouraging walking, cycling and outdoor activity and reducing pollution boosts health and wellbeing.
Equality and diversity (please add an 'x' as appropriate)				
	Neutral	Positive	Negative	Comments
Relations between groups (cohesion)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Bringing citizens together for events in good quality public space helps break-down barriers between neighbourhoods and foster a civic identity.
Eliminating discrimination & harassment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Principles of assessing the equality impacts of transport policy and schemes are advocated.
Advancing equality of opportunity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Affordable access to facilities in the city is important.
Environmental (please add an 'x' as appropriate)				
	Neutral	Positive	Negative	Comments
Transportation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	All of the policy principles espouse and environmentally progressive approach to transport.
Natural and built environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reducing car use and supporting cleaner alternatives for movement supports the natural and built environment.

	Impact			
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The proposed transport modal hierarchy is based on prioritising modes that minimise the use of resources, especially space and fuel.
Pollution	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reducing car use reduces pollution.
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Energy and climate change	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The first priority in planning for transport is proposed as respecting climate limits by setting and sticking to carbon budgets for the sector.
(Please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Risk management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The development of a new approach to the price and availability of parking would need to carefully consider the risk of reducing revenue.

Recommendations from impact assessment	
Positive	
Negative	

Neutral
Issues
Changes to parking pricing and availability will need to be carefully modelled before any commitment is made to implement the broad approach identified in appendix 1.

Draft Local Transport Plan

Norwich City Council consultation response

DRAFT 03.12.20

1.0 Background

- 1.1 Local Transport Plans (LTP) provide a strategy and policies for transport and guide investment priorities. A new 4th iteration of the LTP has been drafted by Norfolk County Council that will cover the period 2020-36. They are consulting stakeholders and have asked for our feedback prior to approving the document in April 2021. The document can be found [here](#). An implementation plan will follow later in 2021 that lists schemes for the following three years in detail and longer-term schemes in less detail.
- 1.2 On 31 March 2020 the City Council lost most of its ability to directly affect transport and highway matters following the County's decision to terminate the highway agency agreement that had existed for many years. Nevertheless, the City Council understands that fulfillment of its corporate objectives for the health, wellbeing and prosperity of its citizens is strongly influenced by having a good transport system. This means that the City will seek to influence the policies and priorities of the County Council. This is especially important because the transport needs of a city are very different to those of a predominantly rural county.
- 1.3 The Norwich 2040 City Vision was published in November 2018 following an extensive dialogue with individuals and organisations in the city. Transport is an indispensable part of achieving many of the broad objectives of the Vision:
- **Creative** city that promotes innovative development and the regeneration of urban spaces and communities; develops the city centre experience and maximises the use of our heritage assets.
 - **Liveable** city that creates efficient, good quality, low-emission and affordable transport options; protects and maintains our green and open spaces to improve biodiversity and air quality; and develops an alternative approach to energy.
 - **Fair** city that develops an inclusive and joined-up approach to service delivery, ensuring residents have access to all the city has to offer; promotes the independence and diversity of all of our citizens; and makes the best use of our public spaces for physical activity.
 - **Connected** city that has a transport system to link us to the region, country and work; is a great city for walking and cycling; and has a clean, affordable, integrated transport system.
 - **Dynamic** city that works with residents and businesses to create an inclusive economy and growth.
- 1.4 In June 2020 the City Council published [Covid-19: A blueprint for recovery](#). Among the actions were identifying opportunities to promote sustainable travel in the city centre, with a focus on walking, cycling and other forms of

sustainable transport; and to secure £25m investment from the Towns Fund. This was bolstered the following month by the publication of the [Norwich City Centre Public Spaces Plan](#) that presented an illustrated summary of the public space improvements that are planned over the next few years. A positive announcement about the Towns Fund was made at the end of October.

- 1.5 Our response to the LTP and the framework of transport policy that we want to see are grounded in the City Vision and recovery plan.
- 1.6 The architecture of local transport policy covering Norwich comprises the LTP, which covers the whole County and the Norwich Area Transportation Strategy (NATS), which was produced in October 2004 and updated in 2010 with the addition of an Implementation Plan. NATS is out of date and the work to produce a replacement Transport for Norwich Strategy (TfN Strategy) is overdue. It is imperative that the TfN Strategy is produced soon because the LTP it is not designed to provide the detailed transport policy for the city based on an analytical understanding of its needs. The draft LTP only contains seven short paragraphs describing transport priorities for Norwich (p52-53). Furthermore, the Greater Norwich Local Plan (GNLP) and TfN Strategy were intended to be mutually reinforcing but the GNLP has proceeded while the TfN Strategy has stalled. This undermines the ability to plan land use and transport together, which is fundamental to good placemaking. The final element of the emerging transport policy for Norwich is the Local Cycling and Walking Infrastructure Plan (LCWIP).
- 1.7 The relationship between these documents and the choreography of their production is not clear and there is no reference in the LTP to either the LCWIP, the 2040 City Vision or the Norwich City Centre Public Spaces Plan. The LCWIP, TfN Strategy and LTP would ideally nest together like Russian dolls, one within the next. Each is intended to have an implementation plan or action plan, comprising lists of schemes. We advocate that the list of cycling and walking schemes in the LCWIP is incorporated in the TfN Strategy action plan and that the TfN Strategy action plan is imported into the LTP implementation plan. These could then replace the transport content in the Norwich sections of other infrastructure documents - Greater Norwich Infrastructure Plan (GNIP) and the Norfolk Strategic Infrastructure Delivery Plan. This integration is needed to avoid creating a proliferation of overlapping plans.
- 1.8 An alternative, simpler approach would be to agree that the Norwich area is not included in the LTP or the Norfolk Strategic Infrastructure Delivery Plan but that policies and schemes are to be found in the TfN Strategy and the GNIP. This would ensure that the particular needs of Norwich and its hinterland are captured. Further simplification and integration could be achieved for the next iteration of the GNLP and TfN Strategy by producing one combined document.
- 1.9 This response to the LTP is not a detailed or exhaustive critique. Our overall view is that the document is deficient due to a lack of clarity of expression with too many words and too few images; generic policies that unsuccessfully attempt to straddle the needs of the City and the rest of the

County; specific commitments to infrastructure schemes that promote long-distance car-based connectivity but a lack of equivalent scheme commitments that would support the more environmentally progressive policies in the document; and a general lack of ambition and recognition that the world must be radically different by the end of the plan period in line with the government's objective in its Gear Change document published earlier this year for England to be "a great walking and cycling nation" with "half of all journeys in towns and cities being cycled or walked by 2030".

- 1.10 The approach to policy development should be informed by a determination to create the future we want by bending trends using policy levers, rather than extrapolating existing trends, such as car ownership and use. In order words, plan and provide, not predict and provide. For example, the first statistic presented in chapter 4 (p12) says that "nationwide, population growth is expected to increase road traffic by 17-51%". The source or time parameters for this statistic are not cited. The pandemic has shown how travel activity can change dramatically and it seems likely that a lasting effect of the pandemic will be that working from home will create longer commutes that happen on fewer days leading to a smoothing of demand to use the transport system across the day. So we should not treat either traffic growth or diurnal peak travel demands as a permanent or inevitable state and our focus should be on deciding how we want the future to look when the LTP expires in 2036 and the policies and interventions we need to make it happen.
- 1.11 We have offered here a set of high-level policy principles and interventions that flow from them that the City Council would like the County Council to incorporate into the suite of policy documents that it is producing. It is not a complete list and some of the policy principles might be better served by other interventions. It is incumbent on the County Council, with all its resources following the ending of the agency agreement, to undertake the analytical work needed to create an ambitious transport plan for Norwich.

2.0 Policy principles

2.1 Respect climate limits.

- 2.1.1 Climate change presents an existential threat. The County Council set a very ambitious carbon neutrality target for 2030 in its 2019 Environment Policy. It made a distinction between achieving this on its estate by 2030 and "working towards" it elsewhere. It is not explicit about whether the highway network, for which it has responsibility, is being treated as part of its estate for the purpose of applying this target but the content of LTP policy 12 (p42) suggest it is not. Nevertheless, policy 12 is a welcome recognition of the need to apply tough carbon reduction targets to transport given that the sector represents about one third of emissions of carbon dioxide. Achieving this ambitious goal will require an immediate and radical reduction in emissions but there is a gap in the LTP between the ends and the means because it does not demonstrate that the other policies in the plan will collectively achieve this objective.

2.1.2 The LTP should state a carbon budget for transport in Norfolk and Greater Norwich (if the data is available at County and city level) and present stronger policies in service of containing emissions within this budget. The explanatory text beneath policy 1 strongly suggests that the answer lies in “technology, innovation and behaviour change” (p17) but behaviour is shaped the by the structure of the city, the design of streets and the availability and level of service offered by different modes of transport. Individual major schemes and transport investment programmes should therefore demonstrate how they will not lead to this carbon budget being exceeded.

2.2 Put health, wellbeing and fairness at the centre of transport policy.

2.2.1 The availability of transport services is an important determinant of life chances and the harmful impacts of transport are disproportionately felt by the poorest people in our society. Lives are blighted and stunted by pollution arising from a transport system that relies too heavily on vehicles burning fossil fuels. Living by a busy road can shorten your life through the polluted air that infiltrates the lungs and the noise that can disturb sleep and cause stress. Fewer people know their neighbours on busy roads and this lack of community erodes wellbeing. These effects are amplified by poverty, whereby wealthier people in cars drive from the suburbs through the neighbourhoods of poorer people living in inner areas of the city. Transport policy therefore needs to promote social justice by reducing inequalities and promoting fairness, especially in relation to health outcomes.

2.2.2 A healthy city promotes walking and cycling as the default way to get around for short journeys. By integrating exercise into everyday tasks like the journey to the shops we boost our own health and reduce the pollution that damages the health of others. Our exhortations to cycle will only work if we have first created an environment that makes it feel safe and fun to be on a bike or to walk.

2.3 Ensure affordable access without a car.

2.3.1 Transport services provide access from homes to places where people work, learn, shop and are entertained. The best way to achieve good access is by creating compact mixed-use clusters in the city that are close to shared and clean transport services. This requires an approach to land use and transport planning that directs development and calibrates its density towards places where these services exist or can be provided. It stops development happening where they don't exist or the cost of providing them is too high. If we do not get this stage right it is impossible to achieve sustainable development because there will not be enough capital to provide the infrastructure to break the habit of car-based resource-intensive movement patterns.

2.3.2 Policy 5 (p26) “new development should be well located and connected to maximise use of sustainable and active transport options, making them more attractive places to live, thus supporting a strong sense of the public realm” is a helpful statement against which site allocations and infrastructure programmes can be evaluated. Policy 14 (p47) contains a

welcome commitment to working with other agencies to plan accessibility as part of service delivery e.g. decisions about the location of public facilities.

2.4 Prioritise the modes of transport based on efficient use of energy and space.

- 2.4.1 Our approach to transport planning since the second world war has been a self-fulfilling prophecy. We expect more car use, so we provide more space, which generates more car use. Instead we need to induce demand for the travel behaviour that we want by designing Norwich around the speed and ergonomic requirements of pedestrians, cyclists and buses that are efficient and conserve precious resources, rather than waste them.
- 2.4.2 Different ways of getting around consume different amounts of resources. A car, especially when containing only one occupant and powered by combusting fossil fuel, is very wasteful. A great deal of energy is burned to move the vehicle's own weight through a city at a speed far below that which it is designed to achieve. By contrast, a bicycle is the most efficient method of converting human to propulsive energy ever invented. Furthermore, the amount of space taken up by a person in a car is greedy by comparison with a person walking, riding a bicycle or sitting on a bus. Private cars occupy a disproportionate amount a space in motion and when parked. This pushes apart the buildings and facilities in a city, acting against the imperative that cities should be compact and walkable.
- 2.4.3 The amount of capital expenditure and design attention should be commensurate with the level in the hierarchy of resource efficiency (see 2.4.5 below). Currently the reverse is true with the £32m DfT Transforming Cities Fund grant (whilst very welcome) being dwarfed by the sums intended to be spend by Highways England and the County Council on road building schemes. This is reflected in section 6 and policy 8 on enhancing strategic connectivity, which seems the most clearly defined section of the document. By comparison, policy 9 in that section "Our priority for improved connectivity will be for it to be via clean transport modes" does not appear to be consistent with, supported or explained by the detail of highway schemes mentioned under policy 8 (p34).
- 2.4.4 The elevated position of buses in our proposed hierarchy is explained by their capacity to accommodate large numbers of passengers and therefore remove car journeys. However, if the buses have very few people on them and have dirty engines this is not a positive contribution to our objectives. It is therefore imperative that our interventions, planned in combination with the bus operators' investments, ensure good occupancy, cleaner and quieter engines. Our proposed hierarchy also reflects the importance of the sharing economy with Norwich being the UK's first Sharing City, hosting companies like Liftshare, the Norfolk Car Club and Beryl.
- 2.4.5 We propose that the LTP should include a hierarchy, not including freight vehicles, that follows the order in the table below. Each mode is given a simple 1-3 rating on 5 criteria, with a score of 1 being the best.

Pos	Mode	Active	Space	Clean	Affordable	Shared	Total
1	Walking	1	1	1	1	3	7
2	Cycling	1	1	1	1	3	7
3	Buses	3	1	3	2	1	10
4	Train	3	1	3	2	1	10
5	Taxi	3	2	3	2	1	11
6	Car club	3	2	3	2	1	11
7	Electric car (multiple occupants)	3	2	1	3	1	10
8	Hybrid car (multiple occupant)	3	2	2	3	1	11
9	Powered 2 wheeler	3	2	2	2	3	12
10	Fossil fuel car (multiple occupant)	3	2	3	3	1	12
11	Electric car (single occupant)	3	3	1	3	3	13
12	Hybrid car (single occupant)	3	3	2	3	3	14
13	Fossil fuel car (single occupant)	3	3	3	3	3	15

2.5 Balance the place and movement functions of streets.

2.5.1 The spaces between buildings are used for many different activities. Movement is very important, but it is often accorded too much value at the expense of dwelling, accessing, retail and social exchange. Language is important, as seen in the distinction between the word “street” (which

conveys the idea of a route with multiple functions) and “road” (where movement of vehicles is prioritised). When planning changes to the street network numbers are often substituted for street names, which further abstracts the “network” function from the qualities of place. Manual for Streets and Transport for London promotes a matrix to classify the parts of the street network according to their place function and movement function together. This should be applied to Norwich and it would mean that transport investment, traffic management and highway design decision will take more account of receptors to pollution; clusters of commercial activity; and buildings of civic, historic and architectural importance. Furthermore, the place of a street in the network hierarchy should reflect its importance as a link in the cycle network and bus networks and nodes of attraction for walking, not just the movement of private vehicles, as is currently the case.

2.5.2 Respecting the place function of streets extends into the techniques for design. This is typically a 2D exercise whereby designs are developed on a topographical line drawing that gives no detail beyond the building edge. Understanding the 3D envelope within which designs are developed is crucial to producing designs that respect and respond to the character of the street and identify how level changes impact on movement patterns and drainage. This requires the 3D modelling of building heights and facades and the vertical features within the street such as trees and lighting columns.

2.6 Be mindful of the equality impact of transport policy and design.

2.6.1 The ability to physically access the places we need to reach is a fundamental right. The street environment can be difficult to navigate if one is in a wheelchair or has a sensory impairment and we need to improve our understanding of the barriers they face by working more effectively with those who have lived experience of disability at all stages of policy and implementation. Simple interventions can often be cost effective, such as removing and consolidating signs that restrict footway space and installing dropped kerbs and tactile paving. Other types of intervention are mentioned on p54-55 of the LTP. We also need to challenge false assumptions that people with physical disabilities rely on vehicles to get around. For example, our observations suggest that the dedicated spaces for disabled motorists in the City Council’s car parks are very underused. One of the excellent features of the recent government guidance on designing for cycling (Local Transport Note 01/20) is the advice around designing for the geometric requirements of a variety of types of human powered vehicle, such as tricycles and hand cycles that are often used by people with disabilities.

2.7 Facilitate the delivery of goods through active management.

2.7.1 Businesses need to obtain goods to sell and raw materials to process into manufactured products. Customers are increasingly shopping online leading to a large increase in deliveries by van. When individual businesses consider their logistics in isolation this can create perverse outcomes whereby large vehicles are attempting to deliver into the heart of the historic

city. Freight can be consolidated into smaller vehicles to achieve last mile deliveries. The use of electric powered cargo bikes by the local company Zedify demonstrates what can be done and the competitive advantage of cargo bikes versus deliveries by motorised vehicles was assisted by the liberalisation of access to city centre streets through the cycle city ambition programme. In the same way that Harford P&R site is to be used as a recycling centre, there may be scope for other sites to offer more functions such as freight consolidation and pick up locations for parcels.

2.8 Make infrastructure work harder - blending grey, green and blue infrastructure.

2.8.1 A traditional approach to designing highway space likes to keep infrastructure hard, precise and controllable, consisting of impermeable surfaces, piped drainage and an absence of vegetation. It regards parks and green spaces as a separate realm. Our transport policies need to recognise the value of vegetation and permeable surfaces to mitigating climate extremes by absorbing water, slowing pluvial flooding and moderating the urban heat island effect. This requires collaboration between highway engineers, landscape architects and drainage experts. Another way of squeezing more value out of infrastructure is to allow kit to be combined, for example using lamp columns to mount traffic signals or provide electricity for electric vehicles (EV).

2.9 Technology as the servant of our goals.

2.9.1 Technology can help us to make the best use of our infrastructure assets as expressed in policy 22 of the LTP. The widespread deployment of sensing devices mounted on street lighting columns, traffic signals and bus shelters can provide real-time information so adjustments can be made to traffic signaling in response to traffic congestion and concentrations of poor air quality.

2.9.2 It is tempting to embrace technological advances uncritically, but we need to check whether they help us get closer to our vision of a good society and ensure they are deployed equitably. The recent announcement by government that sales of vehicles exclusively powered by fossil fuels will be banned by 2030 is welcome and makes the needs for charging infrastructure more urgent. However, much of the electricity comes from the burning of fossil fuels; EVs can kill and maim when they collide with people, a risk that is increased by their quiet operation; particles from brake pad wear embeds in the lungs, the manufacture of EVs creates pollution and uses energy; and they consume the same amount of space when moving or parked as a normal car. These observations are offered as a corrective to the general fanfare around EVs and a reminder of why they do not sit higher up in our proposed hierarchy. Nevertheless, it is very important to supplement the 48 existing charging points in the City Council's area by deploying a large number of additional charge points, enabling EVs to be charged on street and in public car parks at a range of charging speeds.

2.9.3 The electrification of buses, taxis and car club cars is a higher priority because this combines the resource efficiency of the sharing economy with

the air quality benefit of eliminating tailpipe emissions in the most polluted places where these vehicles are concentrated, such as the city centre and the main radial routes.

2.10 Overcoming fragmentation of asset ownership.

2.10.1 Our ability to coherently design and manage the street environment is made much harder by the fragmentation of responsibility for owning, managing and maintaining assets on the highway. The County Council have traffic signs, traffic signals, highway surfaces, bollards, trees and grass. Amey manage street lighting under a 25-year PFI contract with the County Council, which means that decisions to use street lights for other functions such as sensors and EV charging may be restricted by the terms of existing contracts. The City Council has pedestrian signage and seats and regulates pavement cafes and street trading. It also has a contract with Clear Channel to provide bus shelters that are funded through advertising so decisions to use bus shelters more creatively require the agreement of a third-party. Responsibility for other forms of planting or public art is yet to be decided. Utility companies own many other pieces of equipment above and below the ground. The successful co-ordination of the street environment requires a consolidation of responsibility in the hands of fewer entities.

2.11 Make traffic models more sophisticated or do not use them.

2.11.1 Many of the decisions about the use of highway space and its allocation to different modes of transport are based on traffic models. These typically have four flaws, which bias decisions towards prioritising motorised vehicles. Firstly, the number of people walking or cycling on a link or junction in the network is not included. Secondly, no allowance is made for shifting people from driving to cycling or walking as a result of design interventions so it is assumed that the effect of reducing vehicular traffic capacity at a junction will be to move the traffic elsewhere on the network rather than for it to “evaporate” due to modal shift. Thirdly, strategic traffic models do not enable decisions to be made with confidence about detailed design changes to junctions and microsimulation models are required. These can consider the variety of interactions between road users at a specific junction but are too seldom used because of the cost. Fourthly, rush-hour traffic levels are often used to determine space and time requirements at junctions but the LTP helpfully acknowledges (p15) employment trends suggest that traditional working hours and office-based work patterns are changing.

2.11.2 We must overcome these limitations of traffic models if we are to continue using them and stop them being a pernicious drag on the implementation of schemes to promote walking and cycling. If we do not address this the space allocated to vehicle movement will continue to grow.

2.12 Maintenance is as important as improvement.

2.12.1 Our ability to maintain transport networks is under great strain so we need to not only increase the proportion of money spent on maintenance versus

new build but also use that money more intelligently. Building big new roads is not only expensive in capital terms but they must be looked after.

2.12.2 These types of project should be subject to a level of scrutiny commensurate with their cost. Currently, that scrutiny seems directed most fiercely towards the infrastructure that support a healthy city such as seating and planting rather than schemes to facilitate vehicular movement.

2.12.3 If a piece of highway has pedalway status it has a strategic movement function and users should not have to cycle through mulch or have their faces lashed by branches on unlit paths. This would not be tolerated on a minor road with primarily a vehicular function. The draft LTP policy 19 (p73) that commits to focusing maintenance on corridors for walkers and cyclists is very welcome and an additional reason cited for it should be the fact that modal shift to cycling and walking reduces maintenance costs because it is vehicles that damage highway surfaces.

2.12.4 The ability to target maintenance spend on cycling and walking networks makes the network maps in the emerging LCWIP even more important and the lack of a reference to the LCWIP in the draft LTP more concerning.

2.13 Generate revenue for investment in sustainable transport.

2.13.1 It is a feature of many continental cities that have invested consistently in sustainable transport that they generate revenue locally and spend it locally. By contrast, we are too dependent on competitively bidding to central government for money. Our interventions should seek to generate revenue from charging unwanted transport activity so that the money can be spent on encouraging wanted transport activity. This virtuous cycle of wielding sticks and dangling carrots will create a more constant revenue stream that allows us to have confidence that we can implement our plans. For example, the low cost of using an electric vehicle after purchase could result in more driving and a reduced level of taxation so road user charging will need consideration in the future.

2.14 Capital funds generated through new methods of raising revenue could be pooled with the community infrastructure levy or any successor infrastructure levy for allocation at the Greater Norwich level. A significant proportion of this revenue should be spent on supporting people to become confident and knowledgeable users of the transport system to get the maximum value from investment in infrastructure (e.g. cycle training, walking buses to schools and travel planning). The draft LTP seems to assume that we will remain reliant on competitive bidding to central government rather than develop independent income streams (p72).

3.0 Interventions

3.1 These policy principles can be implemented in a variety of ways using different financial, technological and regulatory tools. Examples that we would like to see receive serious feasibility analysis and decisions in the emerging suite of transport policy are:

- 3.2 **Workplace Parking Levy**, designed to discourage employers for devoting land to car parking; release land for development that is currently used for car parking; encourage employers to incentivise employees to walk, cycle and take public transport to work; and generate revenue for investment in sustainable transport. This would need to be applied across a much wider area than that covered by the City Council including peripheral business and retail parks to avoid a counter-productive hemorrhaging of jobs from the city centre towards the edge. More restrictive parking standards for new development would reinforce the benefits. Nottingham has implemented a workplace parking levy.
- 3.3 **Raise long-stay parking charges in public car parks**, designed to incentivise use of park & ride; maintain overall revenue levels by offsetting fewer car park users with the higher amount paid by each; facilitate redevelopment of redundant car parking space and intensify the turnover of the spaces that remain.
- 3.4 **Gradual reduction in the space available for fossil fuel vehicles to park**, designed to make land available for development in the city centre, remove the penetration of polluting vehicles into the heart of the city and incentivise the use of electric vehicles (EVs). The priority would be the removal of surface car parking that can only be reached by driving through environmentally sensitive parts of the city centre and the consolidation of parking into multi-story car parks or ground floor car parks with buildings above (e.g. new Barn Road car park). The existing 10,000 cap on parking numbers should be gradually reduced year on year through amendments to planning policy, with a proportion of the total allocated to EVs and multiple occupancy cars. Unauthorised car parks resulting in a breach of planning control will be investigated and the City Council will consider the use of its enforcement powers if appropriate.
- 3.5 **Allocate land for autonomous vehicles to park**, designed to facilitate a preferred scenario whereby autonomous vehicles gather in low value locations on the edge of cities for the majority of the day when they are not in use and from which they can be remotely summoned when they are needed. This would free the streets of parked vehicles and enable the space to be used more positively for widened footways, cycle tracks, cycle parking, seating and vegetation.
- 3.6 **Reallocate road space and time from cars (especially single occupancy) to walking, cycling and public transport**, designed to make these modes safer, quicker and more reliable. Policy 15 in the draft LTP (p15) is a welcome commitment that dedicated, segregated lanes should be provided for buses and cyclists with the acknowledgement that this is likely to disadvantage general traffic.
- 3.7 **Downgrade the traffic function of the inner ring road** and redesign it so people can more easily access the city centre on foot and on a bicycle, it is more pleasant to close to the inner ring road and it becomes easier to regenerate areas close to it. One of the City Council's preconditions for supporting the Norwich Western Link (NWL) is a clear and deliverable

commitment to a genuinely sustainable transport policy and implementation plan containing schemes that serve the policy principles outlined above. The combination of the Western Link and the Broadland Northway would produce a third ring of orbital strategic traffic routes encircling Norwich. We do not regard this as sustainable development, even if it is proved that the local environmental harm can be mitigated, unless the new road capacity is used to re-purpose existing road space for more sustainable uses. We therefore expect to see proper investigation of how the NWL can take traffic off the outer ring road, which in turn could take traffic off the inner ring road, allowing the inner ring road to be downgraded and redesigned. We look forward to seeing this emerge through the implementation and action plans supporting the LTP, TfN Strategy and LCWIP.

- 3.8 **Light-touch regulation of bus services** designed to ensure that core routes have an agreed frequency and capacity of service provided by vehicles that meet high environmental standards in exchange for public investment in infrastructure and the vehicle fleet.
- 3.9 **Freeing the city centre and the neighbourhoods from polluting vehicles**, designed to improve the quality of the air, reduce noise and create space for better public realm. This can be achieved through a combination of eliminating the few remaining routes that can be used by general traffic driving across the city centre and the introduction of an ultra-low emission zone across the city centre air quality management area where more polluting vehicles are banned or taxed. Any taxes would be spent on sustainable transport infrastructure, including assisting less profitable bus operators to introduce cleaner buses. A similar approach could be employed in the neighbourhoods to create “traffic cells” whereby through routes are eliminated and heavier flows confined to the edges of a neighbourhood. We need to check that schemes designed to exclude traffic from the city centre or from neighbourhoods do not result in harmful air pollution arising on major traffic routes where poorer people disproportionately live. If traffic is displaced rather than “evaporating”, mitigating measures should be employed and any residual impacts will need to be justified. Such justification will be easier to make if the neighbourhoods from which traffic has been removed are relatively deprived. The LTP draft policy 11 (p38) talks about “investigating vehicular restrictions or charging” but it is clear that the objective and legal obligation to improve air quality cannot be achieved without such measures and the LTP needs say what will be done.
- 3.10 **Reduce traffic in the vicinity of schools**, designed to reduce the danger to pupils on their journey to and from school and boost their independence and health by making it safer to cycle and walk to school. This would involve traffic restrictions, traffic calming and encouragement to parents.
- 3.11 **20mph as the default speed limit in Norwich**, designed to avoid and minimize the severity of road traffic collisions and encourage walking and cycling. The cycle city ambition programme enabled the introduction of a 20mph area across the city centre and a dramatic extension across residential neighbourhoods that were close to pedalways that were improved as part of the programme. There was also an acknowledgement that A road

status did not prevent lower speed limits where they pass through busy residential and commercial areas through the introduction of a 20mph restriction on Magdalen Road and the lower part of Sprowston Road. The logic used for the cycling ambition programme should be extended to the whole of Norwich with the creation and implementation of a plan showing the speed limit category that every street will ultimately belong to. Once this is done it would be much clearer and easier to publicise and enforce the fact that people should drive slower than 20mph in Norwich unless there is clear signage to say faster driving is permissible. A collateral benefit of this approach would be to encourage use of the strategic road network because people will reach their destination more quickly. Chapter 9 of the LTP covers road safety and acknowledges on p60 that “between 2000 and 2010 speed management contributed to a 59% reduction of road collisions in Norfolk with a reduction in killed and seriously injured from 862 to 353.” It is therefore disappointing that the safe speeds section on p61 contains no new commitment to 20mph as a default speed limit in Norwich as part of the safe systems approach outlined in policy 17. It would be deeply regrettable if a stronger commitment to reduce speed limits had not been made due to a lack of funding to introduce design changes that would create “self-explaining roads” where the “traffic environment elicits safe behaviour through its design” (p61).

- 3.12 **Create mobility hubs**, designed to facilitate interchange between shared and clean mobility services and support a virtuous cycle of development intensification and investment in key locations. The Transforming Cities Fund (TCF) application stated that “central to the passenger experience is ease of access and smooth interchange between transport modes. Users need confidence that there are key places within the city where they can access shared mobility services – buses, trains, car club vehicles and hire bikes. We will create these places and call them mobility hubs. We will make it convenient for people to reach these places on foot and by bicycle and hubs will be well-designed so that people feel comfortable, secure and well informed whilst waiting for services to arrive or navigating between them.” Mobility as a Service, whereby technology allows users to view and compare the speed, cost and environmental impact of their transport options in real time on smart phones, is mentioned on p19 of the LTP. Missing from this section is the symbiotic relationship that needs to be established between the technology and the physical consolidation of services at mobility hubs. Suitable locations on the TCF investment corridors were identified and a limited number are being funded through the programme. A commitment to create a comprehensive set across the area is needed in transport and planning policy.

4.0 Points of detail

- 4.1 Page 2 states that “Our ambitious Transforming Cities bid, and Cycle City Ambition programme, should see ...”. The tense is wrong because the Cycle City Ambition programme is complete and the Transforming Cities bid has been successful so it should be referred to as a programme rather than a bid.

- 4.2 Page 3 includes a policy to “Endeavour to secure, design and implement improvements to the strategic connections them [sic.] in a way that encourages clean transport modes.” The meaning of this is unclear and its elaboration later in the document does not clarify.
- 4.3 Page 4 under “recent progress and achievements” contains a cursory remark that “We have also made significant improvements to walking and cycling”. The achievements in this sphere deserve the degree of specificity provide for road and rail schemes earlier in the paragraph with reference to adopting a comprehensive pedalway network and investing significantly in improvements to the pink, yellow, blue and green pedalways and the Marriotts Way section of the red pedalway / NCN1.
- 4.4 Page 43 contains a reference to Norwich inner ring road being an air quality management area. This should refer to “within Norwich inner ring road”.
- 4.5 Page 52 refers to a priority being “quicker buses and new transport links to Norwich Airport, the University of East Anglia and Norwich Research Park”. It should be made clearer that these links should be principally with the city centre.
- 4.6 On pages 52-53 there is no mention of key regeneration sites within Norwich that have accessibility issues. Whilst this is something that may be more appropriate to expand upon within the TfN Strategy, we feel that there should be mention of this within the LTP given the strategic importance of these sites. In particular, mention should be made of the East Norwich Strategic Regeneration Area where redevelopment will need all the necessary supporting vehicular, pedestrian, cycle and public transport access infrastructure. Anglia Square will also need improvements in connectivity and permeability across the site with new and enhanced pedestrian and cycle links and improved shared transport services (buses, car club and bike share).

5.0 Governance

- 5.1 Questions of governance lie outside transport policy but are key to its successful implementation. Since the ending of the agency agreement and the demise of the Norwich Highways Agency Committee there has been some ambiguity about the member-level decision-making process.
- 5.2 The Joint Committee for TCF Projects was established with a remit to make decisions about schemes within that programme. Policy decisions fall to other County Council committees and decisions on schemes that are outside the TCF programme are made in the same way as elsewhere in the County through a combination of ward member and cabinet member decision making.
- 5.3 There is a need for a single set of councillors that represent the Greater Norwich area to make decision on policy and scheme implementation,

regardless of the funding source. One option would be for the Joint TCF committee to have an expanded remit.