

## **North Norfolk District Council – Local Development Framework, Site Specific Proposals Public Examination**

### **Norfolk County Council Statement in response to Transport Statement – Land at North Walsham Football Club (I30)**

#### **Introduction**

This Statement is prepared in response to the AECOM report Transport Statement – Land at North Walsham Football Club (I30) commissioned by North Norfolk District Council.

#### **Summary of the Highway Objection**

The county council submitted a representation challenging the soundness of inclusion of NW28a. The two main points of the County Councils objection are;

- The existing **pedestrian links** from the site to the town centre are inadequate and there is no prospect of bringing them up to an acceptable standard; and
- The proposals will generate **additional vehicular traffic on an unsuitable highway network** with inadequate pedestrian provision and no identifiable means of improving the inadequacies in the local network.

#### **Pedestrian Links**

Firstly it is noted that the AECOM assessment of the local road network does not disagree with the County Council's observations. The report acknowledges that there are a number of stretches where there is no footway or the width of the footway is so inadequate that pedestrians are required to step in the road.

The County Council has consistently raised concerns to the inclusion of this site since the early stages of plan preparation. To meet local and national transport policy, new housing sites should maximise the potential for travel by non car modes.

The quality of the local footway network falls well below that expected to make walking reasonable travel choice. To bring the route up to a suitable standard would require acquisition of 3<sup>rd</sup> party land and the implementation of engineering works well beyond the scale considered reasonable for a site of this scale. The measures proposed in I30 do not adequately address this concern.

Comment is made that as the County Council have taken no action then there can be no overriding need for the improvements to the local network. This is not so. In 2007/2008 the County Council investigated the feasibility of pedestrian improvements on Aylsham Road as they were a high priority, but after initial local consultation, the plans were dropped. To enable a footway to be built either the road needs to be made narrower and a one way system introduced, or land needs to be purchased from numerous frontages, some of which do not have much frontage to start with. Both of these ideas were rejected by the local residents. This is direct evidence of the problem and the constraints and difficulty in delivering meaningful mitigation.

The site cannot be linked to local facilities and services by adequate footway provision and is unlikely to meet the requirements of Policies SS6 and CT5 in the North Norfolk District Council Core Strategy.

### **Additional vehicular traffic on an unsuitable highway network**

The AECOM report looks to provide an assessment of the likely trip generation and modal split from the site. Local observations and census data show a significantly higher use of the private car than trip rates derived from TRICS would suggest. TRICS data presented in the report shows that 41% of rented housing trips and 57% of private housing trips are vehicular based. However local observation of Suffield Close shows in this location 95% of all trips are vehicle based. The 2001 census data indicates that in the local area 71% of journeys to work were vehicle based.

The report does not provide a consistent approach for determining trip rate and mode share and therefore the assumptions around trip generation are not considered to be reliable.

Notwithstanding the precise volumes of vehicular traffic generated, the local road network is of a low standard with poor pedestrian provision. The vehicular trips generated will along routes with poor pedestrian provision will be detrimental to pedestrian safety that will either lead to person injury accidents, or more likely to lead to trips being made by car that would with a good walking network have been made on foot.

### **Summary**

The report does not show that adequate improvements to the local walking and cycling network can be achieved. The poor pedestrian provision will remain a barrier to trips being made on foot.

The proposals will generate additional traffic on a poor local highway network. The analysis of mode share and trip generation in the report I30 is flawed and does not provide a reliable basis on which to draw its conclusions.

## **Conclusions**

The contents of the Report I30 do not address or overcome the concerns raised by the County Council as Highway Authority. The site is inappropriate for housing given the inadequacy of the local highway and footway networks and the Highway Authority cannot see a reasonable prospect of providing adequate enhancement. Allocation of the site is considered contrary to Core Strategy policies SS6 and CT5.

For the reasons above, the site NW28a is considered unsound for inclusion in the Site Specific Proposals on the grounds of effectiveness.

As this site is not required to deliver housing with the range identified in the core strategy, its removal from the plan does not create the need to find an alternative site.

The Inspector is invited to consider this statement and remove site NW28a from the North Norfolk District Council Site Specific Proposals.