

## **Draft Policy LP10 - Strategic Road Network**

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542892963547#section-s1542892963547>

### **Consideration of issues:**

The main issues raised by consultees were:

- Rewording suggested by the County Council to make reference to the 'Major Road Network'. The Major Road Network (MRN) forms a middle tier of the country's busiest and most economically important local authority 'A' roads, sitting between the national Strategic Road Network (SRN) and the rest of the local road network. A specific new funding stream will be dedicated to improvements on MRN roads. This is recommended to be included.
- Suggesting an amendment to reflect the wording of the NPPF in relation to 'severe cumulative traffic impacts'. The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. It is considered that this wording should be reflected in the policy.
- Comments relating to Knights Hill and transport. Knights Hill is dealt with in the appropriate section. No change is recommended.
- Comments around the application of the transport hierarchy. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before this policy LP10 and policies LP11 and 13.

The resulting changes recommended to the policy and supporting text are set out below.

### **Officer Recommendations to Task Group:**

The Task Group is recommended to:

- 1) Amend LP10 Strategic Road Network Policy and its supporting text by adding references to the 'Major Road Network'.**
- 2) Amend policy wording 1.b. to be in line with the NPPF para. 109 by replacing 'significant adverse effect' with 'severe cumulative impact' and by adding supporting text as follows: "The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This wording is reflected in the policy."**

**Policy Recommendation:**

**Policy LP10 – The Strategic and Major Road Network**

1. The Strategic Road Network within the Borough, comprising the A10, A17, A47, A134, A148, A149, A1101 and A1122 and shown on the Policies Map, will be protected as follows outside of the settlements specified within Strategic Policy LP02:
  - a. New development, apart from specific plan allocations, will not be permitted if it would include the provision of vehicle access leading directly onto a road forming part of this Strategic and Major Road Network;
  - b. New development served by a side road which connects to a road forming part of the Strategic and Major Road Network will be permitted provided that any resulting increase in traffic would not have a significant adverse effect severe cumulative impact on:
    - i. the route's national and strategic role as a road for long distance traffic;
    - ii. highway safety;
    - iii. the route's traffic capacity;
    - iv. the amenity and access of any adjoining occupiers.
2. In appropriate cases a Transport Assessment will be required to demonstrate that development proposals can be accommodated on the local road network, taking into account any infrastructure improvements proposed.
3. Strategic Policy LP12 sets out the transport requirements for development proposals to demonstrate that they accord with. Paragraph 013 - Transport Assessments and Statements of the Planning Practice Guidance should also be considered.

**Supporting text:**

## Policy LP10 Strategic **and Major** Road Network Policy (previously DM12)

### Introduction

5.5.1 Former government guidance in PPG13 advised local authorities to identify trunk roads and other major roads as 'Corridors of Movement' in order to safeguard their national and strategic importance in carrying significant amounts of through traffic between major centres. Whilst this guidance has not been included in the National Planning Policy Framework, it is still seen as important at a local level to define and protect these key strategic roads to maintain their primary function as routes for long distance travel.

### Relevant Local and National Policies

- National Planning Policy Framework: Promoting sustainable transport
- National Planning Policy Framework: Promoting healthy and safe communities
- National Planning Policy Framework: Supporting a prosperous rural economy
- Strategic Policy LP12 Transport

### Policy Approach

5.5.2 New development near strategic routes, or on side roads connecting to them, can add significant volumes of local traffic so the proposed policy approach is to not allow development that could undermine their function as long distance routes. Norfolk County Council have designated such roads, these include the A10, A17, A47, A134, A148, A149, A1101 and A1122 and are identified on the Policies Map. **The Major Road Network (MRN) forms a middle tier of the country's busiest and most economically important local authority 'A' roads, sitting between the national Strategic Road Network (SRN) and the rest of the local road network. A specific new funding stream will be dedicated to improvements on MRN roads.**

5.5.3 Strategic Policy LP12 identified some of this same network for improvement, including measures to reduce congestion and improve reliability and safety. The purpose of the Policy below is not to reproduce that, but to reflect and ensure that the most important roads in the area do not have their safety and reliability degraded by ill-designed or located development. Hence it is considered desirable to include within this provision the additional main routes (not subject of the Strategic Policy) of the A1101, A1122 and the north coast part of the A149.

5.5.4 The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This wording is reflected in the policy.

**Sustainability Appraisal:**

**LP10 Strategic and Major Road Network**

This policy is very similar, to the draft policy and the sustainability appraisal of that. The proposed policy was assessed as having a positive effect.

| LP10: Strategic and Major Road Network |               |   |   |   |   |   |   |     |     |    |    |    |    |    |     |    |    |    |    |     |    |                |                              |
|--|---------------|---|---|---|---|---|---|-----|-----|----|----|----|----|----|-----|----|----|----|----|-----|----|----------------|------------------------------|
| Policy                                 | SA Objective: |   |   |   |   |   |   |     |     |    |    |    |    |    |     |    |    |    |    |     |    | Overall Effect |                              |
|  | 1             | 2 | 3 | 4 | 5 | 6 | 7 | 8   | 9   | 10 | 11 | 12 | 13 | 14 | 15  | 16 | 17 | 18 | 19 | 20  | +  |                | -                            |
| LP10                                   | 0             | 0 | 0 | 0 | 0 | 0 | + | +/- | +/- | 0  | 0  | ++ | 0  | 0  | +/- | 0  | 0  | 0  | +  | +/- | +8 | -4             | Likely Positive Effect<br>+4 |
| Draft LP10                             | 0             | 0 | 0 | 0 | 0 | 0 | + | +/- | +/- | 0  | 0  | ++ | 0  | 0  | +/- | 0  | 0  | 0  | +  | +/- | +8 | -4             | Likely Positive Effect<br>+4 |
| No Policy                              | 0             | 0 | 0 | 0 | 0 | 0 | = | =   | 0   | 0  | 0  | 0  | 0  | 0  | =   | 0  | 0  | 0  | 0  | 0   | 0  | -3             | Likely Negative Effect<br>-3 |

**Appendix 1: Summary of Comments & Suggested Response:**

| Consultee  | Nature of Response | Summary   | Consultee Suggested Modification | Officer Response / Proposed Action  |
|------------|--------------------|---|----------------------------------|---|
| Ben Colson | <b>Object</b>      | <p><b>How the Borough LPR policies apply the transport hierarchy</b></p> <p>The West Winch Growth Area apart, the Borough appears to adopt a different hierarchy to that adopted by government and NCC, one which generally omits recognition of the role that public transport (the bus) can play in enhancing life style choices (and this is about choices), improving local economies (the evidence is clear) and reducing air quality impacts (the evidence is growing). It follows a hierarchy of walking and cycling (equal first) then car (whether multi-occupancy or not).</p> <p>As a result, all of the PE30 development (including The Woottons) site allocations do not require public transport mitigation as a policy. There are no criteria as to road widths and layout to enable public transport to use the roads, nor funding streams (from developers) to pump-prime the service. Most other authorities across the country take a different approach. Section 5.7 and Strategic Policy LP10 covers traffic and transport issues. It states that a TA is only required in respect of infrastructure requirements, and as public transport is seen as a service, NCC and developers will not be required to routinely include it in their TA. This is a major failure of the policy.</p> <p>Para 5.7.3 is significant. It states “many people rely on the car as the main mode of transport” and “whilst it is vital that North West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.” 5.7.9 states “improvements to the public realm will</p> |                                  | <p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before policies LP10, 11 and 13.</p> |

| Consultee | Nature of Response | Summary  | Consultee Suggested Modification | Officer Response / Proposed Action |
|-----------|--------------------|--|----------------------------------|------------------------------------|
|           |                    | <p>prioritise pedestrian and cycle access helping to make central King’s Lynn less car orientated” but at 5.7.11 “it is essential for residents and businesses of King’s Lynn that the town remains accessible.....in the long term reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles”.</p> <p>Para 5.7.19 refers to the Norfolk Local Transport Plan. It states “The increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the Borough by encouraging modal shift.....and facilitating improvements for infrastructure for public transport.” None of these requirements are met in the LPR, with the sole exception of the West Winch Growth Area. This is all really important. Paras 5.7.3, 5.7.9, 5.7.11 and 5.7.19 face in different directions sending conflicting signals. What they mean is that a developer can in effect choose the one to suit his circumstances best.</p> <p>The Borough is signalling no change of approach during the period of the LPR (at the least up to 2026) but then may – or may not – consider alternative, more sustainable, approaches. There are two problems with this. Firstly that development design and location now influences, and reduces, options for the future, just as past developments have done (for example Kings Reach in King’s Lynn and parts of Downham Market which are, by design, inaccessible to buses), and secondly today’s politicians (and officers) are “kicking difficult decisions down the line” for future generations to sort out. That is irresponsible. Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core</p> |                                  |                                    |

| Consultee   | Nature of Response | Summary  | Consultee Suggested Modification  | Officer Response / Proposed Action   |
|---|--------------------|--|---|--|
|   |                    | <p>area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough's view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents.</p> <p>Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent policy to take traffic mitigation measures whatsoever.</p> |   |  |
| Parish Clerk Castle Rising Parish Council                               | <b>Object</b>      | The cumulative effects of development should be assessed when proposals for development bring forward new sites and an updated assessment should be made of the Local Plan Allocations. Each allocation should be reviewed.  | Knights Hill allocation deleted   | A King's Lynn Transport Strategy is being prepared taking account of existing and proposed allocations. The Knights Hill allocation is dealt with in that section. <b>No change.</b> |
| Norfolk County Council (Infrastructure Dev, Community and Env Services) | <b>Object</b>      |  | LP10 Strategic Road Network Policy – reference should be made to the Major Road Network and Strategic Road Network. | <b>Agree - reference should be made to the Major Road Network and Strategic Road Network in LP10 Strategic Road Network Policy.</b>  |

| Consultee                                 | Nature of Response | Summary   | Consultee Suggested Modification | Officer Response / Proposed Action   |
|---|--------------------|---|----------------------------------|--|
| Lord Howard, Castle Rising Estate         | <b>Object</b>      | The cumulative effects of development should be assessed when proposals for development bring forward new sites and an updated assessment should be made of the Local Plan Allocations. Each allocation should be reviewed.   | Knights Hill allocation deleted  | A King's Lynn Transport Strategy is being prepared taking account of existing and proposed allocations. The Knights Hill allocation is dealt with in that section. <b>No change.</b>                                       |
| Parish Clerk Castle Rising Parish Council | <b>Object</b>      | We would support the identification and protection of the strategic road network and measures to ensure that development proposals do not adversely impact on the capacity, safety or operation of that network. This should, however, apply to all sites, including those allocated within the Local Plan. The cumulative effects of development should be assessed when proposals for development bring forward new sites and an updated assessment should be made of the Local Plan allocations. It is not sufficient to rely on the evidence base of the Core Strategy and SADMP to consider the acceptability of allocations on the strategic network. Each allocation should be reviewed. The impact of the proposed development at Knights Hill for 600 houses was considered to have a significant adverse effect on the strategic highway network (A148/A149 and related junctions within Kings Lynn). The related TA submitted with the application and its assessment by NCC concluded that there would be additional queuing to key junctions within the town and that this could not be fully mitigated by the improvements to the network that were proposed. The provision of a major new roundabout junction on the A148 with complex slipways and pedestrian crossing points, in the absence of street lighting, is considered unsafe. The proposed allocation at Knight Hill should, therefore, be deleted. |                                  | <b>Support is noted and welcomed.</b> A King's Lynn Transport Strategy is being prepared taking account of existing and proposed allocations. The Knights Hill allocation is dealt with in that section. <b>No change.</b> |



| Consultee                              | Nature of Response | Summary   | Consultee Suggested Modification  | Officer Response / Proposed Action  |
|--|--------------------|---|---|---|
| Parish Clerk West Winch Parish Council | <b>Support</b>     | West Winch Parish Council agrees with Policy no 5.5.2 as these routes are essential to the local economy, tourism and long distance through routes which includes West Winch and the Hardwick Roundabout. Extra congestion will impact on these important factors. NPPF paragraph 180 (a) and paragraph 18 refers. New roads must be wide enough to allow large vehicles to access, such as refuse lorries, oil tankers, deliveries etc. Primary corridors of movement must be protected. |   | <b>Support is noted.</b>  |
| Craig Barnes                           | <b>Object</b>      | Gladman largely accept the requirements of this policy in regard to development at the Strategic Road Network. Gladman is however concerned that part 1b of the policy fails to sufficiently reflect the wording of the NPPF with regard to the impact on the highway network. The policy outlines that development should be refused where it results in a significant adverse effect on the capacity of the Strategic Road Network.   | <p>The wording of Paragraph 109 of the NPPF is that development should only be prevented or refused on highways grounds where the cumulative impacts would be severe.</p> <p>Gladman recommend that the wording of the policy is amended to reflect the test of the NPPF to avoid any doubt of its consistency with national planning policy.</p> | <p><b>Agree - amend policy wording 1.b. to be in line with the NPPF para. 109 by replacing 'significant adverse effect' with 'severe cumulative impact'. Add supporting text as follows:</b></p> <p><b>"The NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This wording is reflected in the policy."</b></p> |