

Planning Inspectorate NSIP ref no TR010037 A47–A11 Thickthorn Jcnctn

Submission from Richard Hawker IP ref No 20028387 Date: 23 November 2021

Summary

My questions have not been answered fully, requiring more detail, particularly regarding traffic figures. My suggestions for minimising the scale and impact of the scheme, while still delivering improvements, have not been addressed.

Air quality is a concern which has been glossed over; ANY increase of pollutants, including CO₂, whether within current allowances, is surely unacceptable.

I request that a more detailed, and reasoned response is given.

I make comments about the inadequacy of consultation (although this, incorrectly in my opinion, is not part of the examination process).

1) Comments on Applicant's response to Relevant Representation

Q1 Common response B in REP1-004

The applicant repeats a description of the scheme and its benefits; it is this text which has elicited my relevant representation, so to repeat this is nugatory and vexatious. I am aware of the increase in jobs and houses planned, the supposed congestion at the junction and do not dispute that the scheme will, once completed, reduce that congestion, certainly at first. There is large uncertainty over the exact level of increase in traffic generated by new residential and commercial developments, and concern as to whether the scheme will indeed cater for it. The applicant's statement just reinforces part of the question's initial assumption; that the scheme is likely to be accompanied by increased traffic flow. This will be a combination of that generated by new developments, and the inevitable, but lower, increase which all such road schemes have witnessed, even in the absence of such nearby developments.

Nowhere does the applicant explain how the scheme will encourage a move from private car to public transport. I mention the Park and Ride facility; no response to my comment is offered.

APP-042 Air quality The predicted figures of NO and PM particulates have been based on the DM (Do-minimum – i.e. without the scheme, but with the other nearby schemes, North Tuddenham and Blofield, and Norwich Western Link, in place.) Whilst this is helpful, there should also be a comparison for the scenario that NONE of these other schemes are enacted, as against the DM and DS scenarios.

The fact that emissions will still be within statutory limits is some comfort; however, it does not answer the question "will emissions rise?". The calculations to assess this are hidden behind obscure government guidance, with no attempt to explain this to the layman. It is therefore difficult to generate any sensible assessment of the 'reasonableness' of the results. Surely the applicant can provide much more detail.

Common response A

This refers me to APP-140, which I cannot find. I am told that section 4.14 of Vol 7.1 (case for the scheme) details improvements in WCH facilities, but in fact that is in section 4.13. The main gain appears to be in making the new A47 footbridge into a bridleway and providing a cycle way on the

new Cantley Lane flyover. This last is a potential benefit, but making the bridge over the A47 into a bridleway, or at least to allow cyclists, could be achieved without building a completely new bridge. The approaches to the existing bridge could also be revamped to accord with the new max 5% gradient limit. (incidentally, the drawing of the proposed foot/cycle bridge details the carriageways as west and east in one location, and as south and north in another location.)

Thus the scheme cannot be claimed to give major encouragement for people to swap car for cycle or foot.

I am told that Section 5.4 of Vol 7.1 shows that the effect on Public Transport is 'neutral'. I cannot find any section 5.4. If the predicted effect on PT is indeed neutral, then it surely cannot be deemed to be aiding modal shift to public transport. Indeed, I can see no feature in the scheme which could make travel by bus more attractive. It is an accepted fact that, in general, enlargement of road systems results in increased use of the car, and surely there needs to be a formal assessment of the effect on public transport before the 'neutral' statement can be accepted; otherwise the statement should surely be withdrawn.

2) Comments on Applicant's response to RH's Written Representation

Applicant refers me to APP-036. Vol 5.2 Consultation report, with the bizarre title 'table evidencing regard had to statutory consultation responses'. This is prefixed by 'ANNEX M' but then is strangely followed by 'ANNEX N'. This details the various responses to statutory consultations in Jun-Jul 2019 and Aug-Sep 2020, though we are not told which comments come from which consultation, or indeed who was consulted in each consultation, and why there was a second one in 2020. Why was this information not given?

The overview states that there are three tables, but the contents page correctly lists four tables (2.1 – 2.4), and which part of the Planning Act 2008 they refer to; however, this is of little help to the layman who is not intimately familiar with that Act. Within tables 2.3 and 2.4, the consultee is identified by a number, but nowhere is its relevance explained.

There are complaints and comments from many people which generally ask the same thing; why could not these have been given a summary response as a separate additional table, to facilitate reading ? It is not feasible for most people to read a document of 203 pages; many people will want to find a response to their own specific comment, and not only is it impossible to find it quickly, one has to recognise one's own wording to be able to find it at all, as names of consultees are not shown.

Traffic information

I found a particular query of mine on digital p133 regarding traffic information. Once again, as with responses elsewhere, the applicant has failed to answer my specific question; where are the origin-and-destination and turning-count figures to support the road design proposals? Instead, the applicant repeats the statement, seen so many times, that the scheme will reduce congestion, increase speeds, etc.. I am aware of the statement, and I have actually not challenged it; I am simply looking for evidence to support the particular scheme design proposed. It is not good enough to say just that computer analysis has been done and it conforms with TAG guidance, as this makes it impossible for any interested party to become convinced that this scheme is the optimum one, or even necessary at all. The data I requested is not very complicated, and it must be possible to make it available, because without it, the computer model could not make any predictions of traffic flow numbers other than by rough estimation. That much is surely obvious.

There is no justification for NOT using more up-to-date data than the 2015 NATS. This is what the TAG Guidance requires. To say that NATS 2015 has been 'updated' is not the same at all. It is nearly 2022; by now surely DfT has had enough time to 'approve' NCC's figures, so that the NATS2019 can be used by HE.

Pressure on roundabout

My suggestions for relieving pressure on the roundabout do not seem to have been addressed at all. Obviously the value of any feature would depend upon relevant traffic information, which is not made available to the public, so any feature is offered as an idea, not a definite solution.

A slip road from the A11 N-bound to the Park and Ride would potentially take cars from the roundabout. Applicant's response is simply "no additional routes to access the P and R are required". Where is the data to support this statement? There can be no doubt that such a slip road WOULD reduce numbers of cars using the roundabout.

Another possibility would be to provide a link to and from the A47NW-bound carriageway, north of the roundabout, to the small roundabout at the end of the B1172. This slip road would clearly take traffic from the main roundabout. Why was not this suggestion analysed? Proper traffic figures are needed.

I raised the subject of proper traffic figures, including origin and destination, and their necessity to evaluate the need for large modifications to slip roads at the ISH 17 November, but ExA did not pursue this, instead focussing on the unsupported statement from the Applicant that the most stressed arm of the roundabout would be that from A11southbound.

Cantley Lane link Road

On digital page 115, there appears an attempt at justifying the proposed Cantley Lane Link, (not, I think, against my own consultation response) because it is claimed it would be impossible to continue to provide a link from Cantley Lane south to the enlarged slip road from A47 NW-bound to A11 S-bound. Surely I could have been offered at least this bald statement as a response to my Relevant Representation, instead of my having to trawl through 203 pages of APP-036 to find this. However, no further data is given to justify the statement; what has changed in the road design criteria which permitted the current arrangement, but now finds it unacceptable and/or impossible to achieve within the available land area (which looks to be extensive)? Such an arrangement would continue to provide access to and from the properties in Cantley Lane south, unrestricted by the low rail bridge, obviate the need for the Cantley Lane flyover and the redirection of Cantley stream. Surely this possible massive reduction in cost and environmental disruption deserves more than a cursory dismissal?

Quality of consultation

Reading APP-06, it is clear that many of the responses to the statutory consultations criticise the lack of clear and detailed information at the exhibitions, and lack of expert people. The applicant, instead of accepting that this must have been a problem, simply states that experts were indeed on hand, or refers the complainant to links to the current documentation. Surely this is not good enough? If there are so many complaints, there clearly was a problem, and the applicant needs to address it.

The low numbers of 'ordinary people' now engaging in the Examination in Public, particularly including the Open Floor Hearing (plus its clashing with the other two A47 schemes), surely indicates that many have lost faith that the system of consultation is capable of delivering convincing arguments, or satisfying requests for information.

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