

# A47/A11 Thickthorn Junction

**Scheme Number: TR010037**

**Volume 9**

## **9.13 Applicant's Response to submissions at Deadline 3**

The Infrastructure Planning (Examination Procedure) Rules 2010  
Rule 8(1)(c)

Planning Act 2008

December 2021

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Examination Procedure) Rules 2010**

A47/A11 Thickthorn Junction  
Development Consent Order 202[x]

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**9.13 APPLICANT'S RESPONSE TO  
SUBMISSIONS AT DEADLINE 3**

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<b>Rule Number:</b>	8(1)(c)
<b>Planning Inspectorate Scheme Reference</b>	TR010037
<b>Application Document Reference</b>	TR010037/EXAM/9.13
<b>BIM Document Reference</b>	HE551492-GTY-LSI-000-RP-ZL-40402
<b>Author:</b>	A47/A11 Thickthorn Junction Project Team, Highways England

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
Rev 0	December 2021	Deadline 4

## SWECO QA RECORD PAGE

**MANDATORY ACTION: Page to be removed from published pdf copy issued with DCO Application to the Planning Inspectorate.**

Revision	Purpose description	Originator	Checked	Approved	Authorised	Date
P01.01	Draft	---	---	---	---	---

## CONTENTS

1.	<b>Introduction .....</b>	<b>1</b>
2.	<b>Key Abbreviations.....</b>	<b>1</b>
3.	<b>Hethersett Parish Council .....</b>	<b>2</b>
4.	<b>Richard Hawker .....</b>	<b>4</b>
5.	<b>Big Sky Developments Ltd .....</b>	<b>7</b>

## 1. INTRODUCTION

- The Development Consent Order (DCO) application for the A47/A11 Thickthorn Junction scheme was submitted on 31 March 2021 and accepted for examination on 28 April 2021.
- The purpose of this document is to set out Highways England's (the Applicant) responses to submissions made at Deadline 3.

## 2. KEY ABBREVIATIONS

- The following common abbreviations have been used in the Applicant's submissions to the Examination:
  - dDCO = draft Development Consent Order
  - DMRB = Design Manual for Roads and Bridges
  - ES = Environmental Statement
  - ExA = Examining Authority
  - NPSNN = National Policy Statement for National Networks 2014
  - NWL = Norwich Western Link
  - the Scheme = the A47/A11 Thickthorn Junction

### 3. HETHERSETT PARISH COUNCIL

- The below submission on 19/11/2021 (see below link) from Hethersett Parish Council has been examined and the responses to the questions and concerns raised are provided in the table below.



Comment	Applicant's Response																																								
<p>1. The Actual need for this link road (Cantley Lane Link Road) has never satisfactorily been explained.</p>	<p>The Applicant reviewed five proposed options for the sideroad link, of which the Cantley Lane Link to the B1172 was the best performing option. The appraisal of all options is contained within the Sideroad Options Report available on the National Highways A47 Thickthorn project specific website. This Report was available during the Statutory Consultation.</p> <p>A summary of this appraisal can be found in Chapter 2 of the Case for the scheme (<b>APP-125</b>).</p>																																								
<p>2. The origins of this new link road at Cantley Lane will clearly require disturbance to otters, badgers, smaller mammals such as water voles and newts. Newts also have rights. We have not seen any proposals to ensure their safeguarding whilst the stream ex Thickthorn Hall pond is being diverted and bridged.</p>	<p>An ecological impact assessment was undertaken prior to the submission of the DCO Application for the Scheme, the results of which are contained in Environmental Statement (ES) Chapter 8 Biodiversity (<b>APP-045</b>). This Chapter provides a summary of the baseline ecology survey reports that were completed to inform the ecological assessment. The baseline survey reports are included in Appendices to ES Chapter 8 Biodiversity (<b>APP-087 to APP-097</b>).</p> <p>As detailed in Section 8.12.9 of Environmental Statement Chapter 8 (<b>APP-045</b>) where construction works are required around the habitat of identified protected species (for example, water voles and bats and if identified on site during preconstruction surveys, otter, Great Crested Newt (GCN) and badger), a licence to undertake proposed mitigation works will be sought from Natural England in advance of the construction works.</p> <p>With regard to newts, the Applicant has previously provided a response to the Examining Authority's First Written Questions (GC 4.3 in <b>REP2-006</b>) regarding the proposed intentions for GCN should they be found on site during surveys proposed for 2022.</p> <p>Preconstruction ecology surveys will be undertaken during 2022 as summarised in the Proposed Pre-Construction Environmental Survey Schedule submitted at Deadline 4.</p>																																								
<p>3. What traffic modelling has been accomplished? The road, if completed, will produce a new major 'through route' potentially attracting traffic from as far away as Hethel, Bunwell, Tacolneston and Wreningham, travelling via several unsuitable country roads and finally via that through Ketteringham village. There is a further potential attraction to vehicle drivers emanating from Mulbarton and East Carleton again using similarly unsuitable rural roads.</p>	<p>Section 4.2 of the Case for Scheme (<b>APP-125</b>) provides an overview of the modelling assessment. In summary the modelling assessment comprises a strategic multi-modal model. The model utilised for the assessment of the Scheme is called the Norwich Area Transport Strategy Model (referred to as the NATS Model). The NATS model, utilised for the preliminary design work has been developed in line with the DfT's Transport Appraisal Guidance (TAG).</p> <p>The NATS model covers all strategic traffic movements across Norwich as well as the wider Broadland and South Norfolk area.</p> <p>The base year and forecast years are listed as follows:</p> <ul style="list-style-type: none"> <li>2015 Base Year</li> <li>2025 Opening Year</li> <li>2040 Design Year (15 years after opening).</li> </ul> <p>In the future year scenarios, 2025 and 2040, both a 'without-Scheme' Do Minimum (DM) and a 'with-Scheme' Do Something (DS) network scenarios were modelled. Hence the comparison of the DM and a DS provides the assessment of the Scheme's impacts in a given forecast year.</p> <p>The table below shows the Annual Average Daily Traffic flows (AADT) for the following links around Ketteringham:</p> <ul style="list-style-type: none"> <li>High Street (south): just south of the village between Church Road and The Street</li> <li>High Street (east): just east of the village between The Street and Hethersett Road</li> <li>Ketteringham Lane: just north of the village between Low Street and Norwich Road</li> </ul> <p>In summary the results show overall minimal changes between the DM and DS in 2025, with slight increases on The Street and High Street (approx. 10-50 AADT). In 2040 there is an increase of approx. 200 AADT on The Street however this is off-set by a decrease in the same order of magnitude along Ketteringham Lane.</p> <table border="1" data-bbox="940 2228 1940 2487"> <thead> <tr> <th>Year:</th> <th>2015</th> <th colspan="3">2025</th> <th colspan="3">2040</th> </tr> <tr> <th>Road</th> <th>BY</th> <th>DM</th> <th>DS</th> <th>Change DS vs DM</th> <th>DM</th> <th>DS</th> <th>Change DS vs DM</th> </tr> </thead> <tbody> <tr> <td>High Street (south)</td> <td>1126</td> <td>1220</td> <td>1230</td> <td>10</td> <td>1318</td> <td>1353</td> <td>35</td> </tr> <tr> <td>High Street (east)</td> <td>988</td> <td>906</td> <td>955</td> <td>49</td> <td>903</td> <td>1117</td> <td>214</td> </tr> <tr> <td>Ketteringham Lane</td> <td>305</td> <td>480</td> <td>473</td> <td>-7</td> <td>696</td> <td>473</td> <td>-223</td> </tr> </tbody> </table>	Year:	2015	2025			2040			Road	BY	DM	DS	Change DS vs DM	DM	DS	Change DS vs DM	High Street (south)	1126	1220	1230	10	1318	1353	35	High Street (east)	988	906	955	49	903	1117	214	Ketteringham Lane	305	480	473	-7	696	473	-223
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<p>There is no traffic light, or roundabout proposed to avoid potential accidents at the B1172 'T' junction.</p>	<p>Traffic modelling undertaken demonstrates that the proposed ghost island junction works adequately for the expected traffic using this junction without increasing the risk of accidents. The speed limit on the B1172 will be reduced from National Speed Limit to 40mph, from the extents of the Scheme at the Colney Lane Junction to the Park and Ride/Services roundabout.</p>																																								
<p>The actual works in Cantley Lane will require two very expensive bridges, for the railway at height compatible with retrospective electrification and then the A11 itself.</p>	<p>The Cantley Lane Link Road requires two structures to cross the existing A11 and the new A11-A47 Connector Road. No works are required to any existing railway assets.</p>																																								

Comment	Applicant's Response
<p>Little consideration has been given to Station Lane which is already bisected by the A11. It would simply require a bridge to be constructed. This would mean that there would be no need for a new road coming out onto the B1172.</p>	<p>Modifications to Station Lane were considered in the Sideroad Options Report published with the consultation, and detailed in Section 2 of the Case for the Scheme (APP-125) but were discounted for the following reasons:</p> <ul style="list-style-type: none"><li>• Properties on Cantley Lane South would require additional detours of between 4.7km and 5.3km, (depending on the options chosen) in order to access the existing A11/A47 Thickthorn Junction.</li><li>• The detour noted above leading to adverse response times for emergency services, accessing Cantley Lane South.</li><li>• Access to properties on Cantley Lane South being restricted by the low railway bridge. With a headroom of 13 feet 6 inches, access would be restricted for agricultural equipment</li></ul>

#### 4. RICHARD HAWKER

- The below submission on 23/11/2021 (see below link) from Richard Hawker has been examined and the responses to the questions and concerns raised are provided in the table below.



Comment	Applicant's Response
<p>Q1 Common response B in REP1-004</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The scheme reduces congestion at the Thickthorn Junction, which in turn, will allow quicker journey times to / from the Park &amp; Ride facility as congestion induced delays are reduced. The applicant has worked with Norfolk County Council to ensure that the expanded Park and Ride Capacity has been accounted for within the traffic modelling. The scheme provides an access into the Park and Ride facility for cyclists and pedestrians from the Cantley Lane Link Road. Combined with the new cycle/footway bridge across the A47 and the segregated cycleway/footway along the Cantley Lane Link, this provides a safer, segregated route for pedestrians and cyclists to access the Park and Ride facility, avoiding the requirement to travel through the Thickthorn Junction.</p> <p>The air quality assessment contained in ES Chapter 5 (APP-042) considered emissions of Nitrogen Oxides (NO) and Particulate Matter (PM<sub>10</sub>) within the assessment. PM<sub>2.5</sub> was scoped out of the assessment as the UK currently meets its legal requirements for the achievement of the PM<sub>2.5</sub> air quality annual mean objective.</p> <p>As detailed in Section 5.4.8 to 5.4.12 of ES Chapter 5 (APP-042), the assessment considered scenarios including the baseline year, projected baseline year for long terms trends, opening year without the scheme (Do Minimum (DM)) and opening year with the scheme (Do Something (DS)).</p> <p>The local air quality assessment has been undertaken for the opening year as this is when pollutants are expected to be worst-case in terms of local air quality impacts, continued improvements in emissions are expected in future years. The local air quality assessment has compared the predicted NO<sub>2</sub> and PM<sub>10</sub> annual mean concentrations against the relevant air quality objectives (AQO), this approach is consistent with DMRB LA 105.</p> <p>The PM<sub>10</sub> concentrations were adjusted according to the methodology outlined in ES Appendix 5.2 (APP-076). There are no predicted exceedances of the PM<sub>10</sub> annual mean AQOs in the baseline year. The highest concentration was recorded at receptor 128 at 16.7 µg/m<sup>3</sup>. All annual mean concentrations are predicted to be below the 40 µg/m<sup>3</sup> AQO. In line with LA 105 and with no exceedances being reported in the baseline scenario, PM<sub>10</sub> was not modelled in the Do-Minimum and Do-Something scenarios.</p> <p>The full set of results for annual mean concentrations and the changes (increases and decreases) in NO<sub>2</sub> concentrations between the DM 2025 and DS 2025 opening years can be found in ES Appendix 5.3 (APP-076).</p> <p>The total annual mean NO<sub>2</sub> concentrations were estimated for the opening year with and without the Proposed Scheme at 155 sensitive human receptors (Figure 5.4 Sheets 1 to 6 (APP-055)). The NO<sub>2</sub> concentrations were adjusted following verification outlined in ES Appendix 5.2 (APP-076). The final concentrations were compared to the AQOs to determine whether there are any exceedances.</p> <p>There are no exceedances of the NO<sub>2</sub> annual mean objective at any of the selected sensitive human receptors in the opening year with and without the Proposed Scheme. Annual mean NO<sub>2</sub> concentrations were well below the AQO of 40 µg/m<sup>3</sup> across all modelled receptors in the DM 2025 and DS 2025 scenarios.</p> <p>The maximum modelled annual mean NO<sub>2</sub> concentrations in the DM and DS scenario were 19.7 µg/m<sup>3</sup> and 18.9 µg/m<sup>3</sup> respectively at receptor 63, located on Pople Street in the town of Wymondham (Sheet 1 of 6, Figure 5.4 (APP-055)). The decrease in concentration in the DS scenario is due to a reduction in Annual Average Daily Traffic (AADT) flow by over 400 vehicles once the Proposed Scheme is in place. The predicted NO<sub>2</sub> annual mean is below the AQO of 40 µg/m<sup>3</sup>.</p> <p>The greatest increase in annual mean NO<sub>2</sub> concentration is expected to occur at receptors 19 and 87. Receptor 19 (Sheet 1 of 6, Figure 5.4 (APP-055)), located on Kimberley Street in Wymondham indicates an increase in annual mean NO<sub>2</sub> concentrations from 12.8 µg/m<sup>3</sup> to 13.5 µg/m<sup>3</sup>, an increase of 0.6 µg/m<sup>3</sup>. Kimberley Street is predicted to experience an increase of 1105 AADT vehicles with the Proposed Scheme in place, triggering the traffic screening criteria. Receptor 87 (Sheet 2 of 6, Figure 5.4 (APP-055)) located near Station Lane, adjacent to the A11 near Hetherset, indicates an increase in annual mean NO<sub>2</sub> concentrations from 15.0 µg/m<sup>3</sup> to 15.6 µg/m<sup>3</sup>, also an increase of 0.6 µg/m<sup>3</sup>. The A11 is predicted to experience an increase in AADT by 4238 vehicles with the Proposed Scheme in place, again triggering the traffic screening criteria. However, the predicted annual mean concentrations are below the AQO of 40 µg/m<sup>3</sup> in both the DM and DS scenarios.</p> <p>The greatest improvement in annual mean concentrations is expected to occur at receptor 61 (Sheet 1 of 6, Figure 5.4 (APP-055)) located in Wymondham next to a road which is predicted to experience a reduction in AADT flows by 2341 vehicles, resulting in an</p>



Comment	Applicant's Response
	<p>improvement in annual mean NO<sub>2</sub> concentrations. Receptor 61 shows a decrease from 12.6 µg/m<sup>3</sup> in the DM scenario to 11.8 µg/m<sup>3</sup> in the DS scenario.</p> <p>Overall, 50 of the 155 receptors are expected to show a deterioration in air quality, with 88 showing an improvement in air quality with the Proposed Scheme in place. The remaining 17 receptors experienced no change in concentrations with the scheme in place. All concentrations are well below the AQO of 40 µg/m<sup>3</sup>.</p>
<p>Common response A</p> <p>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. )</p> <p>Thus the scheme cannot be claimed to give major encouragement for people to swap car for cycle or foot.</p> <p>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.</p>	<p>The reference to APP 140 for the Case for the Scheme in Common Response A should read APP-125. The existing footbridge is not suitable for either cyclists or equestrians. The bridge structure itself has steps, which means just amending the approach ramps to a maximum of 5% would not solve this problem. The current width of the footway across the bridge is 1.8m and the parapet height is 1.1m, which is not in accordance with current guidance for shared footway/cycleways or bridleways. If the existing structure was retained, an additional structure would be required to span the new A11-A47 Connector Road, which would require additional land take, which the Applicant has sought to minimise, whilst providing a fully compliant structure, suitable for pedestrians, cyclists and equestrians.</p> <p>Please refer to table 5.3 on page 93 of the Case for the Scheme (<b>APP-125</b>) that summarises Social Impacts of the Scheme, specifically that public transport is not affected by the Scheme, therefore the impact is neutral.</p> <p>Whilst the impacts on public transport are neutral, the modal shift of transport from cars to public transport and non-motorised travel is not an objective of the Scheme.</p>
<p>Comments on Applicant's response to RH's Written Representation</p> <p>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?</p> <p>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.</p> <p>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.</p>	<p>The Consultation Report (<b>APP-023</b>) details how the Applicant has complied with the consultation requirements set out in the Planning Act 2008. Guidance about this Report and the pre-application process, including statutory consultation, is found in the 'Department for Communities and Local Government's (now known as the Ministry for Housing, Communities and Local Government) document Planning Act 2008: guidance on the pre-application process' (DCLG guidance).</p> <p>Names of consultees are not provided in Annex M 'Table Evidencing Regard had to Statutory Consultation Responses' as this would not be consistent with current General Data Protection Regulations. They are instead assigned a number.</p>
<p>Traffic information</p> <p>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 originand-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.</p> <p>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</p>	<p>Section 4.2 in the Case for the Scheme (<b>APP-125</b>) details the Baseline data collection for the traffic modelling assessment. The baseline dataset includes the collection of volumetric traffic count, network and vehicle journey time data sources. This information is used in the model development process to calibrate and validate the baseline model. The fully calibrated and validated base year model then provides a stable basis to undertake the future year assessment of the Scheme. As such the Applicant does not deem it necessary to release the collected traffic data. Figure 4.13 presents the Average Annual Daily Traffic flows for the scheme at the Baseline Year and in the Do Minimum and Do Something modelling scenarios.</p> <p>The 2019 NATS model has not yet been approved by the Department for Transport. On that basis, NATS 2015 remains the approved model and so was used in the Applicant's assessment.</p> <p>However, the Applicant has undertaken a comparison between the NATS 2015 and 2019 traffic models based on the total annual average daily traffic (AADTs) summed across the major links around the Thickthorn Junction. In summary, the comparison indicates that there is a difference of 3.4% AADTs between the NATS 2015 model and the NATS 2019 model. An increase in traffic of 3.4% is broadly in line with the expected traffic growth over a four-year period (2015-2019). It follows that the comparison shows a good degree of consistency between the two models at an aggregate level.</p>

Comment	Applicant's Response
<p><b>Pressure on roundabout</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The Case for the Scheme (<b>APP-125</b>) provides modelled base year AM and PM peak hour traffic flows, delays and V/C in Section 4.6 (<b>APP-125</b>). In section 4.8, the Case for Scheme presents the change in traffic flows, delays and V/C between the DM and DS scenarios for the AM and PM peak periods in 2025 and 2040.</p> <p>As stated in 4.8.5 the results provided indicate that the introduction of the Scheme would reduce the overall traffic approaching the roundabout to an extent where the traffic signal-controlled approach arms will operate without any significant over capacity delays.</p> <p>In addition, journey time results are presented in the Case for Scheme Section 4.8 (<b>APP-125</b>). As stated in 4.8.5 the results clearly show the Scheme will provide substantial journey time savings for eastbound traffic movements in both the AM and PM peaks. These savings are due to the capacity enhancements provided by the new connector road (eastbound direction). In turn this will also improve A11 cross junction journey times, as a reduced volume of traffic will approach the Thickthorn Junction because A11 to A47 movements will divert to the new connector road.</p> <p>In summary, the results of the modelling assessment show that the Scheme improves the overall operation of the network, in terms of average speeds (See Section 4.8 : 4.8.14), as well as improving A47 and A11 peak hour journey times (by up to approximately 35% depending on direction and time period, see Section 4.8: 4.8.7 to 4.8.12).</p> <p>Traffic using the Thickthorn Junction to access the Park and Ride facility is not a major contributing factor to the congestion currently experienced on the A11 Northbound approach to the junction. The Applicant has liaised extensively with Norfolk County Council throughout the development of the proposed scheme and it was agreed that an additional access into the Park and Ride facility via a dedicated slip road from the A11 Northbound was not required.</p> <p>The Interested Party's suggestion for access from the A47 NW is not sufficiently detailed to be considered for a detailed review. The Applicant would like to note that a large number of alternative solutions were investigated prior to the Preferred Route Announcement.</p>
<p><b>Cantley Lane link Road</b></p> <p>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 ?</p>	<p>Any new junction with the trunk road network would be subject to the requirements of the current design standards, which might not have been applicable at the time of the construction of the current access arrangements, specifically DMRB CD 123 clause 4.1.1 which states that "A direct access should not be provided on trunk roads where it is feasible to provide an alternative access onto the local road network".</p> <p>One of the key objectives of the scheme is to make the network safer for motorists and for those living near the junction by improving operational safety issues at the junction.</p> <p>Further to being able to provide a junction in accordance with the current design standards, there are several practical reasons why an access directly off the A47 westbound exit slip road would not be desirable. Vehicles wishing to enter the roundabout would have to cross several lanes of traffic, including the segregated left turn lane over a short length of road, which could lead to safety issues. Secondly, traffic could only enter the junction from the A47 westbound, which would lead to a considerable detour for traffic originating from the north, west or south.</p>
<p><b>Quality of consultation</b></p> <p>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.</p> <p>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.</p>	<p>The Applicant has followed all necessary processes set out in the Planning Act 2008 and has adapted to virtual delivery during the pandemic in compliance with Covid-19 restrictions. Regular engagement was held with the directly affected parish councils virtually to keep them informed of scheme developments. The Applicant does not have control on the scheduling of dates set for Examination events on this or other schemes.</p>

## 5. BIG SKY DEVELOPMENTS LTD

- The below submission on 23/11/2021 (see below link) from Big Sky Developments Ltd has been examined and the responses to the questions and concerns raised are provided in the table below.



Comment	Applicant's Response
<p>The answer from the Applicant, that plot 7/7c is the area required for the scheme at this stage in the design process is understood, but we remain concerned that the Applicant indicates there is no alternative location for the welfare facilities.</p> <p>We are not convinced the Applicant has tried hard enough to find an alternative solution and simply referring this to a financial settlement is unsatisfactory. The owner does not consider the Applicant's scheme should be able to prevent or delay the construction and sale of much needed housing.</p> <p>The Applicant has indicated in meetings that there is insufficient land within the scheme Red Line to provide an alternative location for the facilities, whereas we suggest it may well be possible for alternative land to be made available.</p> <p>If replacement land is outside the Red Line, in the time available the Applicant can apply either to amend the red line or apply for a freestanding planning permission for the use of other land for welfare purposes. The owner has detailed planning permission for housing on plot 7/7c which will be built out through 2023 and sold during 2024, with the expected withdrawal from site by December 2024. The A47 Thickthorn Junction scheme proposes works in this location from early 2023 to December 2024 if there are no delays, so the two uses will coincide.</p> <p>As the plot reference 7/7c will occupy land designed for three houses, after the Applicant has left site, the owners will have to ensure reasonable ground conditions remain and that there are no unintended consequences from the occupation, whether compaction, new contamination from fuels or otherwise relating to construction contract penalties and excess preliminary costs.</p> <p>If the site (plot 7/7c) is to be used for welfare facilities with portaloo and an office or welfare base, it seems unlikely that the site needs to be 1.7 acres.</p> <p>As an example, this use may well be accommodated:</p> <ol style="list-style-type: none"> <li>along the hard surfacing of Cantley Lane, a closed off road used for public access, which can be maintained with a temporary diversion.</li> <li>on a site limited to the south of the overhead UKPN overhead pylon line which is reserved for public open space after completion. It would not prevent construction, and the delays would be reduced.</li> </ol> <p>If the Applicant can persuade their contractors, or they can be pressurised to omit this area or time limit their occupation, we request that a deadline is set for removal of the compound so the landowners can provide guarantees to contractors and house buyers.</p>	<p>A number of alternative solutions were considered for the location of the site compound in this area, as detailed below:</p> <ul style="list-style-type: none"> <li>Using the football pitch 9, this was discounted due to the timings for delivery of the football pitches that Big Sky Developments are obliged to meet under their Section 106 agreement.</li> <li>Area on Cantley Lane South near the existing footbridge, discounted due to advance works required on the new bridge embankment and abutments with settlement periods leaving no space</li> <li>Area along Cantley Lane North, discounted due to this being highlighted as dissected for the logistical route and ensuring a one way access and egress point onto the A47 for all construction traffic on this side of the development</li> <li>Area south of the overhead pylon, discounted due to the access route of the A47 for the construction traffic and also for being too close to a 10-15m excavation required to place the wingwalls for the new box</li> </ul> <p>The Applicant would like to highlight the extent of the works in this area and also the requirement of the Contractor appointed under CDM Regulations 2015 as Principal Contractor and Principal Designer and their duties to Health and Safety under these regulations. As such, a welfare area cannot be provided in close proximity to a 10-15m excavation, it must have sufficient clearance of the haul route to be used for the removal of plant, equipment and excess soil, and a welfare area that is within a suitable distance for staff to utilise and free from any interaction with the overhead high voltage power cables.</p> <p>In terms of the works, the Applicant notes that there will also need to be sufficient space within the working area to store large plant items such as excavators, piling rigs and cages, bucket loaders, concrete wash out areas, vehicle wash out areas and a spoil area as indicated on all plans and shown in discussions with Big Sky as an indicative orange rectangle, whilst also maintaining a haul route through the works for traffic to access and exit site safely.</p> <p>The Applicant is of the view that using the area in question for storage of welfare cabins and ablution facilities will ensure that there will be no impact or unintended consequences in terms of contamination and that the land will be returned to green field status.</p> <p>Unfortunately, due to the restrictive nature of this area, there is no land outside of the DCO boundary that has been identified as suitable for this use. The Applicant has minimised its impact as much as possible within the area.</p>