

A47/A11 Thickthorn Junction

Scheme Number: TR010037

Volume 9

9.18 Applicant's Response to submissions at Deadline 4

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]

**9.13 APPLICANT'S RESPONSE TO
SUBMISSIONS AT DEADLINE 4**

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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. ENVIRONMENT AGENCY

- The below submissions on 06/12/2021 (see below link) from Environment Agency has been examined and the responses to the questions are provided in the table below.

[REDACTED]

Comment	Applicant's Response
Requirement 8 Surface water drainage We note and welcome the addition of the Environment Agency as a named consultee in respect of part (2) of R8; this is in addition to being a named consultee for part (1). This will ensure that we are able to review any required amendments to the previously approved details. We can confirm that we are satisfied that this issue is now resolved.	The Applicant acknowledges these comments and has nothing further to add.
Comments on document 6.3 Environmental Statement Appendix 13.1 – Flood Risk Assessment Rev 1	The Applicant acknowledges these comments and will engage with the relevant affected landowners. An update will be provided at the next deadline.

4. RICHARD HAWKER

- The below submission on 06/12/2021 (see below link) from Richard Hawker has been examined and the responses to the questions and concerns raised are provided in the table below.

[Redacted]

Comment	Applicant's Response
<p>1) I am grateful to the applicant for summarising the oral submission I made to the Issue-Specific hearing on 17 November, and providing a response. Whilst it is interesting to note that the traffic model has been calibrated and validated, for the lay public this has little meaning without explanation of how this process is achieved, which we have not been given. Simply producing an anticipated level of traffic flow gives no understanding of the current traffic situation, nor of how the proposed scheme will alter it. I do not understand why the applicant 'does not deem it necessary' to release this information, when the intention of this examination is surely to demonstrate clearly, in public, that the background to the scheme is sound. I call upon the ExA to support my request for this information.</p> <p>2) Recent experience with traffic modelling in this vicinity has proved remarkably inaccurate. Below, as Appendix 1. I show predicted and actual traffic flow figures for the recently-constructed Norwich Northern Distributor Road. The accuracy is generally outside the limits apparently deemed acceptable by traffic modellers. Note that where figures are not shown for the roads listed, this is because no relevant figures are available – figures have not been chosen selectively for those which show large deviations.</p> <p>3) My earlier statement has not been adequately addressed: the applicant claims that the roundabout is congested, and this is the root problem to be solved, then an analysis of the traffic using it, and how this could be reduced or diverted, is an obvious first step. I cannot see that this has been addressed systematically; I note the reference to APP-127, but would appreciate being directed to particular paragraphs of this document which show this. I can find no reference to the particular design ideas I suggest, such as providing slip roads to take traffic away from the roundabout. A proper origin and destination analysis could indicate way to provide alternative routes for traffic, avoiding the junction altogether. When the spending of so many millions of public money is being considered, this would seem essential. Why cannot this be done? (Please also note my submission of 23 November 2021)</p>	<p>1) Please see the Applicants 'Response to submissions at Deadline 3' (REP4-026) that address the representations made by Mr Richard Hawker regarding traffic data.</p> <p>2) The Applicant cannot comment on data from another Scheme. The data used for the Thickethorn scheme has been collated in accordance with industry standards and TAG Guidance and the modelling has been undertaken by a team of experienced transport planning and modelling professionals.</p> <p>It should be noted that the Applicant does not recognise the source of the data 2017 and 2018 provided in Mr Hawkers Appendix to the document submitted (link shown above). The NATS modelled data in Chapter 4 of the Case for the Scheme (APP-125) is for a base year of 2015 and future years 2025 and 2040. The Applicant can therefore not comment as it is not part of the Case for Scheme.</p> <p>However, as discussed in 4.3.1 of the Case for the Scheme (APP-125), the NATS model includes AM and PM peak hours (08:00 to 09:00 and 17:00 to 18:00) and an Inter-Peak (IP) average hour (10:00 to 16:00) time segments. The model calibration is undertaken on the basis of the AM, IP and PM peak hour time periods, rather than on a daily basis.</p> <p>The base model was developed in accordance with the DfT's TAG Unit M3.1: Highway Assignment Modelling (2020). In general, it is standard practice to undertake the model calibration, including applying GEH, based on hourly traffic rather than across 24hrs.</p> <p>An overview of the current operation of the road network, based on the base year modelling exercise, can be found in Section 4.6 of the Case For the Scheme (APP-125)</p> <p>3) The Applicant addressed this comment at Deadline 4. Please see the Applicant's 'Response to submissions at Deadline 3' (REP4-026) that addresses the representations made by Mr Richard Hawker regarding alternative scheme solutions.</p>

5. NORFOLK COUNTY COUNCIL

- The below submission on 06/12/2021 (see below link) from Norfolk County Council has been examined and the responses to the questions and concerns raised are provided in the table below.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Comment	Applicant's Response
<p>Issue Specific Hearing1 Sessions 1</p> <p>On growth factors the council would wish to be covered in the modelling (38.48 in the transcript)</p> <p>This is well defined DfT guidance on what developments (residential and commercial) to include in the strategic traffic modelling of future year scenarios, a process which uses an Uncertainty Log technique. NCC colleagues worked with National Highways to identify the status of likely developments to determine whether they should be included or not. Based on the information NCC supplied, we are confident that National Highways consultants have followed the DfT guidance and modelled the amount of specific growth based on the developments we advised and then applied factors to control the overall growth, so it did not exceed government forecasts.</p>	<p>The Applicant acknowledges these comments and has nothing further to add.</p>
<p>On Cantley Lane Walking, Cycling and horse riding improvements (58.01 in the transcript)</p> <p>In regard to Cantley Lane there are currently no funded schemes or identified schemes without funding. There is currently a proposal for an extension to Thickthorn Park and Ride.</p> <p>The route is identified in the draft Greater Norwich Local Cycling and Walking Infrastructure Plan (LCWIP). This was consulted on in May and June 2021. The outcome has been reported to our infrastructure & Development Committee and will go to Cabinet for approval early in the new year.</p> <p>Cantley Lane is identified as a neighbourhood route but does not have any projects identified for it. The route and those identified projects in the short to medium term in Greater Norwich are shown on the following plan.</p>	<p>The Applicant acknowledges these comments and has nothing further to add.</p>
<p>Issue Specific Hearing 1 Sessions 2</p> <p>On 30 year compensation strategy to complement the environmental master plan (44.59 in the transcript)</p> <p>The reason that 30 years was used was because this is what we would expect for a compensation strategy on our own land, based on the fact that we require commuted sums from developers for a 30 year maintenance period under S278 of the Highways Act and that compensation strategies for veteran tree removal often include ongoing woodland maintenance both inside and outside the red line of a development depending on the strategy requirements.</p> <p>However, the Woodland Management Planning Grant (WMP) is a one-off payment to create a 10 year Woodland Management Plan which is UK Forestry Standard (UKFS) compliant. Therefore a 10 year compensation strategy with tree and woodland management plans may be more appropriate, however again, we can only recommend this rather than enforce it for this scheme (as this does not affect county council owned land).</p> <p>To summarise, although Norfolk County Council would recommend a 30 year compensation strategy, if it is not considered reasonable, a compensation strategy in accordance with the NPPF (2021) Section 180c will be required to address the loss of veteran trees.</p>	<p>The Applicant acknowledges these comments and has nothing further to add.</p>