

A47/A11 Thickthorn Junction

Scheme Number: TR010037

Volume 9

9.19 Applicant's Response to submissions at Deadline 5

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

Planning Act 2008

January 2022

Infrastructure Planning

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

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

**9.19 APPLICANT'S RESPONSE TO
SUBMISSIONS AT DEADLINE 5**

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Author:	A47/A11 Thickthorn Junction Project Team, Highways England

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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 5.

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. CLIMATE EMERGENCY POLICY AND PLANNING (CEPP)

- The below submission on 21/12/2021 (see below link) from Climate Change Emergency Policy and Planning (CEPP) has been examined and the responses to the questions and concerns raised are provided in the table below.



Comment	Applicant's Response
<p>I find that the carbon quantification, based on the core scenarios in the traffic models in the Transport Case, is without doubt a solus quantification, and not cumulative. The carbon assessment based on these quantities is also a solus only assessment, and not a cumulative assessment. Since an assessment of the cumulative GHG emission impacts of the Scheme is legally required under the EIA Regs, and is not provided anywhere else in the Environmental Statement, this failing alone renders the Environmental Statement unlawful.</p>	<p>Annex 1 of REP3-019, Applicant's written submission following ISH1, provides an overview of the approach that is required for the determination for the DCO Application in accordance with Section 104 of the Planning Act 2008. That submission also describes the cumulative assessment which has been carried out in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.</p> <p>With regards to carbon quantification, the assessment undertaken in ES Chapter 14 Climate, Rev.1 (REP3-006) has assessed the change in GHG emissions between Do Something (DS) and Do Minimum (DM), which is the approach described in the EIA Regulations. The DM baseline is described in Section 4.4 of ES Chapter 4 – Environmental Assessment Methodology (APP-041), which states that the future baseline (used for DM) considers changes which are certain to occur before the implementation of the Proposed Scheme, and entirely independent of the Proposed Scheme.</p> <p>Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states the following should be given with regards to the required baseline:</p> <p>A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.</p> <p>The future baseline used for the DM considers this likely evolution and in compliance with traffic modelling guidance from the Department for Transport (DfT) Transport Appraisal Guidance (TAG), developments and transport schemes identified in the uncertainty log with the likelihood of at least 'near certain' or 'more than likely' were included in the core scenario forecast, reported in Chapter 4 'Transport Assessment' within the Case for the Scheme (APP-125). As such, the DM includes other A47 schemes and the NWL.</p> <p>This enables a consistent assessment approach to be taken through the ES and the traffic model that informed the scheme design and economic case. This provides an assessment of the cumulative effects of the scheme through the consideration of the GHG emissions impact of the scheme with other relevant committed developments within the traffic model.</p> <p>This has been the standard approach for all traffic model dependent EIA assessments (e.g. Air Quality, Noise, Water and Climate). This applies to all highways scheme EIAs previously approved under the Planning Act 2008.</p>
<p>I request that the ExA request the following additional information from the Applicant:</p> <ul style="list-style-type: none"> Any other roads schemes which are included in the DM and DS models beyond the A47BNB, A47THI and NWL. Traffic modelling, carbon quantification and assessment based on the three EIA Regs compliance-oriented traffic models which I define at Table 2. This is required for EIA Regs compliance. This modelling should be provided for both the NATS 2015 base year model architecture and the NATS 2019 base year model architecture as the Applicant has indicated they have access to NATS 2019. An analysis of which other environmental factors, for example noise, have no cumulative assessment due to the error (as explained in detail) of using performance-oriented traffic models as a basis for environmental impact assessment. An explanation of inconsistencies between the traffic modelling uncertainty log and Cumulative Effects Assessment short and long lists. For algorithmic transparency, requires a fuller explanation of how the traffic models used by the Applicant for the Environmental Assessment function and link together. 	<p>As described previously, the assessment undertaken in ES Chapter 14 Climate, Rev.1 (REP3-006) is compliant with EIA Regulations and as such the additional assessments requested by CEPP will not be provided as the information provided by the Applicant is sufficient to determine the impact of the scheme against the requirements of the NN NPS.</p> <p>With regards to the Cumulative Effects Assessment, the Blofield and Tuddenham schemes are not mentioned specifically in the long or short list for the A11-A47 Thickthorn scheme and are not assessed in the wider CEA in Chapter 15. This is described in ES Chapter 15 (APP-052) in the following:</p> <p><i>15.3.19 Other projects occurring along the A47 were initially considered following scoping opinion feedback. However, none are within the zone of influence (ZOI) and therefore not progressed further in this assessment.</i></p> <p><i>15.3.26 A search for developments in the south east of England was carried out using the Planning Inspectorate website. Developments within the ZOI were included in the long list of developments as shown in Table 1 of ES Appendix 15.1 (TR010037/APP/6.3).</i></p> <p>Table 15-1 'Study area extents' scopes the traffic model assessments out of the cumulative ZOI that the above relate to. The Uncertainty Log referenced in the Case for the Scheme (APP-125) includes other projects that may impact the traffic model. Tuddenham and Thickthorn have been considered as part of the traffic model and are therefore part of the air quality, noise, carbon assessments in their respective ES Chapters.</p> <p>With regards to the NATS 2015 and NATS 2019 models, The Applicant responded in the Deadline 1 submission document '9.2 Applicant's Response to Relevant Representations' (REP1-004) – Common Response E.</p>

Comment	Applicant's Response
<ul style="list-style-type: none">• A response from both the Applicant, and from Norfolk County Council, to my questions in my written representation, REP1-029, 114-122 about the NATS 2015 and NATS 2019 models, the inconsistencies between them, and the marked difference in traffic volumes and changes in increases/decreases in traffic over time between the two models.	