

# A47/A11 Thickthorn Junction

**Scheme Number: TR010037**

**Volume 9**

## **9.23 Applicant's Responses to ExA's Request for Additional Information under Rule 17**

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

Planning Act 2008

March 2022

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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**9.23 APPLICANT'S RESPONSES TO ExA's REQUEST FOR ADDITIONAL  
INFORMATION UNDER RULE 17**

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**SWECO QA RECORD PAGE**

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

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## **1 INTRODUCTION**

- 1.1.1 The Development Consent Order (DCO) application for the A47/A11 Thickthorn Junction was submitted on 31 March 2021 and accepted for examination on 28 April 2021.
- 1.1.2 The purpose of this document is to set out Highways England's (the Applicant) comments on the ExA's request for additional information under Rule 17 issued on 26 January 2022.
- 1.1.3 The following sections present the responses where concerns or requests are made warranting provision of additional information or clarity by the Applicant.

## **2 KEY ABBREVIATIONS**

- 2.1.1 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 THE EXAMINING AUTHORITY

3.1.1 The below submission of 26 January 2022 (see below link) from the Examining Authority has been reviewed and initial responses to the questions and concerns raised are provided in the table below.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010037/TR010037-000739-220126%20TR010037%20A47%20A11%20Thickthorn%20Rule%208,%2013%20and%2017.pdf>

Question	Applicant's Response
<p>1 The ExA acknowledges that the Secretary of State for Transport (SoST) is requesting additional information on other highway projects (for example A1 Morpeth to Ellingham, A38 Derby Junctions scheme which was subject to High Court challenge, M25 Junction 28, and others) to assist a decision on climate change related impacts having regard to cumulative assessment concerns.</p> <p>In those circumstances and based on current submissions, the Applicant is requested to provide a Climate Change Position Statement which further addresses climate change and cumulative assessment of climate impact information issues being referred to for this scheme.</p> <p>The statement should provide (or, to the extent that it has already been provided, identify) its assessment of the cumulative effects of Greenhouse Gas emissions from the scheme with other existing and/or approved projects on a local, regional and national level on a consistent geographical scale (for example an assessment of the cumulative effects of the Roads Investment Strategy RIS 1 and RIS 2 at a national level). This should take account of both construction and operational effects; identify the baseline used at each local, regional and national level; and identify any relevant local, regional or national targets/budgets where they exist and how the assessment complies with these (including the carbon budgets, the 2050 zero target under the Climate Change Act 2008, and the UK's Nationally Determined Contribution under the Paris Agreement). It should be accompanied by reasoning to explain the methodology adopted, any likely significant effects identified, any difficulties encountered in compiling the information, and how the assessment complies with the Environmental Impact Assessment Regulations. Confirmation should be given that the statement has been prepared by a competent expert. It is requested that links be provided to any documents referenced and their relevance fully explained.</p>	<p>A position statement has been included in this deadline submission 'Position Statement on Climate Change' (<b>TR010037/EXAM/9.26</b>)</p>
<p>The ExA also notes that Written Question CC.1.1 (i), (ii), (iii) has not been answered in full in earlier submissions and is seeking a response.</p> <ul style="list-style-type: none"> <li>i. Chapter 14 Climate of the ES [APP-051] discusses how the proposed Scheme considered manages its effects on the climate (i.e., carbon emissions) and potential vulnerability to climate change (i.e., resilience to projected climate changes). Is there any more detail or reasoning on likely climate change effects to be submitted taking into account other planned schemes and any changes that may have occurred?</li> <li>ii. ES Appendix 14.1 Embodied Carbon Report [APP-116] specifies that embodied Carbon emissions for the Scheme have been calculated for the design using the Highways England Carbon Tool. Have there been any changes to the baseline information? If not, is the present information being relied upon an accurate best estimate?</li> <li>iii. What are the potential implications arising from any future estimated increases in electric vehicles using public roads in the overall planning of the scheme?</li> </ul>	<p>Please see below the Applicants full response to Question CC.1.1 i), ii) and iii). Responses i) and ii) were included in the Applicant's Response to Examining Authority's First Written Questions (<b>REP02-006</b>).</p> <ul style="list-style-type: none"> <li>i. Previous text within the Applicant's Response to Examining Authority's First Written Questions (<b>REP02-006</b>) have addressed the issue of climate change effects and other schemes. This is supported by the response to the Information Request - under Rule 17 which sets out in detail the Applicant's position on Cumulative Effects of Greenhouse Gas Emissions from the Scheme with other Existing and/or Approved Projects and how the assessment complies with EIA regulations and wider carbon policies.</li> <li>ii. There have been no changes to the baseline information provided in ES Appendix 14.1 Embodied Carbon Report (<b>APP-116</b>) and this still provides a best estimate of carbon emissions from construction. As discussed in Section 14.9 of ES Chapter 14 – Climate (<b>REP3-006</b>), mitigation actions will be taken during PCF Stage 5 and a further carbon baseline will be based upon the Proposed Development's final design.</li> </ul> <p>iii) Using traffic model data for the affected road network, end user (traffic) greenhouse gas emissions have been calculated for the Scheme using the DfT's 'Transport Appraisal Guidance Methodology, Unit A3 Environmental Appraisal'. This modelling used to support the assessment accounts for predicted proportions of the vehicle types, fuel type, forecast fuel consumption parameters and emission factors according to DfT. These data tables include forward forecasting of different vehicle types (such as electric) for future years. The use of these data tables is considered best practice for calculating end-user (traffic) greenhouse gas emissions, however, the forecast of vehicle types is still conservative against proposed Government plans meaning the uptake of electric vehicles is expected to be greater than the data tables.</p> <p>This assessment allows for carbon emissions to be judged at the baseline year (2015), opening year (2025) and design year (2040). Using these figures, estimations are made to calculate emissions during these time periods in order to assess over the respective carbon budgets. These figures also assume that end</p>

	<p>user emissions do not change beyond 2040 over the remainder of the 60-year appraisal. It is expected that the uptake of zero emission cars beyond this period will be significantly higher than those provided within the Transport Appraisal Guidance data tables which mean the end user emissions (over the 60-year appraisal period) are likely to be the worst-case scenario.</p>
<p>2. The Applicant's response to further written question CA.2.7 indicated discussions are ongoing pursuant to Section 135 of the PA2008 for matters relating to the Compulsory Acquisition of an interest in land held by or on behalf of the Crown. It is acknowledged that consent under Section 135 (1) and (2) is outstanding and needs to be obtained from the Crown authority before the close of the Examination.</p> <p>The ExA encourages that the issue should not be left until 23 March 2022 in the event that the Examination closes prior to this date. The ExA requests that the relevant consents are obtained/completed from the Crown authority and provided by the Applicant by 14 March 2022 (Deadline 9) in the interests of certainty.</p> <p>The submission of a Crown Land Position Statement giving all relevant details is requested from the Applicant by 3 March 2022 (Deadline 8) setting out progress for relevant plots against the relevant authority for those.</p>	<p>The Applicant has been in continuous discussions with the Government Legal Department in relation to obtaining the required Crown consents. The Applicant has not received any indication to suggest that the Crown consents will not be forthcoming and a copy of the consents are expected to be received before the close of the Examination. The Applicant does not anticipate that there would be any impediment to the carrying on of the Scheme in the unlikely event that Crown consent was not forthcoming.</p>
<p>3. The Applicant, South Norfolk District Council, Norfolk County Council and Norwich City Council are requested to inform the Examination of any relevant updates to the emerging Greater Norwich Local Plan (GNLP) for the conurbation currently subject to formal examination. Those parties are also requested to confirm whether there are any forthcoming policy changes being pursued which raise new material issues for the land which the Proposed Development is located or in the immediate vicinity of the land concerned. In the event there are any material planned local policy changes those would need to be set out in full giving an assessment of the subsequent impact. An overview of any relevant strategic transport aim changes compared to the present local plan should also be provided.</p>	<p>The Applicant set out its approach to the Greater Norwich Local Plan in the recent ISH2 (03/03/2022) and will provide confirmation in writing in its summary of ISH2. South Norfolk District Council also provided an updated at ISH2 and the Applicant considers that the Councils are better placed to provide relevant updates to the examination.</p>