

A47/A11 Thickthorn Junction

Scheme Number: TR010037

Volume 9

9.33 Applicant's Responses to Submissions at Deadline 8

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

Planning Act 2008

March 2022

Infrastructure Planning

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(Examination Procedure) Rules 2010**

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

**9.33 APPLICANT'S RESPONSES TO SUBMISSIONS
AT DEADLINE 8**

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

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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 responses to submission at Deadline 8 issued 07 March 2022:
- Richard Hawker (**REP8-019**)
- 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 RICHARD HAWKER

3.1.1 The below submission made on 7th March 2022 (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>Summary</p> <p>I describe serious confusion about accident predictions and costs.</p> <p>I still have major misgivings about the accuracy of prediction of traffic flows and counts, as their basis has still not been explained.</p> <p>Road Safety</p> <p>The applicant, in REP7-007, refers me to the accident data in APP-125, section 4.12. This was in response to my asking about accident occurrences in the slip road arrangement for A47NW to A11SW, (where the feed from Cantley Lane joins the slip) in the absence of information from the applicant to explain in what way this slip road arrangement was no longer acceptable, and why no acceptable redesign could be contemplated in that local area.</p> <p>From Fig 4.27, showing the impact area, there appear to have been several accidents at the roundabout near where the main slip road joins it, but it is not clear whether these are near the slip arrangement from Cantley Lane, nor their level of severity. Figures for accidents within the impact area over the 5 years 2014 – 2018 are shown in Table 4.15. This shows 11 serious and 1 fatal.</p> <p>The next table shown is 4.16, and it is not clear to what geographical area this refers. The text describes the changes in the road layout which would be expected to lead to a reduction in accidents, and these are all concerned with the Thickthorn scheme, nothing else, so it is difficult to imagine that this table refers to anything different from the 'impact area' of Table 4.15. Yet the numbers of accidents area very much greater. Exactly what the figures refer to is not explained. Surely what we should be looking at here is the predicted accidents in the impact area, in order to assess the savings, not any wider area. The table is extremely confusing. The abbreviation KSI is not explained, but I have worked out that it is the sum of fatal and serious accidents.</p> <p>The text says that section 5 explains how these figures are used to assess the economic savings due to accident reduction, yet all I can see is the figure £7.2M quoted, with no calculation shown.</p> <p>Thus it is difficult to be:</p> <p>a) convinced that there is no safe way of allowing Cantley Lane residents to gain access to the main road system without the expense and environmental disruption of the new road over the A11</p> <p>b) assured that the £7.2M saving over 60 years due to accident reduction is valid</p>	<p>a) The Applicant provided a detailed response at Deadline 4 (REP4-026) regarding the issue of reconnecting Cantley Lane South to the A47 West slip road, and has nothing further to add.</p> <p>b) As discussed in paragraphs 4.12.3 and 4.12.4 in the Case for the Scheme (APP-125).</p> <p>The COBA-LT model study area is shown in Figure 4.26. In Figure 4.26 the blue links show the COBA-LT road network within the study area.</p> <p>In addition to the study area, a relatively smaller Scheme impact area is represented by the red box in Figure 4.26. Figure 4.27 also shows the locations and years of the observed accidents, within the smaller Scheme impact area.</p> <p>Within this Scheme impact area observed data was analysed to assess the accidents recorded on the local road network. The observed data analysis was used to inform the accident Scheme impact area baseline accidents in the COBA-LT model. As noted in paragraph 4.2.16, Table 4.15 summarises the observed accidents within the impact area.</p> <p>Outside of the Scheme impact area, default DfT COBA-LT accident rates were adopted.</p> <p>Tables 4.16 and 4.17 present the accident savings and economic benefits of the scheme. These are derived from the COBA-LT assessment across the study area over a 60 year timeframe using NATS 2025 and 2040 forecast traffic flows. The abbreviation of killed or seriously injured (KSI) is included at paragraph 4.12.10.</p> <p>As noted in paragraph 4.12.1 The DfT's COBA-LT modelling tool has been used to assess the forecasted impact of the Scheme on accidents. As referenced in the footnote, further details about COBA-LT can be found in the COBA-LT software and user manuals on the GOV.uk website</p>
<p>Transport and Traffic.</p> <p>1) The applicant deems it unnecessary to supply traffic count details and turning counts for both the base year and predictions for 2025 and 2040. There is thus no way that the traffic numbers predicted can be verified in any common-sense way. We have no way of checking whether the predicted figures look reasonable, because we have no current turning counts, nor the origin and destination of traffic; we have to trust that HE's computer programme works accurately. This was certainly not the case with the most recent local large road scheme, the NDR, where I must assume a similar computer programme was used (because we have not been told of any differences). Many predictions were outside the criteria stated in REP7-007.</p>	<p>The Applicant wishes to direct the examiner back to the previous submission REP4-026, and further submissions REP5-021 and REP7-007.</p> <p>Section 4.2 in the Case for the Scheme (APP-125) 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. Chapter 2 of the Scheme Design Report (APP-127) describes scheme development. This outlines how feasibility assessment, consultation on options and the preferred route announcement took place. It should be noted that the traffic modelling assessment has been internally reviewed and approved by National Highways Transport Planning Guidance (TPG). Furthermore, the</p>

	<p>results have also been reviewed by NCC and a statement of common ground has been produced.</p>
<p>2) The statement is made that the figures have been calibrated and validated, yet this process has still not been explained. I am aware of what TAG says on the subject; validation is the comparison of predicted with actual figures; calibration is the alteration of the computer programme to improve the difference between prediction and actual. I can understand how this can be done using past and current count figures, or using some current figures on some roads to predict those on other roads, but how this can be done for future figures I do not understand. It would be a great help if the applicant could agree to a meeting to discuss and resolve this difficulty. In the absence of that, it is difficult to be confident that the predicted figures, on which the justification for the scheme is mainly based, is reasonable.</p>	<p>The Applicant wishes to direct the examiner back to previous submission REP4-026, and further submissions REP5-021 and REP7-007 which details the process of model calibration based on TAG.</p> <p>In summary, the calibrated base year model forms the basis for the future year forecast assessment of the Scheme. The traffic forecasts are developed in accordance with TAG methodology.</p> <p>Further information on the traffic forecasting methodology can be found in Traffic Growth Forecasts in Section 4.3 of the Case for the Scheme (APP-125). Sections 4.3.14 to 4.3.16 detail the following:</p> <p>The traffic forecasts are dependent on household and employment growth, which were derived from both local and national growth forecasts. The local growth forecasts consider the local authority growth projections and the national growth forecasts take wider anticipated growth into account.</p> <p>The wider area national growth in car trips is derived from the DfT National Trip End Model (NTEM 7.2). This provides demographic projections in employment and population throughout the UK. The change in freight traffic (light and heavy goods vehicles) was derived from the DfT 2018 road traffic forecasts.</p> <p>The local authority forecasts on development growth are derived from the uncertainty log. The uncertainty log details the local authority development schemes in regions which are both nearby and significant to the model. This includes assumptions on local uncertainty, which is dependent on whether developments or other planned transport schemes close to the Scheme are proposed.</p>