

George Josselyn

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Adrian Hunter Esq
Examining Authority, A47 North Tuddenham to Easton
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol BS1 6PN

Your ref: TR010038

Date: 25 July 2021

Dear Sir

Planning Act 2008

Application for the A47 North Tuddenham to Easton dualling Development Consent Order

Preliminary meeting 3 August 2021

1. Introduction

I am writing on behalf of Mr Anthony Meynell ("AM"), owner of the [REDACTED], East Tuddenham and Honingham (the "BHE"), (AP ref 2002 8353). This letter adopts in addition to the foregoing abbreviations the same abbreviations used in the course of the Application by the Ex A and others.

2. Request to attend Preliminary Meeting

By this letter AM requests that his representatives listed in para 3 below be permitted to attend and speak at the Preliminary Meeting on 3 August 2021 on the matters outlined in this letter, if the Ex A will permit him. The writer apologises for this letter being written after PD A. AM's Agent, Savills, will not be able to attend as their representative (Joshua Spink) has another prior engagement at the same time.

3. The representatives proposing to attend if permitted are:-

<i>Name and status</i>	<i>email</i>	<i>Telephone</i>
Mr George Mackenzie	[REDACTED] FTB chambers.co.uk	020 7353 8415

Barrister

Mr George Josselyn
former Solicitor

Mr Anthony Meynell
Owner,

The primary speaker will be Mr McKenzie. Mr Josselyn and AM will be available to answer questions if needed.

4. The interests affected – background to the directions sought

The BHE is situated on the south side of the existing A47 at the proposed Wood Lane Junction to be constructed by HE, to the east and west of Berry's Lane (shown on plans 8 and 9 of the proposed construction design). The estate as a whole is a national Heritage Asset designated by HM Treasury (now HMRC) for its outstanding scenic and historic interest, as well as containing two grade II listed buildings. The estate is subject to a Management Plan monitored by Natural England.

Under the DCO the BHE is the subject of both permanent and temporary proposed acquisitions to enable construction of the southern part of the Wood Lane Junction and as compounds for the general construction works for the mainline A47 as proposed.

AM's primary concern with the proposals lies with the design of the Wood Lane Junction which his engineering expert has advised is inappropriate for the location and needs (both existing and future) which it is intended to serve. His concerns are echoed by NCC in their RR's.

AM will be proposing in his WR's a more suitable alternative to the design of the junction and its approach roads able to be constructed within the Limits of Deviation sought by HE. The alternative (which may take one of several forms) will at the same time address other concerns regarding the proposed junction and its effects which have been raised in RRs both by NCC (in their County capacity and for the NWL project), by local Parishes and by other adjoining landowners.

AM wishes through his experts to engage with HE, NCC and the other affected IPs to agree if possible as early as possible during the DCO process that the proposed alternative in one form or another can be adopted by HE in lieu of the existing design and with alternative compounds situated elsewhere and more convenient to the works than those currently proposed to be sited on the BHE.

It is regretted that these issues are being addressed only now and in the DCO process, but the current proposed design for the Wood Lane Junction has been developed only since the latest 2020 consultations and it appears from the DCO documentation not seen before the DCO was made, that there has been no reported consideration by HE of any alternatives to the particular grade-separated design adopted by HE (two 100m dia. dumbbells connected by a single carriageway link).

5. Desired outcome and fallback – reasons for directions to be sought

If AM's proposals for the alternative design and the alternative locations of compounds can be agreed between HE, NCC, the NWL group and other interested IP's, AM will have significantly fewer remaining concerns with HE's proposals in the DCO.

Issues affecting BHE which would otherwise have to be addressed by AM's representatives and HE in every one of the Principal Issues identified in Annex C to the Rule 6 letter would not then arise.

In particular, AM is advised by his engineering expert that the alternative Wood Lane Junction and associated works and compounds can be designed in such a way that no land at all will need to be acquired permanently from the BHE and the only temporary works which will be necessary on the BHE will be those on its land east of Berry's Lane in connection with the construction of the replacement gas main to run beneath the dualled A47 between the Wood Lane junction and the Hall Farm underpass.

The issue will not then have to be addressed (which is raised in AM's RRs) as to whether a compelling case for the required permanent and temporary acquisitions of land from the BHE has been established.

In the event that the alternative design for the Wood Lane Junction is not adopted and HE's proposals continue as currently designed, AM will be wishing to be heard as necessary on each of the current Principal Issues in relation to the BHE.. To cater for that potential event it is believed that it will benefit the Ex A if HE were to prepare an SoCG regarding the BHE to identify the areas of common ground and residual differences of opinion to be addressed in the ISH's.

6. Proposed additional directions

A) *Wood Lane Junction*

In order that all issues relating to the Wood Lane Junction can be addressed more easily together by all relevant parties at an early stage in the process AM will be requesting that the Ex A considers at the Preliminary meeting:-

1) **designation of the Wood Lane Junction as a specific Preliminary Issue** to deal with (inter alia) the following issues (in each case addressing the adequacy of the existing proposals and the desirability or otherwise of the potential alternatives to be proposed):-

- the design and location of the Wood Lane Junction, including any associated necessary alterations within the Limits of Deviation, to the mainline A47 between Sandy Lane and the proposed Hall Farm underpass (or thereabouts)
- the design and location of the interface of the roads leading in to the junction (including NWL, Wood Lane, Dereham Road, the proposed closed Berry's Lane and the currently proposed removed section of the existing A47 between Sandy Lane and the Berry's Lane / Wood Lane intersection and its proposed replacement
- the NMU's proposed around the proposed Wood Lane junction, including the cycle path proposed around the junction from Berry's Lane round and over the NWL and towards Sandy Lane
- the most suitable locations for the construction and soil compounds presently proposed to be located within BHE, both in relation to the current proposed junction and A47 route and in relation to the proposed alternatives
- Traffic management during the construction process both in relation to the current proposals and the alternative proposals

- comparative effects of the current proposal and the alternatives upon each of the Principal Issues identified in Annex C or such of them as are appropriate for consideration at this point;

2) **listing the Wood Lane Junction issue for an ISH early in the Hearings process**, subject to availability of the relevant representatives all relevant parties, so that its outcome can be reflected in subsequent stages of the DCO

3) **preparation of a SoCG on the Wood Lane Issue** to be taken forward with the same timetabling as the other SoCGs, with HE, AM and such of NCC and the NWL team as wish to participate;

B) Residual issues if the alternative design is not adopted

AM would support the Ex A in **directing HE to arrange for the preparation of a SoCG between HE and AM to deal with matters relevant to the BHE in the event that the alternative Wood Lane Junction is not adopted by HE**, addressing the issues relevant to BHE arising in each of the Principal Issues listed in Annex C to the Rule 6 letter.

7. AM and his advisers would wish to liaise closely with HE as well as NCC and the NWL project team with a view to reaching agreement on as many areas as possible.

8. If you have any queries on any matters raised in this letter do please contact me directly at the address above or through Savills (Joshua Spink). I am happy for correspondence to be sent via email.

Yours faithfully

George Josselyn

[sent electronically without signature]