

[REDACTED]
Honingham
Norwich [REDACTED]

I understand that Highways England have applied for a Development Consent Order from the Planning Inspectorate for their proposals for the A47 North Tuddenham to Easton Scheme.

This is a scheme that our family and neighbours have followed in detail for a number of years and concerning which we have made numerous representations both personally and through the Honingham Parish Council, Broadland District Council and Norfolk County Council.

We are aware of the extensive and detailed work done by Highways England but believe that there are still a number of major deficiencies in their current proposals to the Planning Inspectorate.

Non statutory Consultation April 2017

This provided a major opportunity for Highways England to understand local issues that should be taken into consideration as their proposals were developed. Highways England published their Report on the consultation in August 2017.

Highways England have continued to ignore a number of suggestions made to them at that time and subsequently. In particular that St Andrew's Church, Honingham should continue its direct connection to the village and that the Honingham roundabout should continue to be connected to the original A47.

Norwich Western Link consultation 2018/19

This consultation by Norfolk County Council indicated two alternative junctions for the Norwich Western Link with the A47. One at Wood Lane and the other at Taverham / Norwich Road. Based on the results of the consultation Norfolk County Council have announced that the Norwich Western Link will join the A47 at Wood Lane.

Norfolk County Council have discontinued their original alternative of a junction at Taverham / Norwich Road. Highways England, however, have continued their plans for both junctions.

Junction and side road strategy February 2020

This is a highly detailed paper but fails to address the major environmental impact of the area of land taken from the countryside to satisfy Highways England's proposals. It is noted that the Ordnance Survey has now measured land use changes across England, Scotland and Wales between 2010 to 2020 when roads expanded by 132 square miles or 84,480 acres. Having drawn attention to the enormity of the numbers, the Ordnance Survey are likely to monitor future developments more closely.

Highways England do not present any acreage figures for the compulsory purchases and they make no suggestion that they have made any effort to minimise the areas that will be taken out of agriculture by their proposals.

Statutory Pre Application Consultation April 2020

This Consultation closed on 30 April 2020. The comments and questions received and the audited results and conclusions reached by Highways England have not been published before the application for a development consent order almost a year later.

Highways England may have followed the legalities of the Consultation but have made little effort to convince anyone that they have taken notice of many of the local issues raised.

Project update Winter 2020

Highways England have suggested in their update Winter 2020 that safety is one of their prime considerations. It has been pointed out to them that on Taverham Road, a single track country lane, as recently as 2020 they projected an increase from 200 traffic movements per day in 2019 to 1100 in 2025 with their new Taverham/Norwich Road junction.

The existing traffic on Taverham Road is unsafe. If Taverham Road had been the selected option to join the Norwich Western Link to the new A47 it would have been rebuilt and dualled. In the event, the Wood Lane junction was selected and there are no plans proposed by Norfolk County Council for changes to Taverham Road.

Highways England claim that their modelling completed in 2021 now shows a projected decrease from 600 traffic movements per day in 2015 on Taverham Road to 200 in 2025 on the opening of the Norwich Western link. This is not a credible response as the numbers are clearly contradictory. At 200 traffic movements per day, it is unreasonable to suggest that Highways England can support the Taverham / Norwich Road Junction.

The Highways England proposal for a new Taverham / Norwich Road junction is neither justified nor required by the traffic movements on Taverham Road now that it is no longer required to support the Norwich Western Link connection to the A47. Further, it destroys excessive rural acreage and will leave Taverham Road unsafe.

This would seem to be a key ingredient in Highways England's scheme. The Planning Inspectorate may well want to question it.

Recommendation

That the Planning Inspectorate require Highways England

- 1. to publish the detailed results of the Statutory Consultation,**
- 2. to reassess and minimise the area of agricultural land needed to meet their proposals**
- 3. to justify the lack of a continuing direct connection for two way traffic between St Andrew's Church, Honingham and the village.**
- 4. to justify the removal of a direct connection between the Honingham roundabout and the existing A47.**
- 5. to justify the necessity, size and location of their proposals for a Taverham / Norwich Road junction.**

To date I have not made any comments on costs of Highways England's proposals. It is clear that the Appeals Tribunal has a particular focus on costs to the environment and to local communities. These cannot be separated from costs to the taxpayer and, on the assumption that this is relevant to the Appeals Tribunal, I would observe that Highways England have made no effort to justify the costs of the junction at Norwich Road / Taverham Road. Indeed, it is noted that Highways England have not provided any costings whatever on any portion of their A47 widening proposals. It is a fallacy to suggest that any old infrastructure project will boost the economy. I would suggest that the costs of the Norwich Road / Taverham Road junction as proposed are exorbitant and Highways England have provided no evidence to suggest that these costs are the most economic way of resolving any traffic issues at this location.