

Written Representation for A47 North Tuddenham to Easton TR10038

From: Richard Hawker Interested Party No 20028320

Summary of written Representation

- 1) Air quality, emissions. There will be an inevitable increase.
- 2) Loss of natural environment. Because an off-line route has been chosen, not just widening of the existing road, hedgerows and trees are to be removed. The river Tud area will be very badly affected. Construction compounds will take more natural environment.
- 3) Climate change. There will be an inevitable increase in contribution to global warming. Dr Andrew Boswell is an expert on this and will cover it within his representation.
- 5) DCO suitability. The arrangement is extremely confusing.
- 8) Landscape and visual. The tranquil and unspoilt area of the river Tud near Hockering would be hugely affected; many hedgerows would be removed.
- 10) Noise and vibration. There is very little information. We do not know how people near the existing road would be affected.
- 11) Population and human health. Rights of way in Hockering, Honingham and Easton will be severed or altered. Lighting could destroy valuable 'dark skies'.
- 12) Scope of development. Alternative route selections have not been exhaustively considered. The cumulative effect of at least four other road schemes has not been properly assessed.
- 13) Transportation and traffic. The case for the scheme is not proven. It is based on out-of-date and inadequate data. The effect would be to increase local traffic on unsuitable roads. Buses will be inconvenienced by the large number of roundabouts.
- 14) Water Environment. The nearness to the River Tud makes contamination almost inevitable.
- 15) (addition) Costs. I am surprised that this is not discussed in detail.
- 16) (addition) Consultation has been poor and opportunities missed.

Detailed Written Representation

1) **Air quality** - It is inevitable that greater vehicle speeds will produce greater emissions. This exceeds any claimed 'excess emissions' due to current congestion, as engines produce much less pollution when stationary. I cannot produce scientific evidence to prove this, but my garden runs the length of an HGV route; when lorries go by at high speed, fumes are always experienced, but this **never** happens when lorries are stationary for some time to let other large vehicles pass due to narrowness of the road. It will be years before electric power is used for most cars, and use of electric power is many years away for large diesel vans and probably many decades for large lorries.

2) **Loss of natural environment.** As the route is off-line, some way from the existing road, considerable loss of natural environment is inevitable. My particular interest is in the area south of Hockering, where the scheme effectively remodels the whole flood plain to the north of the river Tud. This is a mix of carr woodland, reedbeds, grassland and some pasture. The cutting and embankment required to position the wide road in this sloping area means that a large part of this area will be dug up; in addition lagoons and a lay-by are planned, which will take even more of the natural environment. My calculation from the plans shows that 3.5km of hedges will be removed, 1.7km of which are classed as 'important'. When hedgerows around the country have been decimated over the past decades, this is too much to lose.

HE claimed that one reason for the choice of this route, option 3, was its least effect on the environment. Yet the route actually detailed as the preferred route is closer to the river than option 3, though this was hidden in the text, and not made obvious. Therefore the claim has not been substantiated.

3) **Climate change.** Dr Andrew Boswell, an expert in this field, covers this fully in his submission. I cannot add anything technical to what he writes. This is a subject on which the scientific and most of the political world is united; we have few years remaining in which we must halt and reverse greenhouse gas emissions. Britain led the way in industrialising the world, with all the benefits that has brought. It is incumbent on her to lead the way to mitigate its disastrous drawbacks, and indeed UK government has committed to ambitious targets, which means that every possible increase in emissions must be resisted, however small compared to the countrywide emissions. A big new road will inevitably increase emissions, and so alternatives must surely be put in its place.

5) **dDCO** I wrote to HE and PINS at the start of this examination, to draw attention to the difficulties I had with, amongst other things, the structure of the DCO. Initially, when made available on the HE website (and I believe, the PINS website) there was no index, and so no straightforward way of finding the particular information one was seeking, until the Examination Library was available (which is a great help). The organisation of the documents within the DCO is illogical, which does not help; one surely would expect the very first part to be description of the problem which the scheme was trying to solve, i.e. the need for the scheme. This would include reports of consultation with locals and experts in the field. Then the outline description of possible solutions, and where they had originated; basic analysis of solutions. This is essentially the process described in the government's publication 'The Transport Business Cases', so it would seem logical for the DCO to follow this sequence.

The nomenclature of the sections of the document is very confusing:

The contents page, giving the overall view of the application, appears on an unnumbered page from Section 5? Volume 1, section 1.3. This lists numbers 1 to 12, but does not give these names, e.g. are they to be called chapters, sections, paragraphs, or what? When there are so many number regimes used within the documents, this makes it very difficult to navigate.

Against numbers 4 – 11 in this contents page are listed 'Volumes 1 – 7'; still more numbers to confuse. The appendix A is not listed in the contents. Why not ?

Volume 6 (section? 10) Environmental Impact Assessment does not mention the Environmental Statement (ES), which is a crucial component of this issue.

This whole application has been referred to in most places as 'the DCO'. But on delving into the morass of documents, it seems that the DCO itself is actually just one document, which appears as Volume 3. All the other documents are those referred to within that DCO, or background to its creation, and so are NOT the DCO proper, but the **supporting documentation**.

PINS' examination library, giving shortform numbers such as 'APP-003' to documents has helped a good deal, but it is a major difficulty that these documents cannot be searched-for, and when closing such a document, one is not returned to the location of the link for that document, but back to the top of the list. It is also confusing that the letters APP, chosen by PINS for their referencing, is also used by HE in several of their document references.

There are many more ways in which this set of documents is made unnecessarily confusing, especially to a layman, but it would be tiresome for me to list them all. I have spent much of my

working life dealing with, wrestling through and interpreting many British, European and Defence standards, mostly in engineering. None was as difficult to understand as this.

Perhaps the easiest difficulty to fix would be that of page numbering. Please can it be made a requirement that every page of a document, including the front page and contents page AND any appendix or annex, is numbered from number 1 ? Then the search facility on that document will reflect the page numbers listed in the contents. This would save considerable frustration, in always having to remember to add a certain number to the page required.

Having all documents available on line for all to access is a huge benefit, but when things are organised in such a strange way, it would be a great help to have access to printed documents, and especially large maps and plans, which have not been made available anywhere. This has been a major drawback.

8) Landscape and visual effects. The area around the River Tud south of Hockering (described in 2), above) will be massively changed. This rural area, relatively unspoilt by new building, still retains a delightful mix of grazing and marshland, and tree cover, with a meandering river through its centre. There are two footpaths, either side of the River Tud, from which the public can admire the varied and peaceful countryside landscape.

Please can there be one or more selected viewpoints from this area ?

These views would be utterly destroyed were this road to be built. The road, with its lagoons, and access road, and layby, would be seen from so many points. The enhanced viewpoint from the wooden bridge over the Tud would be drastically devalued by sight of the busy road, just yards away, on an embankment. And of course, there would be incessant noise.

As there is so little information in the application regarding **lighting**, it is impossible to judge the effects this will have, but **any** lighting in the area will be detrimental to the rural aspect, so I would be opposed to it.

10) Noise and vibration. I have found very little noise information in the application. It seems that up-to-date baseline surveys have not actually been done, but old information relied upon, with some estimates for updating. Monitoring points have only been chosen for places which would be likely to experience increased operational noise. One of the benefits assumed for this route was its greater distance from Hockering village than others, one benefit assumed to be that of reduced noise. But this needs to be evaluated in order to assess the size of benefit to Hockering residents. I cannot see that this has been done. I understand that NO mitigation against construction noise will be offered to some sensitive locations. I requested information on noise well over a year ago, but was denied it, being told that it would all be in the DCO; this really should have been part of the consultation, as it is crucial for local people.

11) Population and human health.

The maps have been created on sheet size A1, and it is extremely difficult to discern detail when printed on A4, and when viewing on a standard TV screen, enlarging is very tiresome. Viewing actual documents, even it meant travelling to see them, would be much preferable. This has not been possible.

a) Non-motorised users and public rights of way

Roads and other rights of way are proposed to be stopped up. Of particular concern is FP7 in Hockering, which uses Gypsy Lane to access FP8 and the bridge over the river Tud, to footpaths in East Tuddenham. This would sever a major means of access by foot to parts further south. No substitute is provided. It is not clear what is planned for the cycleway recently constructed by the north side of the A47 between Heath Road, Lyng (Lyng Road) and Hockering Street. From the description in the DCO p68, this is to be eliminated, and the map is not detailed enough to discover what is proposed. Nor is it clear what would happen to the pond at the junction of the old A47 (NOT B1147, as described) and Lyng Road. I cannot find point A2, and point A4 is actually on sheet 4, not sheet 2.

Church Lane, East Tuddenham, is proposed to be stopped up, where the new road would traverse it. From Hockering it would only be possible to get to the properties around Rotten Row and Traps Lane by a long detour via Hockering, Mattishall Lane Link, or via Wood Lane junction. This may be just acceptable for vehicular traffic (and this elimination of motorised traffic has received much support from local residents), but it is prohibitively-long for pedestrians and cyclists, whom we are surely trying to encourage. Also, this route currently does give access to the No4 Konect bus route from Dereham via Mattishall and East Tuddenham to the hospital; the buses on the A47 do NOT go to the hospital.

At the Easton end of the road, the current pedestrian/cycle 'at grade' crossing across the A47 is considered quite dangerous. Certainly it is intimidating, as it is so far from the roundabout that traffic has either picked up speed, or has not slowed down very much. The proposed alternative is a bridge much further west. For cyclists and pedestrians making the journey from Lower Easton (and other parts further north) to Easton, this is a considerable detour, and will surely be almost as off-putting as the current crossing, when we should be encouraging cyclists and pedestrians. I have already suggested a simple underpass here; this would not be expensive and has been very successfully used on the A14 at Quy, Cambridgeshire. When the North Tuddenham by-pass was built, around 1992, the inspector would not insist on an underpass, and instead an expensive bridge was built, but is hardly used; thus North Tuddenham has been split in two.

b) Lighting I have not found detail of lighting in the documents yet (there is so much to read !), but to many of us, (both in the country and towns) there is a concern over possible loss of the beauty of 'dark skies', and any lighting would be unacceptable.

12) Scope of development and Environmental Impact Assessment. The need for the proposed development is mainly based on the current level of traffic and that predicted for the future. I dispute the need for this intervention. Less disruptive alternatives exist. There are at least four other road schemes being promoted in this area, and the full cumulative effect of them on this area has not been assessed. Other than the A47 schemes, they are the Yarmouth third crossing, and the Long Stratton By-pass, and the Norwich Western Link.

13) Transportation and Traffic.

a) Baseline surveys. In 'The case for the scheme', Volume 7 (Other documents) part 7.1, it is stated that the base year model is from 2015. I understand that Norfolk County Council are using a 2019 model, and the two agencies say they are working together. There is no justification given for using an out-of-date model. Government guidance requires the most recent to be used. Even 2019 is two years out of date, and it is known that surveys have been done much more recently, from which data surely should be used for a model.

Given that proviso, a look at table 4.9 on p69 of 7.1 shows:

The road is currently operating considerably below 100% capacity, mostly around 70%, and in only 5 out of 32 readings is it running above 80% capacity. But it is not clear how the capacity of the road is assessed. Only in the future scenarios is it predicted that many situations will be near or above 100%. No predictions are given for the scenario that the Norwich Western Link is **not** built and this section of the A47 is **not** dualled. Surely this information is an essential part of the case for intervention. The NWL is a separate scheme, of course, and its 'non-construction' should surely be considered in any 'what-if' scenario.

On 12 May 2021, I counted vehicles between 8 and 9 am on the eastward approach to the 'Norwich roundabout' (no-one calls it that – it is usually referred to as the Honingham or Mattishall Road roundabout). Total figures were quite similar to those quoted in the 2015 base year data – 1008 actual vehicles in 2021 vs 1085 in 2015. (1173 Passenger Car Unit equivalents, vs 1233 in 2015). Admittedly these figures are just one count, unofficial and unchecked, but it was significant that passenger cars were 679 compared with 839 in 2015. This may be due to more working from home, or flexible working since the pandemic, and this could well be a permanent feature, as reported in the media. Light Commercial Vehicles were 199 compared with 132 in HE figures, again possibly indicating the surge in home deliveries and a resurgence of home repairs after enforced shut-down. This could decrease over time, as delivery systems increase in efficiency (one hopes) and journeys are reduced. What is clear to me (and could have been checked by HE before issuing this application) is that growth has not been what would have been expected before the pandemic hit, and the figures *need to be revisited*. Surely it does not take a huge resource to mount a survey and/or liaise with NCC to share data.

The total numbers of vehicles in a 24-hour period is around 18,000. I understand that 20,000 per day is considered the minimum to justify investment in a new road in the MRN; on that basis the A47 cannot justify massive investment.

What is essential in order to validate the predictions for the future, especially when considering the impact of the NWL, is origin-and-destination data, and comprehensive turning counts at junctions, *which we do not have*, despite my regularly requesting it (from NCC and HE) since 2017.

b) Alternative design solutions. When the idea of dualling the A47 rose higher up the government's agenda, in around 2012, I suggested HE discuss with local people, particularly Hockering, possible designs for a scheme, knowing that there were many obstacles to be overcome in this area. I was told that HE would be in contact when they had something to offer. That turned out to be March 2017, when HE presented just four options for the road. I summoned a meeting of local parishes for us to determine a collective response. Clearly none of the options was ideal, and further ideas emerged. HE did get involved, but they certainly did not take the lead in looking at design solutions. They have continually altered designs since, and praise is due for a welcome willingness to be flexible, but there are still major objections; much of this could have been avoided with early consultation **before** HE had effectively committed itself to four options. Even those which they did look at before 'going public' with their four options, later claiming they were a comprehensive survey of all possible options, did not anticipate some design ideas which have come forward since 2017.

A preferred route was announced; Option 3. One reason for choosing this was stated as the fact that it was environmentally the least destructive. This may have been true for Option 3, but in fact the route which was published as the preferred route was *nearer the river Tud* than Option 3, though this was 'hidden in the small print'.

Alternatives have been suggested for further investigation, by Weston Longville PC, Honingham PC, myself, and others, but I have not seen appraisals of these by HE. They are not fanciful; they may prove to be unworkable, but they are surely worthy of proper investigation.

Journey delay times are listed, although it is not clear how these are measured or calculated. Anyone travelling this route will agree that the largest cause of delay and congestion on this stretch of the A47 is the Honingham roundabout. Until 2007 there was a simple T-junction for Mattishall Road to meet the A47. There were some tailbacks from the roundabout at Easton, but not excessive. Fatal accidents in the space of 5 years caused a rethink of the junction. Hockering Parish Council ran a campaign to promote a closure of the junction and rerouting of Norwich-bound traffic down Berry's Lane to an improved junction (preferably light-controlled) at Wood Lane. A major extra benefit would have been that the B1535 would have been provided with a good junction with the A47 for all turning movements. This was backed by local councillors, the MP and the public. We held a meeting with HE, warning of problems of putting a roundabout to replace the T-junction, but they ignored our advice and built the current roundabout. The queues were horrendous, and many vehicles caused problems by rat-running through Honingham Village. Eventually part-time traffic lights were installed (HE had rejected another idea of simply putting lights on the previous T-junction, saying that lights 'would not work'). Things have improved, but this is still a major hold-up on the route. I mention this, because it is an example where local people DID offer the solution, but unfortunately HE would not take advice. As a result, thousands of man-hours have been spent unnecessarily in traffic queues every morning and evening for over ten years, and thousands of pounds were spent unnecessarily. I do not think lessons were learned from this. Congestion on the A47 is still mainly caused by this junction, yet nothing has been done over the past several years to improve the situation.

c) Operational effects on the surrounding highway. This has been a major source of friction, and alteration of the designs, without wide consultation, has exacerbated the situation. The closure of the Easton roundabout, which would lead to the welcome cessation of traffic through Lower Easton, has been proposed with little thought to where the c4500 vehicles per day which use that route would travel instead. It is proposed that the Norwich Western Link, which would join the A1067 to the A47 at the Wood Lane junction, would take all this traffic. This may be the case, but this road may be delayed, or not built at all. The success of the A47 scheme in curing problems, not causing them, must surely not rely on a different scheme going ahead at the same time.

To surmount this problem, the A47 scheme proposes a temporary traffic order to redirect all traffic running from the A1067 via Ringland Lane (and which would have gone through Lower Easton), to turn sharp right onto Weston Lane, a very narrow rural road currently carrying around 130 vehicles per day, and then left onto Taverham Road, another narrow lane with a few passing places. A dumbbell roundabout onto the dualled A47 is proposed at Taverham Road. At present, the flow through the road is around 400 per day. This surely could never justify its expensive connection to a dualled trunk road. So one is forced to the conclusion that this connection is proposed *simply* to accommodate this traffic diverted from Lower Easton.

Certainly an extra 4500 vehicles would cause great damage to this route. But not all would travel that route, as many would find that other routes, which, though further west, may be quicker: from the A1067 through Marl Hill and Weston Longville, adding to their current c3000 vehicles per day through narrow lanes; or through Weston Hall Road (B1535) and Hockering parish, especially if going in a westerly direction. Neither of these parishes were involved in any consultation about the above proposed traffic orders.

If traffic levels on the A47 were to increase due to dualling, the effect on the junction at Longwater, already very congested, would surely be severe. Further towards the city, by far the most congested route is the A1074 past Norwich Road, Costessey and Larkman Lane, yet the effect on this area does not seem to have been assessed in the HE consideration.

The closure of the connection to Berry's Lane from the Wood Lane junction has been promoted by a group (the 'south of the A47 task force'), formed by George Freeman MP, which is concerned about a possible increase in traffic along Barnham Broom Road, and through Barnham Broom to Kimberley, and Wymondham and the A11. This is considered likely because the ability to cross the A47 at the Wood Lane junction would indeed have been made much easier and safer with the proposed grade-separated arrangement. No convincing predictions have shown that the new junction itself would increase this traffic significantly; nor is there clarity on where the traffic which DOES currently use the Barnham Broom Road originates from or is going to (lack of origin-and-destination data). It is therefore unclear whether this closure would encourage drivers heading for, say, Wymondham and the A11 to use the A47 instead to join the A11 at Thickthorn. Neither have I seen figures detailing the numbers of vehicles going to the very busy Barnham Broom country club, vehicles which will never have any alternative other than to use Barnham Broom Road. There is also a valid concern that drivers wanting to access Barnham Broom Road may drive through Honingham village and then Colton Road to get to Mattishall Road and thus back to Barnham Broom Road. This would be an unnecessary imposition on the village, and extra mileage for the vehicles, with no benefit to residents of Barnham Broom or Wymondham.

The land taken for the Wood Lane junction is unnecessarily large, and it is placed too near the village of Honingham. A double-roundabout design has been proposed, rather than a simple single roundabout, as is currently used at Thickthorn, and which would surely use less land and offer less deviation from a straight route for any buses travelling into Honingham from the west.

The case for the scheme rests mainly on the increase in speed, reduction in accidents and ability to promote economic growth. The increase in speed from, say 50 mph to 70 mph (assuming that were consistently achievable), for the c4.7 miles length, would result in a saving of 1.6 minutes. It is difficult to believe that this small difference is preventing business investors from coming to Norfolk. The considerable congestion caused by the Honingham roundabout has not spurred HE to plan changes, apart from an ill-fated 'express-lane' idea, so it is difficult to understand the importance placed on this dualling.

d) Safety Serious accidents have been few since the Honingham junction was changed (in fact they were few in that location until those very unfortunate incidents). Regarding the prevention of accidents, it is ironic that it took me over two years of letter-writing and eventually a local radio programme to get HE to repaint safety white lines and arrows on the A47 at Hockering. It took a further two years to get reflector posts renewed. Also, HE initially did not object to a residential development outside Hockering, despite the parish council having concerns about access onto the A47, near Sandy Lane, where several mostly minor (thankfully) crashes have occurred. Following talks, HE did agree that the area would not pass a safety audit, and that they would enact modifications to improve safety before the homes were occupied, but still no design has been agreed, yet the houses are now almost all occupied. Thankfully there have been no serious accidents there to date.

e) Bus users. The government's stated aim is to encourage 'modal shift' to more environmentally-friendly means of transport, of which the bus is one. Local people have pressed hard to ensure that the scheme does not prevent the operation of a bus service through all villages on the A47 from

Dereham to Norwich. I am very encouraged and grateful that HE have heeded this request, and no stopping-up of a road has rendered such a bus service impossible. However, the creation of two double-roundabout junctions means that a bus travelling west to east will have to negotiate four roundabouts in its journey. This slows the journey down considerably and further increases the difference between the time taken by a car at 70 mph, not having to stop in each village, and a bus negotiating a labyrinth of roundabouts and the odd twisty road, when already being restricted to 60mph maximum.

In conclusion, there are cheaper and less disruptive ways of reducing hold-ups and increasing safety, especially of junctions, without enacting the current plan, and these options should be looked at.

14) Water environment. As mentioned above, the road would run very close to the River Tud, and it is difficult to believe that contamination of this rare chalk river could be prevented by installing lagoons, especially when scientists are telling us that flash floods are becoming more prevalent. There is probably even more concern about the control of pollution during construction, especially where the road would cross the river Tud near Honingham.

15) Costs. Although this may not be an official aspect of investigation for PINS, it is one which is very relevant to the scheme and its 'value for money'. There appears to be little or nothing in the documents about costs.

16) Adequacy of consultation and documentation.

Consultation I was disappointed that the ExA did not add to the Principal Issues the issue of consultation. The public was not given adequate notice of the statutory consultation in early March 2020. More than that, although (it later transpired) HE had planned that consultation some weeks ahead, and booked Hockering village hall for it, they refused to announce the nature of the meeting they had planned, until it was too late for the parish council to publicise the event as widely as we would have wanted to. We had around 14 days to do so.

In investigating whether there was a statutory minimum notice period which HE should give, I discovered that there had been created, as required by planning law, a Statement of Community Consultation (SoCC). But the communities to be most affected by the scheme were not made aware of this, nor were they invited to contribute; only the District and County Councils were given that privilege, not parish councils, and those councils were apparently content with the notice period of just 2 weeks. This may be the 'Letter of the law' but it is certain not in the spirit of openness and transparency.

Difficulty of accessing and using the documents (see also 5) , above).

I realise that the Examination in Public is primarily a written procedure; I am not sure whether this has been a recent change, forced by the COVID pandemic, and the prevention of in-person meetings, or whether it was a planned change in procedure. I also realise that PINS' intention has been to be inclusive and give everyone an opportunity to contribute, with which I wholeheartedly agree. However, the complexity of the arrangements has, I believe, daunted many people who are unfamiliar with such arrangements, and less so with the computer technology which is essential to contribute to the online hearings which are being held.

END of main representation Following page is a submission on behalf of a local resident (and friend)

A resident of the area who would be badly affected by the scheme (but is not subject to compulsory purchase), I think has been 'beaten down' by the complexity of the system, and dealings with HE over the past few years, and has asked me to submit the following text. I realise this is 'out-of-order' but I think that many people come into this category, and I hope that you will consider reading it:

From [REDACTED] and [REDACTED], [REDACTED] East Tuddenham

We object to the routing of the A47 North Tuddenham to Easton Dualling.

[REDACTED] has been in [REDACTED]'s family for over 70 years. We have put up with increased noise after the by-pass was built in the 1970s, and the loss of our bus service, which used to stop at the stop of Church Lane. Now we are being told we will have a four-lane dual carriageway right next to our property. We know there will be much more noise, although we don't know how much, but we have been told that we cannot have any noise-abatement while the road is being built. It will be awful here for at least 2 years, and we will not be able to have any compensation for that. Where is the justice? When the road is finished we will have constant increased noise, day and night. Before it is built, while this plan is in place we cannot sell our property, so we are stuck, not knowing exactly what will happen. We will have a lagoon opposite our house, and although we would be happy not to have vehicles along Church Lane, we will not be able to walk or cycle to Hockering any longer; our link to the north of the A47 will have gone. Why? We have always been able to get to Hockering and if this road is built, even if the Hockering bus service is retained, we will not be able to get to it.

How can this country afford to pay for these unnecessary roads, while the NHS is on its knees, not seeing the patients it should. People are suffering every day from lack of medical attention, and yet all this money is to be spent on roads. It makes no sense.

The way this examination/public enquiry has been run has left a lot of people out of the system. [REDACTED] does not use a computer, and so a friend has typed this for her.

Yours sincerely,

[REDACTED]

[REDACTED]

31 August 2021

END of submission