

Highways England A47 North Tuddenham to Easton

Written Representation from Councillor Denise Carlo on behalf of the Green Party Group on Norwich City Council

Unique Reference Number: 20028299

1 September 2021

We wish to make a further few points in addition to our initial representation.

1. The proposed A47 North Tuddenham to Easton scheme (A47NTE) represents business as usual in a world and a future that no longer exist due to the climate and ecological emergencies. We need to face reality and to develop a transport future based on traffic reduction and making best use of the existing road transport infrastructure.
2. Underlying assumptions around national traffic growth forecasts used for A47 NTE fail to recognise paradigm shifts such as the changes in working and travel patterns hastened by the covid pandemic. The A47NTE also fails to address the policy shifts needed to not exceed 1.5C or 2C of global warming which the Intergovernmental Panel on Climate Change agrees will happen unless deep cuts in carbon dioxide and other greenhouse gas emissions occur within the coming decades.<sup>1</sup>
3. The Department for Transport's modelling and appraisal tools adopt a linear view of society and the economy. 'Decarbonising Transport': A Better Greener Britain'<sup>2</sup> commits the government to a review of the National Networks National Policy Statement (2014) (NNNPS) in the light of fundamental changes to commuting, shopping and business travel within the last 18 months as well as the government's legal commitment to net zero and the 6<sup>th</sup> Carbon Budget. The review due to start later this year and complete by Spring 2023 will include 'a thorough examination of the modelling and forecasts used to support the need for development and the environmental, safety, resilience and local community considerations that planning decisions must take into

---

<sup>1</sup> Para B1 in 'Climate Change 2021, The Physical Science Base, Summary for Policy Makers', IPCC, Aug 2021  
[https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC\\_AR6\\_WGI\\_SPM.pdf](https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf)

<sup>2</sup> Department for Transport, 2021  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf)

account'.<sup>3</sup> This timescale appears to exclude schemes in Road Investment Strategy 2 2020-2025.

4. The government would be vulnerable to legal challenge over individual RIS2 schemes such as A47NTE if it gives approval without including them in a root and branch review.
5. The HE states that the low traffic growth scenario undertaken can be used as a proxy for uncertainties which may result in the reduction of traffic demand such as the impact of covid-19 and under this scenario, the scheme still represents medium value for money. However, in-built assumptions in the traffic demand forecasts are unlikely to capture the full range and extent of new trends which might be addressed in its review of the NNNPS. Neither has the low growth scenario as applied to A47NTE been considered in combination with policy changes in line with net zero and the 6<sup>th</sup> Carbon Budget which should lead to further traffic reduction.

### **Potential for Traffic Reduction Along A47 North Tuddenham to Easton**

6. We need to cut demand for road transport and not encourage new demand by providing new road capacity. The A47 between North Tuddenham and Easton has a number of characteristics which provide scope for traffic reduction in line with changes in work and travel patterns and with new strategic priorities in the government's 'Decarbonising Transport' plan to achieve modal shift to public transport and active travel and lower car travel.
7. The A47 between North Tuddenham to Easton is close to a major urban centre. The A47 Feasibility Study in 2014-15 found that a significant proportion of trips are made along relatively short sections, rather than long-distance trips along the entire route.<sup>4</sup> Norwich attracts a significant number of commuters; in 2011, around 46,000 people commuted into Norwich, most of them by car. The majority of commuters lived in Broadland and South Norfolk; smaller numbers came from Breckland and Great Yarmouth and a very small number from King's Lynn (where working residents look to the south and west for employment outside

---

<sup>3</sup> 'Road and rail schemes must consider net zero, says Shapps', Local Transport Today 828 26 July – 5 August 2021.

<sup>4</sup> A47-A12 Corridor Feasibility Study Summary, DfT March 2015.

the town rather than to Norwich). Outward flows of commuting from Norwich are far lower than flows into Norwich from surrounding districts.<sup>5</sup>

8. Consequently, there is potential for shifting a proportion of existing and future peak period commuter trips along the A47 to improved public transport, for example, between Dereham and Norwich, with benefits for congestion reduction. There is scope for greater car sharing in line with the aim of draft Norfolk Local Transport Plan 4 to reduce the number of single occupant car journeys. Planned new growth is concentrated in or close to Norwich where it can be more easily served by sustainable transport. If new development is designed in a way that promotes sustainable travel choices, the number of short unnecessary car journeys on the strategic road network would be minimised.
9. Also, home working in Norfolk is likely to increase which would help to reduce peak period commuting and congestion. In 2011, around 13% of Norfolk's working population worked mainly at or from home.<sup>6</sup> Following Covid-19, several large employers are reassessing their accommodation needs. For example, Aviva announced plans to close its office at Broadland Business Park and relocate around 1,500 staff to its Norwich city centre office to enable staff to choose a mix of home and office working.<sup>7</sup> South Norfolk and Broadland Councils are also re-thinking their accommodation needs in the light of flexible working.<sup>8</sup> Planned improvements to rural broadband in Norfolk may see a further increase in home working.<sup>9</sup>
10. Current traffic flows on the A47NTE do not justify dualling. Annual average daily traffic flows (24,000 vehicles) on A47 Hockering to Honingham in the base scenario are modest compared to many parts of UK strategic road network. The present A47 between North Tuddenham

---

<sup>5</sup> Table 14 in 'Numbers commuting to Norwich', Norfolk 4<sup>th</sup> LTP, Norfolk County Council, Oct 2019.

<sup>6</sup> 2011 Census reported in Figure 1 Method of Travel to Work, Norfolk 4<sup>th</sup> LTP, Evidence Base Review, WSP for NCC, Oct 2019.

<sup>7</sup> 'Norwich-based insurance firm Aviva announces closure of one of its offices', Eastern Daily Press 25 March 2021.

<sup>8</sup> 'Consultants brought in as councils consider selling headquarters', Eastern Daily Press, 14 Aug 2021.

<sup>9</sup> 'Thousands of rural homes (in Norfolk and Suffolk) to benefit from broadband funding', Eastern Daily Press, 2 Aug 2021.

to Easton A47 is operating just below the available capacity during the AM (94%) and PM peaks (89%) in eastbound direction.<sup>10</sup>

11. Traffic reduction measures would manage traffic demand whilst meeting transport need using sustainable modes. Packages of travel and demand management measures should be accompanied by low cost road safety measures such as safety treatment of side roads and reducing the speed limit to 50mph.

## **Climate Change**

12. We support the submission from Dr Andrew Boswell of Climate Emergency Policy and Planning regarding the underestimate of greenhouse gas emissions generated by the A47NTE and the lack of assessment of the cumulative impacts from three A47 schemes currently undergoing examination together with local road schemes being promoted by Norfolk County Council.
13. The scale of Norfolk's road transport contribution to carbon emissions is shockingly high and reflects long standing policies to accommodate growth in road traffic as a sign of a strong economy. Forty per cent of Norfolk's emissions derive from surface transport compared to 27% in 2019 for UK domestic greenhouse gas emissions. Norfolk's transport emissions have barely fallen over the last fifteen years and the planned construction of seven major road projects in Greater Norwich/ East Norfolk including four A47 schemes within the next five years, would drive emissions higher still. A large number of rural neighbourhoods in Norfolk fall into the 10% worst in England for carbon dioxide emissions per capita for car driving; they include Easton through which the A47 North Tuddenham to Easton section passes.<sup>11</sup> The Intergovernmental Panel on Climate Change (IPCC) report finds that mean sea levels have risen faster over any preceding century.<sup>12</sup> Norfolk's soft low-lying coastline and coastal communities are particularly vulnerable to sea level rise. The ban on the purchase of new diesel and petrol cars and vans which comes into effect in 2030 will see growth in vehicle

---

<sup>10</sup> Para 4.6.6 in Case for the Scheme 7.1, Highways England.

<sup>11</sup> Map of Carbon Emissions reveals Norfolk neighbourhoods fuelling climate change, Eastern Daily Press, 13 August 2021.

<sup>12</sup> A.2.4 In 'Climate Change 2021, The Physical Science Base, Summary for Policy Makers', IPCC, July 2021

emissions in the meantime, assisted by the government's large road building programme which is explicitly designed to facilitate road traffic growth. Every tonne of carbon emitted will stay in the atmosphere for decades. We need to save greenhouse gas emissions by not building new roads as opposed to gain time savings by building new roads.

14. Phil Goodwin, professor emeritus of transport policy at UCL and UWE writes, 'the speed of climate change is now faster than the implementation of measures to limit it' and that we are faced with two real alternative futures: <sup>13</sup>

*Runaway Climate Change: 'within a time frame which is much shorter than the appraisal period for infrastructure schemes or the target dates for net zero carbon. ....Unstoppable climate change would quite certainly drastically change the volume and location of traffic and reduce the possibility of confident long term predictions about how much and where..... The traffic conditions they (RSI2) were designed to solve for 60 years into the future will not happen in the locations envisaged, as even with some traffic growth in the near future, traffic will soon be dampened by significant disruption unless the scale of climate adaptation matches the scale of climate change..... The inevitable falls in the standard of living would itself remove one of the drivers of increased car ownership and use.'*

*Accelerated decarbonisation: 'transport's contribution to that requires deep reductions in the volume of fossil fuel road traffic which will remain the majority of vehicles for more than two decades.'*

Prof. Goodwin concludes:

*"Transport policy may plan to continue as before, but in those circumstances business-as-usual does not lead to trends-as-usual; it carries the seeds of its own destruction. "*

15. **In conclusion**, to take account of new trends in society that include an increase in hybrid working changes and to achieve deep cuts in transport carbon emissions, we invite the planning inspector to recommend dismissal of this scheme and to ask the Secretary of State to include RIS2 schemes in the National Networks National Policy Statement review.

---

<sup>13</sup> We are now facing two alternative futures (plus an untenable one), Local Transport Today, 829 6 August – 19 August 2021.

