

Comments in response to the Applicant's response to Relevant Representations
5th October 2021
Brown & Co on behalf of Honingham Aktieselskab

Reference: RR-023.1

The applicant has engaged with Honingham Aktieselskab. Recently the parties have been able to agree some elements of the scheme to address aspects of Honingham Aktieselskab (Easton Estate) concerns although some issues require further collaboration.

This section in the responses refers to the route selection and the omission of the side road between Taverham Road and Church Lane, Easton.

1. Route selection:

The Easton Estate is very private and had wished to remain so. The landowner respects the fact that the alignment was less detrimental than others consulted upon, although would have preferred a more southerly alignment to limit the impact of the scheme which affects the estate along the whole of its southern edge.

Since the route was adopted, further representation has been made to alter the scheme. We have no concern about a proposal to prevent or reduce the impact of the scheme on Berry Hall Farm, but not at the expense of the Easton estate.

Either of the recently tabled proposed plans would, if enacted have a significant impact upon the Easton Estate (Honingham Aktieselskab) which is not entirely clear from the plans provided. The plans do not show the land required in addition to the road corridor for infrastructure, accessways, landscaping and bunding so the impact of the revisions appear to be understated.

Easton Estate (Honingham Aktieselskab) currently has four major infrastructure projects impacting upon the Estate and a proposal for the A47 RIS to have an even greater impact than is already planned is unreasonable.

The loss of any land and boundary features are regrettable and Mr Meynell's representatives have indicated the problems caused to the estate from the loss of 3 hectares of land.

The Easton Estate is currently losing 30 hectares for the road, together with temporary land use over 33 hectares, 16.5 hectares of which will be affected by permanent rights. The landowner is keen not to lose more land or to suffer increased detriment to the retained property.

We recently requested the ability to attend hearings and attach the letter as an appendix.

2. Side Road between Taverham Road and Church Lane, Easton:

The landowner was concerned about land loss required for the side road between Taverham Road and Lower Easton. However, the removal of this link creates a different significant problem related to access to Easton Lodge with especially heavy farm traffic and heavy goods vehicles. Access is required for crop storage, access generally and for services to the houses.

This issue is dealt with further in response RR-023.8 below and see *attachment for location required for access to estate at Lower Easton*

RR-023.2

We note that no further mitigation is considered necessary by the applicant in accordance with Chapter 7 Landscape and Visual and Chapter 11 Noise and Vibration.

This response refers to the section between Taverham Road and Lower Easton.

The Applicant refers to the need for rights of access for maintenance by certain statutory undertakers and Orsted.

In relation to the previous point and RR-023.8 following, it is important to be able to access the southern portion of land adjacent A47 and for any private means of access to be extended to link with Church Lane, Lower Easton.

It seems sensible for the land reserved for the Orsted private access from Taverham Road to be constructed as a private means of access suitable and reserved for Orsted, Messrs Gowing and the landowner.

See *aerial image of the existing access to Easton Lodge, attached.*

RR-023.3

This section refers to screening of the Restricted Byway and the earth bund or embankment between Wood Lane and the River Tud crossing.

1. Restricted byway

There is an area where the potentially temporary route of the restricted byway will be unsecured. It has been agreed with the applicant that fencing and hedging will be agreed as part of compensation measures.

2. Embankment

The applicant has provided information on the proposed earth bund, design drawings and more recently topographical data. The Applicant will need to be guided by the regulations and appraisals, but there has been a reluctance to discuss mitigation measures from the landowner's perspective as opposed to the Applicants assessment of "need".

The landowner has assessed the eventual ground levels of the carriageway and the 2-metre embankment as a means of protection for visual intrusion and noise.

In the absence of collaboration, the landowner has had to resource landscape, noise, and highways advice throughout the process.

The Landscape Partnership, who provided early-stage landscape advice, and *Create Consulting* who have advised recently in relation to noise and highways have both advised the landowner that the 2-metre embankment is insufficient to provide a level of protection a landowner might reasonably expect along sections of the scheme.

The road will be located a significant distance to the north of the existing road on higher ground and we suggest the retained property should be impacted as little as reasonably possible by increased noise and overlooking. This is made more difficult because along much of the route, the land north of the scheme is higher than the scheme, so views pass straight over the bund, where it exists.

The Applicant indicates more need not be done, whereas we consider they should do as much as reasonably possible to mitigate the obvious impact of the works, and that more can be done.

We attach drawings to demonstrate views towards the scheme at 7 various points along the route.

Notwithstanding the applicant's comments about chainage 5 + 650 metres to 6 + 100 metres, there are large stretches where the impact of the road will be significant, and the bank will neither mitigate the works and the use of them visually, nor assist with noise attenuation.

Chapter 11 (Noise and Vibration) refers to the premises at Hall Farm, which consists of a traditional farmhouse, four houses and a set of traditional buildings suited to alternative uses. It states that there will be lasting significant adverse noise effects in this location. Because the barrier considered was likely to

provide only limited benefit, the decision has been made to do nothing about it other than rely on the quiet road surface. We suggest a better barrier specification could enable both noise and landscape benefits.

Extract from Chapter 11; table 11.16 Final operational noise significance summary table

<p>Hall Farm and Hall Farm Cottages, Honingham (5 receptors)</p>	<p>Major adverse in the short-term, moderate adverse in the long term</p>	<p>Significant adverse</p>	<p>These receptors are predicted to experience a major adverse impact in the short-term and a moderate adverse impact over the long-term due to the Proposed Scheme.</p> <p>Do-Something road traffic noise levels are predicted to be below SOAEL and above LOAEL at all receptors. The highest Do-Something road traffic noise level is predicted be 58 dB $L_{A,10,18hr}$ (in the future year) at Hall Farm.</p> <p>Therefore, because of the change in road traffic noise level that is predicted to occur due to the Proposed Scheme, this adverse effect is considered to be significant. A noise barrier is not proposed at this locations it is not a proportionate or reasonable mitigation measure.. This is discussed further in 11.9.29. Mitigation in the form of a low-noise surface along the length of the Proposed Scheme has been included, however, this is not sufficient to avoid significant adverse noise effects in this location.</p>
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To explain the views across various sections, we attach a series of plans. The views overlaid on the estate plan, the extent of a bank required to deliver preferred bund dimensions and 7 long views.

We summarise:

- **Section 1:** The view towards the Wood Lane junction is reasonably well screened because the dumbbell roundabout is low. The main carriageway, between the dumbbell roundabouts is much higher and will be open to view.
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- **Section 2** is taken midway between the Wood Lane junction and the Hall Farm underpass. It is clear the road will be clear to view as the road stays high and rises towards the underpass. Passing vehicles will remain visible.
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- **Section 3:** The carriageway over the Hall Farm underpass will be very high in relation to the surrounding landscape with clear visibility and no noise mitigation. These issues are not experienced with the current road, and it isn't clear why this scheme can be projected into the location without reference to privacy and landscape protection.

A scheme to mitigate the intrusion of the Hall Farm underpass will require significant land take on the landowner's land. We recognise it is likely to have to be done in isolation from the scheme, by the owner if the applicant does not accept further works are necessary or justified.

- **Section 4:** To the east of the Hall Farm underpass the road remains high and as the ground level runs down towards the road, greater protection is required. The road does then enter cutting and the impact reduces as the road approaches Hall Farm through **Section 5**.

The road is cut in around 1 metre so with the bank of 2m, although it is situated half the distance away from Hall Farm and the cottages than at present it shouldn't require much material to improve the situation.

Approaching **Section 6**, the road and vehicles will become increasing visible because of the elevation of the surrounding land.

- **Section 7:** As the land falls away southwards towards the River Tud, the road is elevated on an embankment with very clear sightlines from Hall Farm and the houses.

It would require a significant embankment ideally set at a distance north of the works to mitigate this completely open sight line. We have previously proposed the bund be extended on the north side of the attenuation lagoon.

Combining the proximity of the works and limited protection with the prevailing south westerly wind means the landowner can only expect significant deterioration in noise levels, tranquillity, and privacy.

We hope the examining authority will direct the Applicant that further work is required to agree increased embankment heights and the extent of the embankment near Hall Farm, to mitigate the impact of the realignment of this road.

RR-023.4

The applicant has advised that for engineering and wind loading reasons it is not possible to add screen fencing in the two most exposed locations reflected at section 2 and section 6 in previous comments. We respectfully suggest this justifies even more collaboration by the Applicant to find another way to reduce deterioration in the quality of the retained property.

RR-023.5

The Applicant is convinced few vehicles will use Weston Road and the road over Ringland Hills (Ringland Rd.) when Honingham Lane is stopped up.

We request the Examining Authority consider the alternative access proposed for heavy farm vehicles via Weston Road and Ringland Road. These lanes are barely serviceable for cars and light vans and do not provide a suitable route for heavy farm equipment.

Increasing the need for heavy farm equipment and normal road users to interact in these lanes will cause difficulties as the roads are not wide enough, the junctions are not of satisfactory radii and improvements will be necessary, whatever they may be.

If the parties ultimately accept that these are appropriate alternative routes, if passed could the Examining Authority please embed in the Development Consent Order the need for the applicant and Norfolk County Council to assess constantly the impact on the local road network to inform any improvements required.

RR-023.6

The landowner is pleased the applicant has agreed to amend the structure S04 to provide a 5 metre vertical head room within the box structure.

RR-023.7

The applicant has confirmed the landowner will not be responsible for any water pipe under or to the south of the scheme and that a meter will be fitted on the north of the scheme works.

We welcome further discussion about the precise location and works required for the meter and any rerouting of supplies.

RR-023.8

This refers also to RR-023.5. The need to take heavy farm vehicles along Weston Road and south to Lower Easton to access the land adjacent A47 in front of Fore Cottage is significantly more awkward and unsatisfactory than the current access directly from the A47.

We have requested the applicant extends the proposal for the Orsted private means of access and provides a private means of access from the Taverham Road junction to Lower Easton.

This would enable Orsted to use it when required and for Messrs Gowing and the Landowner to use it in relation to their respective land. It would reduce at least one of the side road problems and is likely to assist other discussions about accommodation works.

The applicant has further agreed that concerns about access to crop storage and a concrete pad on the estate be dealt with through accommodation works and compensation.

Brown & Co
05.10.21