

A47 North Tuddenham to Easton

Scheme Number: TR010038

Volume 9

9.11 Applicant's Comments on Other Third Party Comments

The Infrastructure Planning (Examination Procedure) Rules 2010
Rule 8(1)(c)

Planning Act 2008

October 2021

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning
(Examination Procedure) Rules 2010**

A47 North Tuddenham to Easton
Development Consent Order 202[x]

9.11 APPLICANT'S COMMENTS ON OTHER THIRD PARTY COMMENTS

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CONTENTS

1	Introduction	1
2	Key Abbreviations.....	1
3	Mr A C Meynell	2
4	Weston Longville Parish Council	2
5	Anthorny Clarke, on behalf of the NorwichH Cycling Campaign	4

1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 North Tuddenham to Easton scheme was submitted on 15 March 2021 and accepted for examination on 12 April 2021.
- 1.1.2 The purpose of this document is to set out Highways England's (the Applicant) comments on the following responses by third parties issued 14 September 2021:
- A C Meynell's Deadline 2 Submission - Responses to comments on RRs (**REP2-026**)
 - Richard Hawker's Deadline 2 Submission - Responses to comments on RRs (**REP2-028**)
 - Weston Longville Parish Council's Deadline 2 Submissions:
 - Responses to comments on RRs (**REP2-031**)
 - Comment on Deadline 1 Submissions (**REP2-033**)
 - Anthony Clarke on behalf of Norwich Cycling Campaign Deadline 2 Submissions:
 - Highways England Licence (**REP2-034**)
 - Gear Change (Department for Transport Document) (**REP2-035**)
 - Review of Highways England's engagement approach with local and regional partners June 2020 (**REP2-036**)
 - Proposed 2031 Cycling and walking infrastructure plan (**REP2-037**)
 - Cycle Infrastructure Design (**REP2-038**)
 - Non-IP submission accepted at the discretion of the Examining Authority (**REP2-039**)
- 1.1.3 The following sections present the responses where additional information or clarity by the Applicant is required.
- 1.1.4 The Applicant has no further comments to make on the response by Mr Hawker¹.

2 KEY ABBREVIATIONS

- 2.1.1 The following common abbreviations have been used in the Applicant's submissions to the Examination:
- dDCO = draft Development Consent Order
 - DMRB = Design Manual for Roads and Bridges
 - ExA = Examining Authority
 - NPSNN = National Policy Statement for National Networks 2014
 - NWL = Norwich Western Link
 - the Scheme = the A47 North Tuddenham to Easton dualling scheme

¹ Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-000570-DL7%20-%20Richard%20Hawker%20-%20Responses%20to%20comments%20on%20RRs.pdf>

3 MR A C MEYNELL

3.1.1 Mr Meynell's responses to the Applicant's response to the Relevant Representations (**REP1-013**) are available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-000595-DL7%20-%20A%20C%20Meynell%20-%20Responses%20to%20comments%20on%20RRs.pdf>

3.1.2 In this response, the Applicant seeks to provide additional information or clarity where required. This does not cover all of the issues raised by Mr Meynell, but the Applicant has no further comments to make at this stage in respect of the heritage and landscape assessment and consultation process over and above what has been stated in the Applicant's Response to the Relevant Representations (**REP1-013**) submitted at Deadline 1 and Applicant's Response to the Written Representations (**TR010038/EXAM/9.8**) submitted at Deadline 3.

RR Reference	Comment	Applicant Response
RR-061.1	<p>The Applicant's comment does not take into account the fact that the alternative access identified into the Estate from Berry's Lane (C167) cannot be used by HGVs. See Mr Meynell's statement at ACM 03 at para 155 et seq.</p> <p>For those vehicles which currently use the "old back drive" as referred to in Mr Meynell's statement at para 161, the inability to continue its use will mean an extra journey of approximately 2 miles and if approaching from the west, the necessity to pass through four villages and their built- up areas, which would not otherwise have been necessary.</p>	<p>The Applicant's has considered Mr Meynell's concerns that the alternative access identified cannot be used by HGVs in the Applicant's Response to the Written Representations (TR010038/EXAM/9.8) submitted at Deadline 3.</p> <p>With regards the extra journey distance, the Applicant acknowledges this is due to the additional removal of closure of Berrys Lane connection to the existing A47.</p> <p>The 2020 statutory consultation design retained a through connection between Berrys Lane connection and the A47 Wood Lane junction, but following statutory consultation feedback from the public and engagement with the Local Liaison Group (Norfolk County Council and Parish Councils) the Scheme design was amended to close access to Berrys Lane.</p> <p>This was to avoid an increase in north-south traffic movements using Berrys Lane and associated safety risks to local residents, especially children. This change is reported in Table 4.12 (item no. 6) of the Consultation Report (APP-024).</p>
RR-061.5	<p>The Objector made a written objection to the 2017 Consultation on the four options in which he objected to that which was set to pass through the Estate and which omitted to refer to Berry Hall as being a listed property (referring only to the Ice House (see ACM 03.11A plan 5). At that point there were no junctions proposed at the mid-point of the route on any plans. See ACM 03.11A plans 1-4 Engagement by the Applicant with the Objector prior to the Applicant's decision to locate a junction at Wood Lane was nil. Engagement by the Applicant with the Objector on the design and location of the Scheme between January 2020 and the date of the application for the DCO was limited to the two visits by the Applicant referred to in ACM 02 and ACM 03 and listed in the timeline at ACM 03.11 on 27 January 2020 and 14 December 2020.</p>	<p>The Applicant would direct the Examining Authority to the following responses in the Applicant's Response to the Relevant Representations (REP1-013):</p> <ul style="list-style-type: none"> • RR-061.9 • RR-061.11 • RR-061.13

4 WESTON LONGVILLE PARISH COUNCIL

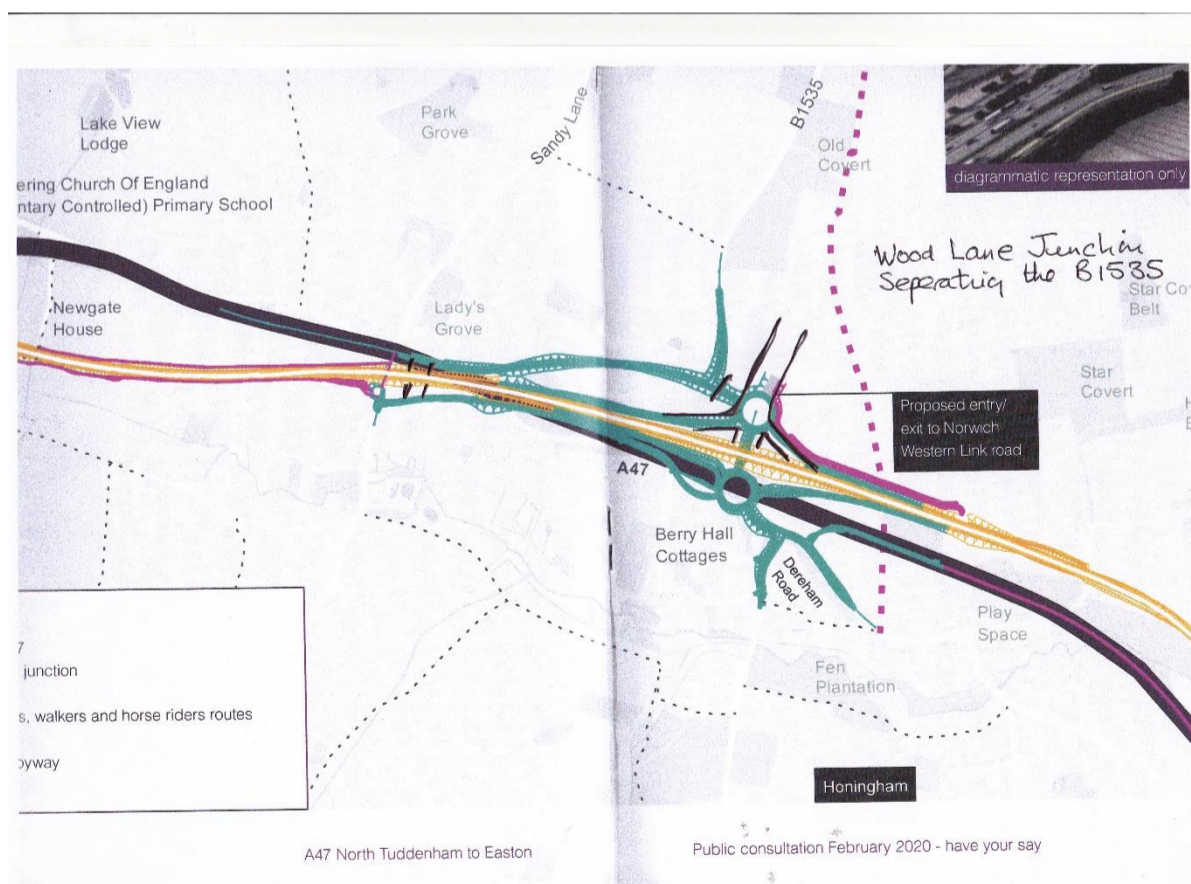
4.1.1 Weston Longville Parish Council's responses to the Applicant's response to the Relevant Representations (**REP1-013**) are available at:

- <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-000559-DL2%20-%20Weston%20Longville%20Parish%20Council%20-%20Responses%20to%20comments%20on%20RRs.pdf>
- <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-000558-DL2%20-%20Weston%20Longville%20Parish%20Council%20-%20Comment%20on%20D1%20Submissions.pdf>

4.1.2 In this response, the Applicant seeks to provide additional information or clarity where required. This does not cover those issues where the Applicant has no further comments to make at this stage above what has been stated in the Applicant's Response to the Relevant Representations (**REP1-013**) submitted at Deadline 1 and Applicant's Response to the Written Representations (**TR010038/EXAM/9.8**) submitted at Deadline 3.

RR Reference	Comment	Applicant Response
RR-004.2	<p>Savills UK on behalf of Anthony Meynell</p> <p>Deadline 1 Submission - Written Representation ACM 04 Transport Consultant's Report</p> <p>2. In its response RR-004.2 HE</p>	<p>Please see RR-004.1 and RR-004.2 of the Applicants Responses to the Relevant Representations (REP1-013) where feedback was provided on the Scheme design and the "Interchange" option submitted by WLPC for review.</p> <p>The Scheme Design Report, Rev.1, (AS-009) sets out the justification for the junction at Wood Lane, details the options considered and outlines the Applicants position on the inter relationship with the proposed NWL.</p>

RR Reference	Comment	Applicant Response
	<p>makes no mention of the second proposal put forward by WLPC following the brusque rejection by the 'senior member of the Integrated Project Team' of the proposal for an interchange. A proposal which shares some similarities with the Berry Hall Estate options but separates the B1535 from the roundabout.</p>	<p>The Applicant has engaged throughout the Scheme development with the Local Highway Authority on the development of the junctions and sideroads.</p> <p>The Applicant has explained to the Weston Longville Parish Council (WLPC) that the Council's desire for a free flow interchange between the A47 and NWL is not required for the traffic flows and would be significantly oversized.</p> <p>WLPC's principal aim is to completely disconnect the B1535 from the Strategic Road Network, but as the local highway authority's assigned HGV route this is not something that the Applicant can influence.</p> <p>In response to statutory consultation feedback, the Applicant disconnected the B1535 from the northern roundabout and relocated the B1535 connection west to a T-Junction with the new sideroad linking into the Wood Lane Northern Junction to mitigate the concerns of WLPC.</p> <p>The Applicant notes the following on the second alternative provided by WLPC (see snapshot below):</p> <ul style="list-style-type: none"> • Did not account for the A47 being a standalone scheme with committed government funding in place for delivery. • Assumed the NWL was delivered and disconnected the local highway authority assigned HGV route (B1535) from the Strategic Road Network (SRN). • Did not account for the NWL scheme being delivered independently by the Local Highway Authority and had no planning consent or funding secured. • Was not in accordance with the UK Design Manual for Roads & Bridges (DMRB). • Would require more land take from landowners north of the proposed A47 to accommodate the free flow links onto the proposed NWL scheme. • Required two new structures compared to one proposed, which would incur a greater embedded carbon footprint. • Removed a direct connection to the SRN from Hockering, with users then routed via a local road junction under the A47 connecting to a new sideroad linking to the southern roundabout at Wood Lane to access the SRN. • Required additional land take from the Berry Hall Estate to provide a sideroad connection to the proposed underpass linking to the southern roundabout at Wood Lane. • Maintained the north – south route through the Barnham Broom corridor to Weston Longville, contrary to design changes agreed in consultation with the local highway authority and Parish Councils following statutory consultation feedback.



5 ANTHONY CLARKE, ON BEHALF OF THE NORWICH CYCLING CAMPAIGN

5.1.1 Mr Clarke's Deadline 3 submission with regards the Scheme is presented in the following document:

- <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010038/TR010038-000602-Norwich%20Cycling%20Campaign%20D2%20Submission.pdf>

5.1.2 Mr Clarke's Deadline 3 submission is supported by the following reference documents:

- <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010038/TR010038-000598-Anthony%20Clarke%20-%20Other-%20Documents%20in%20support%20of%20Norwich%20Cycling%20Campaign%20submission%2014%20September%2001.pdf>
- <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010038/TR010038-000601-Anthony%20Clarke%20-%20Other-%20Documents%20in%20support%20of%20Norwich%20Cycling%20Campaign%20submission%2014%20September%2004.pdf>
- <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010038/TR010038-000597-Anthony%20Clarke%20-%20Other-%20Documents%20in%20support%20of%20Norwich%20Cycling%20Campaign%20submission%2014%20September.pdf>
- <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010038/TR010038-000599-Anthony%20Clarke%20-%20Other-%20Documents%20in%20support%20of%20Norwich%20Cycling%20Campaign%20submission%2014%20September%2002.pdf>
- <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010038/TR010038-000600-Anthony%20Clarke%20-%20Other-%20Documents%20in%20support%20of%20Norwich%20Cycling%20Campaign%20submission%2014%20September%2003.pdf>

5.1.3 The Applicant has identified three main themes and responds to those accordingly.

Timing of this Inquiry and Interaction with the NWL

5.1.4 The Scheme is not dependent on the NWL road scheme and would proceed without the NWL coming forward. However, in July 2019, Norfolk County Council announced the preferred route for their NWL. In May 2020, the Department for Transport approved the Strategic Outline Business Case for NWL. As a consequence, under the Department of Transport traffic modelling guidance, the NWL must be considered as a 'certain development' in the traffic model addressing the need case for the Scheme.

5.1.5 However, if the Scheme were to be completed without the NWL, a junction would still be required to connect the A47 with the B1535 (Wood Lane), which is the locally assigned heavy goods vehicles (HGV) route to the north and provides access for Hockering and northern parishes to the A47. The B1535 would be replaced by the NWL if it comes forward. Therefore, there is a requirement for the Scheme to build a junction at this location whether the NWL is built or not.

5.1.6 Section 4 of the Scheme Design Report, Rev.1 (AS-009) explains the considerations that informed the design of the Wood Lane junction for the Scheme, including why a grade separate junction is needed.

5.1.7 Section 9.2 of the Scheme Design Report also explains why it has provided for the ability to create a stub connection to the NWL within its design.

5.1.8 Although the NWL does not have consent to be constructed yet, the Applicant is working with Norfolk County Council as it is important to understand how the two schemes would interact. In addition, as the local highway authority has a well advanced scheme that will connect with the A47, it is both sensible and pragmatic for the Scheme to anticipate that the NWL may come forward. The Applicant is required to be as efficient as possible with public money and ensure the community benefits from joined up working with regards planning new major developments and cost control both for the short and long term.

5.1.9 In addition, the reconfiguration of a newly built roundabout on a strategic highway junction to incorporate a new arm post construction of the Scheme would incur environmental and social impacts that could be avoided if the junction was designed to incorporate the NWL. These benefits are discussed in Section 9.2 of the Scheme Design Report, Rev.1 (AS-009).

WCHR Assessment Review

5.1.10 Much of the information identified by Norwich Cycling Campaign as being omitted from the WCHR Assessment is not directly relevant to the Scheme since the majority of the features and facilities identified by the Campaign are located some distance to the east of the Scheme extents. The DMRB standard *GG142 Walking, cycling and horse-riding assessment and review* states at paragraph 4.7.1, page 16, (in relation to Table 4.7 Information requirements for large and small highway schemes) that "*The Lead Assessor should determine the appropriate quantity of the information to be captured, such that only information which can be used to help inform the highway scheme design is collated.*"

5.1.11 To comply with the requirements of the NPSNN, the Applicant has sought to both mitigate the environmental and social impacts of the Scheme and provide improved facilities for users by incorporating a reasonable and proportionate package of improvements for walkers, cyclists and equestrians.

5.1.12 As part of the Environmental Impact Assessment, the Applicant has undertaken an assessment of the effects of the Scheme on land-use and accessibility, which includes the effects on walkers, cyclists and horse-riders (WCH), in accordance with DMRB standard *LA 112 Population and human health*. LA 112 recommends that the study area for the assessment of the effects on land-use and accessibility shall comprise the construction footprint/project boundary plus a 500 metre area surrounding the project boundary. It goes on to state that where likely effects are identified outside the 500 metre area, the study area should be extended accordingly. As the majority of the features and facilities identified by the Campaign are located some distance to the east of the Scheme extents, none will be impacted significantly by the Scheme.

5.1.13 In identifying the package of walking, cycling and horse-riding improvements to be provided as part of the Scheme, the Applicant

has been cognisant of the extent of the likely effects.

- 5.1.14 Regarding the impact of the proposed NWL scheme, the Applicant is cognisant of the WCHR strategy for the NWL, which was evolving when the WCHR Assessment was undertaken for the Scheme and held regular liaison meetings with the NWL Design Team. For this reason, no details of the WCHR strategy for the NWL are provided in the WCHR Assessment. Notwithstanding this, the package of improvements for walkers, cyclists and equestrians to be provided as part of the Scheme mitigates the environmental and social impacts and both expands and enhances the existing networks.

Consultation and Liaison with Stakeholders

- 5.1.15 Regular liaison was undertaken with Norfolk County Council officers throughout the design process, including liaison with the Design Team for the NWL.
- 5.1.16 Regular liaison was also undertaken with the Parish Councils through a Local Liaison Group, comprising Norfolk County Council and the Parish Councils.
- 5.1.17 Liaison was undertaken with the Public Rights of Way (PRoW) and Active Travel officers of Norfolk County Council early in the design programme to obtain an understanding of walking, cycling and horse-riding activity in the area of the Scheme. A key take away from these initial consultations was a request for the design team to investigate opportunities to provide safe crossing facilities for north to south movements of all users across the proposed A47 alignment. Additionally, Norfolk County Council confirmed that the only equestrian activity in the area of the Scheme related to Easton College, but the Council was not concerned that this activity would be impacted by the Scheme.
- 5.1.18 The Scheme held Statutory Public Consultation between February and April 2020. Comprehensive feedback on the proposals, including comments on the Scheme drawings and suggestions for improvement to cycling facilities, was received from Norwich Cycling Campaign in July 2020. The feedback from Norwich Cycling Campaign together with that received from other consultees and the wider community, influenced the evolving WCH strategy.
- 5.1.19 The proposed WCH strategy was presented to the PRoW and Active Travel officers of Norfolk County Council at a meeting held in August 2020. Overall, Norfolk County Council officers were supportive of the proposed WCH strategy, with the exception of a few PRoW concerns. The proposed WCH strategy was subsequently amended to address some of these concerns.