

Deadline 4 –

Written summary of oral submissions made at hearings w/c 1 November 2021

Comments on any additional information/submissions received by D3

On behalf of Honingham Aktieselskab - A47 North Tuddenham to Easton Road Improvement Scheme

Scheme Reference: TR010038

Unique Reference: 20028284

Purpose of representation

1. Comments on additional information/submissions received by D3, in relation to the submissions from Berry Hall Estate as they affect the land north-east of Wood Lane.
2. Comments on additional information/submissions received by D3, in relation to the submissions from the Applicant.
3. To present written summary of oral submissions made at hearings w/c 1st November 2021

1. Comments on additional information/submissions received by D3, in relation to the submissions from Berry Hall Estate as they affect the land north-east of Wood Lane.

We write to make representations on behalf of Honingham Aktieselskab trading as Easton Estates.

The Easton Estate is a very attractive traditional Norfolk estate with great diversity of landscape and habitat.

Since the two road improvement schemes, the A47 Road Improvement Scheme and Norwich Western Link, became a possibility the owners have had to carefully consider the main attributes of the estate to clarify how reasonable it is to expect the merits of the property to influence the routes of these works.

Other than the appraisals and investigations carried out by the Applicants, the owners have undertaken investigations into alternative highways solutions and the quality of the landscape, ecology, and habitat. Without exception the respective consultants have been impressed by the quality of the estate and warned about losses in quality from these interventions within the estate. This has enabled the owners to make representations against the roads generally, but in the light of the likelihood that the schemes will proceed, in favour of routes that minimise impact by locating any works along the outside edges of the property.

During the design stages, both the A47 RIS and Norwich Western Link have migrated further into the estate and will cause significantly more interference than was previously intended.

The Norwich Western Link severs 140 acres and extends on the property's northern western boundary some 800 metres into the property.

The A47 takes land from approximately 16 enclosures along a 2 km length on the southern, omitting third party land.

Throughout the western section of the farm, between Wood Lane and the River Tud, the carriageway extends approximately 150 metres into the farm, so the impact is significant along the entire southern section of the estate and from the NWL, along the western section. In addition there are two large cable easements proposed by Orsted and Equinor.

The Applicant has considered the impact on the Easton Estate of the Berry Hall Estate proposed amendments and suggest they would require between 20 and 25 acres extra excluding earth works and any later modifications.

The owners of the Easton Estate would prefer no losses caused by the scheme at all, but certainly do not wish to lose more land. Since the route was established, the owners decided not to try to remove the scheme from the estate onto third party land and considers that each property needs to bear a share of the detrimental impact.

While they are not trying to force greater impact onto anyone else, they don't particularly want anyone else to force further impact onto them.

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2. Comments on additional information/submissions received by D3, in relation to the submissions from the Applicant – REP3 – 022

The Applicant again refers to the works being in cutting between chainage 5+650 to 6+100m but ignores the longer sections of the works which are raised.

We have referred to this before and again at section 3 following, but the reliance on the “assessments undertaken” is unfortunately to ignore or under consider the long-term impact on the retained property.

To leave the scheme as at present will knowingly increase the quantum of compensation required where the owners would prefer to maximise mitigation.

It is disingenuous to assume that the owners and future owners will be mollified by a third-party assessment by a person or persons unknown. The assessment has been made by consultants who have never met the owners or their representatives to discuss what impact is considered likely, nor to understand the interaction of this portion of the estate with the rest.

The drawings at REP3 – 030 to REP3 – 034 provide clear evidence that the scheme will impact on the retained land and the Applicant’s denigrating the vertical scale does not make the drawings incorrect nor does it prevent a meaningful discussion about the impact of further embankment which would be reviewed in the same vertical scale as the drawings.

The Applicant disagrees with the information contained within the Create report within the written reps, but it is worth noting that although the Applicant doesn’t consider land such as woodland, arable land, marshes and plantations are noise sensitive receptors, they are to an owner.

An owner has the right to continued reasonable enjoyment and any planning permission and the related scheme should aim to mitigate losses in amenity and natural tranquillity. These proposals do not make any effort to do more than the bare minimum and by their own admission fail in respect of the residential properties.

The Applicant still makes no effort to counter these impacts, which they could do by relocating and extending the bund as suggested.

The Applicant has agreed, in their rep, but at no other time to work with the estate if they wish to do their own mitigation work and manage any interaction with the scheme. The Applicant considers this work will be at the owners costs, but it is worth pointing out that it will be paid for in increased injurious affection matters, so it is a shame that could not have been avoided.

We look forward to the designs of the Hall Farm underpass.

Access by Ford Cottage is almost as far from the farm complex as it could be and therefore as little use as it could be.

it will only serve all the severed land if the owner creates an internal roadway across two fields and between 500 and 600 m in length.

Access is currently taken from the A47 directly from the south in each enclosure, so to pass off the proposed access as suitable as provided is a basic error.

There is little interest in the continued operations by affected owners, so the owners will have to make accommodations if the Applicant doesn’t. The PMA from Taverham Road would resolve this and other issues.

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i. Plot specific issues

While the owners understand and respect Mr Meynell's desire to limit the impact of the scheme on the Berry Hall Estate and understand that the approximately 3 hectares loss from the Berry Hall Estate is relatively significant, it is worth considering that the Easton Estate is losing 72 acres permanently, 41 acres temporarily with permanent rights and with a further 42 acres used temporarily.

ii. Temporary Use

We request less land is taken for temporary use as the use of entire fields appears excessive. We accept the Applicants have not finalised the design and material storage requirements, but request the temporary land use be reduced where possible and particularly on the enclosure to the west of Hall Farm.

iii. Private means of access from Taverham Road/Norwich Road junction to Lower Easton

Although we make further comment under the Local Roads section, we requested a permanent private means of access from the Norwich Road junction on the north side of the scheme to link Taverham Road with Lower Easton.

This is designed to replace the access to the fields north of the works which are otherwise cut off. The proposed access near Ford Cottage is not appropriate for use by significant farm machinery and forcing the farm to take access from a single point of access as far from the farm complex as possible along poor and unsuited roads.

A private means of access would enable the neighbours Messrs Gowing to access their land in case it is helpful.

It could also prevent the awkward access to Easton Lodge and the properties in the vicinity which would otherwise have to increase the traffic burden along the inappropriate Western Road, Lower Easton diversion proposed by the Applicant.

The private means of access could also be used by Orsted as a permanent right for construction and access rather than the proposal to provide a temporary access for them with removal after the works are completed.

3 Side roads issues

The local roads around the Easton Estate and Ringland Estate are small with tight radius turns and significant rises and dips.

A significant amount of traffic penetrates from Taverham and South Costessey across Ringland Hills to the Easton roundabout.

When that is closed, a similar amount will follow the same route and then turn westwards along Weston Road and south to the Norwich Road junction along Taverham Road.

The size of agricultural vehicles is huge and does not mix well with busy local rural roads. Forcing the agricultural traffic, cars and vans to navigate the same inappropriate roads required because of the temporary road closure of the Ringland Road will cause significant problems.

The Applicant is indicating this is a matter for Norfolk County Council to resolve after the A47 scheme is completed, but this risks the issue falling between two stools.

The Applicant is proposing to close this road and they should engineer a solution for the larger traffic that requires to continue to use it to access land beyond the closure such as the Ringland Estate and Easton Estate which need to access land Ringland and in Taverham respectively rather than absolving themselves of the responsibility.

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The private means of access from the Norwich Road junction to Lower Easton would at least enable a less circuitous route into the Easton Lodge land to the east of the owner's property but the temporary closure has a significant adverse impact on accessing separate land at Taverham. Both these changes are necessary.

4 Landscape and mitigation of works

We have already mentioned the significant impact on the property. The Applicant's own surveys indicate the serious adverse impact of the road on Hall Farm.

During the hearings the Applicant indicated to mitigate the works, especially as Hall Farm would require too significant intervention and therefore appears disinclined to mitigate the impact of the scheme.

There is almost no embankment and bunding mitigation on the comparable scheme between Blofield and North Burlingham, very limited if any embankments for sound and light spill mitigation on the A47 Thickthorn Scheme.

Where Norfolk County Council tends to endeavour to mitigate with embankments as can be seen from a drive along the Norwich Distributor Road, the Applicant remains unwilling and by past performance, tries to avoid mitigating the impact on owners' property.

The Applicant was critical of the owner's drawings presented at reference Rep 3-030 to 037 whereas in fact an exaggeration of the vertical scale doesn't make the drawings less plausible, it merely accentuates the image.

The height of the carriageway and the type of embankment required to mitigate the respective height of articulated lorries is displayed clearly with a vertical scale and with the greatest respect provides a far clearer image than the overlong horizontal scale long views presented by the Applicant.

In parts, relatively modest increases in the height of the embankment will have a significant impact. In other parts more significant works are required, more notably:

- i. from the Wood Lane junction eastwards to a point approximately to the east of the Hall Farm underpass and
- ii. as the road travels past Hall Farm towards the Tud Valley which can be best screened.

The former section near the Hall Farm underpass can be best screened with additional height bunding within the red line area where the owner is prepared to make land available.

The latter area towards the River Tud is best mitigated by extending the embankment on the north side of the wood and the attenuation lagoon at a higher level than to run is down alongside the road.

If the examining authority is not inclined to persuade the Applicant to mitigate their unwelcome scheme and seeks to accept reliance on a 15-year point in the future where tree planting might have grown up to dissipate the view, we request that the scheme be tailored to enable the owners to undertake their own works on what will be retained land on the estate side of the embankment, with any scheme planting to be undertaken thereafter.

5 Conclusion

We have worked as closely with the Applicant as possible, and we still have a few areas which could mitigate the impact of the scheme significantly.

We would welcome the examining authority's assistance to reach a conclusion suitable to the owners who will remain interested in this property long after the completion of the road improvement scheme.

On behalf of the owners we would be delighted to field further questions or to discuss any of these issues in the spirit of good faith if the same approach is taken by the Applicant.

Brown & Co
12.11.21