

A47 DUALLING – NORTH TUDDENHAM TO EASTON

Scheme no. TR010038

SUMMARY OF SUBMISSIONS

At CAH1 (am 3 Nov 2021)

On behalf of A.C. MEYNELL of [REDACTED]

IP reference 2002/8353



ACM 10

12 November 2021

Infrastructure Planning – Planning Act 2008

The Infrastructure Planning
(Examination Procedure) Rules 2010
Regulation 10

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

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On behalf of A.C. MEYNELL of [REDACTED]

Application reference: TR 010038

Interested Party reference: 2002/8353

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SUMMARY OF SUBMISSIONS MADE ON BEHALF OF MR ANTHONY

MEYNELL COMPULSORY ACQUISITION HEARING 1

WEDNESDAY 3 NOVEMBER 2021 – AM SESSION

INTRODUCTION

1. This note summarises the submissions made on behalf of Mr Anthony Meynell ('ACM') during Compulsory Acquisition Hearing 1 ('CAH1'), held virtually on 3 November 2021.
2. The submissions related to:
 - a. The Applicant's claim that it has investigated reasonable alternatives;
 - b. ACM's view that, even if his alternative junction locations/designs ('wholesale alternatives') are not accepted, there are modifications that can be made to the proposals for compulsory acquisition of the [REDACTED] that will result in lesser compulsory acquisition.
 - c. The impact of the overdesign of the junction in the 'without NWL' scenario upon the need for compulsory acquisition.

SUBMISSIONS

Reasonable alternatives

3. ACM accepts that the Applicant has considered alternative schemes to the application proposal. Specifically, it is acknowledged that it has considered alternative routes, and alternative junction locations at the route-wide level. It has also considered alternative forms of junction – namely, at-grade, partially grade-separated and fully grade-separated.
4. Having settled on a fully-grade separated design, what it has then failed to do is consider alternative forms of fully-grade separated junction or the 'micro-location' of the preferred junction design.
5. The possibility of relocation of the junction was raised by ACM both in early 2020 (in response to statutory consultation) and again in December 2020/Jan 2021. The account

given by ACM is that he was told it was not possible to move this due to the redline boundary being fixed. This point gives rise to the inadequacy of consultation argument advanced in ACM 02 (REP1 – 044).

6. The experts engaged on behalf of ACM have concluded that there are feasible alternative designs. These would involve a lesser degree of compulsory acquisition and/or reduced environmental impacts. These alternatives have formed the basis for the submission on alternatives presented by ACM at Deadline 3 (REP3-045).
7. The difficulties faced by an objector who is a private individual seeking to advance alternative designs within the short timescale offered by the Examination process must however be recognised by the Examining Authority. Fundamentally, the work ought to have been done by the Applicant at the appropriate time and its failure to do so undermines its case for compulsory acquisition.

Other changes to the proposed compulsory acquisition

8. ACM noted that, even if his wholesale alternatives are not accepted, there are modifications that can be made to the proposals for compulsory acquisition of Estate that will result in lesser compulsory acquisition. These were to be reported during CAH 2.

Implications of junction overdesign in the 'without NWL scenario'

9. The transport report submitted at Deadline 1 (ACM 02, REP1-057) advances a case that, in the absence of the NWL link, the proposed junction design is considerably over-engineered. In the absence of that proposal, a reduced scale of junction should be implemented.
10. ACM noted that, if this is accepted, that has a consequence for the degree of compulsory acquisition that might be regarded as necessary.

FOR AND ON BEHALF OF MR ANTHONY MEYNELL

12 November 2021