

A47 North Tuddenham to Easton

Scheme Number: TR010038

Volume 9 **9.22 Applicant's Responses to Deadline 4** **Comments**

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

Planning Act 2008

November 2021

Infrastructure Planning

Planning Act 2008

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(Examination Procedure) Rules 2010**

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

9.22 APPLICANT'S RESPONSE TO DEADLINE 4 COMMENTS

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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 submissions by third parties at Deadline 4 (12 November 2021):

- A C Meynell's:
 - Written summary of oral submissions made at Compulsory Acquisition Hearing 1 (**REP4-022**)
 - Written summary of oral submissions made at Issue Specific Hearing 2 (**REP4-023**)
 - Written summary of oral submissions made at Compulsory Acquisition Hearing 2 (**REP4-024**)
 - Comments on behalf of A.C. Meynell on the Applicant's response to his Written Representations (**REP4-025**)
- Andrew M Cawdron on behalf of Wensum Valley Alliance Deadline 4 submission (**REP-040**)
- Andrew M Cawdron's Written summaries of oral submissions made at hearings w/c 1 November 2021 (**REP4-042**)
- Brown & Co on behalf of Alston Farms Ltd (James Alston and Honingham Thorpe Farms) Written summaries of oral submissions made at hearings w/c 1 November 2021 (**REP4-026**)
- Brown & Co on behalf of Food Enterprise Park Written summaries of oral submissions made at hearings (**REP4-027**)
- Brown & Co on behalf of Honingham Aktieselskab written summaries of oral submissions made at Hearings w/c 1 November 2021 (**REP4-028**)
- Brown & Co on behalf of Mr Neil Alston Written summaries of oral submissions made at hearings w/c 1 November 2021 (**REP4-029**)
- Brown & Co on behalf of N. Alston and A. L Alston & Sons Ltd Written summaries of oral submissions made at hearings w/c 1 November 2021 (**REP4-030**)
- Benefice of Honingham, Diocese of Norwich Deadline 4 submission (**REP4-031**)
- Bryan Robinson further comments on ExQ1 and ISH2 (**REP4-032**)
- Christopher Cockcroft Deadline 4 Submission (**REP4-043**)
- D G M Kenney's
 - Response 1 to Issue Specific Hearing 1 (**REP4-034**)
 - Response 2 to Issue Specific Hearing 2 (**REP4-035**)
 - Comments on any additional information/submissions received by

D3 (REP4-033)

- David Hooker's
 - Part 1 Examination (REP4-036)
 - Part 2 Examination (REP4-037)
- Environment Agency's
 - Comments on Document 9.13 outline water management and monitoring plan (REP4-018)
 - Comments draft DCO (Rev 3) (REP4-019)
 - Comments on Document 9.12 additional information for the lead local flood authority and the environment agency (REP4-017)
- Honingham Parish Council Written summaries of oral submissions made at Issue Specific Hearing 2 (REP4-038)
- Norfolk County Council Written summaries of oral submissions made at hearings w/c 1 November 2021 (REP4-020)
- Norfolk Wildlife Trust Deadline 4 Submission (REP4-045)
- Orsted Hornsea Project Three (UK) comments on Applicant's revised draft DCO (REP4-021)
- Robert Wright's Deadline 4 Submission (REP4-039)
- Weston Longville Parish Council written summary of oral submission made at the Issue Specific Hearing 2 (REP4-041)

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 comments to make on the following documents as these record discussions during hearings which the Applicant responded to on the call or through responses to ExA questions from the hearing (please refer to Deadline 4 hearings submission notes REP4-013, REP4-014 and REP4-015):

- A C Meynell's:
 - Written summary of oral submissions made at Compulsory Acquisition Hearing 1 (REP4-022)
 - Written summary of oral submissions made at Issue Specific Hearing 2 (REP4-023)
 - Written summary of oral submissions made at Compulsory Acquisition Hearing 2 (REP4-024)
- Brown & Co on behalf of Alston Farms Ltd (James Alston and Honingham Thorpe Farms) - Written summaries of oral submissions made at hearings w/c 1 November 2021 (REP4-026)
- Brown & Co on behalf of Honingham Aktieselskab - Written summaries of oral submissions made at Hearings w/c 1 November 2021 (REP4-028)
- Brown & Co on behalf of Mr Neil Alston - Written summaries of oral submissions made at hearings w/c 1 November 2021 (REP4-029)

- Brown & Co on behalf of N. Alston and A. L Alston & Sons Ltd. - Written summaries of oral submissions made at hearings w/c 1 November 2021 (**REP4-030**)
- Norfolk County Council - Written summaries of oral submissions made at hearings w/c 1 November 2021 (**REP4-020**)
- Weston Longville Parish Council - Written Summary of oral submission made at the Issue Specific Hearing 2 (**REP4-041**)

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

3 MR A C MEYNELL

3.1.1 The Applicant has reviewed Mr Meynell's comments on behalf of A.C. Meynell on the Applicant's response to his Written Representations (**REP4-025**), available in the below link:

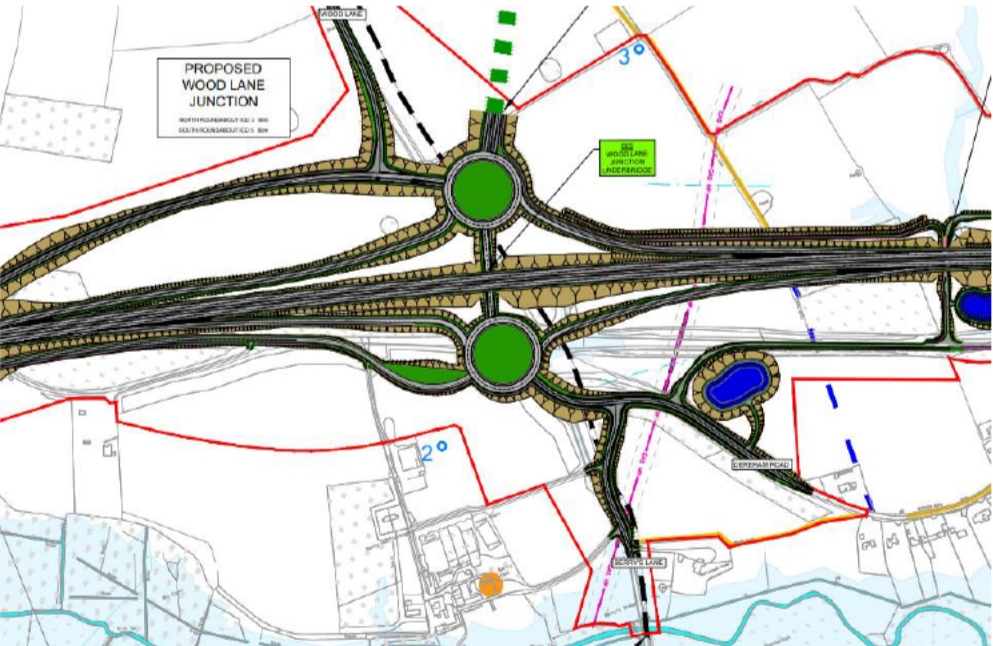
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001334-submissions%20received%20by%20D3.pdf>

3.1.1 For many of the issues raised in submission **REP4-025** the Applicant either:

- has nothing further to add to their previous responses to the ExA at Deadlines 1 to 4 and statements at the November 2021 hearings;
- will respond to these issues through ongoing discussions with representatives of Berry Hall Estate and issue to the ExA a Statement of Common Ground; or
- will aim to provide additional information by Deadline 6, in particular an update to ES Appendix 7.6: Arboricultural Impact Assessment (**APP-094**).

3.1.2 However, the Applicant has responded in the below table to some comments by Mr Meynell in document **REP4-025** that do not fall into the three categories above.

3.1.3 The Applicant has also considered Appendix A to A C Meynell's Written summary of oral submissions made at Issue Specific Hearing 2 (**REP4-023**) comprising a Technical Note review by Mr Joe Ellis of RPS Consulting of the Applicant's Alternative Wood Lane Junction Options Appraisal (**AS-022**), submitted to the ExA by the Applicant on 25 October 2021. Where required, the Applicant has responded to this review through an update to the Alternative Wood Lane Junction Options Appraisal report issued at Deadline 5; for example, the Applicant has clarified why the UK DMRB was applied to the side road designs and evidenced why Lady Grove underpass needs the proposed mainline A47 dual carriageway raising 5.6m.

Comment	Applicant Response				
<p>Reference 1.01 – Mr Meynell infers the December 2020 was not proper consultation as no alterations would be made in response to feedback.</p>	<p>The Applicant would direct the ExA to the Consultation Report's Annex O (APP-039) that presents the Applicant's feedback in response to the December 2020 targeted consultation. Amongst the responses was a commitment to change the proposed use of the Berry Hall Estate field north of Merrywood House from use as an A47 Scheme construction compound to a work area only for National Grid Gas pipeline diversion works and construction of the utility diversion and cycle track. Below is an extract from Annex O (APP-039) demonstrating this change.</p> <table border="1" data-bbox="579 1338 1988 1486"> <tr> <td data-bbox="579 1338 716 1486">Health and wellbeing and safety</td> <td data-bbox="724 1338 1289 1486">Any disruption to the calm of the Merrywood House environment is not conducive to the therapeutic nature of our work and can also cause significant stress to our young people; whether this is from physical changes to their surroundings or a perceived risk to their safety.</td> <td data-bbox="1297 1338 1413 1486">Y</td> <td data-bbox="1421 1338 1988 1486">The area identified adjacent to Merrywood House will only be used for essential works that are required to take place. Following engagement with Merrywood House, the area will no longer be used for a construction compound and activities will be managed to minimise any disturbance to Merrywood House.</td> </tr> </table>	Health and wellbeing and safety	Any disruption to the calm of the Merrywood House environment is not conducive to the therapeutic nature of our work and can also cause significant stress to our young people; whether this is from physical changes to their surroundings or a perceived risk to their safety.	Y	The area identified adjacent to Merrywood House will only be used for essential works that are required to take place. Following engagement with Merrywood House, the area will no longer be used for a construction compound and activities will be managed to minimise any disturbance to Merrywood House.
Health and wellbeing and safety	Any disruption to the calm of the Merrywood House environment is not conducive to the therapeutic nature of our work and can also cause significant stress to our young people; whether this is from physical changes to their surroundings or a perceived risk to their safety.	Y	The area identified adjacent to Merrywood House will only be used for essential works that are required to take place. Following engagement with Merrywood House, the area will no longer be used for a construction compound and activities will be managed to minimise any disturbance to Merrywood House.		
<p>Reference 1.01 – Mr Meynell claims the area proposed for compounds and work area were proposed for permanent roadways in the 2020 consultation.</p>	<p>The below diagram titled the 'A47 North Tuddenham to Easton - Scheme Plan' was presented at the February to April 2020 statutory consultation and shows the side road connection between Wood Lane junction and Church Lane that was removed following statutory consultation. As can be seen this side road only encroached within a small section of the red line area south-west of Wood lane junction. Therefore, though the Applicant subsequently confirmed the use of these areas for a compound, material storage and temporary work area in the December 2020 targeted consultation, it was presented as a temporary work area in the statutory consultation. The Applicant acknowledges the area for the compound was altered to create a buffer area from Hillcrest Cottage and in response to a review of the functional workspace and material storage area requirements in this locality.</p> 				
<p>Reference 7.01.3 – Mr Meynell requested clarification as to whether other utility diversion works are required in the vicinity of the cobblestones, at the Berrys Lane end of this main drive, and the root protection zone of tree T291 adjacent to the cobblestones.</p>	<p>The Applicant can confirm the DCO plans allow for the following utility works near this area:</p> <ul style="list-style-type: none"> • Utility diversion works along the eastern side of Berrys Lane associated with diversion of a BT Openreach cable, but not through the junction. • Potential need to divert the existing UKPN low voltage overhead electricity cable between Merrywood House and west of Berrys Lane, in the field north of Berry Hall's Main Drive, for the safe delivery of construction works in the field north of Merrywood House. <p>However, these works are subject to detailed design discussion with the relevant Statutory Undertakers; for example, there is the potential to avoid the need to divert the 11kV overhead line, but this can't be confirmed for certain until National Grid Gas appoint their gas pipeline diversion works contractor who will be responsible for the safety of their workers on the construction site.</p>				

4 ANDREW M CAWDRON ON BEHALF OF WENSUM VALLEY ALLIANCE

4.1.1 The following two submissions comprise the same written response that the Applicant has responded to in the below table.

- Andrew M Cawdron on behalf of Wensum Valley Alliance Deadline 4 submission (**REP-040**)
- Andrew M Cawdron's Written summaries of oral submissions made at hearings w/c 1 November 2021 (**REP4-042**)

4.1.2 Andrew Cawdron's Deadline 4 submission (**REP4-042**) is available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001270-DL4%20-%20Andrew%20M%20Cawdron%20for%20The%20Wensum%20Valley%20Alliance%20-%20Other-%20A%20plea%20for%20the%20Climate%20Emergency%20to%20be%20taken%20into%20account.pdf>

Comment	Applicant Response
<p>First pollution; the increase in noise generated by a dual carriageway as vehicle speeds increase from engine noise, wind noise and wheel noise. The factors of motor manufacturers supplying larger and faster vehicles with fatter and fatter tyres is another total illogicality impacting upon this pollution, which spreads over the adjoining countryside with the removal of tranquility for all species. All forms of life using their acoustic sensors for survival are immediately affected.</p>	<p>The Applicant has assessed the impacts from and mitigation for noise and vibration impacts by the Scheme in the following chapters of the ES:</p> <ul style="list-style-type: none"> • Chapter 8 – Biodiversity (APP-047) • Chapter 11 - Noise and vibration (APP-050) • Chapter 12 - Population and human health (APP-051) • Chapter 15 – Cumulative Effects Assessment (APP-054). <p>As part of the mitigation measures embedded within the Scheme design, the A47 dual carriageway shall be surfaced with a low-noise road surface. The low-noise road surface will be extended approximately 0.5km (from start coordinates: 613145, 310952; to end coordinates: 612659, 210996) to the east of the tie in works to reduce noise levels at NIA5202. The low-noise road surface shall be provided on both carriageways of the dualled A47 between North Tuddenham to Easton (9km in each direction) and for the proposed connector road between the main dual carriageway and the existing A47 in the vicinity of St Peter's Church (0.5km). This is covered within Sections 11.9.22 to 11.9.30 (APP-050).</p> <p>Noise barriers have been included as part of the embedded mitigation of the Scheme design at the locations described in Table 11.13 (APP-050) and presented in Figure 11.2 (APP-074).</p> <p>Compliance with the National Networks National Planning Policy, especially Paragraph 5.195 with regards to significant adverse effects on health and quality of life from noise by the Scheme, is discussed in Section 7.4 of the Case for the Scheme (APP-140). It is concluded that the Scheme demonstrates it meets the aims of this NPS paragraph.</p>
<p>Second, a dark skies policy illuminated. Water courses tend to provide insect ecological corridors. In two areas of these roadworks the Tud and Wensum Valleys and the Cantley streams will be impacted by dual carriageways being constructed over them or alongside them. If we assume that dual carriageways will attract more traffic for longer periods, then the headlight effect or illuminated graded junctions means that these eco corridors will lose their privacy and darkness. Once again, the nocturnal residents surrounding these areas will be particularly impacted.</p>	<p>The impacts of lighting on the existing environment and proposed mitigation measures are assessed within ES Chapter 7 Landscape and Visual Effects (APP-046) and ES Appendix 7.7 Lighting Assessment (APP-095). Section 7 of ES Appendix 7.7 provides an analysis of the potential post construction light spill levels associated with the Scheme, to allow an assessment of the potential effects on sensitive receptors.</p> <p>The Scheme is required to provide artificial lighting for safety on the approach to and through the proposed junctions, slip roads and associated roundabouts. The design of the Scheme lighting has been undertaken in accordance with:</p> <ul style="list-style-type: none"> • UK Design Manual for Roads & Bridges (DMRB) TA 501 – Road Lighting Appraisal • Institution of Lighting Professionals (ILP) Professional Lighting Guide PLG 02 - The Application of Conflict Areas on the Highway • BS5489-1:2020 Table A4, Lighting Classes for Conflict Areas. • Institution of Lighting Professional's Guidance Notes for the Reduction of Obtrusive Light, 2020 • Institution of Lighting Professional's Guidance Note 08/18 Bats and Artificial Lighting in the UK in 2018. <p>It is important to note that the Guidance Note 08/18 Bats and Artificial Lighting in the UK in 2018 was developed by the Institution of Lighting Professionals in collaboration with The Bat Conservation Trust.</p> <p>The Applicant has also designed the junction below the proposed A47 mainline in a cutting to minimise the impact of light spill. The Applicant covered this within their response to the ExA during the ISH 2 hearing; see item 1 under 'Agenda Item 9: Other issues' on pages 47 to 48 of the Applicant's Written Summary of Oral Submissions at ISH2 (REP4-015).</p>
<p>Third pollution; the petro-chemical stink. Pollution and particles kill people, including those who drive vehicles. What it does to the rest of the environment ecology appears not to be a concern. Is this why the insect world is dying ?</p>	<p>The effects of the Scheme from surface water runoff, sedimentation and air pollution have been assessed as part of the assessment of the impacts on the water environment, soils, ecological habitats and humans in the following application documents:</p>
<p>Fourth pollution; the danger from surface water flowing from our expanded hard surfaces. This product, polluted by tyre particles, oils and brake linings, has to be discharged somewhere, effectively into</p>	<ul style="list-style-type: none"> • ES Chapter 8 Biodiversity (APP-047): assesses effects on habitats and species. • ES Chapter 5 Air Quality (APP-044) assesses effects on air quality to

Comment	Applicant Response
<p>holding tanks and subsequently to the ground water providing and surrounding the rivers. Potential contamination accidents are avoided in documentation, being treated as “major incidents” with their own protocols applying. This is an environmental issue that should be part of the potential hazard evaluation as to whether the roads should be widened/relocated at all. And solutions to emergencies should be given.</p>	<p>human and ecological receptors.</p> <ul style="list-style-type: none"> • ES Chapter 9 Geology and Soils (APP-048): assesses impacts and mitigation from the disturbance of soils and geology. • ES Chapter 10 Material Assets and Waste (APP-049): assesses the consumption of materials and products including the use of excavated soils. • ES Chapter 12 Population and Human Health (APP-051): assesses impacts and mitigation for effects on human health. • ES Chapter 13 Road Drainage and the Water Environment (APP-052): assesses impacts and mitigation for effects on the water environment. <p>Mitigation measures together with good construction practice in relation to pollution prevention, run-off management, soils management, emissions to air and protection of ecological receptors and protected species have been identified. For example, pollution control assessments and controls are covered within section 6.8 of ES Appendix 13.2 Drainage Strategy Report (APP-126 and APP-127).</p> <p>These commitments are reflected in Table 3.1 ‘Record of Environmental Actions and Commitments’ in the Environmental Management Plan (APP-143).</p> <p>The Applicant has also consulted the Relevant Local Authorities, Lead Local Flood Authority, Environment Agency and Natural England throughout the Scheme development process to inform the final design and environmental assessment and mitigation measures.</p>
<p>Fifth pollution; the distance effect; Wider carriageways and higher traffic speeds provides a greater distance for all forms of life to cross if they wish to get to the other side. The killing zone has got bigger and the manner of construction from building “off road” to one side and then crossing coupled with construction compounds and the massive carbon vegetation and top soil strip generates a sterile zone of 30 metres plus stretching for miles across the countryside. This with the existing road and traffic remaining in place becomes a hostile, eco isolating zone for years.</p>	<p>Effects on biodiversity, including habitats and protected species, have been assessed in ES Chapter 8 Biodiversity (APP-047). The assessment was informed by extensive habitat and species surveys, plus consultation with key stakeholders including Natural England, the Environment Agency, Norfolk Wildlife Trust, Norfolk County Council and local wildlife groups (see Section 8.4 of ES Chapter 8 for full list).</p> <p>Section 8.9 of ES Chapter 8 outlines the measures proposed to minimise effects on and maximise opportunities for biodiversity, and to mitigate impacts on protected species. Section 8 of the Scheme Design Report, Rev.1, (AS-009) presents an overview of the environmental considerations that have influenced and form an embedded part of the Scheme design. These include ecological measures to reduce habitat fragmentation through provision of: safe mammal crossing points through mammal ledges in culverts and mammal underpasses; and protecting the flight and foraging routes of bats.</p> <p>The provisional design of the proposed ecological mitigation is presented in the Environmental Masterplan, Rev.1, (AS-007) and all mitigation detailed in Section 8.9 of ES Chapter 8 will be detailed and implemented as part of the record of environmental actions and commitments (REAC), which forms Table 3.1 in the Environmental Management Plan (EMP) (APP-143). Delivery of these commitments, including consulting the relevant local planning authority on the final landscaping design and Environmental Management Plan, are secured through the dDCO Requirements 4 'Environmental Management Plan' and 5 'Landscaping' (APP-017).</p>
<p>Mitigation: the most quoted and biggest lie of all. The NPPF sustainable development objective to “contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy” appears to have got lost in these road building proposals. These road widenings cannot mitigate for the environmental damage and losses they will cause. One cannot replace a mature oak supporting thousands of species with a young tree, even if substantial, (which tends not to happen in any event).</p> <p>The frustration is that we are not solving the problem. This is not a problem we can build our way out of. One can tinker and upgrade, enlarge and change, but the core issues of people numbers, vehicle numbers, journey numbers only change and enlarge to fill the space. One may shift some minor pieces on the chess board of vehicle transport, but the impacts of the consequential pollution will last forever. This is no plan.</p> <p>The argument is that we are all paying too high a price for our “Freedom of Movement” and it is also the other residents of the countryside who are paying it. They don't have a voice here, but we are increasingly aware of how important they are, from the pollinators to the older, mature trees. We are adding to an already polluted environment and increasing carbon emissions at a time when the scientific community world wide has provided us with the starkest warnings yet that ‘carrying on as we are’ is unsustainable.</p> <p>The other price that is unsustainable is the quoted 300 million</p>	<p>The Scheme is identified as required to manage traffic and road safety impacts as part of the Department of Transport (DfT) published Road Investment Strategy 2 (RIS2); and to be developed by Highways England in the period 2020-2025. The need case for this Scheme is discussed in the Case for the Scheme (APP-140), which includes an economic appraisal in Chapter 5 that demonstrates the Scheme provides a positive benefit-cost ratio.</p> <p>However, the need case for the Scheme is more than improving capacity and economic growth. This section of the A47 also has a poor safety record, with the A47 ranked 2nd nationally for fatalities on A roads and the accident severity ratio is above average. During the period 2014 to 2018 a total of 2 fatal, 15 serious and 76 slight accidents have been recorded along a 11km length of the existing A47 from North Tuddenham to Easton.</p> <p>The Scheme will improve safety and operational issues by upgrading to dual carriageway and providing grade separated junctions at the Wood Lane junction and Norwich Road junction. In total, over a 60-year timeframe the Scheme's improvement will save a total of 291 accidents and 47 KSIs (killed or seriously injured).</p> <p>The Scheme would also provide new WCH facilities, improve accessibility for users in the local area and provide the opportunity to choose active travel modes (e.g. walking and cycling); further detail is available in Section 4.14 'Walking, Cycling and Horse-riding (WCH) Assessment' of the 7.1 Case for the Scheme (APP-140).</p> <p>The Applicant recognises the importance of minimising the impact on the environment and has completed an environmental impact assessment of the Scheme; see ES Chapters 1 to 15 (APP-040 to APP-054).</p> <p>The Scheme Design Report, Rev.1, (AS-009) also discusses where reducing</p>

Comment	Applicant Response
<p>pounds to carry out these upgrades from Burlingham to Tuddenham. One has not seen any specific figures, but the probability is that figure will go on the Easton To Tuddenham with those massive grade separated junctions and high degree of difficulty.</p>	<p>carbon emissions has influenced the design of the Scheme, with Section 3.12 summarising the Applicant's approach to reduce carbon emissions through the design development. ES Chapter 14 Climate (APP-053) assesses the impact on and mitigation for carbon emissions and climate vulnerability by the Scheme.</p>
<p>Summary; Some activities may be worth the price to be paid, but it is evident that we cannot continue with old solutions that do not achieve a resolution, while literally costing us the earth to carry them out. These roads will pollute and the resulting environmental damage and degradation of special environments is too high a price to be paid for a few minutes shift in a journey time. One would therefore ask for reason to prevail and for these road schemes to be cancelled and instead for real plans to be made to reduce travel and vehicle over consumption and hence reduce our pollutions. This is not a plan for the future, this is a repeat of failures from the past.</p>	<p>Evidence that committed funding is secured to deliver the Scheme under RIS2 is demonstrated in the Funding Statement (APP-022).</p>

5 BENEFICE OF HONINGHAM, DIOCESE OF NORWICH (BY DAVID HOOKER, CHURCH WARDEN OF ST ANDREW'S CHURCH, HONINGHAM)

5.1.1 David Hooker's Deadline 4 submission (**REP4-031**), on behalf of the Benefice of Honingham, is available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001276-DL4%20-%20Benefice%20of%20Honingham,%20Diocese%20of%20Norwich%20-%20Other-%20Having%20reviewed%20hearings%20through%205%20November%202021.pdf>

5.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p>Access to the church will be severely restricted under the current National Highways proposals. At present the village remains directly connected to the church by means of the Honingham roundabout.</p> <p>Last year more than 100 people attended the Remembrance Day service and Honingham is one of the few Norfolk Village churches which has continued to hold a service every Sunday of the year. This Sunday we again expect a congregation of more than 100.</p> <p>The National Highways design has no direct connection between the village and the church. The journey by car is complex and convoluted and National Highways only offer pedestrians and cyclists an underpass to reach the church from the village.</p> <p>National Highways have repeatedly failed to respond to requests for a bridge or an underpass for vehicles to be able to get to church from the village.</p> <p>We look to the Planning Inspectorate to ask why this has been refused.</p>	<p>The Applicant has responded to Mr Hooker's Relevant Representation on this matter under RR-006.3 in the Applicant's response to relevant representations (REP1-013). RR-006.3 asked the Applicant "To justify the lack of a continuing direct connection for two way traffic between St Andrew's Church, Honingham and the village."</p> <p>Further to the above and in response to similar request by Mr Kenny (see Section 9 below) to convert the proposed Honingham Church WCH underpass for vehicle access, the Applicant's reasons why this is not possible are outlined below:</p> <ul style="list-style-type: none"> • Provision of a wider underpass to accommodate two lanes for traffic plus provision for verges and a safe segregated route for walkers and cyclists. • Realignment of the mainline dual carriageway to enable the highway geometry to construct a link below the A47 at this location in accordance with the UK DMRB. • The underpass would require a 5.3m headroom compared to the current WCH underpass headroom is approximately 2.3m; this in turn would require either: <ul style="list-style-type: none"> - The mainline dual carriageway to be raised, which may further adversely affect the Grade II* setting of St Andrew's Church that may not be accepted by Historic England and the relevant planning authority. - A deeper underpass presenting the risk of requiring a pumped drainage solution using three pumps for overall resilience (a primary pump, a backup pump and a third pump to provide backup when a pump is undergoing maintenance). Such a solution would impose a significant maintenance and operating burden on the adopting highway authority. The Scheme design has avoided deep drainage to comply with The Construction (Design and Management) Regulations 2015, which require designers to minimise construction and operational maintenance safety risks (e.g. working in confined spaces). • Requirement for additional permanent land take from a landowner already affected by the permanent loss of arable land for the Scheme. • The need case for the extra cost and compulsory purchase of additional private land is not justified when the Scheme design: <ul style="list-style-type: none"> - Reduces traffic using Taverham Road to 200 Annual Average Daily Traffic (AADT) in the Scheme Opening year of 2025, with NWL, versus 600 AADT in the 2015 baseline and 900 AADT in the 2025 Do Nothing scenario. - In the interim, between the opening of the Scheme and NWL, a Temporary Traffic Regulation Order would prohibit through traffic on Honingham Lane keeping traffic along Taverham Road to 1,300 AADT compared to 2,600 without Honingham Lane closed. - Though the Applicant does not doubt a good attendance for an annual Remembrance Service, the Applicant understands from discussions with locals that a normal well-attended church service would attract no more than 20 cars. These vehicles park within the church grounds or utilise the existing A47 layby. . - The Applicant's Scheme provides a vehicular connection to St Andrew's Church with dedicated safe parking including all user access parking bays. The proposed route is neither complex nor convoluted, plus safer in that there is no longer a requirement to directly cross a lane of the existing A47 (currently 60mph) or exit from the Church or farm field onto the A47 (currently 60mph).

Comment	Applicant Response
	<ul style="list-style-type: none"> Additional environmental impacts due to the increased width / height of the structure and road surfacing, including additional embedded material carbon emissions and, potentially, additional operational carbon emissions from drainage pumps; this would not be in accordance with the Applicant's application of the hierarchical approach to carbon management described in PAS 2080 'Carbon Management in Infrastructure', which applies the principles of build nothing, build less, build clever, build efficiently. <p>Presently the Church is accessed directly off the A47 Strategic Road and has limited off-road parking meaning church goers use the A47 layby, or for larger events have an informal agreement with a local landowner to use a concrete agricultural pad, used for sugar beet during harvest season. The Applicant has undertaken calculations and estimates that the pad can accommodate a maximum of 17 cars safely. The Applicant has engaged with the landowner and is informed that this is typically only used up to 6 times a year for larger events such as funerals / weddings. The Applicant is providing a replacement concrete pad as part of the Scheme.</p> <p>To access this parking area from the west, vehicles travel eastbound along the A47, with a 60mph speed limit, and then have to slow down to enter the church, layby or field access. To access this parking area from the east, vehicles travel westbound along the A47 and then have to stop in the road to await a gap in traffic to cross the carriageway to the church, layby or field.</p> <p>The field access has poor junction visibility to the east and west for vehicles exiting the access onto a 60mph highway.</p> <p>Currently the Public Right of Way from Honingham roundabout is narrow and is directly adjacent to the A47 carriageway. Users are required to cross both carriageways of the existing A47 at grade at the Honingham Roundabout.</p> <p>The Applicant's proposals include a new walking / cycling route with an underpass providing a safe segregated route for users crossing the new A47 mainline. Paragraph 12.10.81 ES Chapter 12 Population and Human Health (APP-051) confirms the new walking / cycling route access to St Andrew's Church from Honingham, via Honingham Church underpass, does not change the journey length.</p>

6 BROWN & CO ON BEHALF OF FOOD ENTERPRISE PARK

6.1.1 Brown & Co's comments on any additional information/submissions received by Deadline 4 (**REP4-027**) are available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001288-DL4%20-%20Brown%20&%20Co%20on%20behalf%20of%20FEP%20-%20Written%20summaries%20of%20oral%20submissions%20made%20at%20hearings.pdf>

6.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p>At the compulsory acquisition hearing 2 on Wednesday 3 November and the issue specific hearing 2 on Thursday 4 November, I presented representations on behalf of my client the Food Enterprise Park (FEP) in respect of our desire to construct an adopted road from the western boundary of the FEP to connect to the south-western spur of the southern roundabout shown on sheet 12 of the applicant's Environmental Masterplan " Document ref: TRO10038/APP/6.8.</p> <p>This issue is also marked as "Hearing Action Point 5' from the Issue Specific Hearing 2 for the applicant to respond to.</p> <p>I presented at both the hearings that there is a clear need for all vehicular traffic to and from the commercial development at the FEP to be provided with a direct connection onto the grade separated junction/spur road of the A47. This provision of a new road is supported by Broadland District Council, Norfolk County Council, and the local Parish Councils. Without a direct access to the A47 the substantial vehicular traffic, including HGV's, delivery and staff vehicles associated with the FEP, will have no alternative but to manoeuvre through the rural road network. This includes Church Lane, past the listed church into the village of Easton and then gain access onto the A47 westbound by doubling back along the slip road to the southern roundabout. Alternatively, traffic will gain access onto the A47 eastbound, by passing through the centre of the village of Easton; and vice versa.</p> <p>The FEP is being developed following the designation of a Local Development Order (LDO) covering 19 ha for growth of the agri-food, agri-tech and food and drink production sectors, subject to conditions. The FEP comprises development both operating and under construction, with seven further plots that are currently undeveloped, but it is anticipated these will be developed in the near future. The expectation with the development of the LDO is that all traffic to and from the FEP will achieve a direct access onto the A47, to remove the pressure on the rural road network. Indeed condition 2.20 of the LDO required a scheme of highway works to be agreed. In 2018 a scheme of highways works including widening Church Lane and the closure of Blind Lane was approved. These works are to be carried out once a floorspace trigger of 10,000 m2 of development floorspace on the LDO had been completed, or if a high traffic generator is proposed within the LDO, or if direct access to the A47 can be achieved. Therefore, the lack of a direct access onto the A47 is likely to limit the</p>	<p>The ExA is directed to the Applicant's responses to Brown & Co on behalf of the Food Enterprise Park under responses RR-067.1 to RR-067.5 in the Applicant's Response to the Relevant Representations (REP1-013).</p> <p>The Applicant maintains it's position that:</p> <p><i>The LDO made by Broadland District Council (BDC) on 31 October 2017 required a vehicular access route to the FEP to be approved prior to commencement of development pursuant to condition 2.20 of the LDO as well as the closure of Blind Lane. The route via Church Lane was approved by BDC on 21 December 2018 and has therefore been the intended route since that date. As such, there is no requirement for the Scheme to provide an access over and above what has been approved to-date by BDC.</i></p> <p><i>The Applicant will continue to work with the promoters of the FEP and other interested parties, including the local planning and highways authorities, to explore opportunities to work with the FEP's contractor to construct the access alongside the construction A47 North Tuddenham to Easton scheme, to secure cost efficiencies and minimise disruption, provided that agreement can be reached between the parties in respect of all relevant matters, and all necessary permissions are secured.</i></p> <p>The Applicant would also direct the ExA to the following position in the statements of common ground with Broadland District Council and Norfolk County Council:</p> <p>Norfolk County Council Statement of Common Ground</p> <p>The ExA is directed to Row 53 in the Statement of Common Ground - Norfolk County Council, Rev.0 (REP4-003), submitted at Deadline 4 (12 November 2021). This state's NCC's position with regards the Food Enterprise Park (FEP) when reaching agreement on the matter with the Applicant:</p> <p><i>Norfolk County Council supports a connection to the FEP at the Blind Lane / A47 junction. The lack of an access at this point will be</i></p>

Comment	Applicant Response
<p>development aspirations of the FEP.</p> <p>As stated at the hearings, my client has submitted a planning application (ref: 20211335) for the direct vehicular connection onto the south-western spur of the southern roundabout of the A47 shown on sheet 12 of the applicant's Environmental Masterplan, as the applicant's proposals do not include any connection from the A47 to the FEP. The planning application is currently undetermined and although Norfolk County Council Highway Authority has no objections to the proposals, subject to conditions, details raised by other consultees are being dealt with and revised plans will be issued for re-consultation.</p> <p>We heard at the hearing from the applicant's representative that the proposed A47 design does have adequate capacity to accommodate the vehicular traffic from the FEP. My client's desire is for the applicant's plan to be revised to identify a spur connection onto the proposed grade separated junction to enable the essential direct road connection to the FEP to be provided.</p> <p>The offer from the applicant's representative to discuss how this could be achieved is welcomed and awaited.</p>	<p><i>likely to lead to an unacceptable increase in heavy goods movements through the village of Easton.</i></p> <p><i>The council notes that closure of Blind Lane is required in the LDO at an appropriate trigger point, to be agreed in writing with the local planning authority. The council notes the comments received by the Applicant regarding potential use of Blind Lane for through traffic should this road remain open following construction of the A47 North Tuddenham to Easton scheme. The council would therefore support closure of Blind Lane at some point on its length to through traffic.</i></p> <p><i>The council acknowledges that the proposed design of the North Tuddenham to Easton scheme allows a connection to be made to access the FEP at the Blind Lane / A47 junction.</i></p> <p><i>The council accepts that responsibility for connection to the FEP including securing the necessary statutory approvals and funding rests with the promoters of the FEP.</i></p> <p><i>The council wishes to continue to work with National Highways, promoters of the FEP and other interested parties including the local planning authority to enable an access to the FEP to be provided at the Blind Lane / A47 junction. This includes to enable the construction of the access as part of the A47 North Tuddenham to Easton scheme, to secure cost efficiencies and minimise disruption, provided that agreement can be reached between the parties in respect of all relevant matters, and all necessary permissions secured.</i></p> <p><u>Broadland District Council Statement of Common Ground</u></p> <p>Post Deadline 4, the Applicant reached an agreement on the matter of the FEP with Broadland District Council (BDC) on 15 November 2021 to be reflected in the next issue of the Statement of Common Ground.</p> <p>Though BDC do not 'support' the FEP access not being included in the Applicant's scheme, BDC accept the Applicant's position and rationale, so now want to ensure that all parties work together to try and get the FEP access delivered to ensure cost efficiencies and minimise disruption as far as possible. BDC requested the Applicant commits to the below statement, which the Applicant has agreed to:</p> <p><i>"The Applicant will continue to work with the promoters of the FEP and other interested parties, including the local planning and highways authorities, to explore opportunities to work with the FEP's contractor to construct the access alongside the construction A47 North Tuddenham to Easton scheme, to secure cost efficiencies and minimise disruption, provided that agreement can be reached between the parties in respect of all relevant matters, and all necessary permissions are secured".</i></p>

7 BRYAN ROBINSON

7.1.1 Bryan Robinson's further comments on EXQ1 and ISH2 (**REP4-032**) are available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001299-DL4%20-%20Bryan%20Robinson%20-%20Other-%20Further%20comments%20on%20EXQ1%20and%20ISH2.pdf>

7.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p><u>Junction design</u></p> <p>I am still confused with the conflicting interpretations of design requirements between the two National Highway schemes on the A47 between the North Tuddenham and Easton (A47NTE) and between Blofield and North Burlingham (A47BNB).</p> <p>The two schemes adopt differing policies for the use of compact grade separated junctions within the design. The A47 upgrades are publicised as completion of dualling between East Dereham and Acle and I contend that in the interests of safety, a common approach to junction design should be adopted.</p> <p>The DS mainline traffic flows in 2040 for the schemes are stated in the submissions at the Norwich Road junction (A47NTE) and the B1140 junction (A47BNB) as:</p>	<p>The ExA is directed to the Applicant's previous responses to Bryan Robinson under responses RR-022.1 to RR-022.6 in the Applicant's Response to the Relevant Representations (REP1-013) and Section 5 of the Applicant's Response to the Written Representations (REP3-022) concerning the Applicant's approach taken to the design of the junctions for the submitted Scheme.</p> <p>In addition, the Applicant's Scheme ties into the existing dual carriageway east of the Fox Lane Junction. Therefore, the Fox Lane junction does not form part of the Scheme design.</p> <p>With regards concerns about the design of</p>

Comment						Applicant Response
	AADT Mainline 2040	Side Road North 2040	Side Road South 2040	Underpass 2040		
A47NTE	46,000			4,700	Fig 4.18 Doc. APP-140	Fox Lane Junction, an update to the current DMRB standard was released in 2019 and is applicable to the design of new grade separated junctions; it is unfeasible to expect all existing junctions to be upgraded as / when a new standard is released.
A47BNB	49,000	3,800	4,300			
<p>One would therefore assume that the junction designs would follow the same principles.</p> <p>The explanations for the determination of a dumb bell solution for A47NTE and a compact grade separated junction for A47BNB from the respective schemes are repeated below. I will be sending the Inspector for A47BNB a copy of the appropriate section.</p> <p>A47NTE uses the 30,000 mainline flow constraint in UK DMRB, CD 122, Clause 2.2.1 as the overriding determinant factor negating the use of a compact grade separated junction as an option.</p> <p>This is not considered in A47BNB and I suggest that clarification is required on when compact grade separated junctions are acceptable. In this connection it would be useful to understand the intended differentiation between the wording of Clause 2.2 in CD122 which states "Compact grade separated junctions shall not be used on motorways" and Clause 2.2.1 which states "Compact grade separated junctions should not be used on dual and single carriageway roads when mainline flows are above 30,000 AADT".</p> <p>If both are mandatory prohibition statements, then the compact grade separation junction for A47BNB does not comply.</p> <p>These overriding principles of CD122 also therefore raise the question of why the existing compact grade separated junction at Fox Lane at the western extremity of the A47NTE scheme has not been replaced to reflect the increase of AADT mainline traffic flows from 24,000 in 2015 to 49,000 in 2040 under the DS scenario.</p> <p>The Junction and Sideroad Strategy Report (February 2020) published by HE (NH) does not form part of the planning consultation but Section 8.3 in the report acknowledges that the Fox Lane junction will continue to operate as the existing configuration but notes that "mainline traffic figures are far beyond the limiting figure of 30,000 recommended for a compact layout".</p> <p>I find it disturbing that the Applicant can simply use one design principle as justification in a particular situation but argues that the same principle can be ignored for another situation.</p> <p>I would respectfully suggest if it is determined that CD122 2.2.1 should be the dominant design factor, it should apply to the whole scheme and the Fox Lane junction should be upgraded to meet that standard.</p>						
<p><u>Norwich Western Link (NWL)</u></p> <p>I contend that consideration of the status of the NWL is the fundamental issue for A47NTE and how, or indeed if, this should dictate the design of an upgrade to part of the Strategic Road Network (SRN).</p> <p>In the Case for the Scheme (APP-7.1) at paragraph 4.4.6, the Applicant states that the DM scenario assumes, in the absence of any layout plan from NCC, that the NWL junction to the A47 is assumed to be an at-grade five arm roundabout with two circulatory lanes.</p> <p>From all the detailed information provided in the 5 years of the NWL promotions by NCC there has never been any proposal for the A47 connection to be other than by NH in the A47NTE proposals. There is no allowance in the £198m costs of the NWL for the connection.</p> <p>NH has determined that the NWL is "Near Certain" and this forms the basis of the single Core Scenario. This appears to be based on the fact that a Strategic Outline Business Case for the scheme was accepted by DfT for progression to the Outline Business Case stage.</p> <p>Not only does the traffic modelling reflect the NWL, but the side road strategy particularly the temporary closing of Honingham Road, is dependent upon the NWL to allow it to reopen.</p> <p>Whether one agrees with the wisdom of this approach, there is obvious reluctant acceptance that the NWL may not proceed as demonstrated by the alternative scenario presenting forecasts of traffic figures without the NWL. The Applicant does not offer an alternative design against the alternative scenario.</p> <p>If it is accepted that there is the possibility of no NWL, the design implications must be made available to the Inspector, in particular the outline for a revised design of the Wood Lane junction and the side road strategy.</p> <p>Consultants engaged by Interested Parties have made statements that they consider the Wood lane junction to be overdesigned without the NWL. The answer to the question by the Inspector at ISH2 of whether the Wood Lane junction design would change without the NWL was studiously avoided by the Applicant with references to designs following DMRB.</p> <p>I believe this lack of transparency for a base design without the NWL, which currently still does not have planning, is not yet guaranteed of funding and for which a Habitats Regulations Appropriate Assessment has yet to be undertaken, is a the major encumbrance limiting the recommendation options for the Inspector.</p> <p>If the Inspector determines support for the submission, the design for which is specific to the NWL being built, will the recommendation have to be qualified as conditional upon the NWL being built with time constraints also stipulated?</p> <p>Would then such a recommendation constitute predetermination influencing the later planning decision</p>						<p>The ExA is directed to the Applicant's previous responses to Bryan Robinson under responses REP3-022.1 to REP3-022.6 in the Applicant's Response to the Relevant Representations (REP1-013) and Section 5 of the Applicant's Response to the Written Representations (REP3-022) concerning the Applicant's approach to NWL interaction and design of the junction for the Scheme.</p> <p>It is important to reiterate that the Scheme is not dependent on the NWL and would still proceed without the NWL coming forward. A junction at Wood Lane is required to connect the A47 with the B1535 (Wood Lane), which is the assigned local highway authority heavy goods vehicles route and provide access for Hockering and parishes north and south to the Strategic Road Network. The junction design allows for potential connection to the proposed Norwich Western Link (NWL) road scheme, if it gets consent, in accordance with the Department of Transport's Transport Appraisal Guidance¹.</p> <p>It is important to note that the Applicant identified the need for a junction at Wood Lane in December 2015 to November 2017 during the route options assessment that informed the preferred route decision making; see Stages 1 & 2 Scheme Assessment Report (SAR)² and summary in Section 2 of the Case for the Scheme (APP-140).</p> <p>Appendix N of the SAR outlines the four shortlisted Scheme options assessed, which</p>

¹ Available at [redacted]

² This report is available amongst the Consultation 2020 documents at: [redacted]

Comment	Applicant Response
<p>for the NWL and does it then infer that the Inspector should determine the likelihood of planning approval for the NWL? Without the background and detail for the NWL this is impractical.</p> <p>The Applicant made reference during ISH2 Part 1 Session 2 (at approximately 41mins) to NCC having an outstanding requirement as a result of the DCO for the Northern Distributor Road (NDR) to provide a scheme of works as traffic numbers have breached the thresholds of the DCO for Weston Longville. Further (and I paraphrase) that the NWL is the solution by NCC to correct this breach and the Applicant is collaboratively working with NCC to deliver this solution.</p> <p>The Condition relates to traffic levels not exceeding traffic levels which were being experienced prior to the NDR.</p> <p>Whilst agreeing that the requirement of the NDR DCO remains unfulfilled, I do not agree that the NWL is the solution being proposed for discharge, particularly noting the concerns of Weston Longville Parish Council that the NWL and the A47NTE combined are likely to increase numbers further.</p> <p>The NWL scheme was proposed by NCC before the NDR had even commenced and it must be assumed that the traffic predictions for a reduction in traffic through the villages would be achieved. The alternative that NCC knew the NDR would increase numbers would constitute a serious breach of faith in what was promised for the NDR. In fact the Wensum Link is contained in the NDR documents but it refers to the B1535 which was intended to serve as the connection between A47 and A1067.</p> <p>Unfortunately the upgrades, completed in circa 2014, has never fulfilled this solution to the historic problem of rat running across the rural valley roads, primarily due to NCC providing limited funding for a minority of the recommended alterations.</p> <p>I am surprised the NH has allowed itself to become embroiled in the politics of the NWL.</p> <p>It is important that you should be aware that at the time of the NDR planning application to the Planning Inspectorate that a new link over the Wensum Valley was specifically excluded from the submission because it was considered at that time that it would have a negative impact on the River Wensum SAC under the Habitats Regulations. NCC have not provided any evidence that this is still not the case and have indicated in correspondence that there is no intention to prepare a further Habitats Regulations Appropriate Assessment until the NWL planning application.</p> <p>It is agreed that having seen traffic numbers increase in the villages to above pre-NDR levels, the NCC is probably hoping that the NWL will solve the problem.</p> <p>The Applicant emphasises that it is in constant liaison with NCC to assist the implementation of the NWL. Noting the Outline Business Case (OBC) for the NWL, submitted to DfT in July 2021 promotes the scheme as the "completion of the orbital route around Norwich", I am concerned that this concept of a outer ring road which will incorporate the part of the SRN on the A47 between Honingham and Postwick may have dictated the NH design rather than looking at the dualling of part of the Strategic Road Network.</p> <p>If the NWL with the stated intention of being part of an orbital route around Norwich forms an integral part of the A47NTE design, it begs the question of the extent of the environmental considerations which should be included in this application. I would accept that the full implications could be ignored in A47NTE if these considerations had previously been tested under the planning system for the NWL. This is not the case and therefore should be investigated as part of this submission.</p> <p>The Applicant has stated many times that it is in consultation with NCC concerning the design and implications of the NWL and therefore should be aware that the NWL is not in any of the existing policies and although reference in the emerging Greater Norwich Local Plan and Transport for Norwich plans is specifically excluded. It does form part of the emerging Norfolk Local Transport Plan which is programmed to be presented to Council for approval this month, after revisions to the draft. These revisions have not been seen by the public but are rumoured to involve climate and environment issues.</p> <p>If however, despite the continuing dialogue with NCC, NH is unaware of the orbital proposal questions need to be asked whether this will conflict with the design as proposed for implications for the SRN.</p> <p>I reiterate my suggestion that the A47NTE should be a standalone design with the side road strategy to ensure there is no worsening of the current situation and improvements where possible.</p> <p>As a secondary consideration an alternative design can be determined with the NWL to assess the full implications on traffic levels, the design of junctions and environmental issues. This would avoid the current situation of a starting point which makes the NWL front and centre of the design.</p>	<p>demonstrates that two junctions were considered as required by the A47 Scheme as a standalone scheme prior to the NWL Scheme being considered.</p> <p>Norfolk County Council (NCC) held consultations on the four Norwich Western Link route options in late 2018 / early 2019, with the preferred route announced in July 2019.</p> <p>Chapter 4 of the Case for the Scheme (APP-140) presents sensitivity scenarios to compare traffic modelling with and without NWL. Section 4.4.7 of the Case for the Scheme (APP-140) states the Do Minimum (DM) is defined as the core highway network scenario without the A47 North Tuddenham to Easton scheme, against which the Scheme's impact changes are compared. As defined in the uncertainty log, in the wider area network the Norwich Western Link, Thickthorn and Blofield Scheme Improvements are classified as "Near Certain" and therefore included.</p> <p>In order to formulate a Do Minimum scenario with the NWL in place, and in the absence of any layout plan the Applicant made an assumption on what that layout would be, as is stated in section 4.4.6 of the Case for the Scheme (APP-140).</p> <p>The Applicant was compelled to consider the NWL as "Near Certain" having followed the Department for Transport's Transport Appraisal Guidance (TAG). In May 2020, the Department for Transport (DfT) approved the NWL's Strategic Outline Business Case, meaning the NWL has to be considered in the design and need case traffic model for the A47 North Tuddenham to East dualling scheme. Similarly, as the Applicant's Scheme preceded DfT's approval of the business case for the NWL, NCC has to consider A47 North Tuddenham to East dualling scheme as certain in its design development.</p> <p>With regards the design of Wood Lane Junction in the Applicant's Scheme in a 'no NWL' scenario, the ExA is directed to Appendix A of the Applicant's Response to Examining Authority's Action List from ISH1, ISH2, CAH1 and CAH2 (REP4-016). This appendix responds to the ExA's request to provide evidence to demonstrate the size of the Wood Lane Junction required should the Norwich Western Link not be provided.</p>

8 CHRIS COCKCROFT

8.1.1 Chris Cockcroft's comments on submitted at Deadline 4 (**REP4-043**) is available at:

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001339-Chris_Cockcroft_Additional_Submission.pdf

8.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p>I do not think that Highways England and Norfolk County Council (NCC) have ever properly consulted with each other over the connection of Norfolk County Council's proposed Western Link to the A47.</p>	<p>The ExA is directed to responses RR-006.5 and RR-050.5 in the Applicant's Responses to the Relevant Representations (REP1-013), which cover the need for and location of the proposed Norwich Road roundabout.</p> <p>It is important to note that Applicant's requirement to consider developments with approved planning consent or identified as 'Near Certain' in accordance with the Department of Transport's Transport</p>

Comment	Applicant Response
<p>Norfolk County Council have just said to Highways England: We would like a junction at Wood Lane; and also one for our proposed Food Site.</p> <p>But I ask the question: Why do we need TWO junctions, where ONE would suffice?</p> <p>Surely it would be much better if the A47 North Tuddenham to Easton improvement AND the NCC Western Link were planned as a whole.</p> <p>Please make the Planning Inspector aware of this view. It would reduce the necessary land take, the costs to Highways England and probably save many trees.</p>	<p>Appraisal Guidance³. This is explained in Section 4.3.21 Local Developments and Section 4.4 Major Highway Schemes, of the case for the Scheme (APP-140).</p> <p>It is also important to clarify that Norfolk County Council held route option consultations on the selected four Norwich Western Link routes in late 2018 / early 2019, with the Preferred Route Announced in July 2019.</p> <p>The Applicant's Scheme Assessment Report (SAR)⁴ summarises the scheme development works undertaken during Stages 1 & 2 (December 2015 to November 2017) of the route options assessment; the preferred route decision making is also explained in Section 2 of the Case for the Scheme (APP-140). Appendix N of the SAR outlines the four shortlisted Scheme options assessed, which demonstrates that two junctions were considered as required by the A47 Scheme as a standalone scheme prior to the NWL Scheme being considered:</p> <ul style="list-style-type: none"> • <u>Junction 1</u> - On the axis of Berrys Lane and Wood Lane. • The Scheme is independent of the proposed Norwich Western Link (NWL) road scheme and would proceed without the NWL coming forward. However, if the Scheme was built without the NWL a junction is still required to connect the A47 with the B1535 (Wood Lane), which is the assigned local highway authority heavy goods vehicles (HGV) route and also provides access for Hockering and parishes north and south to the Strategic Road Network. <u>Junction 2</u> - west of Easton to replace the existing Easton at-grade roundabout, which the Scheme removes. <p>In line with Scheme objectives, to provide a more free-flowing network, the existing Easton roundabout is to be removed. The location of the new Norwich Road junction at Easton was determined based on the requirement for a fully grade separated junction, whilst taking into account the existing constraints such as the Grade 1 listed St Peter's Church, existing accesses and sideroads, Orsted cable route, Food Enterprise Zone planning permission and local topography.</p>

9 D G M KENNEY

9.1.1 The following documents have been submitted for Deadline 4 from D G M Kenney and have been examined and are now available for viewing at:

- Response 1 to Issue Specific Hearing 2 (**REP4-034**)
- Response 2 to Issue Specific Hearing 2 (**REP4-035**)
- Comments on any additional information/submissions received by D3 (**REP4-033**)

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-000706-submissions%20received%20by%20D3.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001295-DL4%20-%20Mark%20Kenney%20-%20Other-%20Response%201%20to%20Specific%20Hearing%202.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001297-DL4%20-%20Mark%20Kenney%20-%20Other-%20Response%202%20to%20Specific%20Hearing%202.pdf>

9.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p>After considering the comments and questions I raised in my first submission for this deadline (4), it seemed appropriate to make you more fully aware of the safety issues with traffic on Taverham Road.</p> <p>Sadly, you have decided not to have an accompanied site visit along this lane and those connecting to it, so we (the residents) thought we should put before you photographs and a recent communication with NCC Highways (one of many), seeking some serious action to address the present situation - and the situation which will be so much worse should the HE scheme be built with the present proposed connection to a new Norwich Road junction. As a regular litter picker (and cyclist) on Taverham Road, I am always finding parts of cars to be retrieved resulting from impacts : this week there is in one place an entire front car skirting and further down the road some other plastic bodywork parts.</p> <p>I end simply by reiterating one of the Questions I proposed to HE and NCC in my previous response to Item 7, Population and Human Health.</p> <p>Does HE and NCC consider that the Ringland Hill lanes* will be sufficiently quiet and traffic free for safe family cycling and horse-riding once the new roadway scheme is operational? (*In particular, Telegraph Hill, Weston Road, Taverham Road, Honingham Lane, Ringland Road).</p>	<p>The ExA is directed to the Applicant's previous responses RR-010.3 and RR-010.5 in the Applicant's response to Relevant Representations (REP1-013) which addresses this issue.</p>
<p>General observations of Issue Specific Hearings</p> <p>The Transcriber - The transcriber is awful. It was hard to correctly identify the speaker's names and also, at times, to make much sense of what was said. I have partial hearing loss and would have really struggled to follow the sense of the live proceedings as text had my hearing been any worse. I</p>	<p>The Applicant acknowledges the comment and seeks to respond to all Interested Parties through the Examination process but notes that these general observations are matters for the Planning Inspectorate, and not for the Applicant.</p>

³ Available at: [REDACTED]

⁴ This report is available amongst the Consultation 2020 documents at: [REDACTED]


Comment	Applicant Response
<p>obviously took the more ludicrous phrasings with a pinch of salt - '.... bat sandwich' for example (?!!). Can this system be improved?</p> <p>The benefits of legal representation - I, amongst a number of people I believe, formed a very distinct impression that the balance of time, discussion and emphasis in these examinations was significantly skewed by the presence and constant intervention of Mr Meynell's large expert team. Whilst the Wood Lane junction is a major element of the scheme and warrants proper discussion, it is not the only major issue.</p> <p>Every intervention by that team was focussed on bringing the discussion back to Berry Hall's concerns. Clearly there are land issues there, but one might have thought the 'lesser' issues and some of the detail could have been addressed in writing and the disagreements worked through 'off air' and reported back later. There are only so many ways of stating the issue - and we seemed to hear most of the variations.</p> <p>You will have seen that the actual Hall is quite some distance from the junction and a 'glimpse' of the junction from a relatively distant woodland walk did not need to be used as yet another intervention to reintroduce the main issue. I would have thought Mr Meynell might have been a bit more concerned about the implications of the Alston ambition to build a petrol station (we now learn) adjacent to the proposed junction. I thought the days of building more petrol stations were now past.</p> <p>The reality of the road impact is that there are properties almost directly looking out at the proposed Norwich Road junction and these will have to contend with a far larger intrusion on their visual and acoustic amenity than that which will be experienced by the Berry Hall residents. I will raise the question about mitigation measures later in this submission.</p> <p>Last word on this topic: most local residents and interested parties probably don't have the resources needed to employ the type of representation demonstrated by the Berry Hall and Alston organisations. Perhaps you can reassure me that you will take that into account when you judge the balance of all the issues and concerns raised?</p>	
<p>Statements of Common Ground - There were numerous occasions when issues were deferred to 'Statements of Common Ground' which were in the process of being, or would be, prepared. It seemed that this was where contentious / divergent views were frequently (and conveniently) 'parked'. Do these Statements get publicly aired again and each party's concluded positions get examined where there is no agreement? What happens when there is no agreement - can design changes ever be required / brokered from this process?</p>	<p>The following Statements of Common Ground (SoCG) were submitted to the ExA at Deadlines 1 or 4 and outline those issues that are Agreed, Not Agreed or Under Discussions between the Applicant and the respective party (including any changes proposed during the Examination process or to be developed at the detailed design stage).</p> <p>A Statement of Commonality for Statements of Common Ground, Rev.1 (REP4-008), presents the position with Statutory Environmental Bodies and Statutory Undertaker (utility) consultees where a Statement of Common Ground is not required or submitted.</p> <ul style="list-style-type: none"> • Final SoCG with Historic England (REP1-009) • Draft SoCG with Environment Agency (REP4-002). • Draft SoCG with Norfolk County Council (REP4-003). • Draft SoCG with Breckland Council (REP4-004). • Draft SoCG with Broadland District Council - (REP4-005). • Draft SoCG with South Norfolk Council - Rev 1(REP4-006).
<p>The discussion about the Wood Lane junction design seems to be one of these items. Was it necessary to hear a detailed recital of the mooted alternatives in this forum at this stage? I have previously indicated some alternatives for the southern end of Taverham Road - thoughts shared by a number of people affected by the proposed design - which avoid the present direct connection to the Norwich Road junction complex from the north, but these have not been developed for public examination. There is no professional team here to review these ideas and HE has not at any time been prepared to engage on this. Why is it not possible to have some engagement with HE to consider alternative options for Taverham Road and to consider whether they might (or might not) offer a better solution for avoiding the rat-run which the present scheme seems to produce?</p>	<p>The ExA is directed to the Applicant's previous responses RR-010.2 and RR-010.5 in the Applicant's response to Relevant Representations (REP1-013) which addresses this issue.</p> <p>The Applicant has also been in correspondence with Mr Kenney through direct communication sent to the Project Mailbox. These direct communications are recorded by the Applicant and range in date from the Statutory Consultation event held in Honingham Village Hall (03 March 2020), Statutory Consultation (February – April 2020), Targeted Consultation (December 2020-January 2021) and most recently via the Project Mailbox as part of a communication chain during the period 03 February 2021 to 10 May 2021 comprising 6 responses from the Applicant to queries raised by Mr Kenney.</p> <p>The Applicant has had regard to all statutory consultation responses and given proper consideration to all non-statutory consultation. Unfortunately, it is impossible to incorporate the wishes of all individual respondents into the Scheme, as there are many differing views presented by consultees and stakeholders.</p> <p>The Applicant's responses to the February to April 2020 statutory consultation feedback and December 2020 to January 2021 further stakeholder engagement, including those from Mr Kenney and other interested parties with regards to Taverham Road, are presented in Annex N (APP-038) and Annex O (APP-039), respectively, of the Consultation Report.</p>

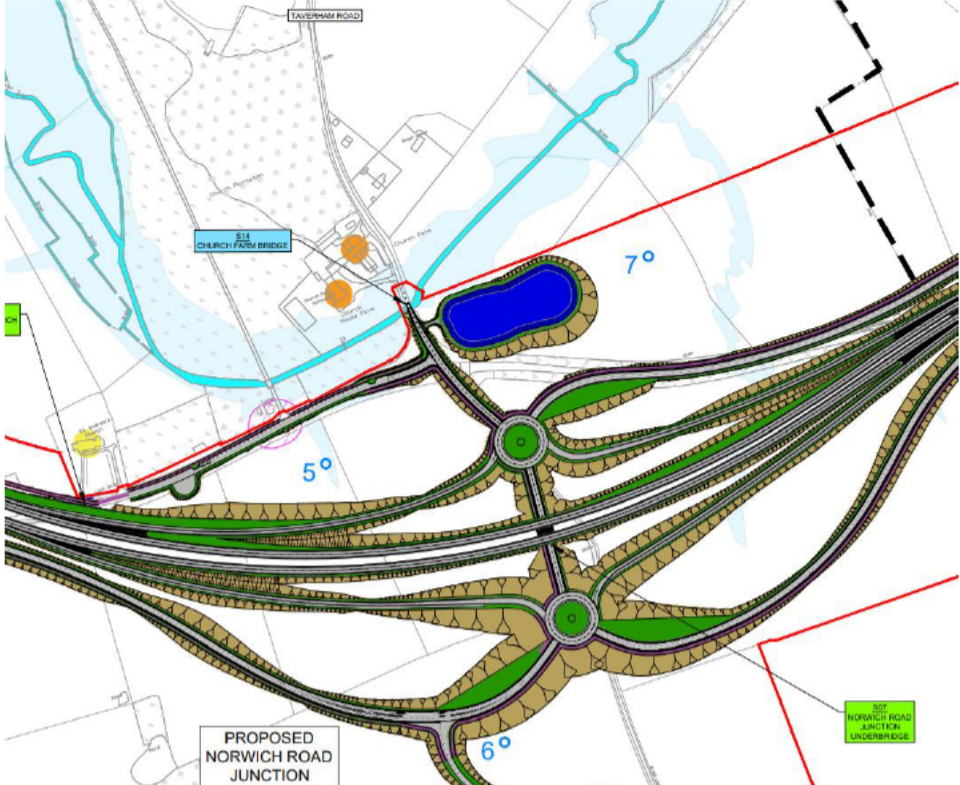
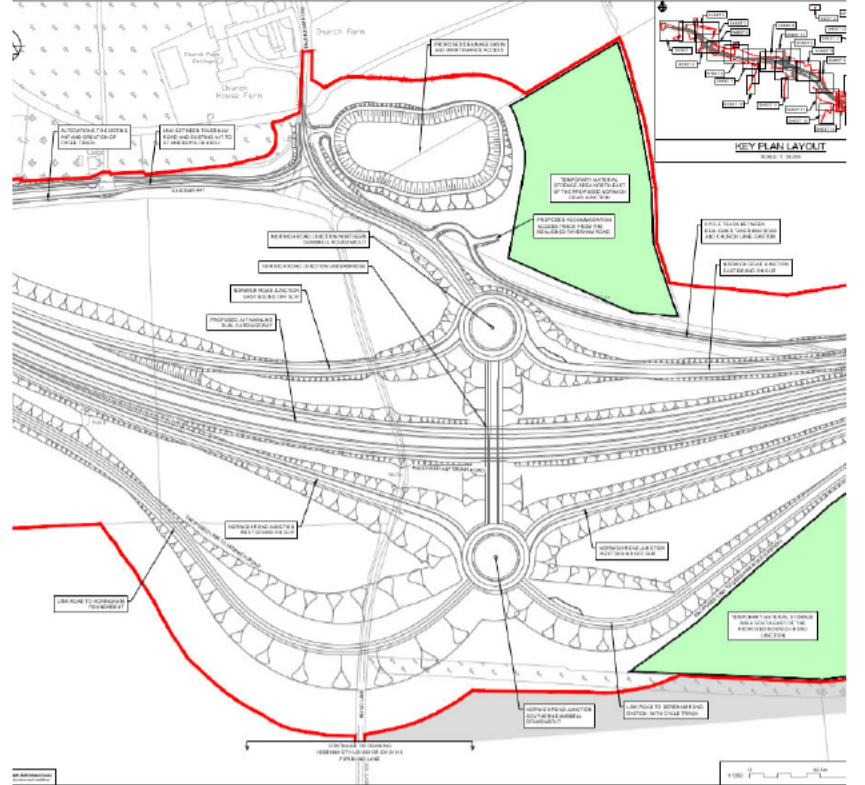
Comment	Applicant Response
	<p>The Applicant has engaged with the Local Highway Authority (Norfolk County Council) and their Network Safety team on the design of the sideroads as these will be handed over to become local highway authority assets. This has included engagement on design standards, cross sections, design speeds, speed restrictions, and road signage strategies.</p>
<p>Questions and comments arising from the hearings</p> <p>Hearing 2. Item 2. Design. - It was disappointing that, though prompted, HE was unable to mention landscape 'beauty' in its response. There seemed to be nothing in the primary HE 'vision' about sensitivity to the local landscape and no stated ambition for the side roads and the affected communities after HE's interventions were complete.</p> <p>For a scheme costing this amount of money and with such local sensitivities and intersection issues, it was incredible to hear that there has been no proper internal Design Review ('it's not a complex scheme' we were blandly told and we have 'experienced road designers'). Well, they may know the standards, but designers should always be imaginative and creative - and always challenged to revisit their assumptions and decisions. In this case, unfortunately and evidently, this hasn't happened. It started with the two roundabout complex junctions and HE has not moved from that throughout the 'consultations'.</p>	<p>As discussed in Chapter 2 of the Case for the Scheme (APP-140), landscape was considered as a criteria within the assessment methodology for the route options appraisal to inform the preferred route decision-making; see paragraph 2.2.4, plus reference to 'landscape' in the review of the short-listed options in paragraphs 2.2.15 to 2.2.26.</p> <p>The landscape and visual effects of the Scheme and proposed mitigation measures are assessed within ES Chapter 7 Landscape and Visual Effects (APP-046).</p> <p>With regards a design review for the Scheme, the ExA is directed to items 1 and 2 under 'Agenda Item 2: Design' on pages 2 to 6 of the Applicant's Written Summary of Oral Submissions at ISH2 (REP4-015).</p> <p>Highways England's Safety, Engineering and Standards (SES) team provides independent assurance to the Highways England (now National Highways) board that our standards are being followed, and that they produce the expected outcome. For example, structures must follow a robust technical approval process, as outlined in CG300.</p> <p>All schemes are required to present their operational solution to Highways England's Operations Technical Leadership Group (TLG) to ensure best practice is applied across relevant programmes of work. The review by TLG has a particular focus on operational, safety and maintenance issues, helps schemes develop consistent approaches, and ensures knowledge is shared across project teams.</p> <p>The purpose of the Operations Technical Leadership Group (TLG) is:</p> <ul style="list-style-type: none"> • To provide direction & guidance on safety, operational and maintenance issues to ensure a consistent approach across schemes/programmes; • To promote continuous improvement of operations and maintenance to achieve enhanced efficiency and safety of all populations, and to identify and promote development requirements; • To ensure that due consideration is taken of route consistency, whole life cost and Asset Management during scheme development; • To facilitate escalation of significant issues to the SRO (Or Project Sponsor/Chair), with clear recommendations; and • To hold the progress of schemes, when warranted.
<p>We never received a clear statement from HE as to what is 'good design' - a lot about standards and relaxations from their 'design guide' - nothing about people and places. I would challenge HE to present a much more concise and project tailored list of ambitions, including those 'softer' design aspirations, and how it judges it has met those ambitions?</p>	<p>The ExA is directed to the Applicant's response to Q1.0.1 in the Deadline 2 submission 'Responses to the ExA's First Written Questions (ExQ1)' (REP2-020). This response outlines how the Scheme meets the requirements to deliver 'good design' in accordance with paragraphs 4.28 to 4.35 of the National Networks NPS, plus satisfy the National Infrastructure Commission's Design Principles for National Infrastructure.</p>
<p>Hearing 2. Item 3. Transport and Traffic - We heard of 'very productive' discussions between HE and NCC, but these appear not to have produced any serious solution to the transfer of ratrun traffic onto Taverham Road once the Church Lane link and Easton roundabout are removed. A 30mph speed limit on Taverham Road seems to be the only current proposal for when '4000 vehicles' daily are transferred onto Taverham Road. It is currently an attractive and elevated country lane across the valley, wholly single vehicle width, with blind humps and bends, raised banks and limited passing places : it certainly shouldn't be littered with Speed Limit signage ... 30mph is too fast on much of the road anyway ... and who could ever police such a control.</p> <p>The question as to why the organisations (HE and NCC) can't agree on one traffic predictive model was not properly addressed by HE. Barrie Arthur then stated it was 'an unreasonable assumption to assume traffic will transfer to Taverham Road'. This has not been proved by HE. In fact, NCC (the only people who have been prepared to talk about this to the local residents) seem to disagree with that opinion. And yet there is still no strategy presented and HE designers have never explained or presented their thinking on this. Neither has a side road strategy been presented yet from NCC - though, to be fair, NCC Highway's hands seem to be tied by the fait accompli handed out (down!) by HE. The Questions below have yet to be answered, albeit that</p>	<p>The ExA is directed to other responses by the Applicant in this table: challenging Mr Kenney's claims of no engagement by the Applicant; explaining why Norwich Road junction is connected to Taverham Road; and why a vehicle connection between Honingham roundabout and St Andrew's Church cannot be retained; and consideration of impacts on residents of Taverham Road.</p> <p>With regards traffic flows along Taverham Road, the ExA is also directed to Appendix A to the Applicant's Written Summary of Oral Submissions at ISH2 (REP4-015). This contains the following Taverham Road summary statement:</p> <p><i>"The C174 Taverham Road is a 1.6km local authority road linking the A47 to the junction north with Telegraph Hill / Weston Road / Honingham Lane. Along the route there are nine signed formal passing places and an implemented order prohibiting HGV use through to Taverham; this is signed at the junction of the A47 / Taverham Road (No Access for HGVs to Taverham) and this provision is retained with the Applicant's scheme.</i></p> <p><i>The "DN" [see below] scenario at Location 2 [Honingham Lane] shows an increase from the 2015 Base, as a result of the inclusion of the</i></p>

Comment	Applicant Response
<p>they have been asked repeatedly. Would the Planning Inspector please attempt to cut through the fudging around and press for some very clear and constructive answers.</p> <p>Will HE please explain why they are wedded to the connection of Taverham Road to the proposed roundabout complex at Norwich Road? Does HE agree that this is setting up an enhanced rat-run by linking through from Taverham to the A47? If HE does not agree, would it please set out the evidence (with origin/destination) that traffic will be able to / prefer to join the A47 elsewhere. Where will all the throughtraffic presently coming down the Ringland Road / Church Lane rat-run disperse to? What is NCC Highway's view on the present proposal - does it feel that there is an impasse with HE?</p>	<p><i>NDR and natural growth. [NOTE: the 2015 baseline for Taverham Road 600 AADT (Annual Average Daily Traffic), whilst the "Do Nothing" scenario in 2025 is 900 AADT along Taverham Road.]</i></p> <p><i>The DS0 Scenario [see below] with the A47 and NWL schemes open demonstrates that the strategic traffic is reduced to 200AADT [Annual Average Daily Traffic].</i></p> <p><i>In the interim, between the opening of the proposed schemes, we are proposing the introduction of a Temporary Traffic Regulation Order (TTRO) to prohibit through traffic on Honingham Lane. This is modelled in the "DS1" scenario [see below], which contains No NWL and the Church Lane (Easton) closure, which demonstrates there is a slight increase in traffic of 400 AADT.</i></p> <p><i>The "DS2" scenario [see below] demonstrates that if Honingham Lane were to remain open without the NWL being operational then the traffic flows would increase from the DN scenario of 900 to 2,600 AADT.</i></p> <p><i>This scenario demonstrates the importance of the TTRO mitigation at Honingham Lane from the closure of Church Lane until the opening of the NWL.</i></p> <p><i>Norfolk County Council have also undertaken further modelling of the scenarios and this joint approach was communicated to the Parish Councils via the Local Liaison Group (LLG) on the 23rd February 2021 based on the proposed A47 mitigation measures.</i></p> <p>Modelled Scenarios:</p> <ul style="list-style-type: none"> • DN = "Do Nothing" - Natural growth only for the proposed scheme opening year of 2025 (Includes the Norwich Distributor Road (NDR)) • DS0 = "Do Something 0" - Natural Growth to 2025 + A47 Scheme + Norwich Western link Scheme • DS1 = "Do Something 1" - Natural Growth to 2025 + A47 Scheme + Honingham Lane Closed • DS2 = "Do Something 2" - Natural Growth to 2025 + A47 Scheme + Honingham Lane Open
<p>Why is the junction (and elevated main line road) directly in front of the Taverham Road houses? Where is the mitigation for these properties?</p>	<p>Please refer to the Applicant's below response to 'Hearing 2. Item 6 Heritage', which covers this issue.</p>
<p>Do the HE calculations include a new source of rat-run traffic down Taverham Road to the food hub site? On behalf of the food hub development Mr Rushe quickly pointed out he didn't like the word 'ratrun' - but what are the predicted figures for food hub traffic up Taverham Road? It seems that Taverham Road is being set up as the 'safety valve' in a flawed solution. What is the NCC (and HE) strategy to prevent, deter, reduce, limit this?</p>	<p>The Applicant's traffic modelling is described in Chapter 4 'Transport Assessment of the Case for the Scheme (APP-140). Section 4.3 confirms vehicle traffic from the Food Enterprise Zone is included in the 2025 (Opening Year) and 2040 (Design Year) traffic growth forecasts, which are discussed above with regards predicted traffic movements along Taverham Road in the Honingham Lane open or closed scenarios.</p> <p>The ExA should also note that an existing order prohibiting HGV use of Taverham Road, illustrated on site by a sign at the junction of the A47 / Taverham Road stating 'No Access for HGVs to Taverham' This provision would be retained with the Applicant's Scheme.</p>
<p>Please ask HE / NCC to explain the process and the short and long-term success of taking a road off satellite routing maps? (This seems to be the sort of 'no ideas fudge' frequently served up when there is a dearth of effective possibilities). What are the other options being considered by NCC (and HE)?</p>	<p>The ExA is directed to the above response demonstrating the Scheme already reduces traffic on Taverham Road.</p> <p>The Applicant has continued to engage with the local highway authority during the Examination period and proposed to reduce speed limits on Taverham Road (30mph) to further discourage use of Taverham Road; this has been accepted by the local authority and was shown on the revised dDCO (REP3-011) and Traffic Regulation Plans (REP3-005) submitted at Deadline 3.</p> <p>The response provided by the Applicant at the ISH hearing regarding satellite navigation (Sat Nav) was borne from feedback from Parish Council representatives and discussion at the Local Liaison Group meeting held on the 21 February 2021. The existing C174 Taverham Road has a national speed limit which means that it appears on Sat Nav routes when "quickest route" is selected. The Applicant has taken all feedback into account and has continued to engage with Norfolk County Council to promote a reduction in the signed speed limit and include the provision of a 30mph restriction within the Scheme.</p>
<p>Does HE and NCC consider Taverham Road a suitable and capable route for carrying articulated lorry traffic - in both directions and combined with cars, tractors, cyclists and horses?! There is already a weight restriction at the A47 junction on Taverham Road. Will this be enforced? Likewise, is the single lane of Weston Road suitable for very large vehicles and cars running in both directions?</p>	<p>The ExA is directed to response RR-010.3 and RR-010.5 in the Applicant's response to Relevant Representations (REP1-013) which addresses the issue of safety.</p> <p>The existing order prohibiting HGV use of Taverham Road would be retained with the Applicant's Scheme.</p> <p>The Applicant and Norfolk County Council will continue to work</p>

Comment	Applicant Response
	<p>collaboratively to develop and agree a scheme of mitigation measures for the implementation of the Temporary Traffic Regulation Order, to close Honingham Lane to manage through traffic between the opening of the Applicant's Scheme and NWL, whilst minimising impact on agricultural access, such as along Weston Road, where possible.</p>
<p>Does HE and NCC consider Taverham Road a suitable road for Equinor to gain cross-country access to the Easton compound? What is the nature / size and daily number of vehicles predicted to require this access? Why exactly is it not possible for Equinor to access their site/compound from the A47 direct in the same manner as HE?</p>	<p>The Applicant notes that due to closure of the access from the A47 Easton roundabout northwards to Church Lane, the Applicant is required to replace the Orsted's Hornsea Project Three (UK) Ltd's DCO approved access to the land between the A47, River Tud, Church Lane and Taverham Road.</p> <p>However, the Applicant is only ensuring that a short section of Taverham Road from the Norwich Road Junction northern roundabout to a proposed agricultural field access on the east side of the realigned Taverham Road, south of the proposed drainage basin, is suitable for Orsted's construction traffic requirements. It is not possible to achieve a safe access directly off the new A47 dual carriageway mainline due to the close proximity of the eastbound on-slip road.</p> <p>Access for Orsted construction traffic north of this access point and across the River Tud bridge would be subject to any agreement with Norfolk County Council Highways Authority (not the Applicant) as part of any traffic management plan under their consented DCO that has already been approved by the Secretary of State.</p> <p>The Applicant notes that there is already an approved scheme of mitigation works within Orsted's Hornsea Project Three (UK) Ltd's consented DCO for vehicles movements northwards on Taverham Road.</p> <p>Similarly, use of the local side road network, including Taverham Road, by Equinor will be subject to agreement between Equinor and Norfolk County Council Highways Authority (not the Applicant) and eventual approval by the Secretary of State as part of their DCO application.</p>
<p>What does HE / NCC believe will be the consequences for the side roads when the Western Link doesn't open at the same time as the new A47 (or is, quite possibly, never built at all?). We have seen various predictive figures - we want to know exactly how the consequent traffic on Taverham Road in particular (and elsewhere for that matter) will be addressed. Will HE and NCC provide a joint agreed statement on that, with some jointly agreed figures - and will they explain it to the local residents and answer questions on that in person?</p>	<p>The ExA is directed to above response in this response table to Mr Kenney's Deadline 4 comments.</p>
<p><u>Hearing 2. Item 4 Biodiversity and Item 5 Climate Change</u> - What we heard here from the HE team did not come across as being much in tune with the current environmental climate sensibilities. Most of the HE statements seemed to boil down to saying that such-and-such is not a statutory requirement and that the Government can make its decision irrespective of the climate impact effects. The latter is clearly beyond HE's control, but they might have tried to better demonstrate that they were striving to put before the Minister the most climate friendly design possible - within the obvious limitations of a road-building scheme.</p> <p>Can HE indicate the number of new trees to be planted in the scheme and, more or less, the number of trees to be removed?</p>	<p>Chapter 3 of the Scheme Design Report, Rev. 1 (AS-009), describes how the Scheme considers the ten principles of good design as defined in Highways England's The Road to Good Design (2018)²⁷ and DMRB GG103 Good Road Design, along with the additional consideration of how the Scheme sought to reduce carbon emissions.</p> <p>A hierarchical approach has applied to carbon management, which applies the principles of build nothing, build less, build clever, build efficiently as described in PAS 2080: Carbon Management in Infrastructure.</p> <p>The types and areas of habitat creation and the increases or decreases in size of each habitat are provided in Table 8.13 of ES Chapter 8 Biodiversity (APP-047).</p> <p>The Applicant notes that previous direct communication was received to the project mailbox on the 3 May 2021 upon the release of the Applicant's Scheme flythrough⁵.</p> <p><i>"We have seen the 3D animation, which certainly is quite beguiling with the amount of new tree planting, lagoons and cycle links illustrated. We trust the actual planting will accord with this vision."</i></p> <p>The Applicant provided a response on the 10 May 2021:</p> <p><i>"You asked if our flythrough contained the items illustrated and I'm happy to confirm that the flythrough reflects the proposed landscape planting, drainage ponds and cycle links layout as illustrated in the proposed scheme design and environmental masterplan presented in the DCO application. Please see the links below:</i></p> <ul style="list-style-type: none"> ○ General Arrangement Plans ○ Environmental Masterplan <p><i>We're also continuing to seek additional funding opportunities to add further biodiversity enhancement and other environmental improvements over and above our commitments in the Development</i></p>

⁵ Available for view at: <https://nationalhighways.co.uk/our-work/east/a47-north-tuddenham-to-easton-improvement/>.

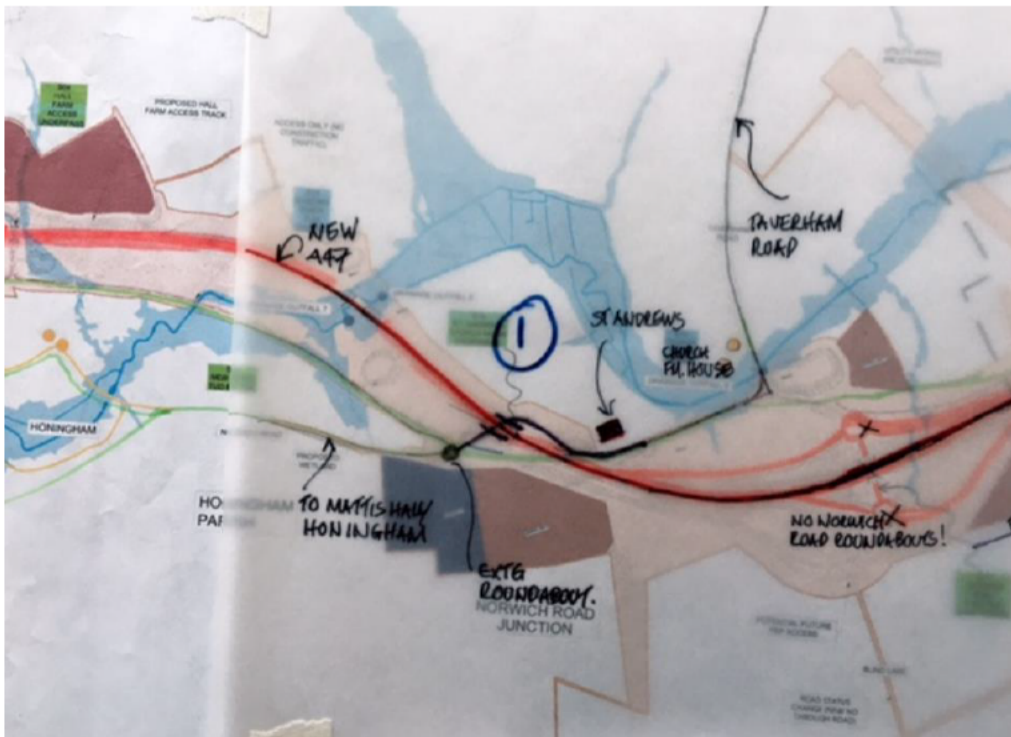
Comment	Applicant Response
	<p><i>Consent Order (DCO); if successful, these would be included during the detail design and build stages of the scheme."</i></p>
<p>I certainly concur with the principle of Mr A Cawdron's 'Sir, let's just hope our children will forgive us'. However, there are without doubt many good reasons for trying to sort out this particularly dangerous short section of the network - but certainly not dualling it all the way to the Midlands as the business community seem to want. I was surprised that there is predicted to be an increase in 'end-user' emissions, despite the scheme addressing the long slow tailback queues we witness daily at peak times.</p> <p>Can HE indicate what it calculates to be the present end-user (congested) emissions figures on this stretch of road and how these compare with the projected increase in end-user emissions on the dualled road?</p>	<p>The assessment of changes in emissions to air due to the Scheme are explored in ES Chapter 5 Air Quality (APP-044), with Section 5.7 presenting the baseline condition and Section 5.8 the predicted impacts.</p>
<p>Hearing 2. Item 6 Heritage - When the heritage bodies asked for the Norwich Road junction to be moved 150m further east to avoid impact on the setting (and deceased souls) of Honingham Church, did HE ever equally consider the impact on the (living) souls now facing directly onto the new junction position?</p>	<p>The Applicant has considered the impacts and, if required, mitigation for local residents in the following application documents:</p> <ul style="list-style-type: none"> • ES Chapter 5 Air Quality (APP-044). • ES Chapter 7 Landscape and Visual Effects (APP-046). • ES Chapter 11 Noise and Vibration (APP-050). • ES Chapter 12 Population and Human Health (APP-051). <p>It is important to note that the Scheme is replacing the existing A47 with a new dual carriageway upwards of 200m south of the existing A47, away from properties near Honingham Church and on Taverham Road. In addition, as illustrated below the relocation of the Norwich Road Junction further east post Statutory Consultation feedback also moved the junction further from properties near Honingham Church and on Taverham Road.</p> <p>Noise mitigation is embedded into the Proposed Scheme in this region in the form of a low noise road surface on the proposed mainline dual carriageway.</p> <p>Sheet 14 of the Environmental Masterplan, Rev 2, (REP3-016) also demonstrates provision of woodland and shrub planting north of Norwich Road Junction to supplement the retained mature trees north of the existing A47, as shown below, provide a visual screen to properties near Honingham Church and along Taverham Road.</p>  <p>Annex A to this document presents two cross sections from properties along Taverham Road looking towards the Scheme to show how the planting would screen views.</p>

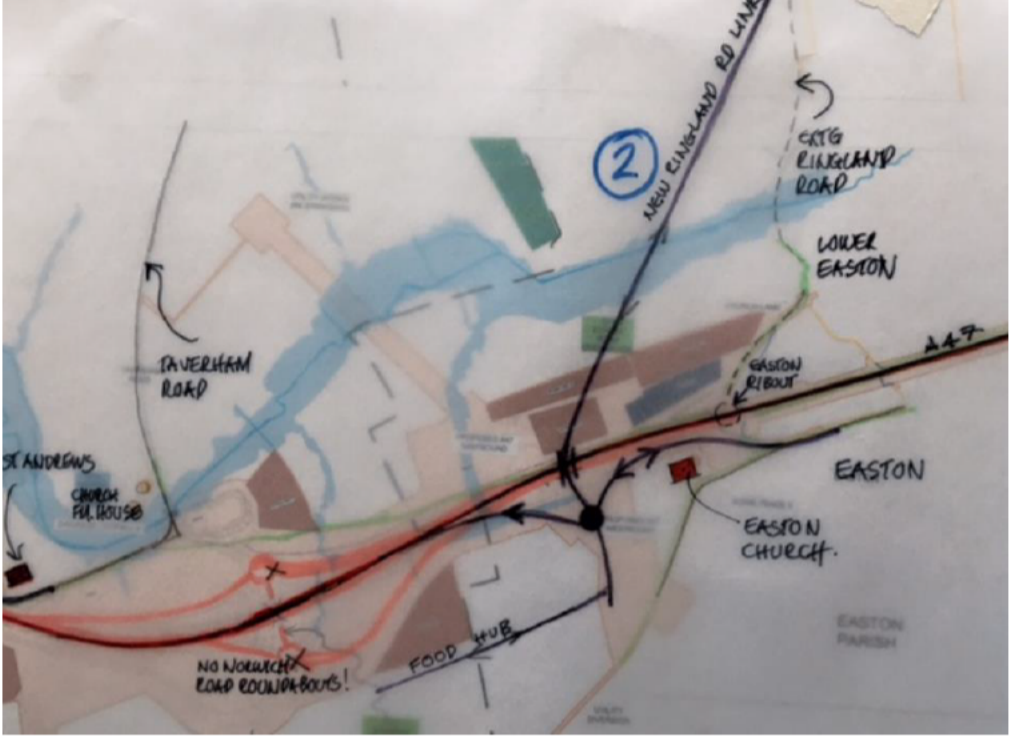
Comment	Applicant Response
 <p>Norwich Road Junction at Statutory Consultation in 2020 (shown in A47 North Tuddenham to Easton - Scheme Plan, available in the 2020 Consultation Documents available at: [REDACTED])</p>	 <p>Norwich Road Junction in DCO application design Shown on Sheet 14 of the General Arrangement Plans, Rev.1 (REP3-002)</p>
<p>It is understood locally that the field immediately west of the Blind Lane / A47 junction is the location of the original old village of Honingham, apparently abandoned as a response to the Black Death. Were HE's archaeologists aware of this and did they uncover any findings to support this? Is there any interesting research here which might be shared with Honingham Parish?</p>	<p>These areas were surveyed by geophysical survey and evaluation trenching, as reported in ES Appendices 6.2 and 6.3 (APP-086 to APP-088). The results of site visits, geophysical survey and trial trenching have been used to inform the assessment of archaeological potential. Norfolk County Council was consulted in relation to the design of archaeological evaluations and archaeological mitigation proposals. The areas of archaeological potential were agreed with Norfolk County Council.</p> <p>The area in question is within archaeological Zone 5, described in paragraph 6.7.49 of ES Chapter 6 Cultural Heritage (APP-045) and paragraphs 6.3.177-186 of ES Appendix 6.1 (APP-085).</p> <p>A strategy for appropriate dissemination of archaeological information will form part of the Written Scheme of Investigation (WSI) committed to under Action CH6 in table 3.1 of the Environmental Management Plan (APP-143).</p>
<p>Hearing 2. Item 7 Population and Human Health - I would put it to HE and NCC Highways that by increasing the traffic on the small country lanes adjacent to this scheme and by not producing a coherent side road strategy to address it, the net result will actually be an end to safe cycling in the Ringland Hills. Unless, of course, cyclists wish to stick solely to the new fume-laden routes alongside the new dual carriageways.</p> <p>Does HE and NCC consider that the Ringland Hill lanes * will be sufficiently quiet and traffic free for safe family cycling and horse-riding once the new roadway scheme is operational? (* In particular, Telegraph Hill, Weston Road, Taverham Road, Honingham Lane, Ringland Road).</p>	<p>The ExA is directed to response RR-010.3 and RR-010.5 in the Applicant's response to Relevant Representations (REP1-013) which addresses this issue.</p> <p>The new routes for cyclists provided by the Scheme are segregated from the highway include grade separated crossings and are located further from the Strategic Road Network than existing routes.</p>
<p>The proposed dead-end vehicle access to St Andrew's Church continues to concern local people who see this option as an open invitation for illegal camping, traveller parking and fly-tipping. The lockable gate is little deterrent and would be easily skirted past.</p> <p>Will HE explain why the pedestrian underpass beyond the church cannot be moved to become a vehicular underpass linking to Honingham village, thereby maintaining a local road network and avoiding the direct connection of Taverham Road to the Norwich Road roundabout?</p>	<p>The ExA is directed to response RR-006.3 in the Applicant's response to relevant representations (REP1-013), where the Applicant responded to the Interested Party's request "To justify the lack of a continuing direct connection for two way traffic between St Andrew's Church, Honingham and the village."</p> <p>The ExA is also directed to the response to this same matter in Section 5 above (by David Hooker, who is Warden of St Andrew's Church, Honingham, on behalf of the Benefice of Honingham).</p>
<p>Hearing 2. Item 8 Landscape and visual effect. Item 9 Other Issues - The proposed new Easton footbridge was described as the answer to crossing the A47 at Easton as other options 'involved multiple switchbacks'. The design we currently have for the new footbridge actually requires considerable ramping to achieve the crossing and it seems in fact to have become a very significant construction in the chosen location.</p> <p>Can HE indicate who will judge the design of this new bridge (which will be prominent in the landscape) and who will decide that a suitably elegant structure has been designed - will HE be sole judge and jury?</p>	<p>Internal Highway's England Independent Design Review</p> <p>Highways England's Safety, Engineering and Standards (SES) team provides independent assurance to the Highways England (now National Highways) board that our standards are being followed, and that they produce the expected outcome. For example, structures must follow a robust technical approval process, as outlined in CG300.</p> <p>All schemes are required to present their operational solution to Highways England's Operations Technical Leadership Group (TLG) to ensure best practice is applied across relevant programmes of work. The review by TLG has a particular focus on operational, safety and</p>

Comment	Applicant Response
	<p>maintenance issues, helps schemes develop consistent approaches, and ensures knowledge is shared across project teams.</p> <p>The purpose of the Operations Technical Leadership Group (TLG) is:</p> <ul style="list-style-type: none"> • To provide direction & guidance on safety, operational and maintenance issues to ensure a consistent approach across schemes/programmes; • To promote continuous improvement of operations and maintenance to achieve enhanced efficiency and safety of all populations, and to identify and promote development requirements; • To ensure that due consideration is taken of route consistency, whole life cost and Asset Management during scheme development; • To facilitate escalation of significant issues to the SRO (Or Project Sponsor/Chair), with clear recommendations; and • To hold the progress of schemes, when warranted. <p>External Design Review and Approval</p> <p>The detailed design of the final Scheme will be developed in consultation with the relevant planning authority prior to approval by the Secretary of State under Requirement 3 of the dDCO (REP3-011).</p> <p>The proposed bridge structure includes a reinforced earth design that will be landscaped and planted to blend into the landscape taking account of sensitive visual receptors, such as residential properties to the south-east and the setting St Peter's Grade I listed Church to the south-west, as illustrated in the Environmental Masterplan, Rev.2 (REP3-016).</p> <p>The final landscaping design will also be developed in consultation with the relevant planning authority prior to approval by the Secretary of State under dDCO Requirement 5 'Landscaping' (REP3-011). This will also be supported by a detailed Landscape and Ecology Management Plan (LEMP) that will describe the proposed management and monitoring of the landscape and ecological mitigation and compensation features of the Scheme. The LEMP forms Appendix B.5 of the Environmental Management Plan (APP-143) and will be approved by the Secretary of State through dDCO Requirement 4 (REP3-011), following consultation by the Applicant with the relevant planning authority, local highway authority, lead local flood authority and the Environment Agency.</p>
<p>The Berry Hall team were very worried about the clear view which the Hall might have of the construction compounds. Putting aside the fact that these are temporary intrusions, surely the most critical views are those of the completed scheme and, in particular, those views of the new roadway (now to be elevated out of its present valley) from the north Wensum / Tud valley areas laying to the east of the Norwich Road junction. These must surely be the most critical and long term encroachments into the visual landscape and yet these didn't seem to get the discussion / emphasis they merit.</p> <p>Does HE's landscape mitigation design fully address the views south (towards the road) from the higher country lanes to the north of the scheme? What will users of Taverham Road see of the new dualled roads from the elevated areas as they drive south? What will the residents at the southern end of Taverham Road see from their properties (some of which appear to be directly north of the elevated junction)? Please spell out what mitigation measures are proposed to address increased traffic noise and junction lighting at these locations in the completed scheme?</p>	<p>Sheet 14 of the Environmental Masterplan, Rev.2, (REP3-016) shows provision of woodland and shrub planting north of Norwich Road Junction, supplemented by the retained mature trees north of the existing A47, to provide a visual screen to properties near Honingham Church and along Taverham Road.</p> <p>The Applicant has considered the visual, lighting and noise impacts and, if required, mitigation for local residents in the following application documents:</p> <ul style="list-style-type: none"> • ES Chapter 7 Landscape and Visual Effects (APP-046). • ES Appendix 7.7 Lighting Assessment (APP-095) of potential post construction light spill levels associated with the Scheme. • ES Chapter 11 Noise and Vibration (APP-050). <p>ES Figures 7.6.9A to 7.6.9D (APP-066) present photomontages from Viewpoint 7, shown below, to illustrate views from Taverham Road looking towards the Scheme, comparing existing with future views in year 1 and year 15 post Scheme opening. At Viewpoint 7, which is located in an elevated position on Taverham Road, just to the north of the Scheme. Viewpoint 7 was specifically requested by the local authorities to represent a clear view towards the site experienced by road users (low sensitivity) and users of an adjacent footpath (medium sensitivity).</p> <p>Effects on specific visual receptors are assessed in ES Appendix 7.4 'Visual Receptors' (APP-092) and summarised on Figure 7.5, Rev. 1 (REP2-012).</p> <p>Visual effects identified in Year 15 on receptors in the vicinity of Taverham Road are:</p> <ul style="list-style-type: none"> • Neutral adverse (no significant) visual effect on 3 properties at Church Farm (Visual Receptors at R33). • Moderate adverse (significant) effect on views from Viewpoint 7 and from four properties opposite Church Plantation (Visual Receptors at R34) during construction and in Year 1 of opening. However, this reduces to slight adverse (not significant) at Year 15

Comment	Applicant Response
	<p>of operation following establishment of mitigation planting beside the Scheme (including tree cover beside the drainage feature directly to the south of the receptor) limiting the visibility to at most glimpsed views.</p> <p>With regards the operational noise effects of the Scheme, ES Figures 11.8 and 11.10 (within APP-075 and APP-076) illustrate the change in road traffic noise between the Do Minimum (without the Scheme) and the Do Something (with the Scheme) scenarios in the short and long term, respectively. The Taverham Road section is extracted below alongside a key for each contour. Noise mitigation is embedded into the Proposed Scheme in this region in the form of a low noise road surface on the proposed mainline dual carriageway.</p> <p>The noise change contours shown below demonstrate that the residential receptors along Taverham Road near the existing A47 will experience a change in road traffic noise that is broadly negligible or beneficial. Where adverse impacts are identified due to changes in road traffic noise near Taverham Road, these changes would be no worse than minor adverse (and close to the smallest noise change that is considered perceptible). Furthermore, road traffic noise levels at these receptors with the Proposed Scheme remain below the Significant Observed Adverse Effect Level (SOAEL), which is the level above which significant adverse effects on health and quality of life occur, as defined within DMRB LA111. For this reason, no significant effects due to these changes in road traffic noise at this location were identified within ES Chapter 11.</p> <p>Of particular note is the final operational noise significance presented in Table 11.16 of ES Chapter 11 (APP-050). Noise Important Area (NIA) 6287 (Church Lodge, Taverham Road) will experience a major beneficial change in road traffic noise on scheme opening and a minor beneficial change in road traffic noise over the long-term. Although this is not a significant effect in EIA terms, it does represent a small improvement in conditions at this NIA.</p>
	<p>Short-term change in road traffic noise, dB $L_{A10,18\text{hour}}$ (on scheme opening)</p> <p>Noise difference</p> <ul style="list-style-type: none"> Greater than or equal to 5.0dB 3.0 to 4.9dB 1.0 to 2.9dB Less than 1.0, more than -1.0dB -1.0 to -2.9dB -3.0 to -4.9dB Less than or equal to -5.0dB

Comment	Applicant Response
	<p>Long-term change in road traffic noise, dB $L_{A10,18hour}$ (change over the 15 year period)</p> <p>Noise difference</p> <ul style="list-style-type: none"> ■ Greater than or equal to 10.0dB ■ 5.0 to 9.9dB ■ 3.0 to 4.9dB ■ Less than 3.0, more than -3.0dB ■ -3.0 to -4.9dB ■ -5.0 to -9.9dB ■ Less than or equal to -10.0dB
	<ul style="list-style-type: none"> □ DCO boundary — Proposed Scheme design - - Operational study area ● Significant beneficial noise effects ● Significant adverse noise effects ■ Noise important area
<p>Early in the consultation process, great concern was raised with HE about the potential loss of the dark skies in this area of countryside. A verbal assurance was received from the former HE Project Manager that the lighting of the Norwich Road junction would be limited to the underpass area and would be very low level. It seems that this may not be the case, as we learn (at the hearing) that the slip roads will also be lit. This makes the removal of the present (very bright) Easton roundabout lights almost irrelevant if this night sky pollution is to be transferred down the road to this new junction.</p> <p>Will HE share and discuss with Taverham Road residents the layout and design detail of the lighting proposals for the Norwich Road junction? We would like to see the proposals and have an opportunity to comment. We would like to see that information at this stage and not when/after it is built.</p>	<p>The ExA is directed to previous response on concerns about lighting of the Scheme and impact on dark skies in responses RR-017.2, RR-017.3 and RR-055.11 in the Applicant's Responses to the Relevant Representations (REP1-013).</p> <p>The impacts of lighting on the existing environment and proposed mitigation measures are assessed within ES Chapter 7 Landscape and Visual Effects (APP-046) and ES Appendix 7.7 Lighting Assessment (APP-095). Section 7 of ES Appendix 7.7 provides an analysis of the potential post construction light spill levels associated with the Scheme, to allow an assessment of the potential effects on sensitive receptors based on indicative locations for lighting columns.</p> <p>The Scheme is required to provide artificial lighting for safety on the approach to and through the proposed junctions, slip roads and associated roundabouts. The design of the Scheme lighting has been undertaken in accordance with:</p> <ul style="list-style-type: none"> • UK Design Manual for Roads & Bridges (DMRB) TA 501 – Road Lighting Appraisal • Institution of Lighting Professionals (ILP) Professional Lighting Guide PLG 02 - The Application of Conflict Areas on the Highway • BS5489-1:2020 Table A4, Lighting Classes for Conflict Areas. • Institution of Lighting Professional's Guidance Notes for the Reduction of Obtrusive Light, 2020 • Institution of Lighting Professional's Guidance Note 08/18 Bats and Artificial Lighting in the UK in 2018, developed in collaboration with The Bat Conservation Trust. <p>The Applicant has also designed the junction below the proposed A47 mainline in a cutting to minimise the impact of light spill.</p>

Comment	Applicant Response
<p>May I also ask whether you are satisfied that the apparent discrepancy I identified (between distances in text and drawing) in HE's DCO Draft (advised in my last submission) has now received an answer / correction?</p> <p>Notwithstanding my original Statement submission, I have noticed an apparent and worrying discrepancy between HE's text in their draft consent and their drawings. I would request that this be checked / queried by the Inspectorate and clarified by HE - and the text corrected as appropriate.</p> <p>Schedule 1, p6. Page 44 of the 167 page document posted on 12 October, Works No.47. HE appears to refer to taking control on Taverham Road for 270m north of the Tud bridge, but the HE drawings only outline the road up to the entrance to Church farm House - which is barely 20m north of the bridge. (270m beyond the bridge would take their works some way up past our own property - for what purpose?).</p>	<p>The Applicant acknowledges the comment and confirms the dDCO is to be amended to clarify 270m refers to distance of works length from the Norwich Road Junction to north of the bridge.</p>
<p>Dear Mr Hunter and the Inspectorate Team,</p> <p>After considering the comments and questions I raised in my first submission for this deadline (4), it seemed appropriate to make you more fully aware of the safety issues with traffic on Taverham Road.</p> <p>Sadly, you have decided not to have an accompanied site visit along this lane and those connecting to it, so we (the residents) thought we should put before you photographs and a recent communication with NCC Highways (one of many), seeking some serious action to address the present situation - and the situation which will be so much worse should the HE scheme be built with the present proposed connection to a new Norwich Road junction. As a regular litter picker (and cyclist) on Taverham Road, I am always finding parts of cars to be retrieved resulting from impacts : this week there is in one place an entire front car skirting and further down the road some other plastic bodywork parts.</p> <p>I end simply by reiterating one of the Questions I proposed to HE and NCC in my previous response to Item 7, Population and Human Health.</p> <p>Does HE and NCC consider that the Ringland Hill lanes* will be sufficiently quiet and traffic free for safe family cycling and horse-riding once the new roadway scheme is operational? (*In particular, Telegraph Hill, Weston Road, Taverham Road, Honingham Lane, Ringland Road).</p> <p><u>NOTE:</u> The above correspondence, presented in the below link, included a copy of an email sent to Norfolk County Council Highways, on 12 September 2021, suggesting the below three outline thoughts for relieving Taverham Road for discussion and examination.</p> <p>https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010038/TR010038-001297-DL4%20-%20Mark%20Kenney%20-%20Other-%20Response%20to%20Specific%20Hearing%202.pdf</p>	<p>The ExA is directed to above responses regarding the Applicant's view on road safety along Taverham Road when the Scheme is operational.</p> <p>The Applicant has provided their view on these proposed alternative options below.</p>
<p>1. Connect Taverham Road back to Honingham village via a single lane width underpass westwards, just past St Andrew's church - one is proposed already for pedestrians, so why not a single lane road? Definitely single lane width and signposted as no through traffic and no HGVs - ideal for church and local access by local car and bike. This idea has much to commend it in our opinion and yet HE appears to have discounted a small road connection with no explanation. Why? Sketch 1 attached.</p> 	<p>This option fails to provide a junction west of Easton to replace the existing Easton at-grade roundabout, which the Scheme objective requires removal of to provide a more free-flowing network.</p> <p>Assuming retention of the Norwich Road junction without the realigned Taverham Road link from the northern roundabout, the ExA is directed to the response in Section 5 above (by David Hooker, on behalf of the Benefice of Honingham) that explains why retaining the connection between Honingham roundabout and St Andrew's Church in this scenario is not justified.</p>
<p>2. Replace the current Ringland Road connection from Taverham to the A47 through Lower Easton with a short length of new road, skirting just west of the</p>	<p>As demonstrated in the above responses within this table, the Applicant's Scheme will reduce traffic along Taverham Road when the</p>

Comment	Applicant Response
<p>Lower Easton properties. Connect to the A47 heading west / leaving east carriageways only - no Norwich bound slips - with simplified bridge over the A47 and smaller roundabout on the south side (west of Easton church) to connect both Easton and the Food Hub to the westward A47. This seems already to be on land acquired by HE for their compounds, so one assumes must avoid sensitive sites. Remove the Norwich Road junction and A47 connection entirely at Taverham Road. Sketch 2 attached.</p> 	<p>Scheme is operational. The Applicant has also proposed a mitigation measure in a no NWL scenario that will also reduce traffic along Taverham Road compared to both the 2015 baseline and 2025 Do Nothing scenarios.</p> <p>In line with the Scheme's objective to provide a more free-flowing network, the existing Easton roundabout needs to be removed. The location of the new Norwich Road junction at Easton was determined based on the requirement for a fully grade separated junction, whilst taking into account existing constraints.</p> <p>The Interested Party's alternative is not feasible for several reasons:</p> <ul style="list-style-type: none"> • Does not provide a connection to users south of the A47, which would result in increased traffic travelling through Easton village to join the strategic road network at the Longwater junction. • Likely to increase harm to the setting of the Grade 1 listed St Peter's Church compared to the Scheme design. • Does not account for availability of existing sideroads and accesses, to avoid an over-engineered design that unnecessarily requires avoidable private land acquisition. • Additional environmental impacts on sensitive receptors, such as the need for another bridge crossing over the River Wensum chalk river. • Overlaps with the consented Orsted cable route. • Does not avoid loss of land within the approved Food Enterprise Zone development. • Commits public funds to providing a connection to a private development where there is no such requirement, as set out in Section 9.3 of the Scheme Design Report, Rev.1 (AS-009). • Requires retention of the existing A47 east-west connection between Taverham Road and Honingham roundabout. This would increase the potential harm to the Grade II* listed setting of St Andrew's Church due to the landscape, visual and noise impacts associated with the raising of the dual carriageway mainline over the existing A47 south and west of the church.
<p>3. Disconnect Taverham Road through-traffic to / from the A47 by physically cutting off the through-traffic at Weston Road, Honingham Lane and the Broadway, permitting connecting full through access only for cyclists and pedestrians. Residents of Taverham Road, Lower Easton, Merryhill and Broadway (and farm vehicles) can then have access to the A47 at the new Norwich Road roundabout, but all through-traffic is (physically) prevented from short-cutting through this area of the valley.</p>	<p>As demonstrated in the above responses within this table, the Applicant's Scheme will reduce traffic along Taverham Road when the Scheme is operational. The Applicant has also proposed a mitigation measure in a no NWL scenario that will also reduce traffic along Taverham Road compared to both the 2015 baseline and 2025 Do Nothing scenarios.</p> <p>Therefore, there is no requirement for the Applicant to consider this additional measure under the Scheme design.</p>

10 DAVID HOOKER

10.1.1 The following documents have been submitted for Deadline 4 from David Hooker and have been examined and are now available for viewing at:

- Deadline 4 Submission – part 1 (**REP4-036**)
- Deadline 4 Submission – part 2 (**REP4-037**)

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001278-DL4%20-%20David%20Hooker%20-%20Other-%20Questions%20remaining%20unanswered.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001280-DL4%20-%20David%20Hooker%20-%20Other-%20Further%20question%20concerning%20landscape%20and%20visual%20effect.pdf>

10.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p>We have followed progress of the hearings on this project in considerable detail. We have noted that many questions raised previous submissions to the Inspectorate have not been fully answered by National Highways and there appear to be significant issues outstanding on which answers have yet to be given. The purpose of this submissions to note a number of these issues and to request that the Inspectorate pursue these points.</p> <p>1. Why did National highways include the Norwich Road junction in its plans when NCC after a consultation abandoned it in favour of the Wood Lane junction</p>	<p>The ExA is directed to the Applicant's previous responses to Mr Hooker on this matter under RR-050.5 in the Applicant's Responses to Relevant Representations (REP1-013) and Section 9 of the Applicant's Response to the Written Representations (REP3-022).</p> <p>The ExA is also directed to the Applicant's response to this same matter in Section 8 above, by Chris Cockcroft.</p>

Comment	Applicant Response
2. Why did National Highways locate the junction so far west when it had already indicated a junction north of the church at Easton	
3. Why did National Highways ignore protests that the single track Taverham Road was already unsafe and yet proposed a direct connection from it to the Norwich Road junction	<p>The ExA is directed to the Applicant's previous response to Mr Hooker on this matter under RR-050.4 In the Applicant's Responses to Relevant Representations (REP1-013) and Section 9 of the Applicant's Response to the Written Representations (REP3-022).</p> <p>The ExA is also directed to response RR-010.3 and RR-010.5 in the Applicant's response to Relevant Representations (REP1-013) which addresses the Applicant's consideration of safety along Taverham Road.</p>
4. Why did National Highways attempt to circumvent the closure of Blind Lane which was made a condition of the Local Development Order for the Farm Hub. There Norwich Road junction and its connections to the south closely follow the path of Blind Lane	<p>The Applicant is not providing a connection to Blind Lane, as set out in Section 9.3 of the Scheme Design Report, Rev.1 (AS-009). The design presented on Sheet 14 of the General Arrangement Plans, Rev.1 (REP3-002) shows no connection to Blind Lane from the new southern roundabout side road connection.</p> <p>During the 2020 statutory consultation the initial design concept proposed the Norwich Road junction with a side road connection to Blind Lane; see drawing on page 10 of Consultation Report Annex J - Section 47 Consultation Materials (APP-034).</p> <p>However, statutory consultation feedback raised concerns about the provision of a link to Blind Lane in light of the Local Development Order requiring the closure of Blind Lane and the provision of a link for the benefit of the private developers of the Greater Norwich Food Enterprise Zone (FEZ).</p> <p>Therefore, the Applicant reviewed the legal position and determined there is no existing or contingent requirement that the Local Development Order requires the Greater Norwich FEZ site is accessed directly from the A47 given the approved alternative route along Church Lane. The analysis is set out in Section 9.3 of the Scheme Design Report, Rev.1, (AS-009) and the removal of Blind Lane post statutory consultation is reported in Table 4.12 (item no. 12) of the Consultation Report (APP-024).</p>
5. Why have the Traffic modelling figures used by National Highways for Taverham Road changed dramatically during 2021.	<p>The Applicant does not understand the reason for the question as the Applicant's traffic modelling figures for Taverham Road remain the same as those presented in Chapter 4 'Transport Assessment' of the Case for the Scheme (APP-140) submitted with the original DCO application in March 2021.</p> <p>However, the ExA is directed to the Applicant's response in Section 12 below, where Honingham Parish Council raised a concern about different traffic numbers along Taverham Road to that presented by the Applicant.</p>
It has been suggested that National Highways should specify the acreage of the area of land taken from the countryside to satisfy their proposals and should also describe efforts made to minimise the areas effected. In particular, the necessity for two major junction complexes within a short distance of each other does not seem to have been addressed.	<p>The Applicant has provided the landtake areas within the Book of Reference, Rev.1 (REP1-008).</p> <p>With regards efforts made to minimise the areas affected and need for two major junctions, the ExA is directed to the Applicant's response to Mr Hooker on these matters under RR-050 In the Applicant's Responses to Relevant Representations (REP1-013) and Section 9 of the Applicant's Response to the Written Representations (REP3-022). Sections 4 and 5 of the Statement of Reasons (REP2-010) include details of how the Applicant has sought to minimise the land take required for the Scheme.</p>

11 ENVIRONMENT AGENCY

11.1.1 The following documents have been submitted for Deadline 4 from the Environment Agency and have been examined and are now available for viewing at:

- Comments on Document 9.13 outline water management and monitoring plan (**REP4-018**)
- Comments draft DCO (Rev 3) (**REP4-019**)
- Comments on Document 9.12 additional information for the lead local flood authority and the environment agency (**REP4-017**)

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001283-submissions%20received%20by%20D3.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001284-submissions%20received%20by%20D3%201.pdf>

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001282-DL4%20-%20Environment%20Agency%20-%20Comments%20on%20Applicant%E2%80%99s%20revised%20draft%20DCO%20.pdf>

11.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p><u>Oak Farm</u></p> <p>Section 2.2 of the document refers to the compensatory flood storage of the Oak Farm watercourse. Section 2.6 refers to a meeting to be had with the landowner affected by the increased flood storage upstream of the Oak Farm culvert. We have advised the Applicant that we would wish to be updated on the outcomes of that meeting, and see confirmation that the landowner is accepting of the increase in flood risk.</p>	<p>The Applicant acknowledges this comment and confirms that there is ongoing engagement with the Environment Agency to provide additional information.</p>
<p><u>Hockering culvert</u></p> <p>Section 2.7.2 and 4.1.1 of the document refer to new 1D-2D hydraulic flood risk modelling and an updated model report for the Hockering culvert. We will await these to be provided to us for review. Section 2.10.5 determines that 11m³ of flood storage is lost in the 1% (1 in 100) annual exceedance probability event, plus 35% allowance for climate change on an ordinary watercourse. In section 2.10.6 the Applicant has proposed that no flood compensatory storage area is provided, stating a "lack of meaningful detriment, small loss of floodplain storage and the improved confidence in the hydraulic model".</p> <p>Ideally we would like to see this lost flood storage compensated for. The individual effect of not carrying out compensation works for the loss of floodplain storage may appear to be minor or insignificant, but the cumulative effect of such proposals can result in more significant impacts.</p> <p>At this location there is an existing road and culvert approximately 200 metres upstream, and the project would result in a new road and culvert immediately downstream. These constrictions on fluvial flows may limit the possibility of any adverse cumulative effects arising from not providing compensatory storage for the 11m³ lost at this location.</p> <p>We have requested that the Applicant provides further information on the reasons for not providing compensatory storage, and further detail on what happens as a result of 11m³ of flood storage being lost. For example, is that volume retained within the application site boundary with the new culvert downstream regulating flow rates? Or if not, does the 11m³ of lost flood storage result in any offsite impacts and where are those impacts?</p> <p>We understand that the Applicant intends to submit further information for Deadline 5.</p>	<p>The Applicant acknowledges this comment and confirms that there is ongoing engagement with the Environment Agency to provide additional information.</p>
<p><u>River Tud Compensatory storage</u></p> <p>The Applicant has provided further detail on the River Tud compensatory storage proposals, set out in section 3.1.1. we expect to be consulted on the detailed design of the River Tud compensatory storage proposals under Requirement 4 Environmental Management Plan, as stated in 3.1.2. from the information provided, we are satisfied that the Applicant has adequately demonstrated that in principle appropriate flood storage compensation can be delivered at this location.</p>	<p>The Applicant confirms the Environment Agency will be consulted on the detailed design drawings for the floodplain compensatory area under action RD9 of the Environmental Management Plan (APP-143), secured under Requirement 4 of the dDCO (REP3-011).</p>
<p><u>River condition surveys</u></p> <p>We note the inclusion in the document of section 5, 6 and 7, which outline the work being undertaken by the Applicant to resolve our concerns regarding the potential ecological impacts on the River TUD, Oak Farm And Hockering watercourses. We look forward to reviewing the outputs of these surveys and agreeing with the Applicant any further measures required.</p>	<p>The Applicant acknowledges this comment and confirms that there is ongoing engagement with the Environment Agency to provide additional information.</p>
<p><u>Section 3: Consents and Permissions</u></p> <p>We note that Table 2 appropriately highlights the circumstances in which a Flood Risk Activity Permit may be required, although this requirement is not referenced in the preceding text.</p> <p>Table 2 also outlines when an abstraction license may be required for construction dewatering. We would re-emphasise that dewatering can only be undertaken without a license at the rates quoted if dewatering works for the whole scheme will last for a period of 6 consecutive months or less. If dewatering will occur over a longer time frame, the maximum rate at which dewatering can be undertaken without an abstraction license is 20m³/d.</p> <p>We would also highlight that Table 2 incorrectly refers to the Environment Agency as the 'Environment Agency'.</p>	<p>The Applicant acknowledges the feedback and will ensure the corrections are made to a copy of this table that is <i>Table 4.1: Consents and Permissions that may be required to deliver the EMP</i> in the 2nd Iteration of the Environmental Management Plan (APP-143), which is a certified document to be secured under Requirement 4 of the dDCO (REP3-011) in consultation with the Environment Agency.</p>
<p><u>Annex 1 Water Management Proposals</u></p> <p>Regarding Item 3 in the table, we would highlight that the requirement to not change the existing hydraulic continuity should also be a consideration when designing piling.</p> <p>In respect of Items 3 & 4, the use of the term 'hardstanding' should be reconsidered or more clearly defined. It is not clear whether the term relates to inherently permeable or impermeable surfacing? Item 4 refers to "a hardstanding area" for storage of oils, fuels etc. which is to be bunded. We would expect this 'hardstanding' to be impermeable. However, the refuelling, maintenance and concrete batching sites are specifically described as being on "impermeable hardstanding with drainage treated appropriately".</p> <p>Regarding Item 9, regular monitoring of groundwater quality will also be required in areas where proposed activities have the potential to adversely impact upon it.</p>	<p>The Applicant acknowledges the feedback and will ensure the corrections are made in the updated version of the Water Monitoring and Management Plan, which will form Annex B.7 in the 2nd Iteration of the Environmental Management Plan (APP-143), to be secured under Requirement 4 of the dDCO (REP3-011) in consultation with the Environment Agency.</p>


Comment	Applicant Response
As above, the Environment Agency is incorrectly referred to as the 'Environment Agency' in Annex 1.	
<p>Comments on draft Development Consent Order Rev 3</p> <p>With regard to Requirement 8 Surface water drainage, we note that the Environment Agency have been added as a named consultee in part (2). We welcome this addition and can confirm that this resolves our previously raised issues with this Requirement.</p> <p>We note that minimum consultation period in Requirement 19 Details of consultation, has been amended from 10 to 15 business days. We are supportive of this change which should allow us sufficient time to respond to consultations concerning the discharge of requirements.</p>	The Applicant acknowledges these comments.

12 HONINGHAM PARISH COUNCIL

12.1.1 Honingham Parish Council's written summaries of oral submissions made at Issue Specific Hearing 2 (**REP4-038**) is available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001293-c%201%20November%202021.pdf>

12.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p>Side road strategy and practical solutions remains a major unresolved issue. This is vitally important in the lives of local residents, businesses and farms. We have consistently argued that as much of the existing A47 as possible should be retained to serve as access for local people and to enable full connection to the existing local side road network. The failure of the National Highways proposal to address this and the absence of any coherent joined up practical proposals with Norfolk County Council on side roads at this stage of the process defies belief. As a Council we cannot understand why anyone would propose that some 1800 vehicles a day (NCC modelling outputs shared at the Local Liaison Group without construction of the NWL, reducing to 1,100 with the NWL) be allowed to traverse a single-track narrow country lane with limited passing spaces. Apart from the severe impact on the lives of residents in Taverham Road, we feel this situation is manifestly unsafe for road users.</p>	<p>The ExA is directed to detailed responses above to similar issues raised in Section 5 (by David Hooker, who is a Church Warden of St Andrew's Church, Honingham, on behalf of the Benefice of Honingham) and Section 9 (by D G M Kenney).</p> <p>Further to those responses, Norfolk County Council presented their independent traffic modelling results to the Local Liaison Group (Norfolk County Council and Parish Councils) on 23 February 2021 – where Honingham Parish Council were represented by Richard Kirkham.</p> <p>The NWL figure of 1800 AADT quoted was in relation to the 2025 Do Minimum scenario for the NWL scheme. The table presented also contained the 2025 Scenarios for the "Closure of Honingham Lane with further measures on Taverham Road". Those results demonstrated that the Average Annual Daily Traffic (AADT) on Taverham Road with the proposed mitigation measures in place (Honingham Lane closure) was 400 AADT in the Scheme opening year of 2025.</p>
<p>The Council continues to maintain that Taverham Road should not be directly connected to the A47 mainline at the Norwich Road junction but continue to be connected via the existing A47 route to the existing Mattishall Road roundabout. This would require limited motorised access (weight, height and width restricted) via the proposed WCHR underpass access adjacent to St. Andrews Church. This in our view balances the need to maintain local access across the Wensum Valley whilst further discouraging rat running around the western edge of Norwich, for what would be a relatively small change to the existing scheme. This proposal has additional advantages in avoiding the problems of rubbish dumping and illegal occupation that the existing National Highways proposal would bring to the severed road in front of St. Andrews Church.</p>	<p>The Applicant's transport assessment, in Chapter 4 of the Case of the Scheme (APP-140), shows a prediction of 200 AADT for the Scheme opening year of 2025 with NWL also open. Both these situations are still lower than the 2015 baseline of 600 AADT along Taverham Road.</p> <p>As part of the development process, an independent Stage 1 Road Safety Audit of the Scheme has been undertaken. No safety concerns were identified in this location.</p> <p>The Applicant has engaged with the Local Highway Authority (Norfolk County Council), the NWL project team and Norfolk County Council Public Rights of Way officers throughout the design development process. No safety concerns have been raised by representatives of the Local Highway Authority at any point during development of the Scheme.</p> <p>The Applicant recognised the risk of increased traffic numbers in a 'no NWL scenario without mitigation'; see Figure 4.27 in Chapter 4 'Transport Assessment' of the Case for the Scheme (APP-140). Therefore, through analysis of traffic modelling scenarios and engagement with the local liaison group, the Applicant explored the concerns related to safety and disturbance from increased traffic passing through Ringland, via Honingham Lane and onto Taverham Road during the period between the Scheme opening and NWL opening.</p> <p>As an outcome of this process and engagement with the Local Liaison Group, the Applicant's DCO application include allowance to implement the temporary closure of Honingham Lane to through traffic, in the interim period between the A47 opening and NWL scheme opening.</p> <p>This measure would reduce the volume of traffic utilising this route during the interim period between the A47 opening and NWL becoming operational. If the NWL scheme does not obtain planning consent, the Applicant would continue to engage with the local highway authority, Norfolk County Council, on the implementation of this proposal (e.g. long term closure of Honingham Lane or alternative measures). This commitment is stated within Section 9.2 of the Scheme Design Report, Rev.1 (AS-009); see paragraph 9.2.10.</p>

Comment	Applicant Response
	<p>The ExA is also directed to Agreed items C and G, with regards the Honingham Lane Stopping Order, presented in Table 3.3 of the Draft SoCG with Norfolk County Council (REP4-003), submitted at Deadline 4.</p> <p>The SoCG confirms Honingham Lane will be subject to a temporary Traffic Regulation Order to prevent vehicular use for a period to be agreed with Norfolk County Council. Article 20 of the dDCO (REP3-011) provides the power to make such an order subject to the consent of the relevant traffic authority.</p> <p>The Applicant will continue to work collaboratively with Norfolk County Council to develop and agree a scheme of mitigation measures for the implementation of the TTRO to close Honingham Lane to through traffic whilst minimising impact on agricultural access where possible.</p>
<p>The Council is also of the view that insufficient screening is proposed for the residents of Taverham Road from the Norwich Road junction complex.</p>	<p>It is important to note that the Scheme is replacing the existing A47 with a new dual carriageway upwards of 200m south of the existing A47, further away from the properties near Honingham Church and on Taverham Road.</p> <p>In addition, as illustrated earlier in this table, the relocation of the Norwich Road Junction further east post Statutory Consultation feedback also moved the junction further from properties near Honingham Church and on Taverham Road.</p> <p>Sheet 14 of the Environmental Masterplan, Rev 2, (REP3-016) demonstrates provision of woodland and shrub planting north of Norwich Road Junction to supplement the retained mature trees north of the existing A47, as shown below, provide a visual screen to properties near Honingham Church and along Taverham Road.</p>  <p>Annex A to this document also presents two cross sections from properties along Taverham Road looking towards the Scheme to show how the planting would screen views.</p> <p>ES Figures 7.6.9A to 7.6.9D (APP-066) also present photomontages from Viewpoint 7, shown in ES Figure 7.4 'Visual Context', to illustrate views from Taverham Road looking towards the Scheme, comparing existing with future views in year 1 and year 15 post Scheme opening. At Viewpoint 7, which is located in an elevated position on Taverham Road, just to the north of the Scheme. Viewpoint 7 was specifically requested by the local authorities to represent a clear view towards the site experienced by road users (low sensitivity) and users of an adjacent footpath (medium sensitivity).</p>
<p>The Council supports the Berry Hall proposed alternative plans in respect of the Wood Lane/NWL junction. This shows that it is potentially feasible to design a junction that significantly reduces existing mature tree and hedgerow removal required in the current scheme. This would provide significant immediate environmental gain in a world where climate change and conservation should now be overriding priorities. In our view the current scheme 15-year environmental net neutral target does not sufficiently recognise this priority. This alternative would also provide for increased mitigation to shelter the west side of Honingham from what will be significant visual, noise, pollution and light impacts on local residents. This alternative also keeps open more of the existing A47 (via the Lady's Grove underpass) which provides advantages in terms of a direct route for local bus services (potential services from Hockering - Honingham - Easton and onto Norwich), local motorised traffic and cyclists – all of whom would not need to negotiate the proposed Wood Lane / NWL A47 mainline junction. The size of the over designed roundabouts on the current National Highways proposals at this junction remain a further key concern. It appears that the designed capacity to have minimal queues in 2040 based on historically informed estimates of future journey growth (before current trends to work more from home and be more sustainable can be effectively determined) and to provide a link to the</p>	<p>The ExA is directed to the Applicant's Alternative Wood Lane Junction Options Appraisal (AS-022), plus the updated version submitted at Deadline 5, that demonstrates why the Applicant's proposed Scheme design would still be preferred.</p> <p>The report also reviews the benefits and disadvantages of the alternative compared to the Applicant's Scheme design, which outline how many of the benefits perceived by the Interested Parties are either not realised / or are limited (e.g. effects on residents of Honingham) or offset by alternative additional adverse impacts (e.g. increased loss of woodland and important hedgerows outwith the Berry Hall Estate).</p> <p>With regards accounting for current trends to work more from home, the ExA is directed to Common Response B in the Applicant's Response to the Relevant Representations (REP1-013).</p> <p>The ExA is also directed to Appendix A of the Applicant's Response to Examining Authority's Action List from ISH1, ISH2, CAH1 and CAH2 (REP4-016) for evidence justifying the size of the Wood Lane Junction should the Norwich Western Link not be provided.</p>

Comment	Applicant Response
<p>NWL that may never be built is at the needless expense of considerable immediate environmental damage. The existing junction proposal may meet required regulations and design standards but, in our view, completely misses the opportunity to considerably reduce environmental damage and to maintain connectivity of the local road network.</p>	
<p>The Council is also concerned that the proposed scheme may attract opportunistic development proposals that are unacceptable to the rural character and setting of the Parish, not least the landscape of the River Tud. The Parish is determined to retain its current rural character and to ensure that any development is consistent with this.</p>	<p>The Applicant acknowledges the comment and notes that consideration and approval of future developments are the responsibility of the local highway and planning authorities.</p>

13 NORFOLK WILDLIFE TRUST

13.1.1 Norfolk Wildlife Trust's Deadline 4 Submission (**REP4-045**) is available at:

https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001340-A47_North_Tuddenham_to_Easton_dualing_NWT_comments.pdf

13.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p><u>NWT comments on A47 North Tuddenham to Easton Dualling</u></p> <p>We are concerned at the scale of the ecological impacts of this proposal and object due to the significant impacts that are likely to occur, particularly to legally protected species known to be present in the vicinity of the route. Notwithstanding our concerns over protected species, the scale of residual impacts on habitats remains significant, even when the time lag until new habitat is functional is discounted, and would require further commitments from the applicant on extent and aftercare in order to avoid any residual impacts</p>	<p>Effects on biodiversity, including habitats and protected species, have been assessed in ES Chapter 8 Biodiversity (APP-047). The assessment was informed by extensive habitat and species surveys, plus consultation with key stakeholders listed in Section 8.4 of the ES, including Natural England, the Environment Agency, Norfolk County Council and local wildlife groups.</p> <p>Section 8.9 of ES Chapter 8 outlines the measures proposed to minimise effects on and maximise opportunities for biodiversity, and to mitigate impacts on habitats and protected species. Section 8 of the Scheme Design Report, Rev.1, (AS-009) presents an overview of the environmental considerations that have influenced and form an embedded part of the Scheme design. These include:</p> <ul style="list-style-type: none"> • Ecological measures to reduce habitat fragmentation through provision of safe mammal crossing points through mammal ledges in culverts and mammal underpasses; and protecting the flight and foraging routes of bats. • Re-meandering and additional riparian planting along the Oak Farm tributary and Hockering tributary. • Sustainable drainage systems design, including wetland habitat creation at two drainage basins. • Landscaping with sensitive planting, native plant species and wildflowers. <p>The provisional design of the proposed ecological mitigation is presented in the Environmental Masterplan, Rev.1, (AS-007) and all mitigation detailed in Section 8.9 of ES Chapter 8 will be detailed and implemented as part of the record of environmental actions and commitments (REAC), which forms Table 3.1 in the Environmental Management Plan (EMP) (APP-143). Additional detail regarding the mitigation design will be presented in Annex B5 'Landscape and Ecology Management Plan (LEMP)' of the EMP, to be produced by an appointed Landscape Architect and Ecologist prior to construction. The LEMP will describe the proposed management and monitoring of the landscape and ecological mitigation and compensation features of the Scheme.</p> <p>Delivery of these commitments, including consulting the relevant local planning authority on the final landscaping design and Environmental Management Plan, are secured through the dDCO Requirements 4 'Environmental Management Plan' and 5 'Landscaping' (APP-017).</p>
<p><u>Insufficient information on protected species</u></p> <p>All UK bat species are fully protected under the Wildlife & Countryside Act and the Habitats Regulations. We are concerned that a) the ES (library reference APP-047) predicts a large adverse impact on bats even after mitigation and b) that the ES itself considerably underestimates the impacts on the local barbastelle bat population. We strongly support the comments made by the Norfolk Barbastelle Study Group and Wild Wings Ecology, which note that the proposal is within the Core Sustenance Zone of a nationally important super-colony for barbastelle bats, with a crossing point identified on the proposed route from radio tracking work, and that the cumulative impacts of the scheme and the Norwich Western Link on the super colony have not been addressed. We strongly recommend that a full assessment of the impacts on the barbastelle super-colony is provided by the applicant prior to any decision on this application and that consent should only be granted if it can be robustly demonstrated that impacts on the favourable conservation</p>	<p>a) The ExA is directed to the Applicant's response to Q3.0.13 in its Deadline 2 submission 'Responses to the ExA's First Written Questions (ExQ1)' (REP2-020) regarding the large adverse and significant residual effect on bats. Here the Applicant's explains the main cause of the residual 'large adverse' impact of the Scheme on bats is as a precaution due to the uncertainty around use of hop-overs in bat mitigation at the existing crossing points.</p> <p>a) The ExA is directed to the Applicant's response to Q3.0.16 in the Deadline 2 submission 'Responses to the ExA's First Written Questions (ExQ1)' (REP2-020) regarding consideration of Barbastelle bats and the Core Sustenance Zone. The Applicant has nothing more to add to this response, but will be presenting an update to the Environmental Statement Chapter 8 Biodiversity (APP-047) by Deadline 6 to clarify how the core sustenance zone of Barbastelle bats has been considered in that assessment.</p>

Comment	Applicant Response
status of bat species near the route can be avoided.	
<p><u>Unacceptable level of residual adverse impacts</u></p> <p>Notwithstanding our objection raised above, should consent be granted, then we would expect to see a greater commitment made to habitat restoration and creation in order to address the multiple residual adverse impacts predicted in the ES. Table 8.14 of chapter 8 of the ES (library reference APP-047) notes that even after mitigation there will be residual adverse impacts on a range of Priority Habitats, due to the reduction in habitat area (for example woodland and floodplain grazing marsh), or due to the time lag involved where some habitat creation takes longer (as noted for breeding and wintering birds). We believe that it is feasible to provide further habitat creation as mitigation in order to remove any remaining residual adverse impacts related to habitat loss. Where this is in part to do with any time lag associated with new habitat creation, then we recommend that additional habitat is provided, in line with the approach taken in the Defra biodiversity net gain metric for similar situations, in which additional habitat is required to compensate for the lower value of new habitat in early years whilst it establishes.</p>	<p>The ExA is directed to Common Response F in the Applicant's response to relevant representations (REP1-013), which responds to similar concerns about the Scheme's destruction and fragmentation of rare habitats such as wet grazing meadows and those home to protected species, notably bats.</p>
<p><u>Monitoring</u></p> <p>We are concerned at the monitoring period set out in section 8.11 of the ES and (library reference APP-143). For a proposal of this scale, we do not consider five years to be a sufficient monitoring period, in particular for the successful establishment of new habitats that are critical to the mitigation of ecological impacts linked to habitat loss. A significant part of the ecological mitigation is reliant on the creation or restoration of complex habitats such as woodland and species-rich grassland, therefore we recommend that the monitoring period for habitat works is revised to cover the time needed to demonstrate it can achieve good condition, which will normally be longer than the standard five year period proposed. We refer to Table TS3-1 of the Technical Supplement to Defra's Biodiversity Metric version 3.0 [redacted] for peer-reviewed best estimates on the required time needed for successful establishment of new habitats, as a guide to the likely monitoring periods needed to demonstrate successful delivery of the habitat creation proposed in the ES. For example, the document advises that good condition ponds can be established in 5 years, whilst neutral grassland can take 10 years, floodplain wetland mosaics can take 20 years and woodland at least 30 years.</p>	<p>With regards monitoring and management to ensure the successful establishment of new habitats as mitigation for ecological, landscape and visual impacts, this would be managed through a detailed Landscape and Ecology Management Plan (LEMP) that will detail the proposed management and monitoring of the landscape and ecological mitigation and compensation features of the Scheme. The LEMP forms Appendix B.5 of the Environmental Management Plan (APP-143) and will be approved by the Secretary of State through dDCO Requirement 4 (REP3-011), following consultation by the Applicant with the relevant planning authority, local highway authority, lead local flood authority and the Environment Agency.</p>

14 ORSTED HORNSEA PROJECT THREE (UK) LIMITED

- 14.1.1 Orsted Hornsea Project Three (UK) Limited's comments on Applicant's revised draft DCO (**REP4-021**) are available at:
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001302-DL4%20-%20Orsted%20Hornsea%20Project%20Three%20UK.pdf>
- 14.1.2 The Applicant's response is presented in the below table.

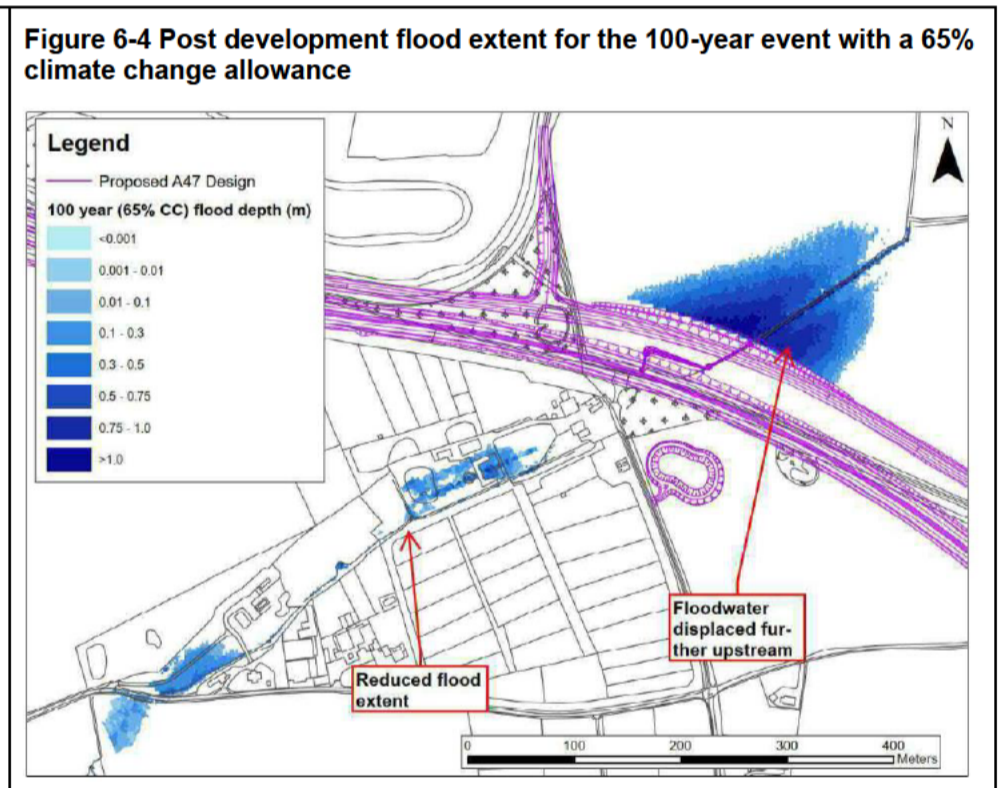
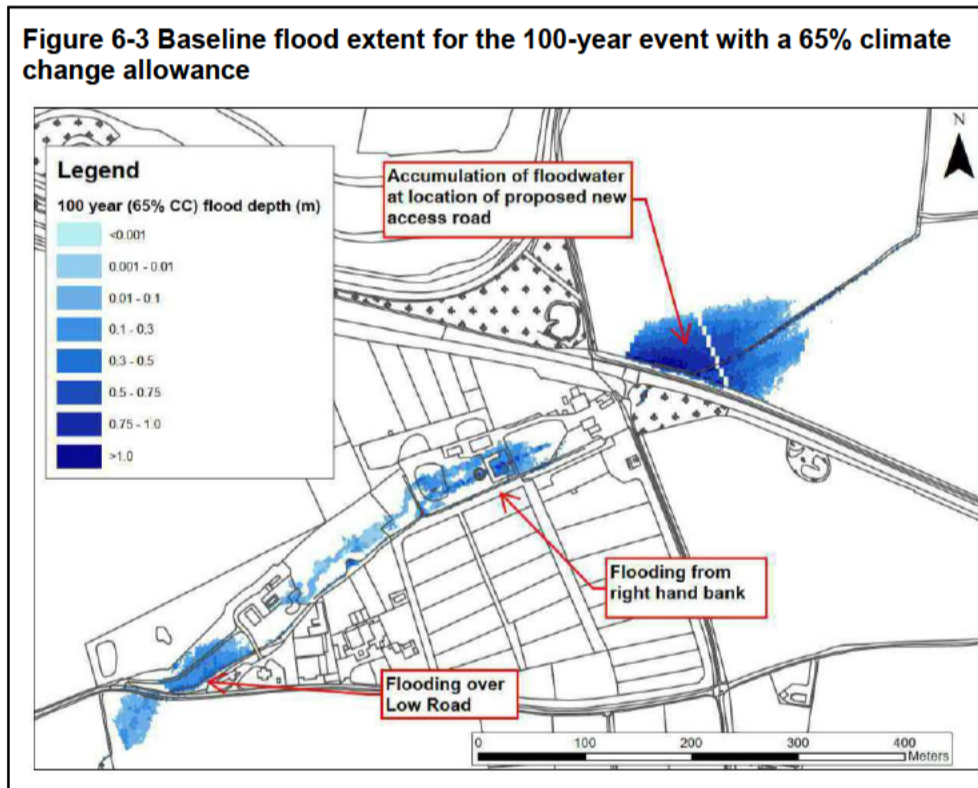
Comment	Applicant Response
<p>Negotiations are ongoing with National Highways on the A47 North Tuddenham to Easton scheme. However, in the absence of an agreement or agreed Statement of Common Ground, Hornsea Project Three Offshore Wind Farm is seeking protective provisions to be included in the A47 North Tuddenham to Easton Development Consent Order to ensure that Hornsea Three can be delivered without impediment.</p>	<p>The Applicant confirms negotiations are progressing with Orsted Hornsea Project Three (UK) Limited.</p>

15 ROBERT WRIGHT

- 15.1.1 Robert Wright's Deadline 4 Submission (**REP4-039**) is available at:
<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010038/TR010038-001307-DL4%20-%20Robert%20Wright.pdf>
- 15.1.2 The Applicant's response is presented in the below table.

Comment	Applicant Response
<p><u>Great Crested Newt Relocations</u></p> <p>I am very happy to accept the displaced newts from their current habitat into my two ponds, despite my concerns that the water quality of the ponds is not good and I understand that this particular type of newt requires clean water for healthy survival. I</p>	<p>The Applicant confirms a land agreement has been issued to Mr Wright and that a further meeting took place between the Mr Wright and representatives of the Applicant on the 15 November 2021 on site.</p>

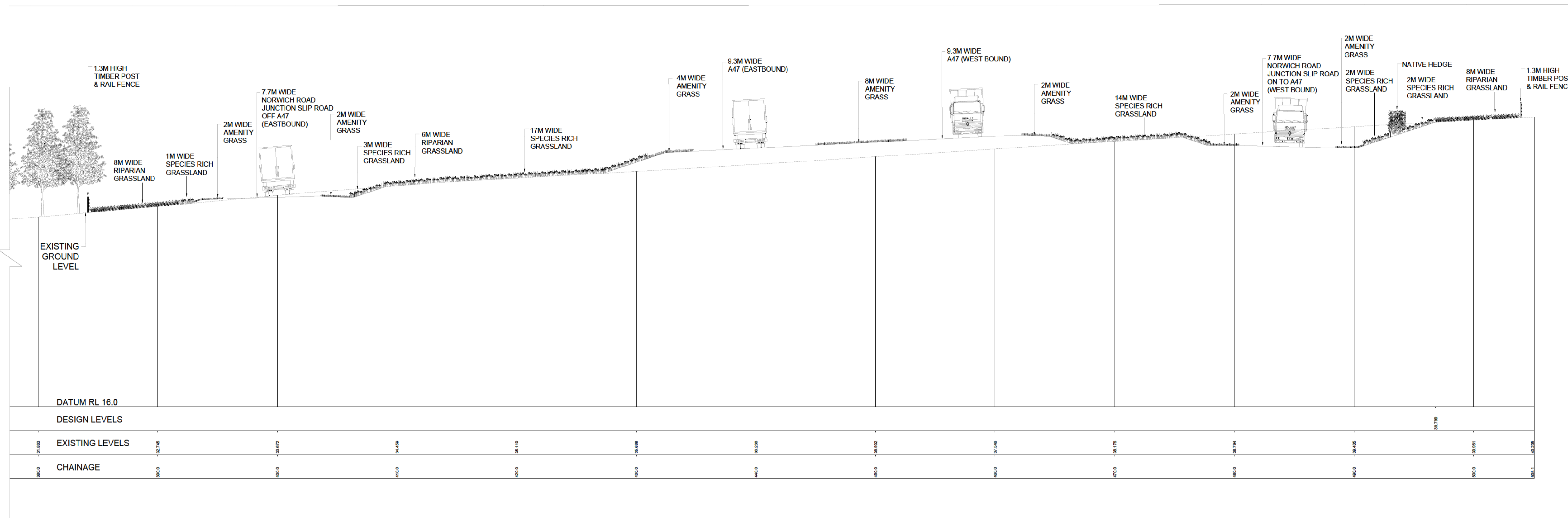
Comment	Applicant Response
<p>today have been verbally reassured by Steve Bratton, the district valuer, that the parcels which were highlighted (DCO) in the communication from Highways England (22/10/21) as land to be acquired permanently, will be amended to land to be used temporarily. We look forward to our meeting with Steve and team on Monday 15th November, 2021 @ 1630 HRS.</p>	<p>Upon receipt of the signed land agreement from Mr Wright, the Applicant will update the Book of Reference, Rev.1, (REP1-002) and Land Plans, Rev.1, (REP1-008) to show land parcels 1/5a and 1/5b as reduced from Permanent acquisition rights (pink) to acquisition of New Rights (blue) to reflect support of the land owner that a land agreement will be agreed to provide rights to discharge the Natural England GCN licence requirements in these land parcels.</p>
<p><u>Land Drainage and inadequate culvert beneath Low Rd (close to land parcels)</u></p> <p>As previously discussed with Jamie Hayward (Galliford Try), the culvert on Low Rd and drainage from Low Road to the River Tudd is inadequate and I feel would need upgrading in view of the inevitable larger volumes of water coming off the proposed dual carriageway after construction. I believe this is under discussion with various agencies (confirmed verbally in today's hearing by Barrie Arthur) but I would request to be kept informed of the much needed proposed solution to this issue.</p>	<p>Responsibility for land drainage problems on the local side road network, including the culvert beneath Low Road, is the responsibility of Norfolk County Council as the local highway authority.</p> <p>However, the Applicant can confirm the Scheme design does improve flood risk upstream where associated with the culvert under the existing A47. This is illustrated in the Figures 6-3 and 6-4 ES Appendix 13.1 Flood Risk Assessment, Part 1 of 2 (APP-124). These are copied below and show the flood extent for the 100-year event, with a 65% climate change allowance, in the baseline and post scheme scenarios, respectively.</p>
<p><u>Letters previously served addressed to me regarding A47 dualling project</u></p> <p>At today's hearing Jonathan Bower offered to supply a schedule of all letters served to me regarding this project since its conception, bearing in mind that the first communication I received was from Highways England on 06/05/21. I would like to accept his offer please and look forward to receiving the schedule.</p>	<p>The Applicant confirms a schedule of correspondence records has been issued to Mr Wright.</p>



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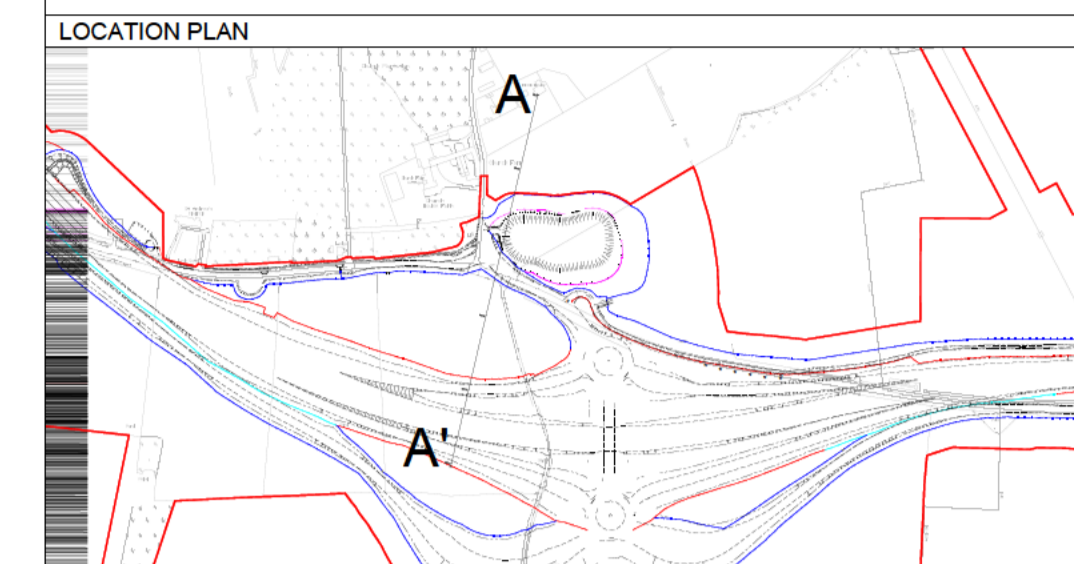
SOURCE: Appendix 13.1 Flood Risk Assessment, Part 1 of 2 (APP-124)

ANNEX A CROSS SECTIONS OF VIEWS FROM TAVERHAM ROAD



SECTION A - A' PART 3 OF 3
SCALE 1 : 200

- NOTES**
1. THIS DRAWING SHALL ONLY BE USED FOR THE DESIGN ELEMENT STATED IN THE DRAWING TITLE.
 2. ALL DIMENSION IN METRES (m) UNLESS OTHERWISE STATED.
 3. DO NOT SCALE FROM THIS DRAWING.
 4. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH:
NORWICH ROAD JUNCTION LONG SECTION SHEETS:
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HE551489-GTY-ELS-000-DR-LX-31002
HE551489-GTY-ELS-000-DR-LX-31003
ENVIRONMENTAL MASTERPLAN SHEETS 1 TO 14:
HE551489-GTY-ELS-000-DR-LX-30001 TO HE551489-GTY-ELS-000-DR-LX-30016



KEY TO SYMBOLS

REV	DATE	REVISION NOTE	ORG	CHKD	APPD
P01	23/11/21	DCO DEADLINE 5	LS	JMoe	MR
C04	23/11/21	DCO DEADLINE 5	LS	JMoe	MR

DESIGNER



CONTRACTOR



CLIENT



PROJECT TITLE

A47 NORTH TUDDENHAM TO EASTON DUALLING

PROJECT STAGE

PCF STAGE 4

DRAWING TITLE

NORWICH ROAD JUNCTION
LONG SECTION A-A'
SHEET 2 OF 2

SUITABILITY

AUTHORISED AS STAGE 3 COMPLETED

SHEET SIZE SCALE STATUS REVISION

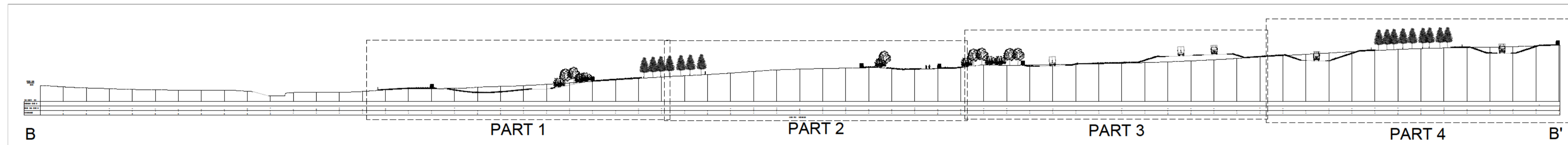
A1 AS SHOWN A3 C04

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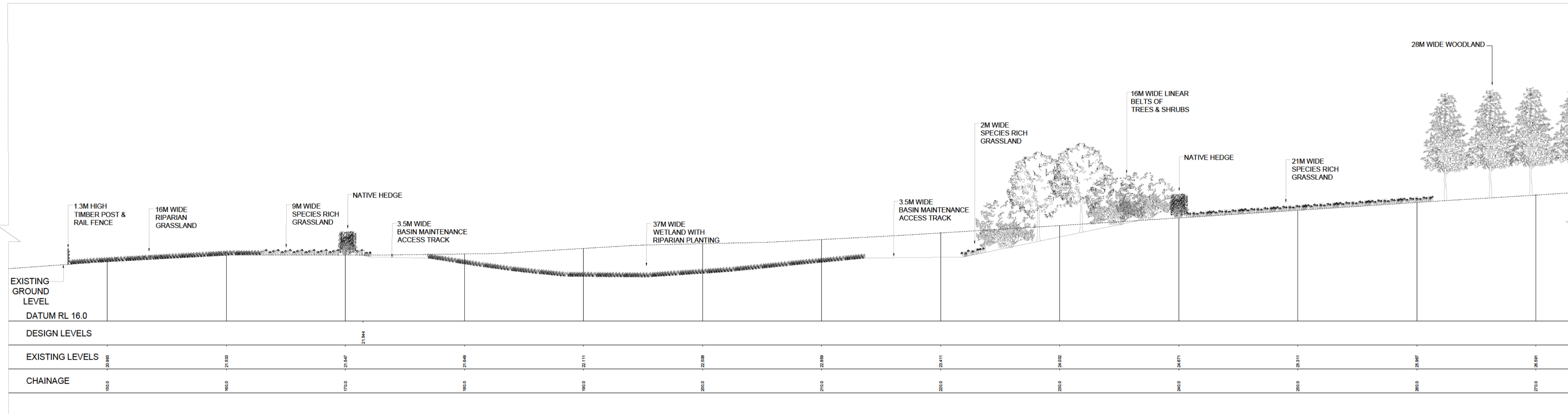
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IMPORTANT
SAFETY, HEALTH & ENVIRONMENTAL INFORMATION
TO BE READ IN CONJUNCTION WITH HAZARD REGISTER
DOC. REF: HE551489-GTY-GHS-000-HS-ZZ-30001.

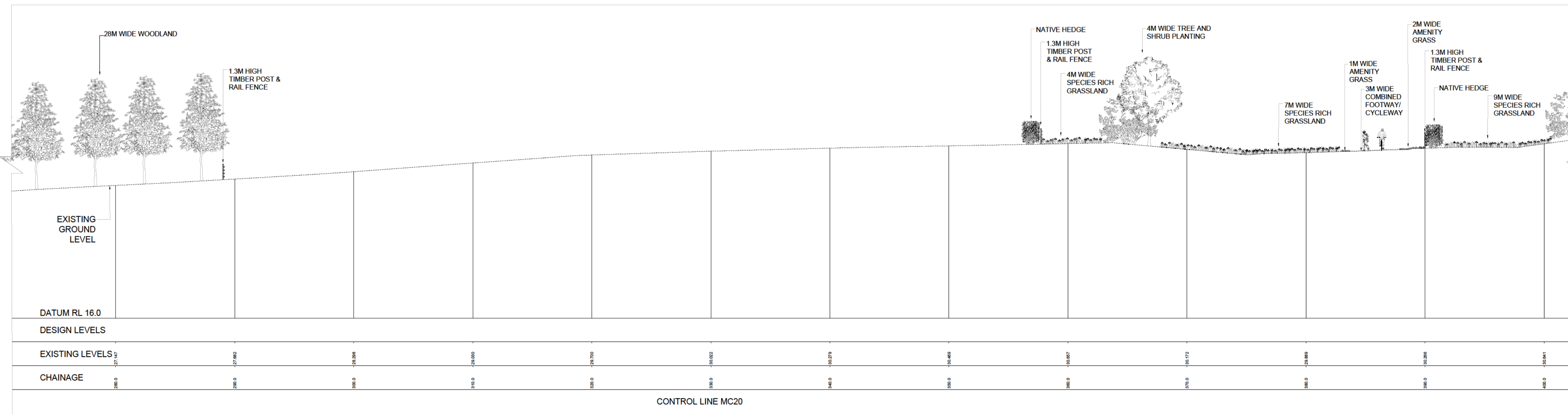
HAZARD REF	BRIEF DESCRIPTION OF HAZARD:



SECTION B - B' OVERVIEW
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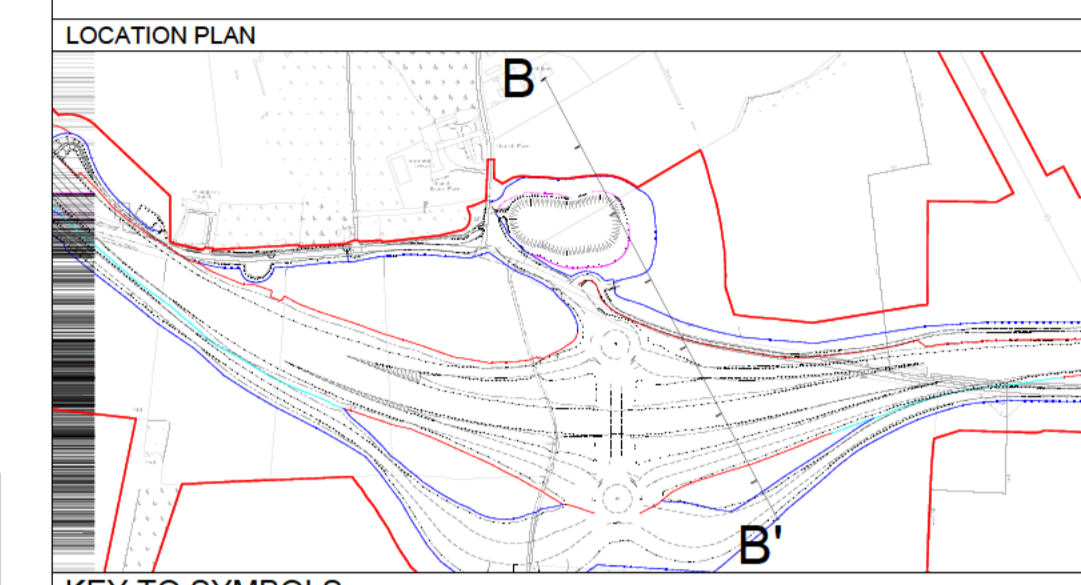


SECTION B - B' PART 1 OF 4
SCALE 1 : 200



SECTION B - B' PART 2 OF 4
SCALE 1 : 200

- NOTES**
1. THIS DRAWING SHALL ONLY BE USED FOR THE DESIGN ELEMENT STATED IN THE DRAWING TITLE.
 2. ALL DIMENSION IN METRES (m) UNLESS OTHERWISE STATED.
 3. DO NOT SCALE FROM THIS DRAWING.
 4. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH:
NORWICH ROAD JUNCTION LONG SECTION SHEETS:
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HE551489-GTY-ELS-000-DR-LX-31001
HE551489-GTY-ELS-000-DR-LX-31003
ENVIRONMENTAL MASTERPLAN SHEETS 1 TO 14:
HE551489-GTY-ELS-000-DR-LX-30001 TO HE551489-GTY-ELS-000-DR-LX-30016



KEY TO SYMBOLS

REV	DATE	REVISION NOTE	ORG	CHKD	APPD
P01	23/11/21	DCO DEADLINE 5	LS	JMoe	MR
C04	23/11/21	DCO DEADLINE 5	LS	JMoe	MR

REV	DATE	REVISION NOTE	ORG	CHKD	APPD
P01	23/11/21	DCO DEADLINE 5	LS	JMoe	MR
C04	23/11/21	DCO DEADLINE 5	LS	JMoe	MR

DESIGNER

CONTRACTOR

CLIENT

PROJECT TITLE
A47 NORTH TUDDENHAM TO EASTON DUALLING

PROJECT STAGE
PCF STAGE 4

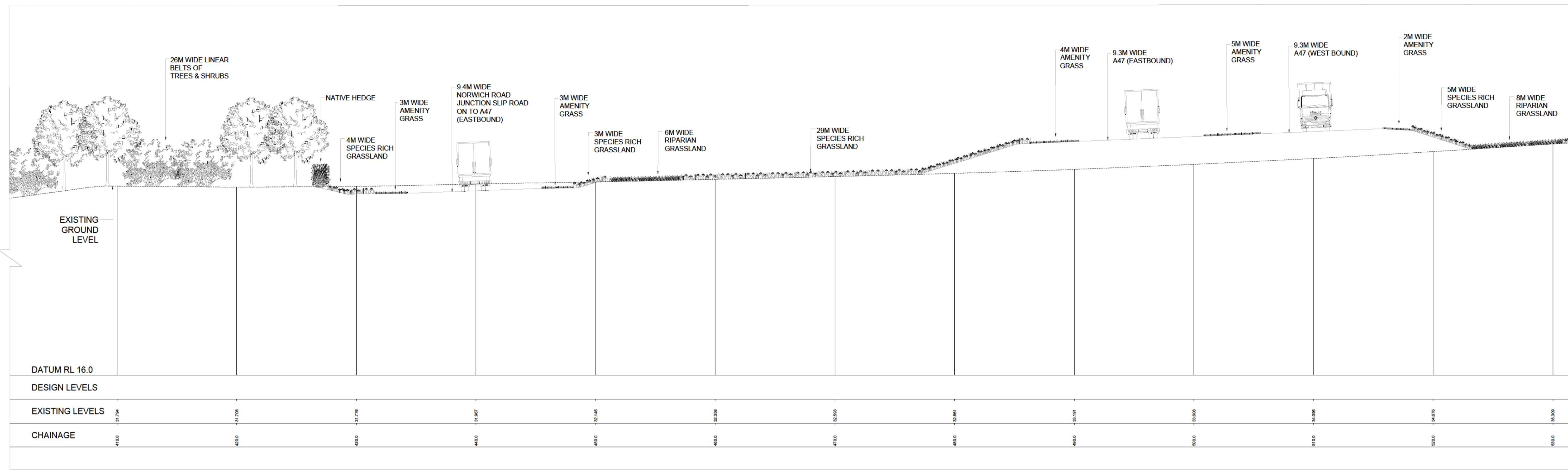
DRAWING TITLE
NORWICH ROAD JUNCTION LONG SECTION B-B' SHEET 1 OF 2

SUITABILITY
AUTHORISED AS STAGE 3 COMPLETED

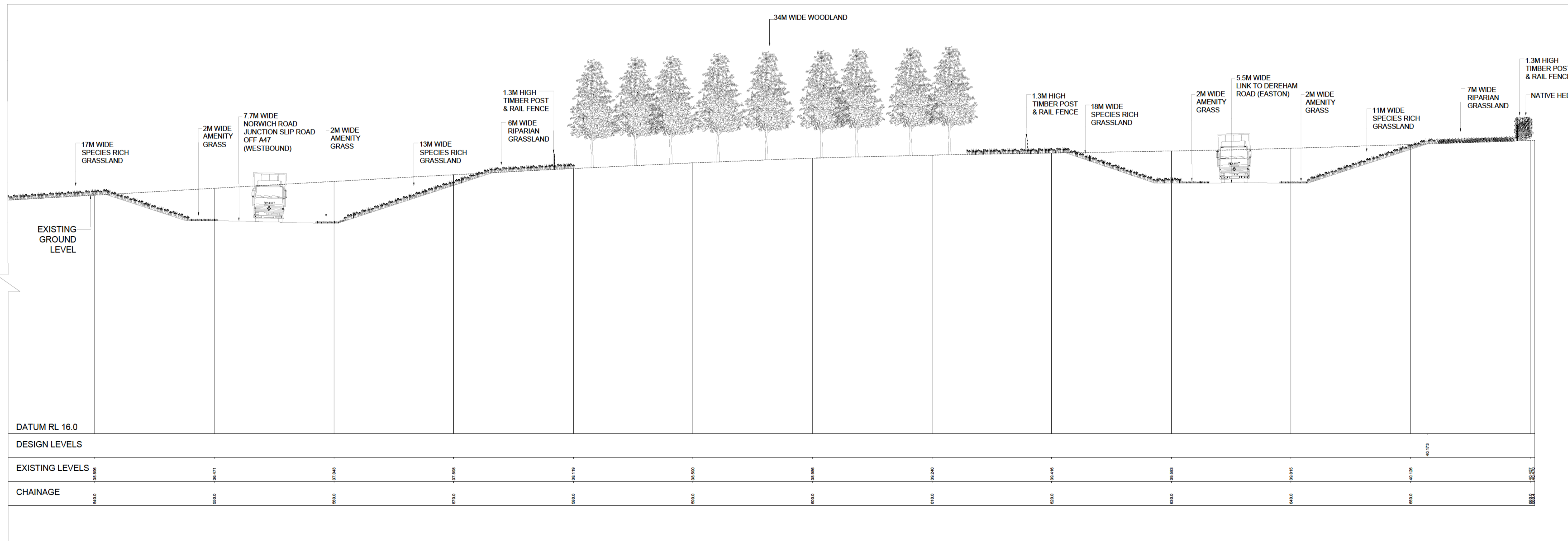
SHEET SIZE	SCALE	STATUS	REVISION
A1	AS SHOWN	A3	C04

DRAWING NUMBER
HE551489-GTY-ELS-000-DR-LX-31002

IMPORTANT
SAFETY, HEALTH & ENVIRONMENTAL INFORMATION
TO BE READ IN CONJUNCTION WITH HAZARD REGISTER DOC. REF: HE551489-GTY-GHS-000-HS-ZZ-30001.
HAZARD REF AND BRIEF DESCRIPTION OF HAZARD:-
HAZARD REF | BRIEF HAZARD DESCRIPTION

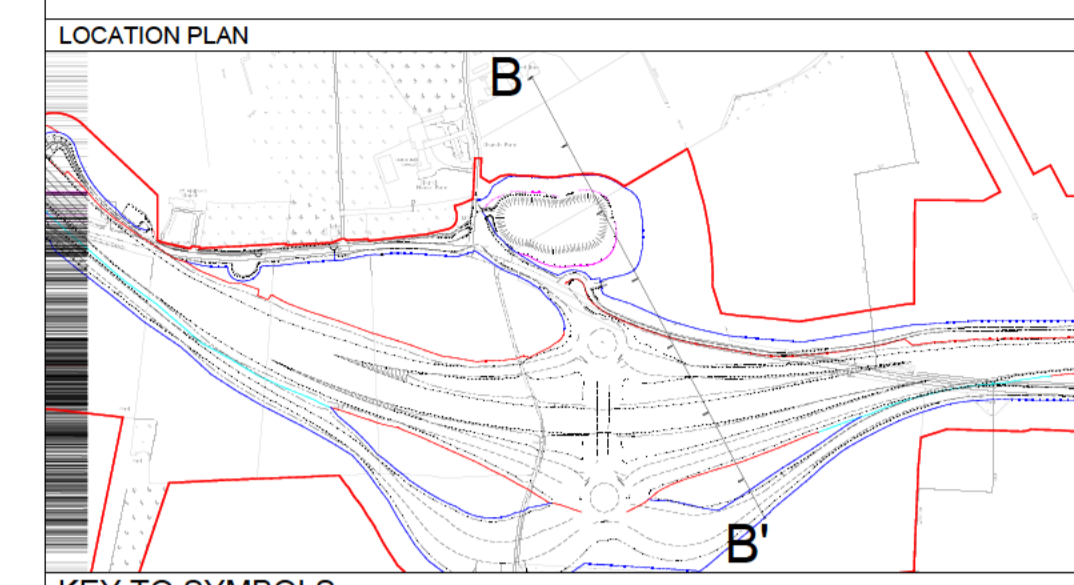


SECTION B - B' PART 3 OF 4
SCALE 1 : 200



SECTION B - B' PART 4 OF 4
SCALE 1 : 200

- NOTES**
1. THIS DRAWING SHALL ONLY BE USED FOR THE DESIGN ELEMENT STATED IN THE DRAWING TITLE.
 2. ALL DIMENSION IN METRES (m) UNLESS OTHERWISE STATED.
 3. DO NOT SCALE FROM THIS DRAWING.
 4. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH:
NORWICH ROAD JUNCTION LONG SECTION SHEETS:
HE551489-GTY-ELS-000-DR-LX-31000
HE551489-GTY-ELS-000-DR-LX-31001
HE551489-GTY-ELS-000-DR-LX-31002
ENVIRONMENTAL MASTERPLAN SHEETS 1 TO 14:
HE551489-GTY-ELS-000-DR-LX-30001 TO HE551489-GTY-ELS-000-DR-LX-30016



KEY TO SYMBOLS

P01	23/11/21	DCO DEADLINE 5	LS	JMoe	MR
C04	23/11/21	DCO DEADLINE 5	LS	JMoe	MR
REV	DATE	REVISION NOTE	ORG	CHKD	APPD

DESIGNER

CONTRACTOR

CLIENT

PROJECT TITLE

A47 NORTH TUDDENHAM TO EASTON DUALLING

PROJECT STAGE

PCF STAGE 4

DRAWING TITLE

NORWICH ROAD JUNCTION LONG SECTION B-B' SHEET 2 OF 2

SUITABILITY

AUTHORISED AS STAGE 3 COMPLETED

SHEET SIZE	SCALE	STATUS	REVISION
A1	AS SHOWN	A3	C04

DRAWING NUMBER

HE551489-GTY-ELS-000-DR-LX-31003

IMPORTANT
SAFETY, HEALTH & ENVIRONMENTAL INFORMATION

TO BE READ IN CONJUNCTION WITH HAZARD REGISTER DOC. REF: HE551489-GTY-GHS-000-HS-ZZ-30001.

HAZARD REF	BRIEF DESCRIPTION OF HAZARD-
	BRIEF HAZARD DESCRIPTION