

Department for Transport
By email to Planning Inspectorate



15 June 2022.

F.A.O. Rachel Dominey, Senior Planning Officer, Department for Transport.

Dear Ms Dominey,

A47 North Tuddenham to Easton dualling scheme TR010038

I note your letter to various parties of 1 June 2022, asking questions relating to the A47 North Tuddenham to Easton scheme.

I realise that Interested Parties were not directly addressed in your letter, but I ask that that we are please given the opportunity to do so.

In advance of that possibility, I offer the following brief notes to emphasise those questions which I asked at the various stages of the examination process, but which were not answered, or answered unsatisfactorily. I feel that the Secretary of State should ensure he obtains answers to these queries.

For reference, my submissions to the examination were: RR-071, PDB-008, REP1-037, REP1-038, REP2-028, REP2-029, REP5-017, REP6-028, REP8-027.

A Traffic modelling - There are inconsistencies which give cause for concern over the handling of traffic figures, and use of the model for prediction of future traffic. This is surely crucial for justification of the need of the road, and for estimation of future carbon emissions. These were raised in my submission REP5-017, but not answered adequately in the applicant's REP6-017. I raised them again in REP8-027, but still they were no addressed adequately. The applicant has stated that 'the model has been calibrated and validated to a high level". This 'marking of one's own homework' surely does not show the openness and transparency required for such a project. Therefore I ask for the following (as also asked-for by Dr Andrew Boswell):

1 The traffic modelling and its application should be subjected to assessment by an independent expert, agreed by all parties, and there should then be further consultation rounds.

2 Prior to those further consultation rounds, a full technical dialogue should be established with the independent assessors, the Applicant, and interested parties, to the satisfaction of all parties and in line with professional Codes of Conduct.

3 Also prior to those consultation rounds, a full WebTAG-compliant Transport Appraisal, with models which are coherent between the A47NTE and the NWL schemes, and agreed by the independent assessors, should be supplied by the Applicant.

I give below just a few of the anomalies within my REP5-017 which have not been resolved satisfactorily, with observations and conclusion:

1. *The current situation.* Some daily traffic count figures given for the current situation (as of 2015) are not credible. The applicant has given no justification for:
 - a) No difference in traffic flow on A47 between N Tuddenham (Fox Lane) and Wood Lane (B1535), yet there are several side roads. Without figures for those roads, it cannot be confirmed that traffic figures are unchanged over that stretch of A47. It seems very unlikely.
 - b) No difference in traffic flow either side of B1535.
 - c) The flow on the Easton by-pass is only 1,000 more than just east of it. Yet we know around 4,500 use Church Lane, mainly to get on and off the by-pass, not to go west.
 - d) It was stated that the NATS2019 survey and model is not yet approved by the Department for Transport (DfT), and so its content cannot be disclosed in full. But some count figures have indeed been quoted. Using those, the changes from 2015 to 2019 range from -41% to +88%. This surely warrants investigation, and justification of the 3.3% general increase quoted in REP1-013.

2. *Predictions.* In their letter(s) to you, Andrew Boswell and Bryan Robinson have produced more detail on the inadequacy of the predictions for years 2025 and 2040, by comparing the predictions for similar scenarios, but using 2015 and 2019 model outputs. This is in particular with reference to the calculation of carbon emissions. I detail below further queries:
 - a) Looking at the change from 2019 figures to those of DS1 (A47NTE but no NWL) in 2025; Wood Lane (B1535, two-lane with good connection to A47) takes no more traffic, but Sandy Lane (single-track of poor quality and no passing places and no direct connection to A47) takes 1400 more. The road through Hockering (C173, two-lane) takes 1400 fewer. This is against common sense.
 - b) Looking at the change from 2015 figures to those of DS0 (A47NTE and NWL) in 2025:
 - i) the flow E of Hockering is 3,000 greater than flow W, yet there are no junctions.
 - ii) there is a 53% increase in traffic on the rural Mattishall Rd. This runs roughly parallel with the A47; the dualled road is not doing its job if a result is that traffic increases on a parallel route.
 - c) Taverham Road, which the scheme would provide with a direct connection to and from the dualled road, is very narrow with few passing places. As designed, the scheme would close the Easton roundabout and sever the connection of Church Lane (Lower Easton) to the dualled road. The c4,500 vehicles which use this road will transfer to another route, which would include Taverham Road, but we have never been advised how the model distributes this traffic, and various figures have been offered for the increase in flow through the highly unsuitable Taverham Road, all of which is unacceptable. This needs to be explained.

3. *Co-operation and consistent figures* We were told that Highways England and Norfolk County Council were working together on traffic modelling. But we have been given a disjointed presentation of figures, in small tranches, and with multiple reference numbers for the same count location. This has been very confusing.

4. *Conclusion* The model has produced outputs which do not accord with measured flows by a considerable margin. It has also predicted many unbelievable traffic flow predictions. Attempts to engage the applicant in dialogue to understand these difficulties have been fruitless. We were told that the model had been 'calibrated and validated to a high level'

but this is clearly untrue, as there are so many large inconsistencies. The inputs to the model (including the origin-and-destination matrix) and the way its algorithm works have not been divulged to us, despite requests, and so we have no way of evaluating its operation. Hence the recommendation for independent assessment at the start of this section.

There are requirements in many government publications, including the Design Manual for Roads Bridges (DMRB) and WebTag, for the workings of the traffic model (and other processes in the development of a scheme) to be open and transparent. Clearly this has not been the case with this scheme.

B Non-motorised users

The road would sever permanently Hockering Footpath 7 and sever access from Sandy Lane E Tuddenham southward to Church Lane and East Tuddenham village. The applicant claims that local people requested that Church Lane be closed, but that was a closure against motorised traffic, NOT against travel on foot or cycle. This is an important crossing point on the A47.

D Consultation on alternatives

The design has had to be changed since revealing four options to the public in 2017. If the applicant had consulted with local people in advance, much of this could be avoided. Even now, much less destructive and less expensive options to increase the safety and improve the flow on this part of the A47 are possible; some had been put forward by local people, but were not shown in the application documents. Others have emerged since.

This is another good reason to pause the process and review the scheme, which I encourage you to do.

Thank you.

Yours faithfully,

Richard Hawker

IP 20028320