

# A47 Blofield to North Burlingham Dualling

**Scheme Number: TR010040**

**Volume 9**

## **9.7 Applicant response to Rule 17 letter**

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

Planning Act 2008

Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009

July 2021

Deadline 2

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Applications: Prescribed Forms and  
Procedure) Regulations 2009**

A47 Blofield to North Burlingham Dualling  
Development Consent Order 202[x]

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**APPLICANTS RESPONSE TO RULE 17 REQUEST**

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<b>Regulation Number:</b>	Rule 8(1)(c)
<b>Planning Inspectorate Scheme Reference</b>	TR010040
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## **1 INTRODUCTION**

- 1.1.1 This report provides a response to the Rule 17 request by the Examining Authority in the Rule 8 Letter dated 22 June 2021.

## FURTHER INFORMATION REQUESTED BY THE EXA UNDER RULE 17 OF THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Ref	Request	Applicant's Response
1	<p>Environmental Statement Chapter 15: Cumulative Effects Assessment, Table 15-1, states that a cumulative assessment of climate has not been undertaken to avoid double counting traffic emissions. However, this does not account for other sources of emissions, for example, through the use of construction materials such as cement and the use of construction machinery as outlined in Design Manual for Roads and Bridges (DMRB) LA 114 Table 3.11.1.</p> <p>Considering the requirements of the National Networks National Policy Statement and paragraphs 3.21.1 and 3.21.2 of DMRB LA 104 guidance applied to the cumulative assessment, can the Applicant either further justify an omission of cumulative effects on climate or provide such an assessment; this should include an appropriately justified study area with consideration of ongoing current challenges to cumulative climate change assessments.</p>	<p>ES Chapter 15 Cumulative Effects Assessment (<b>APP-053</b>) does not include assessment of climate, as these impacts are considered in ES Chapter 14 Climate (previously <b>AS-004</b> and <b>TR010040/APP/6.1</b> submitted at Deadline 2).</p> <p>ES Chapter 14 Climate does include sources of emissions other than traffic emissions, for example, through the use of construction materials such as cement and the use of construction machinery as outlined in Design Manual for Roads and Bridges (DMRB) LA 114 Table 3.11.1. The carbon emissions associated with construction for the Scheme was estimated using the Highways England Carbon Tool v2.3.</p> <p>The estimated GHG emissions arising from the Scheme have been compared with UK carbon budgets and the associated reduction targets in the climate chapter.</p> <p>NNNPS Paragraph 3.8 sets out that “the impact of road development on aggregate levels of emissions is likely to be very small”.</p> <p>It is acknowledged that the Scheme would result in an increase in GHG emissions (25,765 tCO<sub>2</sub>e during construction and 1,320 tCO<sub>2</sub>e during operation) and this would contribute to the carbon budgets.</p>