

A47 Blofield to North Burlingham Dualling

Scheme Number: TR010040

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9.8 Applicant's Response to Deadline 1 Submissions

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]**

APPLICANT'S RESPONSE TO DEADLINE 1 SUBMISSIONS

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CONTENTS

1	INTRODUCTION.....	1
	CLIMATE EMERGENCY PLANNING AND POLICY	2
	NORWICH CYCLING CAMPAIGN.....	5
	THE RANDLESSOME FAMILY	7

1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 Blofield to North Burlingham scheme was submitted on 30 December 2020 and accepted for examination on 27 January 2021.
- 1.1.2 The purpose of this document is to set out Highways England's (the Applicant) response to documents submitted at Deadline 1.
- 1.1.3 This document provides the Applicants response to submissions made at Deadline 1 by:
- Climate Emergency Planning and Policy (**REP1-074**)
 - Norwich Cycling Campaign (**REP1-075**)
 - The Randlesome Family (**REP1-077**)

CLIMATE EMERGENCY PLANNING AND POLICY

Ref	Statement	Highways England Response
	<p>I note your Rule 8 letter of June 22nd, 2021, and further information requested from the Applicant under Rule 17 of the Examination Rules and wish to make these comments at this stage.</p> <p>1. I can only find paragraph 3.21.1 in the latest version of the DMRB LA 104 guidance. Your request for further information also refers to paragraph 3.21.2.</p>	<p>A response to the Examining Authority's Rule 17 request in the letter dated 22nd June has been provided at Deadline 2 'Information requested by the ExA under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010', (TR010040/APP/9.7)</p>
	<p>1.1 Cumulative Construction or Embedded Emissions</p> <p>2. With reference to the Design Manual for Roads and Bridges (DMRB) LA 114 Table 3.11.1, "Construction Stage" emissions are usually calculated solely for the project in question. Therefore these should be simply cumulative, project-by-project, and do not incur the inherent risk of double counting.</p> <p>3. Under PAS 20801, module D includes GHG emissions associated with ongoing land use change/sequestration. Future loss of ability to sequester carbon from habitats lost during construction (over the 60-year assessment period) are included in construction emissions.</p> <p>Emissions from immediate loss/disturbance of habitats, for example, carbon from trees, vegetation and soil carbon lost are also included in construction emissions.</p> <p>4. The following table gives a simple list of some known projects within the local area and shows the extent of available data for "construction emissions" and "land-use change related emissions".</p> <p>5. I draw your attention to the following points in the above data.</p> <p>a. There are more cells with "no data" than currently published data indicating that an accumulative assessment of embedded emissions across these schemes, based on available evidence will be an under-estimate. The under-estimate may be significant for the next two bullet points.</p> <p>b. Construction emissions for the Norwich Western Link can be expected to be 'high' given the design for this road includes a 700m viaduct.</p> <p>c. No data is published for land clearance and loss of land use carbon sequestration for any of the above schemes. The values for these categories on the Norwich Western Link are also expected to be 'high' – as the landscape proposed for clearance is woodland and woodland soils which are both rich in carbon (that would be loss through clearance) and an established carbon sink (that would be loss through construction).</p>	

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	<p>d. Except for the Great Yarmouth Third River Crossing which is already in construction, all the above schemes are timetabled by their promoters for construction during the 4th Carbon budget period, and their cumulative emissions require assessment against available budget for that period. This is a carbon budget for which there is already an identified “policy gap” in delivering the necessary national emission reductions, and it is also a critical carbon budget in making emissions reductions (from 1990 levels) for the national targets by 2030 (68% reduction in the UK National Determined Contribution under the Paris Agreement⁵) and 2035 (78% reduction by 2035⁶).</p> <p>e. Local Authority carbon emission data has been published since 2005 up to 2019⁷ which goes to the level of the roads transport sector (and sub-sectors for A-roads and minor-road emissions) and district council level. From this data it is trivial to produce historic transport sector emissions for either the Norfolk County Council area, or for the Greater Norwich Local Plan area (comprising the Norwich, Broadland, and South Norfolk local authority areas). It is therefore trivial, if the data were available, to assess the impacts of the cumulative embedded emissions against recent historic emissions of these areas.</p> <p>f. However, to assess the cumulative impacts Construction, or Embedded Emissions, against any study area, significantly more data, yet undetermined, is required as above</p>	
	<p>1.2 Cumulative Operational Emissions</p> <p>6. Operational emissions have been recently reported for four of the schemes as shown in the Table below. (<i>not included here</i> – see REP1-074)</p> <p>7. I draw your attention to the following points on the above data.</p> <p>a. They all share the same 60-year appraisal period ie 2025-2084.</p> <p>b. The models all use the Norwich Area Transport Strategy (NATS) model.</p> <p>c. Despite these schemes all being within a 10 miles radius of Norwich, the DM models show different values, indicating that the assumptions and/or study areas for each scheme are different. It is not clear how the study areas overlap, which indicates a risk of not just double counting, as identified by the Applicant, but no way to determine the extent of double counting.</p> <p>d. It also raises other issues of consistency and coherence between modelling approaches including different study areas and assumptions.</p> <p>e. The NWL has been modelled with a different baseline year (2019 rather than 2015). 30% of vehicle kilometres were lost between the NWL model run at 2015¹⁶ and 2019¹⁷.</p>	

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	<p>This indicates that the 2015 base year and 2019 base year NATS models have vastly different assumptions, and apparent traffic level outputs.</p> <p>f. It is also not clear what schemes are included in the DM baselines of each of the other scheme's models. For example, whilst the evidence from promoters indicates that the NWL contains the A47 North Tuddenham to Easton in its DM baseline¹⁸, and the A47 North Tuddenham to Easton contains the NWL in its DM baseline¹⁹, the extent to which other schemes are included has not been made clear. Further, in the case of the NWL and the A47 North Tuddenham to Easton schemes, neither of these schemes has been assessed against a model in which neither scheme exists (ie the true environmental baseline representing the situation as it currently is).</p> <p>g. Overall the existing data is inconsistent and incoherent, and cannot be unravelled easily.</p> <p>8. The precursor for assessing cumulative operational carbon emissions across these schemes is a coherent and consistent modelling environment. To achieve this, it is necessary:</p> <p>a. To choose an appropriate "study area" which covers all the schemes. A rational approach would be to choose the County council area, or the Greater Norwich local plan area, as these areas have well established historical emission data for comparison at the relevant local authority level.</p> <p>b. To set a common base year for the model. As the NATS model is now available at a 2019 base year, then this may be the appropriate year, if the large difference in vehicle km is explained. Currently, a satisfactory explanation has not been given.</p> <p>c. To develop a consistent set of model assumptions to apply.</p> <p>d. To set the DM, at the correct current environmental baseline in which none of these schemes exist.</p> <p>e. Model each scheme in isolation, generating the DS for that scheme, which gives the inherent operational emissions without any of the other schemes.</p> <p>f. For any particular scheme (eg: A47 Blofield to North Burlingham), then sensitivity test the DS by adding in the other schemes to the modelling – this will produce the cumulative operational emissions of including the other schemes without double counting.</p> <p>g. Consistent base years, assumptions and study areas have also been designed-in in the above approach, eliminating other issues that confuse generating an assessment of cumulative operational emissions.</p>	

NORWICH CYCLING CAMPAIGN

Ref	Statement	Highways England Response
1	I cannot see any reference to Non motorised users - will this be addressed later?	The term 'non motorised users' has been replaced with 'Walking, Cycling and Horse Riding'. This is in line with Design Manual for Roads and Bridges GG142.
2	I cannot not find (on the web site) reference to the "Walking, cycling and horse - riding assessment and review" as required by GG142 of the Design Manual for Roads and Bridges. I have obtained a copy of this document from Highways England under freedom of information. There are omissions, errors and assertions which should be clarified and challenged. Will this document be published on the website and considered by the Examining authority?	The Applicant has submitted these documents at Deadline 2 (TR010040/APP/9.10)
3	There does not appear to be any questions raised by the Examining Authority on how this project meets the policy statements made by the Government on cycling - in the recent document "Gear Change" for instance. Will this be addressed later?	No response required from the Applicant
4	This project is being considered in isolation from the many major construction projects and housing developments in Norfolk which will coincide and overlap. What will be the cumulative impact of all these projects on road safety, congestion and air pollution (particular around the two aggregate rail heads in the Norwich area)? Also it seems that this project will coincide with two years of the "Sugar Beet" campaign which sees large numbers of HGVs crossing the area of the project on their way to the Cantley Sugar Beet Factory. Is this an appropriate point to ask this question or will there be an opportunity later?	As part of the Environmental Impact Assessment (EIA) process, the Applicant has considered potential cumulative effects (including construction impacts) from different projects in combination with the Proposed Scheme. This is reported in Environmental Statement (ES) Chapter 15 Cumulative effects assessment (APP-053). The methodology for establishing a list of projects which have the potential to result in cumulative impacts was undertaken in line with Planning Inspectorate Advice Note Seventeen and in consultation with both Norfolk and Suffolk county councils and Broadland district council. Air pollution, as well as other relevant environmental topics, is included in the assessment and the methodology detailed in Section 15.3 of the ES chapter. The NATS model traffic forecast considers all developments, or other planned transport schemes, close to the Scheme area and are taken into account if they are considered 'near certain' or 'more than likely'

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		<p>in the uncertainty log (see REP1-044 Section 6.3 which details the transport forecast methodology).</p> <p>The results of the traffic modelling assessment show that the Scheme improves the overall operation of the network (APP-122 Section 7.6: increase in average speeds of up to approximately 1%) as well as improving A47 peak hour journey times (APP-122 Section 7.6: approximately 20% to 30% depended on direction and time period in 2025).</p> <p>Furthermore, it should be noted that with respect to road safety (see REP1-044 section 7.11), COBA-LT analysis indicates that, over a 60-year timeframe the Scheme's improvements will save a total of 190 accidents and 29 KSIs (killed or seriously injured).</p> <p>VISSIM operational modelling has been undertaken to provide a detailed assessment of the Scheme's performance across the A47 mainline Scheme section and the upgraded B1140 junction. To support this assessment PICADY analysis has been undertaken of the priority junction connecting the de-trunked A47 east to B1140 South Walsham Road on the northern side of the A47.</p> <p>For the VISSIM and PICADY assessments, October 2019 traffic counts were utilised to calculate the additional seasonal growth in traffic relating to the British Sugar PLC located in Cantley. The additional British Sugar PLC demand was added to the NATS 2040 forecasts. This ensures that the VISSIM and PICADY operational assessments account for the extra demand generated from the British Sugar PLC during its seasonal period.</p> <p>In summary the VISSIM and PICADY analysis shows that the Scheme design is suitable even with the British Sugar PLC peak season traffic.</p>

THE RANDESOME FAMILY

Ref	Statement	Highways England Response
1	<p>Comment on Hemblington Parish Council's relevant representation</p> <p>As a resident of Yarmouth Road (north of the A47, adjoining High Noon Lane), we are both surprised and concerned by Hemblington Parish Council's comments that they're reassured by the greater clarity that access from High Noon Lane will be closed off and that the "new road is simply an access road from the Sparrow Hall properties". This is the first that we have heard about this even being a possibility.</p> <p>We are astounded that the Hemblington Parish Council have received greater clarity on the closure, and are just awaiting confirmation on the point at which the road will be closed, when the residents haven't even been consulted about any closure of the road. To our knowledge (and indicated by all of the Highways England plans in the dDCO), almost all of High Noon Lane is outside the order limits of the A47 dualling scheme.</p> <p>We would politely request that Hemblington Parish Council confirm who this clarity was provided by so that we can contact them directly regarding this proposal.</p>	<p>The Applicant has noted these comments.</p>
2	<p>Comments on The Randlesome Family's relevant representation</p> <p>In addition to the points mentioned in our initial 'relevant representation', we're seeking clarity on points previously raised to Highways England, including concerns regarding pedestrian safety for residents on or near High Noon Lane, where no footpath access has been included in the proposed plans.</p> <p>As the proposed plan removes the current access to Blofield across the A47, the replacement access to the village should include a footpath to the new bridge (along what will be the 'old A47') from the corner of High Noon Lane, to ensure safe access for residents - particularly given the increased vehicular traffic this route will incur.</p> <p>With the A47 access being closed, a 'dead-end' will be created at the west of Yarmouth Road which will be an easy target for fly-tipping or potentially travellers setting up there. This has been discussed directly with Highways England but we would like assurance that the gated access will definitely be included in the scheme.</p>	<p>The Applicant met with Mr Randlesome on 16 July 2021 and discussed these points.</p> <p>The Applicant will respond regarding the footpath along the old A47 to High Noon Lane at a subsequent deadline.</p> <p>As per the Applicant's Response to the Relevant Representations (REP1-060), RR-043-3, the Applicant is considering provision of a gate and will confirm if it is to be provided during the Examination.</p>