

A47 Blofield to North Burlingham Dualling

Scheme Number: TR010040

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9.14 Applicant's Response to Written Representations

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

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Infrastructure Planning (Applications: Prescribed
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August 2021

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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 WRITTEN REPRESENTATIONS

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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 the Written Representations submitted at Deadline 2 (20 July 2021).

2 ENVIRONMENT AGENCY (REP2-013)

Reference	Written Representation	Applicant's Response
1.0	<p><u>Document 3.1 Draft Development Consent Order (DCO) (Revision 1)</u></p> <p>1.1 Our Relevant Representation highlighted that Part 1 Article 3 of the draft DCO (Revision 0) included the proposed disapplication of certain permits required from the Environment Agency under the Environmental Permitting (England and Wales) Regulations 2016. Specifically, flood risk activity permits and water discharge consents.</p> <p>1.2 We stated that we would not usually agree to dis-apply water discharge consents; and given that there are no designated Main Rivers within the extent of the order limits for the proposed scheme, there would be no requirement for any flood risk activity permits to be obtained.</p>	<p>This has been amended in the revised dDCO (TR010040/APP/3.1 Rev 2).</p> <p>Noting the Environment Agency's comments, Article 3(2), which disappplied the permitting regime, was deleted from the draft Development Consent Order in the revised dDCO (REP1-006) submitted at Deadline 1.</p>
	<p>1.3 We note that the draft DCO submitted by the Applicant at Deadline 1 (Revision 1) has had reference to dis-applying these permits removed. On that basis, we can confirm that we are satisfied that this issue is resolved.</p>	<p>The Applicant has noted this response</p>
	<p>1.4 Requirement 4 requires the preparation of an Environmental Management Plan (EMP) and associated documents. The EMP is a mechanism to ensure the delivery of mitigation measures during the construction phase as outlined in the Environmental Statement, including those in Chapter 13 Road drainage and the water environment. Although satisfied with the approach taken in identifying the potential adverse effects of the proposed scheme on surface water and groundwater, and with the mitigation outlined to date, we highlighted in our Relevant Representation that we should have the opportunity to review and comment on the detailed proposals prior to construction.</p> <p>1.5 We therefore requested that the Environment Agency be added as a named consultee in respect of Requirement 4, for matters relevant to our remit. The draft DCO (Revision 1) includes the requirement for the Environment Agency to be consulted on the Second Iteration of the EMP.</p>	<p>Requirement 4 has been amended in the revised dDCO (TR010040/APP/3.1 Rev 2).as follows:</p> <p>4—a) No part of the authorised development is to commence until an EMP (Second Iteration) for that part, substantially in accordance with the EMP (First Iteration) has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant planning authority, the Environment Agency and local highway authority to the extent that the content of the EMP (Second Iteration) relates to matters relevant to their functions.</p>

Reference	Written Representation	Applicant's Response
	On that basis, we can confirm that we are satisfied that this issue is resolved.	
	1.6 We remain supportive of the inclusion of Requirement 6 Contaminated land and groundwater, and the inclusion of the Environment Agency as a named consultee. However, we would wish to suggest an amendment to the proposed wording. The determination of the need for remediation in part (2) should be based on a consideration of the risk assessment by all parties, rather than determined solely by the undertaker. Additionally, and also in respect of part (2), specific mention should be made to the need for remedial measures to prevent any impacts on controlled waters, in addition to rendering the land fit for its intended purpose.	Just because contamination is found it does not necessarily mean that it needs to be remediated. If it does require remediation, then that remediation must be carried out in accordance with details approved by the Secretary of State consulting the Environment Agency. The Environment Agency is therefore afforded the chance to highlight any shortcomings of the proposed scheme and programme, including whether it contains sufficient safeguards to prevent impacts on controlled waters.
	<p>1.7 Requirement 8 is concerned with Surface and foul water drainage. As previously highlighted, we are satisfied with the approach proposed to date. However, the detailed drainage design is still to be finalised. The Environment Agency should have the opportunity to review and confirm that the detailed proposals are acceptable, in particular where the use of deep infiltration features is proposed.</p> <p>1.8 In our Relevant Representation, we requested that the Environment Agency be added as a named consultee in respect of Requirement 8. We note that the draft DCO (Revision 1) includes a requirement for the Environment Agency to be consulted. We also note and welcome for clarity the additional specific reference to the drainage strategy. On the basis that the amended wording remains, we can confirm that we are satisfied that this issue is resolved.</p>	The Applicant has noted this comment
	1.9 Although not raised in our Relevant Representation, we have responded to the Examining Authority's first written questions in respect of Requirement 18 Details of consultation. We stated that we do not consider 10 business days, as currently proposed, to be a sufficient time for the Environment Agency to respond to a consultation on the discharge of requirements. We would require a minimum of 21 days to enable internal consultation to take place, and to prepare a co-ordinated response.	The Applicant has noted this comment, amended the dDCO and submitted the revised version at Deadline 3 (TR010040/APP/3.1 Rev 2).

Reference	Written Representation	Applicant's Response
2.0	<p><u>Document 3.3 Consents and Licences Position Statement (Revision 1)</u></p> <p>2.1 Paragraph 3.1.3 lists those consents which are to be addressed by the DCO. The list in Revision 0 included the consent to carry out flood risk and water discharge activities. As stated in our comments in relation to the draft DCO above, we would not agree to dis-apply water discharge consents, and there are no Main Rivers within the order limits to trigger the possible requirement for a flood risk activity permit. We therefore stated in our Relevant Representation that reference to these permits being included or addressed as part of the DCO should be removed.</p> <p>2.2 Reference to flood risk activities has been removed from paragraph 3.1.3 in Revision 1, but reference to water discharge activities remains. For clarity and consistency, reference within this section to water discharge activities should be removed.</p> <p>2.3 However, we note that Appendix A consists of a table which details the permits, consents and agreements that may need to be sought separately from the DCO. We welcome the reference now included in this table to water discharge activities, and the reference to the associated permitting and consenting requirements. We are therefore confident that the Applicant will seek the necessary permissions as required.</p> <p>2.4 Additionally in respect of Appendix A, we note that reference to the Pollution Prevention and Control Act 1999 has been removed, which is welcomed. We also note that the regulating authority for mobile plant licences for the crushing of concrete has correctly been amended from the Environment Agency to Broadland District Council.</p> <p>2.5 Appendix A in Revision 1 now also includes reference to the permitting requirements associated with dewatering activities. While we are supportive of the addition, we would highlight that the dewatering exemptions noted here are only applicable if the works will take less than 6 months. For works over a longer time period, an abstraction licence will be required for any dewatering at rates over 20 m3/d. We note that the</p>	<p>The Consents and Licences Position Statement has been revised to take into account the Environment Agency comments and has been resubmitted at Deadline 3 (TR010040/APP/3.3 Rev 2).</p>

Reference	Written Representation	Applicant's Response
	anticipated construction period for the proposed scheme is approximately 22 months. We can discuss dewatering requirements further with the Applicant at the detailed stage, and in respect of the EMP.	
3.0	<p><u>Document 6.2 Environmental Statement Appendix 10.3 Outline Site Waste Management Plan (Revision 1)</u></p> <p>3.1 We note and welcome the updated references to the Environmental Permitting (England and Wales) Regulations 2016 at paragraphs 10.1.20 and 10.1.32. This is in line with the request in our Relevant Representation.</p>	The Applicant has noted this comment.
4.0	<p><u>Document 7.7 Environmental Management Plan (Revision 1)</u></p> <p>4.1 Table 4-1 of document 7.7 replicates Appendix A of Document 3.3, and lists consents and permissions that may be required. IN our Relevant Representation we highlighted that the Environment Permitting (England and Wales) Regulations have replaced the permitting system in the Pollution Prevention and Control Act. In respect of "Waste Materials", we highlighted that the regulating authority for mobile plan licences for the crushing of concrete is the relevant local authority, no the Environment Agency. Although these points have been addressed in Appendix A of Document 3.3 (Revision 1), they have not been made to Table 4-1 of Document 7.7 (Revision 1). This table should therefore also be updated.</p> <p>4.2 As with Appendix A of Document 3.3, additional references should be added to Table 4-1 regarding the consenting requirements for temporary water discharge activities and dewatering. Reference to dewatering requirements should take into account our comments regarding dewatering exemptions in paragraph 2.5, above.</p>	The Applicant has noted this comment, amended the Environmental Management Plan and resubmitted the document (clean and tracked versions) at Deadline 3 (TR010040/APP/7.7 Rev 3).

3 HISTORIC ENGLAND (REP2-015)

Reference	Written Representation	Applicant's Response
	<p><u>Written Representation</u></p> <p>The Environmental Statement (ES) supporting the application includes Cultural Heritage Chapter (Chapter 6) including an assessment of the baseline data and incorporating the results of archaeological geophysical and trial trenching surveys.</p> <p>Historic England is in agreement with the baseline data considered in the Cultural Heritage Chapter and the list of designated and non-designated heritage assets set out in Appendix 6.1 (Cultural Heritage information). We are also in agreement with the methodology used to assess the cultural heritage datasets and the conclusions reached in relation to designated heritage assets.</p> <p>The Cultural Heritage assessment (6.1 of the ES) establishes that there are not scheduled monuments, grade II* listed structures, registered parks and gardens, registered battlefields or conservation areas within the defined study area. Grade I and Grade II listed buildings are identified as heritage receptors with the study area.</p> <p>Historic England's advice on designated heritage assets will be limited grade I listed buildings. Advice relating to grade II listed structures will be provided by Broadland District Council's Conservation Team.</p> <p>The Cultural Heritage assessment concludes that only one grade I listed designated heritage asset would be affected by the proposed scheme. This is the grade I listed Church of St Andrew at North Burlingham (list Entry Number 1051522). The church is located c.140m from the application site boundary and c.180m north of the proposed new carriageway of the A47.</p> <p>Historic England considers that the proposed scheme would result in a</p>	<p>The Applicant acknowledges the comments with regard to baseline information, methodology and assessment.</p> <p>The Applicant has made a change to requirement 9 and a revised dDCO provided (TR010040/APP/3.1 Rev 2).</p> <p>Requirement 9:</p> <p>(1) No part of the authorised development is to commence until, for that part, a written scheme of investigation of areas of archaeological interest, reflecting the relevant mitigation measures set out in the REAC, has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant planning authority and the Historic Buildings and Monuments Commission for England.</p> <p>Mitigation measures are set out within the Register of Environmental Actions and Commitments which forms part of the Environmental Management Plan (TR010040/APP/7.7 Rev 3).</p> <p>The EMP and the measures within it are secured by Requirement 4 to the Draft DCO (TR010040/APP/3.1 Rev 2).</p>

Reference	Written Representation	Applicant's Response
	<p>change to the setting of the grade I listed Church of St Andrew at North Burlingham. This change would arise through the introduction of new infrastructure into the wider landscape context of this designated heritage asset.</p> <p>No street lighting is proposed on the sections of the scheme adjacent to the grade I listed Church of St Andrew at North Burlingham. The lighting at proposed road junctions to the west and east of the church is sufficiently distant and it would not have any impact on the significance of this designated heritage asset.</p> <p>The proposed scheme would result in the carriageway of the A47 being moved further to the south, away from the grade I listed Church of St Andrew at North Burlingham. With additional mitigation planning in place as proposed, Historic England considers that the overall impact of the proposed scheme on this designated heritage assets would be positive (slightly beneficial) due to the movement of the road away from the church and its immediate setting.</p> <p>Advice regarding the impact of the proposed scheme on non-designated archaeological heritage assets is being provide by Norfolk County Council Environmental Service. However, Historic England retain an interest in the non-designed archeological heritage assets within the schemed area in our capacity as a provider of specialist archeological science advice to the Norfolk County Council Archaeological Advisors and to the Applicant and their Archeological Consultants/Contractors. We consider that we should be consulted on the draft Archaeological Written Scheme of Investigation and specified as such in Requirement 19 of the draft DCO.</p> <p>In the even that the development is consented, Historic England would be concerned to ensure that the historic environment is adequately and appropriately considered, and that the DCO is appropriately worded to ensure appropriate mitigation would be delivered.</p>	

4 LINGWOOD AND BURLINGHAM PARISH COUNCIL (REP2-016)

Reference	Written Representation	Applicant's Response
	<p><u>Walkers, Cyclists and Horse Riders – Proposed overbridge at B1140</u></p> <p>Lingwood and Burlingham Parish Council has already submitted comments which the Inspector has published. We now wish to submit further evidence for the need of a dedicated underpass (or adequate footbridge) for walkers, cyclists and horse riders to link both parts of our parish north and south of the A47.</p> <p>Highways England's document, 'Case for the Scheme' (The Impact of the Scheme on Walking and Cycling, 4.4.8) states, "The Scheme provides support to walking, cycling and vulnerable users by incorporating safe, convenient, accessible and attractive routes for pedestrians and cyclists to improve connectivity in areas local to the Scheme".</p> <p>We take issue with this assertion. As mentioned previously, the A47 divides the Parish of Lingwood and North Burlingham. The Proposed Scheme includes a footpath on the proposed overbridge at the B1140 instead of an underpass or footbridge. Highways England maintains this is adequate to replace Burlingham FP3 which will be blocked</p>	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Section 2 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>0.66km of shared use footway / cycleway, referred to as new cycle track, will be incorporated into the B1140 junction as shown on the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2). This new facility will provide a connection between the B1140, South Walsham Road and Main Road in North Burlingham for pedestrians and cyclists.</p>
	<p>Please see pasted below an email from British Sugar to the Chairman of Lingwood and Burlingham Parish Council. British Sugar has a factory at Cantley, a few miles south of North Burlingham. All lorries visiting their site turn off the A47 onto the B1140 (southbound) at the White House junction. The email confirms that 700 lorries per day could visit the site in peak periods. Each has to make a return journey, thus up to 1,400 HGVs could be crossing the proposed overbridge on any day, as well as general traffic.</p> <p>Residents who live north of the A47 and who wish to cycle to their designated parish facilities in Lingwood (listed in our previous remarks) will be expected to cross the busy B1140, then travel over the proposed overbridge alongside convoys of HGVs and other traffic. Once over the bridge, cyclists will travel onwards while the HGVs will be turning left</p>	<p>The Applicant notes the information on likely HGV movements at the B1140 junction provided by British Sugar.</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</p>

Reference	Written Representation	Applicant's Response
	<p>across their path.</p>	<p>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> <p>According to the 2019 October data around 700 2-way HGV vehicles were recorded along the B1140 over a 12-hour period (07:00-19:00). This demand has been included in the VISSIM operational assessment.</p> <p>Furthermore, according to the 2019 survey data the dominant movement for B1140 HGV demand is to/from the A47. Overall, only about 10% of this HGV demand is B1140 through traffic which would travel across the A47 over bridge.</p>
	<p>As mentioned in our previous remarks, the distance from North Burlingham to Lingwood across the overbridge would be too far for most pedestrians to walk. With no other option to cross the A47, they will be forced to drive, adding to the volume of traffic on the overbridge.</p> <p>I assume no horse rider would attempt to use this overbridge!</p>	<p>The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Section 2 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>This analysis concludes that Burlingham FP3 is not a practical route in all weathers for utility trips between North Burlingham and Lingwood, given the sizeable walking distances involved and the fact that it is an un-surfaced, part enclosed/part field edge/part field footpath. Burlingham FP3 is more of a leisure route for recreational walking trips where surface quality and walking distance are less important.</p> <p>With the Scheme implemented as proposed in the application, users undertaking recreational walking trips would experience increases in walking time and walking distance when travelling between North Burlingham and Lingwood via the B1140 overbridge. However, the increased walking distances are unlikely to be a deterrent to recreational users and the creation of additional lengths of footpath can be seen to provide additional walking opportunities for them.</p> <p>WCH (non-motorised user) surveys were conducted a key locations on</p>

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		and in the vicinity of the existing alignment of the A47 in June 2018 and in May / June 2021 (reference to Annex B of Appendix A to the Applicant's Response to Relevant Representations (REP1-060)). No equestrian movements were recorded during any of the WCH surveys.
	How can the proposed overbridge be 'safe, convenient, accessible and attractive'? And how does it improve connectivity in our parish if people are now forced to use cars?	<p>The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Section 2 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>The cycle track incorporated into the proposed overbridge at the B1140 junction will facilitate safe, grade separated, north to south (and vice versa) crossing movements of the new A47 for pedestrians and cyclists. The B1140 junction is located in the right place to provide both for connectivity and remove a difficult existing junction.</p>
	<p>Also concerning traffic on the overbridge, we wish to challenge the report submitted by Highways England on behalf of Norfolk Constabulary which is listed under 'Documents' in the 'Inspector's pre-examination'. (Ref AS-014).</p> <p>We are extremely concerned this report is flagged by Highways England as, 'Importance – High' and, as such, it will gain undue weight in the Inspector's eyes.</p> <p>This report is flawed. It appears to be compiled by someone who has no working knowledge of the local area. No-one from Norfolk Constabulary has ever consulted the Parish Council about local traffic issues.</p> <p>The report makes no mention of the lorries visiting Cantley sugar factory. I believe anyone who knows the B1140 (southbound) would have advised Highways England of the potential dangers for cyclists, pedestrians and horse riders on the proposed overbridge.</p>	<p>The response from Norfolk Constabulary was sent to the Applicant rather than the Planning Inspectorate, and the Applicant therefore submitted it into the Examination.</p> <p>The term 'Importance –High' relates to the email itself and not the contents.</p> <p>The Applicant cannot comment regarding contact between Norfolk Constabulary and the Parish Council.</p> <p>The Applicant was cognisant of the seasonal volumes of HGV traffic visiting the Cantley sugar factory when identifying the layout and form of the proposed B1140 junction.</p>
	The report also refers to 'White House Lane' which does not exist! Anyone who knows the area is aware 'The White House junction' is named locally after a residential property and not a road. Might this suggest the report is an unformed 'desk job'?	The Applicant has noted this comment.

5 CREATE CONSULTING ENGINEERS LTD ON BEHALF OF BURLINGHAM COTTAGE GARDENS ASSOCIATION (REP2-017)

Reference	Written Representation	Applicant's Response
1.0	<p><u>1.0 INTRODUCTION</u></p> <p>1.1 I am Jonathan Paul Cage, a Chartered Civil Engineer with over 31 years of experience providing expert advice on highway design projects. I am Managing Director of Create Consulting Engineers Ltd who are an award winning multi-disciplinary civil, structural, and environmental engineering consultancy with offices in Norwich, London, Glasgow, Milton Keynes and Chelmsford. I have extensive experience in the preparation and design of Highway Schemes and Active Travel Corridors throughout the UK. I am also a resident of South Walsham and currently. travel the route the subject of the DCO Inquiry daily.</p> <p>1.2 I have been instructed by Chris Gates of Burlingham Cottage Gardens Association (BCGA) to act as an expert witness in relation to their concerns in relation to the impact that the proposed A47 Blofield to North Burlingham Dualling Scheme will have on the life choices, sustainability and general health and wellbeing of the residents of all ages of North Burlingham and the surrounding villages. These representations are also supported by Burlingham and Lingwood Parish Council and Hemblington Parish Council.</p> <p>1.3 BCGA are generally in support of the dualling of this section of the A47 which, in most people's eyes, is now well overdue being provided. Their main concern however is that the existing A47 has created a distinct barrier between the villages to the north and south of the route for several years, especially for residents wishing to travel between the villages on foot or on bike. The village is also not connected for pedestrian and cycling to the east to the main Market Town Acle. It is these two areas which these representations will focus on.</p> <p>1.4 The first section of the representations will focus on the current issues</p>	No response required

Reference	Written Representation	Applicant's Response
	<p>and explain how they have prevented the sustainable integration of the villages such as North Burlingham, Lingwood, Hemblington, South Walsham and Upton. Many of the villages are cut off from services such as catchment schools, shops, leisure facilities, employment opportunities, local and regional travel such as bus and rail services.</p> <p>1.5 The introduction of the new A47 Dualling in this area mainly offline should provide an excellent opportunity to solve a number of these existing issues, however the scheme which has been presented to this Inquiry falls short especially in relation to north south pedestrian and cycling connections and links to the east towards Acle.</p> <p>1.6 The representations will then outline some proposed changes which we believe should be incorporated into the scheme. We believe that these are deliverable and, if integrated into the scheme design now, will provide a good return on investment. Not only in terms of facilitating the shared use of facilities between villages but providing a strategic cycling link which could then be interconnected into the National Cycle Network which would help connect the Norfolk Broads to the villages to the south of the A47 and further south of the River Yare.</p> <p>1.7 These relatively small improvements we believe could be readily incorporated into the scheme, without detrimentally impacting on the proposed delivery programme of the overall project or the outcome of this DCO Inquiry process. We have outlined what we believe could be a typical programme for developing the outline design further, along with an initial budget cost for the proposed changes.</p> <p>1.8 The representation will show that the introduction of our proposed changes to the scheme will provide a range of opportunities for residents in the area to integrate socially, to share services and facilities and generally improve social mobility.</p>	
2.0 (2.1 – 2.3)	<u>2.0 BARRIER TO SUSTAINABLE TRAVEL</u>	The Case for the Scheme (REP1-042) sets out the need for the Scheme, the transport case for the Scheme and an overview of the economic case.

Reference	Written Representation	Applicant's Response
	<p>2.1 The A47T runs east west through the county of Norfolk linking the port of Great Yarmouth on the eastern coast with Peterborough and the Midlands to the west. It is an important strategic highway route which is heavily used by Freight users, holiday traffic and general residents and businesses within the County of Norfolk.</p> <p>2.2 The Blofield to Burlingham section of the A47T is a single carriageway section of the route, which is subject to a 50 mph speed limit mainly for safety reasons. This section of the A47T is often completely saturated and due to the funnelling effect of traffic having to merge from a dual carriageway into a single carriageway, there are often long queues at both the eastern and western approaches to the single carriageway section. As a result, in busy periods there is often a continuous stream of traffic flowing along this section of the A47T with very few breaks in the traffic, making it very difficult to either cross or gain access to the road.</p> <p>2.3 There have been several fatalities along this section of the A47T and it has been recognised by Highways England (HE) and Norfolk County Council (NCC) that this section of the A47T has required upgrading for a number of years. Therefore, when HE announced funding commitments for three significant upgrades of the A47T in the Norwich Area including North Tuddenham to Dereham, Thickthorn Interchange and the Blofield to Burlingham Dualling, it was the Blofield to Burlingham Dualling which was given priority in terms of delivery. The scheme is intended to start in January- March 2022-23 and be completed by 2024-25 with an estimated budget of between £50m - £100million.</p>	<p>The document notes that:</p> <p><i>"The A47 is important route for both commuter and longer distance east/west traffic. It forms part of the Strategic Road Network (SRN) between Yarmouth on the east coast and the A1, connecting Norwich and Peterborough, as well as the towns and villages between. The rapid economic growth along this corridor decade is expected to continue with continuing implications for traffic growth".</i></p> <p>The objectives of the Scheme are:</p> <ul style="list-style-type: none"> • Supporting economic growth The Scheme will provide additional capacity and improved journey times underpinning sustainable economic growth in the local and wider areas, supporting opportunities for employment and housing. • Making a safer network The Scheme will improve safety and operational issues by increasing capacity and providing new junctions. • A more free-flowing network The Scheme will result in minimal delays and a smooth flow of traffic. Journey times will providing benefits to travellers and those accessing local facilities. • Protected environment - The Scheme has been assessed and mitigation measures set out to minimise any impacts on biodiversity, heritage, climate, air quality, flooding, and geology, and from any cumulative effects. • An accessible and integrated network The Scheme links into the SRN to the Midlands and North, supporting the wider economy. It provides safer routes, between villages and local facilities, for cyclists, pedestrians, and vulnerable users with new cycling and walking infrastructure. • Value for money The Scheme is High Value for Money (VfM). It includes travel time savings, vehicle operating costs, accident savings and indirect savings relating to the reduction in greenhouse gases and improvement in air and noise quality which all support inward investment. <p>The Scheme has therefore much wider objectives than just safety.</p> <p>The Applicant is committed to all the A47 improvement schemes and none</p>

Reference	Written Representation	Applicant's Response
		have priority over the others.
2.0 (2.4)	<p><u>Vehicular Access</u></p> <p>2.4 The A47T has physically split the parish of Burlingham and Lingwood for years. With the ever increasing number of vehicles using the route it has become almost impossible to cross the road by vehicle, on foot or bike in busy periods, which causes significant issues with access to schooling and local services for the residents of Burlingham. The barrier effect however has a much wider impact than just on these two villages. Any vehicles wishing to cross the A47T in this area would have to negotiate at grade crossings; none of them having deceleration/acceleration lanes and many requiring crossing of a central reservation.</p>	<p>The Scheme Design Report (REP1-046)-describes the considerations for the junction designs.</p> <p>At the western end the existing access from the existing A47 to the private access at High Noon Lane will be closed on road safety grounds to prevent slow moving vehicles exiting from and entering onto the dual carriageway without safe means to increase and decrease speed. Alternative suitable access will be provided by the new Blofield Overbridge and the connection to the existing A47 (see Scheme Design Report (REP1-046 Section 4.4).</p> <p>The proposed configuration of the Yarmouth Road Junction provides the following features:</p> <ul style="list-style-type: none"> • closes the gap in the central reserve to prevent right-turn movements for road safety reasons • retains access from Yarmouth Road to the A47 westbound • closes the existing private access from the A47 toward High Noon Lane • mitigates existing east-west community severance • retains a westbound left in, left out junction. <p>The improvements to be made to the junction include: an improved diverge lane to make leaving the A47 safer for road users, an additional merge taper and auxiliary lane to make joining the A47 safer for road users, safer access to fields and private properties via the retained A47 and the agricultural access track (see Scheme Design Report (REP1-046 Section 4.5).</p> <p>The junction with the B1140 is to replace the existing at-grade junction between the A47 and the B1140 (South Walsham Road, and White House Lane). The existing at-grade junction is a point of road safety concern which would worsen with traffic growth. The new junction arrangement will prevent right turn movements which would require crossing lanes of the proposed dual carriageway (see Scheme Design Report (REP1-046 Section 4.6).</p>

Reference	Written Representation	Applicant's Response
<p>2.0 (2.5-2.7)</p>	<p><u>HGV Access/Sugar Beet</u></p> <p>2.5 The main junction in the centre of this scheme is where the B1140 South Walsham Road crosses the A47T and is currently the primary route for sugar beet wagons from the farms to the north of the A47T and all round the Broads to gain access to the British Sugar Factory at Cantley. During campaigns there can be at times almost back-to-back sugar beet wagons passing through this junction trying to cross the A47T and the central reservation. Whilst the crossing is in a 50mph section, the size and weight of these vehicles make it impossible for them to pull out at speed and therefore there is a real risk of serious accidents occurring in this location.</p> <p>2.6 The area to the north of the A47T is predominantly agricultural and therefore the B1140 is often used by a wide range of large and slow-moving agricultural vehicles, whether it be farm machinery itself or 44 tonne sugar beet vehicles used to take the crops off to processing or market.</p> <p>2.7 The nearest grade separated crossing points are the substandard junction arrangements at Blofield Heath or even further to the west at Cucumber Lane roundabout or to the east at Acle. This results in vehicles often taking a considerable detour just to be able to access the A47T safely, adding to increased vehicle mileage and congestion, along with traffic travelling through interconnecting villages such as South Walsham, Panxworth and the town centre of Acle.</p>	<p>In the existing situation the B1140 accesses the A47 via an at grade staggered junction from both north and south sides of the corridor. This entails that B1140 through traffic will have to make a staggered movement across the A47.</p> <p>In the with Scheme 'Do-Something' scenario the junction is reconfigured with an over bridge. Thus, B1140 through traffic can traverse north-south without accessing the A47. The Do-something scheme will therefore improve the capacity of the junction for local traffic (i.e B1140) and improve the operation of the overall highway network. Furthermore, the Scheme improves safety along the A47 by providing upgraded dual carriageway alignment and an improved B1140 interchange junction upgrade.</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.</p> <p>Analysis of the VISSIM model results (APP-122 section 7.8) clearly shows that there is minimal delay on all merges and diverges. This indicates that in the 2040 design year the grade separated Scheme junction is operating satisfactorily.</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 for both south and north of the A47. 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 AM and PM peak hour, when the A47 is most congested, VISSIM and PICADY assessments were undertaken using the October 2019 traffic counts to calculate the additional seasonal growth in traffic relating to the British Sugar PLC located in Cantley plus any other B1140 seasonal demand. 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</p>

Reference	Written Representation	Applicant's Response
		<p>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>
<p>2.0 (2.8-2.9)</p>	<p><u>Pedestrian and Cycleway Links</u></p> <p>2.8 With respect to existing pedestrian and cycling crossing points there are no formal crossing points anywhere on the section between Blofield Heath and Acle, even though there are several footpaths which link up to the A47 including Burlingham FP1 and Burlingham FP3. See Appendix A for Existing Footway and Bridleway Routes in the area. There is no formal footpath/cycleway link between North Burlingham and its current catchment primary school in Lingwood, and no footpath cycleway link to the catchment secondary school in Acle.</p> <p>2.9 In my view I do not believe that there are any safe pedestrian and cycling crossing facilities anywhere along this section of the trunk road.</p>	<p>The Applicant acknowledges that there are no formal crossing points for pedestrians and cyclists along the section of the existing A47 comprising the Scheme. Burlingham FP3 connects to the southern verge of the existing A47 in the vicinity of its junction with Main Road at North Burlingham. Burlingham FP1 does not connect to the existing A47, it connects to Main Road in North Burlingham approximately 160 metres to the east of the A47 / Main Road junction.</p> <p>Burlingham FP3 and the footways provided as part of the local highways provide a pedestrian link between North Burlingham and Lingwood. However, the walking distance between the centre of North Burlingham and the primary school at Lingwood, approximately 2.5km, exceeds the preferred maximum walking distance of 2km from walking to school. From a practical perspective, also, the absence of a made surface, pooling of water and overgrown nature of the footpath mean that the path would not appear very suitable for this type of journey as outlined in Section 2 of Appendix A to the Applicant's Response to Relevant Representations (REP1-060).</p> <p>Burlingham FP3 is a PRoW footpath so cannot be used legally by cyclists. This means that, all existing cycle trips between North Burlingham and Lingwood are required to make use of the local carriageway highways connecting to the A47 and cross the A47 at the existing at-grade junctions.</p> <p>The walking distance between the centre of North Burlingham and the centre of Acle is approximately 3.8km. The walking distance to the secondary school is a similar distance depending upon the choice of route. As outlined in Section 3 of Appendix A to the Applicant's Response to Relevant Representations (REP1-060), these walking distances greatly exceed the preferred maximum walking distances. Walking trips between North Burlingham and Acle are therefore more likely to comprise recreational walking trips than utility trips. As outlined in Section 1 of</p>

Reference	Written Representation	Applicant's Response
		<p>Appendix A, an attractive walking route for trips between North Burlingham and Acle is already provided by way of the Burlingham Woodland Walks network, utilising sections of Burlingham FP1 and FP2, South Walsham FP12, the permissive footpath between South Walsham Road and The Windle and the Byway between The Windle and Mill Lane in Acle.</p> <p>It is widely accepted that 5 miles or 8km is an achievable distance to cycle for most people. As outlined in Section 3 of Appendix A, with the Scheme in place, cyclists wishing to travel between North Burlingham and Acle will have a choice of routes, all of which are less than 8 km in length. Given the choice of existing cycling routes, there is no requirement for an additional cycling route along the A47 between South Walsham Road and The Windle.</p>
2.0 (2.10-2.11)	<p><u>Access to Public Transport</u></p> <p>2.10 At present North Burlingham and Burlingham are not served by any public transport, even though the express bus service the X1 Yarmouth to Peterborough passes the village every half hour on the A47. It currently does not stop at the village as any detour currently would add too much time to the overall journey time, with the bus struggling to turn off the A47 into Burlingham travelling in a westerly direction and again to regain access when travelling in an easterly direction. To access this extremely useful service any resident of Burlingham and Lingwood would need to currently travel by car to Acle to pick up this bus.</p> <p>2.11 The next nearest bus service is the 15A which connects Lingwood with Norwich, this is a very irregular service, providing poor interconnectivity with other areas. Again, there is no safe accessible way that any resident to the north of the A47T could reach this service.</p>	<p>The Applicant has no powers over bus services.</p> <p>The Scheme will however make joining the A47 safer/easier due to the junction improvements. The bus service providers will determine whether to review the timings/demand for services.</p>
2.0 (2.12-2.13)	<p><u>Access to Local Rail Services</u></p> <p>2.12 The nearest rail station to North Burlingham is located 1.8km to the south in Lingwood on the Norwich to Great Yarmouth line. Well within easy walking and cycling distance. This service has recently been upgraded as part of the Greater Anglia Franchise and now has this benefit</p>	<p>From the centre of North Burlingham, Lingwood station can be accessed via Lingwood Rd (approximately 2.9km). This route requires crossing the existing A47 at grade and across live traffic.</p> <p>During operation, Lingwood station will be accessible from the centre of North Burlingham via the B1140 overbridge and Acle Rd (approximately</p>

Reference	Written Representation	Applicant's Response
	<p>of high-quality new trains which link into Norwich City Station and further afield using intercity links to London and Cambridge. Currently there is no safe accessible way that residents of North Burlingham can access this service due to the A47T.</p> <p>2.13 The next nearest station is 3.5km to the east in Acle, again the only way residents of North Burlingham can access this service now is by car, as there is no safe footpath/cycleway link to the town and the railway station.</p>	<p>3.3km). It is acknowledged that this is an increase of approximately 0.4km in distance but does improve safety for the route, including new footway / cyclepath provision from North Burlingham and over the A47 traffic.</p>
2.0 (2.14)	<p><u>Bridleways</u></p> <p>2.14 Both the areas to the north and south of the A47T have a number of large equestrian facilities and horse riders are regularly observed on the wide range of country lanes. At present there is no safe facility where a horse could currently cross the A47T, therefore significantly restricting access for this important road user in the area, limiting opportunities for this rural based industry.</p>	<p>No PRow bridleways or permissive bridleways connect to the section of the existing A47 comprising the Scheme. The closest facility for horses is the permissive bridleway which provides a connection between Lingwood Road and Lingwood Lane to the south of the Scheme.</p> <p>WCH (non-motorised user) surveys were conducted a key locations on and in the vicinity of the existing alignment of the A47 in June 2018 and in May / June 2021 (reference to Annex B of Appendix A to the Applicant's Response to Relevant Representations (REP1-060)). No equestrian movements were recorded during any of the WCH surveys.</p>
2.0 (2.15)	<p><u>Local Services</u></p> <p>2.15 At present North Burlingham has no village shop, pub, restaurant or primary school. All these facilities are available within the parish albeit located to 1.6km south of the A47T within Lingwood. In addition, there is a full range of services available in Acle including supermarkets, post office, butchers, primary and secondary schools, doctors and healthcare, professional services, pubs, and restaurants. Unfortunately, the only way of accessing these at present is by car, and even that is difficult in peak hours. There are no footpath/cycleway links, even though Lingwood is in easy walking and cycling distance and Acle would be readily accessible by cycling and walking.</p>	<p>The Applicant acknowledges that North Burlingham does not provide local facilities or a primary school, although, this is probably due to the small number of dwellings in the village.</p> <p>Whilst local facilities, including a primary school, are provided in Lingwood, they are located a greater walking distances away from the centre of North Burlingham than the 1.6km crow-fly distance quoted.</p> <p>As indicated, Burlingham FP3 and the footways provided as part of the local highways provide a pedestrian link between North Burlingham and Lingwood. The walking distance between the centre of North Burlingham and the primary school and village hall at Lingwood is approximately 2.5km whereas the distances to the convenience store and fish & chip shop are around 3km, all of which greater exceed the preferred maximum walking distance (as reference to Section 2 of Appendix A of the</p>

Reference	Written Representation	Applicant's Response
		<p>Applicant's Response to Relevant Representations (REP1-060). These facilities do, however, lie within an acceptable cycling distance of North Burlingham.</p> <p>The Applicant acknowledges that a full range of local facilities are available in Acle. The walking distance between the centre of North Burlingham and the centre of Acle is approximately 3.8km, which exceeds the preferred maximum walking distance to common facilities. Walking trips between North Burlingham and Acle are therefore more likely to comprise recreational walking trips than utility trips. As outlined in Section 1 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060), an attractive walking route for trips between North Burlingham and Acle is already provided by way of the Burlingham Woodland Walks network, utilising sections of Burlingham FP1 and FP2, South Walsham FP12, the permissive footpath between South Walsham Road and The Windle and the Byway between The Windle and Mill Lane in Acle.</p> <p>As indicated, it is widely accepted that 5 miles or 8km is an achievable distance to cycle for most people. As outlined in Section 3 of Appendix A, with the Scheme in place, cyclists wishing to travel between North Burlingham and Acle will have a choice of routes, all of which are less than 8 km in length. Given the choice of existing cycling routes, there is no requirement for an additional cycling route along the A47 between South Walsham Road and The Windle.</p>
2.0 (2.16)	<p><u>Gateway to the Broads</u></p> <p>2.16 For a long time the B1140 South Walsham Road had been identified as one of the key access routes for holiday makers wanting to gain access to the Broads. Wroxham is signposted from the trunk road network in this location. During the holiday season these routes can be heavily used by a wide range of vehicles with the A47T being readily grid locked if there has been an accident further to the east on the Acle straight. During these times it becomes impossible to not only cross the A47T as a pedestrian or a cyclist, but also as a driver of a vehicle.</p>	<p>In the existing situation the B1140 accesses the A47 via an at grade staggered junction from both north and south sides of the corridor. This entails that B1140 through traffic will have to make a staggered movement across the A47.</p> <p>In the with scheme 'Do-Something' scenario the junction is reconfigured with an over bridge. Thus, B1140 through traffic can traverse north-south without accessing the A47. The Do-something scheme will therefore improve the capacity of the junction for local traffic (i.e B1140) and improve the operation of the overall highway network. Furthermore, the</p>

Reference	Written Representation	Applicant's Response
		<p>Scheme improves safety along the A47 by providing upgraded dual carriageway alignment and an improved B1140 interchange junction upgrade.</p> <p>The VISSIM operational model has been adopted to undertake a detailed assessment of the Scheme's performance across the A47 mainline Scheme section and the upgraded B1140 junction.</p> <p>Analysis of the VISSIM model results (APP-122 section 7.8) clearly shows that there is minimal delay on all merges and diverges. This indicates that in the 2040 design year the grade separated Scheme junction is operating satisfactorily.</p> <p>The VISSIM modelling assessment is derived from October 2019 data to capture the British Sugar PLC seasonal demand, however as the VISSIM shows minimal delays and it indicates there is reserve capacity for additional holiday demand.</p> <p>The proposed cycle track incorporated into the B1140 overbridge will facilitate safe north to south crossing movements of the A47 for pedestrians and cyclists.</p>
3.0	<p><u>3.0 NEED TO TRAVEL</u></p> <p>3.1 The 2011 census data confirms that the population of the Lingwood and Burlingham Parish was 2,643 residents, with average age of the residents being 43 which is generally of working age. See Appendix B for an extract of the Census Results. Out of the people who travelled to work rather than working at home who 85 % used their private car or were a passenger in a car and van. A very small percentage 4.5% walked and 1.7% cycled to work, 4% used rail and a mere 2% used the bus service.</p> <p>3.2 51% of the trips to work were between 10km to 20km which probably indicated that they worked in or around the City of Norwich. There was however a reasonable percentage of 28% of people who travelled less than 10km to work and 17% less than 5km which would be readily cyclable and walkable especially. This however does not correlate with the</p>	<p>It is acknowledged that a 5km commuting distance is cyclable since it is widely accepted that 5 miles or 8km is an achievable distance to cycle for most people. However, the preferred maximum walking distance for commuting is 2km reference to Section 2 of the Applicant's Response to Relevant Representations.</p> <p>In combination with the retained facilities, the pedestrian and cycling infrastructure proposed as part of the Scheme will provide improved and safe connections between Blofield and North Burlingham and between Lingwood and North Burlingham, reference to Section 1 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060). The Scheme will also improve the connectivity between North Burlingham and existing cycle routes to Acle. In addition, the shared use pedestrian and cycle facilities, referred to as new cycle track, incorporated into the</p>

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	<p>number of people using these modes to travel to work which would suggest that people who could be encouraged to not use their private car are currently being deterred for some reason in this area. I believe that this is a direct result of the barrier to sustainable travel caused by the existing A47T and lack of safe walking and cycling facilities.</p> <p>3.3 No existing walking or cycling survey has been undertaken by Highways England to inform the current scheme design and my client was informed when challenging this position that it was considered that there was no need due to what was perceived was a low demand. This is clearly incorrect and does not consider the fact that the existing A47T has formed a barrier to these modes for years, hence why very few people either cycle or walk between Burlingham to the north and Lingwood to the south.</p> <p>3.4 The 2011 census shows us that there was a total of 152 children of primary school age and a total of 271 secondary/sixth form age living in the Parish. The catchment for the Lingwood primary school includes North Burlingham to the north of the A47T. It is not possible from the census data to be able to identify how many of the primary school age children in the parish live to the north of the A47T, however at the moment they are severely disadvantaged by being physically cut off from their school resulting in the only way of accessing it, being a car journey which in itself is not at all easy in the peak am period due to congestion and queuing. See Appendix C for Primary School Catchment.</p> <p>3.5 With respect to secondary and sixth form age children the catchment school for the parish is Acle High School 3.5 km to the east. As previously stated, there is no footway or cycleway link between the parish and Acle and therefore the only way that children can get to school is by a special school bus or private car. See Appendix D for Secondary School Catchment.</p> <p>3.6 BCGA have organised a petition of over 1036 signatures who have all requested that a safe pedestrian and cycling crossing facility be provided along this section of road, whether that be in the form of an overbridge or</p>	<p>proposed Blofield Overbridge and the North Burlingham Junction will remove the A47 as a barrier to sustainable travel.</p> <p>WCH (non-motorised user) surveys were conducted a key locations on and in the vicinity of the existing alignment of the A47 in June 2018 and in May / June 2021 (reference to Table 12.5 of ES Chapter 12 Population and Human Health (REP1-030) and Annex B of Appendix A to the Applicant's Response to Relevant Representations (REP1-060)). In summary, with the exception of Burlingham FP1, which runs northwards from Main Road in North Burlingham, the results showed low usage of all the existing facilities and no electric scooter or equestrian movements were recorded. Very few crossing movements of the A47 were recorded and those users who crossed were predominantly cyclists.</p> <p>Reference is made to the village of North Burlingham being in the catchment area for Lingwood primary school. A maximum of 30 residential properties are present in North Burlingham so the number of primary school age pupils residing in the village will be very small. This situation is likely to remain in the future.</p> <p>Reference is made to the village of North Burlingham being in the catchment area for Acle High School. A maximum of 30 residential properties are present in North Burlingham so the number of high school age pupils residing in the village will be very small. This situation is likely to remain in the future. Notwithstanding this, as outlined in Section 1 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060), an attractive walking route for trips between North Burlingham and Acle is already provided by way of the Burlingham Woodland Walks network, utilising sections of Burlingham FP1 and FP2, South Walsham FP12, the permissive footpath between South Walsham Road and The Windle and the Byway between The Windle and Mill Lane in Acle. A choice of cycle routes is also available, all of which are less than 8km in length, and the Scheme will improve the connection to these routes.</p> <p>The Applicant has been cognisant of the strength of feeling expressed by the local community and visitors to the area, by way of a petition, regarding a requirement for the an overbridge of the A47 to carry</p>

Reference	Written Representation	Applicant's Response
	<p>an underbridge.</p> <p>3.7 The widespread introduction of electric bikes has now opened cycling for a lot wider range of users, enabling cyclists to now ride further than before and enabling the mode to be a real alternative to the private car. If Burlingham and Lingwood are going to enjoy this enhanced freedom, then the provision of the Active Travel Underbridge and Link to the east are essential.</p>	<p>Burlingham FP3. This information has been considered alongside the results of the WCH surveys conducted for Burlingham FP1 and FP3 and the Applicant's investigations into the reasons for the very low usage of Burlingham FP3.</p> <p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding improvements is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Section 2 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>Given the availability of the existing walking and cycling routes between North Burlingham and Acle, there is no requirement for an additional walking and cycling route along the A47 between South Walsham Road and The Windle.</p>
<p>4.0 (4.1 – 4.6)</p>	<p><u>HIGHWAYS ENGLAND SCHEME</u></p> <p>4.1 The scheme that is the subject of this DCO application whilst greatly improving the safety of vehicle movements wishing to use the B1140 South Walsham Road to both access and egress the A47T, along with crossing the road to reach villages such as Lingwood and Cantley, does very little to improve footpath cycleway links between the villages. In my view this is huge opportunity which is missed.</p> <p>4.2 The introduction of a dual carriageway along this section of the A47 and the removal of the vehicles crossing the central reservation is going to lead to the road speed limit being increased to 70mph. This will without a doubt increase the barrier effect of the A47 unless other measures are put in place to assist footway/cycleway/bridleway movements.</p> <p>4.3 The proposed scheme now relies on the two new structures to the east and west of the scheme to provide safe footway/cycleway facilities. On the western end there will be a new 2.5m wide footway provided immediately adjacent to the carriageway on the new overbridge. The</p>	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding improvements is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Section 2 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>The WCH surveys, as outlined in Section 2 of the Appendix A of the Applicant's Response to Relevant Representations (REP1-060), suggest that the cycle track over the proposed B1140 Overbridge would remove the barrier effect of the existing A47 for the majority of WCH.</p> <p>The Scheme includes the provision of 2.4km of shared use footway / cycleway, referred to as new cycle track, including:</p> <ul style="list-style-type: none"> o 1.74km between Yarmouth Road, Blofield and the footway at North Burlingham on the northern frontage of the existing A47 to be de-trunked, including a section on the proposed Blofield Overbridge; and

Reference	Written Representation	Applicant's Response
	<p>footway will then be extended to the east linking with the existing footway to the west of Dell Corner Lane, therefore providing a continuous link into North Burlingham. Although it is assumed that cycling movements will need to be undertaken on carriageway.</p> <p>4.4 The crossing point to the east is to be formed by the new B1140 South Walsham Overbridge, with again only 2m footway shown immediately adjacent to the carriageway terminating just to the south of the eastbound access slip. Thus, providing no direct link to any other footway/cycleway network and effectively dropping cyclists and pedestrians onto what is a heavily used HGV route especially during Sugar Beet Campaign time and the holiday seasons. This footway provision does not even connect with the access track which is proposed along the southern side of the A47T which would at least enable a link to Lingwood Road and other footpath links to the south.</p> <p>4.5 All cycling movements again would need to be on carriageway which again in this area around the B1140 South Walsham Junction is unlikely to be safe especially with the number of HGVs, especially over the new bridge.</p> <p>4.6 There is also no continuation of a footway/cycleway to the east linking into Acle. Clearly it would be unsafe for cyclists to use the upgraded A47T in this area.</p>	<ul style="list-style-type: none"> ○ 0.66km incorporated into the B1140 junction, which provides a connection between the B1140, South Walsham Road and Main Road in North Burlingham. <p>The shared use facility in the verge along the northern frontage of the existing A47 is proposed to be 2.5 metres wide, although, the width may reduce to a minimum of 2.0 metres at pinch points where there are existing trees. The width of the facility will be confirmed as part of detailed design and an appropriate separation distance from the carriageway will be provided which reflects the prevailing speed limit.</p> <p>The shared use facility at the B1140 junction will be a minimum of 2.0 metres wide and a separation distance from the carriageway will be provided which reflects the prevailing speed limit.</p> <p>The appropriate Design Manual for Roads and Bridges (DMRB) standard for the design of shared use facilities is the England National Application Annex to CD143 Designing for walking, cycling and horse-riding.</p> <p>Regarding the cross-section of the shared use facilities, CD143 states that the width of an unsegregated shared use route shall be a minimum of 2.0 metres where there are less than 200 users an hour (paragraph E/3.5 refers). Observed user activity in the vicinity of the Scheme is very low and the volume of users is unlikely to exceed 200 users an hour in the future. A minimum width of 2.0 metres is therefore appropriate for the proposed shared use facilities.</p> <p>The cycle track incorporated into the proposed overbridge at the B1140 junction will facilitate safe, grade separated, north to south (and vice versa) crossing movements of the new A47 for pedestrians and cyclists. The B1140 junction is located in the right place to provide both for connectivity and remove a difficult existing junction.</p> <p>The cycle track provides a connection to the proposed new PRoW footpath running east to west and to the south of the new A47 (reference to point FP17 on Sheet 7 on the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2)). This new PRoW footpath comprises the diversion of Burlingham FP3 and provides connections to Lingwood Lane</p>

Reference	Written Representation	Applicant's Response
		and Lingwood Road (both of which will become a cul-de-sac as a result of the Scheme) and the permissive routes to the south of the A47, giving pedestrians a choice of routes between North Burlingham and Lingwood.
4.0 (4.7 – 4.9)	<p><u>National Guidance</u></p> <p>4.7 The recently published Local Transport Note 1/20 Published by the Department of Transport LTN 1/20 in July 2020, which is a nationally important guidance note which has been issued to all Local Authorities who will have to demonstrate that they have given due consideration to this guidance when designing new cycling schemes and when applying for Government funding that includes cycle infrastructure. This states in Paragraph 1.1.2 that: Only schemes with a minimum score of 70% under the Cycling Level of Service CLoS, no critical fails under the Junction Assessment tools JAT no red scored turning movements will generally be considered for funding.</p> <p>4.8 See Appendix E for extract of LTN 1/20.</p> <p>4.9 The scheme currently being promoted by the HE completely fails to deal with cycling movements along this corridor and even more importantly how they would cross it. The B1140 South Walsham/A47T junction does not provide any cycling facilities at all, resulting in this arrangement clearly failing the JAT as outlined in LTN 1/20.</p>	<p>Local Transport Note 1/20 (LTN 1/20) applies to local highway schemes as indicated in paragraph 1.1.1, which states that:</p> <p><i>“Local authorities are responsible for setting design standards for their roads. This national guidance provides a recommended basis for those standards based on the overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and in particular, when applying for Government funding that includes cycle infrastructure.”</i></p> <p>Guidance for strategic roads is provided by DMRB standards, namely, CD 143 Designing for walking, cycling and horse-riding (for shared use facilities) and CD 195 Designing for cycle traffic (for cycle only schemes). However, it is acknowledged by the Applicant that there is a grey area where the Strategic Road Network interacts with the local highway network.</p> <p>The Applicant considers that many of the factors for consideration identified in the Cycle Level of Service Tool provided in Appendix A of LTN1/20 are not directly applicable to the assessment of cycling facilities provided in a rural setting, i.e. they are more applicable to an urban setting. For example: Cohesion - consideration of density of network; Directness – Time:, frequency of required stops of give way, delay at junctions and delay on links; Safety – avoid complex design, consider and reduce risk from kerbside activity; and Attractiveness – lighting and isolation activity, minimise street clutter, secure cycle parking.</p> <p>The cycle track proposed along the northern frontage the section of the A47 to be de-trunked will provide an appropriate walking and cycling connection between Blofield and North Burlingham. The cycle tracks proposed at the Blofield Overbridge and the B1140 Overbridge will</p>

Reference	Written Representation	Applicant's Response
		<p>facilitate the safe north to south crossing of the A47 for pedestrians and cyclists.</p> <p>As indicated, a cycle track will be provided across the B1140 overbridge and this provides a connection between the B1140, South Walsham Road and Main Road in North Burlingham. The fully kerbed cycle track will be separated from the B1140 carriageway, ensuring that this facility is suitable for most people (reference to Figure 4.1, page 33 of LTN 1/20). Also, the speed limit on the approaches to and within the junction will be 30mph to ensure that the speed of general traffic through the junction is minimized. It therefore follows that the B1140 junction does not have any red-scored turning movements under the Junction Assessment Tool provided in LTN 1/20.</p>
5.0	<p><u>PROPOSED ACTIVE TRAVEL UNDERBRIDGE</u></p> <p>5.1 To address the issues raised in Sections 2, 3 and 4 of this report, we believe that a new underbridge located close to where Main Road connects to the current A47T to the east of North Burlingham would provide a major benefit to the residents of North Burlingham and Lingwood as well as the wider area both north and south of the facility.</p> <p>5.2 The underbridge with connecting footway/cycleway links from Dell Corner Lane and a crossing facility of the old A47T would provide a high-quality safe crossing point for pedestrians, cyclists and potentially horse riders to cross the new road alignment. The underpass would be designed to have a minimum headroom of 2.7m and would have between 1.5m to 2m depth of cover under the carriageway. The underpass will provide separated footpath/cycleway links with associated ramps either side meeting current accessibility standards. The underpass would enable horse riders to cross the A47T albeit it is expected that they would need to dismount to prevent conflict with pedestrians and cyclists.</p> <p>5.3 The structure would be formed by reinforced concrete walls, covered by precast concrete beams, the underpass can be completely constructed offline at the same time as the main works are being constructed. See</p>	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Section 2 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>Notwithstanding the above, the Applicant's observations on the suggested new underbridge at North Burlingham are outlined below. It should be noted that the Drawing Number E21-067003-001 showing the Proposed General Arrangement is corrupted such that the accompanying notes are not legible. (The Applicant has noted that these drawings were published by PINS (29 July 2021), however this did not give the Applicant sufficient time to review and comment prior to Deadline 3).</p> <p>The proposed underbridge is to provide a crossing facility of the new A47 for pedestrian, cyclists and equestrians, albeit that horse-riders will be expected to dismount. It is not possible to comment upon the deliverability or the suitability of the separated footpath/cycleway links or the gradients of the ramps to the underpass as the details are not legible on the Proposed General Arrangement drawing. However, CD143 Designing for</p>

Reference	Written Representation	Applicant's Response
	<p>Drawing Number E21-067003-001 for a Proposed General Arrangement.</p> <p>5.4 The underpass will cause minimal visual intrusion in the area and there will be no additional landscape impact.</p> <p>5.5 There are no known ground conditions which would prevent the construction of this feature in this area. It is also proposed that the surface water that would possibly collect within the underpass will either be pumped up to the swale system running along the A47T or subject to availability of acceptable soakage rates at depth, drained to a new soakaway.</p> <p>5.6 It is not intended that the underpass will be lit, as none of the connecting road and access routes are currently. Therefore, it has been assumed that users would use the same lighting arrangements that they do already when travelling on the rural lanes.</p> <p>5.7 The underpass will link with the proposed access track which is proposed along the southern alignment of the A47T which will then able pedestrians and cyclist to use the remainder of Lingwood Road to connect into the villages to the south.</p> <p>5.8 The benefit of this new crossing point is that it will provide a much-needed safer crossing point of the A47T which will be clear of the HGV route and the traffic on the B1140. There is a real possibility with the introduction of the grade separated arrangement at the B1140/A47T junction that traffic movements could significantly increase through this junction, especially HGV movement servicing the agricultural industries north and south of the A47T</p>	<p>walking, cycling and horse-riding states that <i>"Horse-riding routes shall be designed to minimise the need for equestrians to lead horses"</i> on the basis that horses can be better controlled when ridden rather than led. Avoiding the need for horses to be led is a requirement of the Overseeing Organisation, namely, Highways England. The suggested underbridge is therefore not suitable for use by equestrians.</p> <p>An underpass and associated infrastructure (embankments, drainage, paved footways/cycle paths connecting to the structure) to has a potentially significant footprint and depth that has the potential to result in significant adverse effects, including; landscape and visual, land take, water environment, geology and soils, and biodiversity.</p> <p>An underpass could not be drained unless by pumping. Consideration would also have to be given to all the intended users for example equine or other animals would create a problem for soiling, collecting in the underpass and in the surface water draining to the pump sump. Should the run-off be soiled then this would have to be directed to a holding tank for removal off site and should not be pumped to ground in any infiltration system. Infiltration is largely poor in the middle of the Scheme and improves at the eastern and western ends, which is why these areas have been identified for soakaways. If the proposed underpass was not close to these areas then a rising main may be required to reach the outfall.</p> <p>As the Scheme outfalls are infiltration to ground, it is not ideal to have point discharge at pumped rates to a soakaway although the quantities would not result in high volumes from the underpass.</p> <p>It is suggested that the underpass will link with the proposed access track running westwards and to the south of the new A47, with pedestrians and cyclists using the access track and the cul-de-sac Lingwood Road to connect into the village of Lingwood to the south. The proposed access track will be a private means of access, with no connection to Lingwood Road, so cannot be used by non-motorised users. Pedestrians using the suggested underpass could connect to the proposed PRow footpath running east to east and to the south of the new A47 which in turn connects to both the retained section of Burlingham FP3 and Lingwood Road. Burlingham FP3 is a PRow footpath so cannot be used legally by</p>

Reference	Written Representation	Applicant's Response
		<p>cyclists and equestrians.</p> <p>In summary, the suggested underpass would not be suitable for use by cyclists and equestrians.</p>
6.0	<p><u>PROPOSED ACTIVE TRAVEL CORRIDOR LINK TO ACLE</u></p> <p>6.1 The other aspect which we strongly believe needs to be added to the scheme and will be a real opportunity lost if not included, is the provision of dedicated footway/cycleway from North Burlingham through to the Windle allowing a link to be provided all the way into Acle. As outlined in Section 3 of this report Lingwood and North Burlingham are in the Secondary School catchment for Acle High. A footway/cycleway link which connects to the underpass outlined in Section 5 above would provide a high-quality link between Burlingham North and Acle, as well as enabling villages to the south also to use this route. There is sufficient space to provide some form of physical separation to the new road alignment, with appropriate fencing at key locations should provide an attractive and important link. See Drawing Number E21-067-03-002 showing proposals for Active Travel Link to Acle.</p> <p>6.2 Whilst we believe that the best solution would be for this to be constructed with asphalt or some other form of sealed surface, if budgets did not allow, a more rural solution would be acceptable using a bound gravel. Again, we do not expect this to be lit and drainage would be simply to run off and soak to adjoining verges. It may be possible to recycle some of the former carriageway which is now becoming redundant in the construction of this facility, keeping down waste and reducing any additional costs.</p> <p>6.3 The construction of this facility would cause minimal disruption to the overall construction process, and we strongly recommend that this link is included</p>	<p>The Applicant considers that attractive routes for walking and cycling trips between North Burlingham and Acle are already provided and the connection to the cycle routes will be improved by the Scheme due to the cycle track proposed between North Burlingham and the B1140 junction. As such, there is no justification for the provision of a dedicated footway/cycleway through to The Windle, as outlined in Section 3 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>Notwithstanding the above, the Applicant's observations on the suggested Active Travel Link to Acle, which is assumed to be a separate footway and cycleway of overall width of around 5 metres, are outlined below. It should be noted that the Drawing Number E21-067-03-002 showing proposals for Active Travel Link to Acle is corrupted such that the accompanying notes are not legible. (The Applicant has noted that these drawings were published by PINS (29 July 2021), however this did not give the Applicant sufficient time to review and comment prior to Deadline 3).</p> <p>User activity in the vicinity of the Scheme has been observed to be low so provision of a shared use cycle track rather than a separate footway and cycleway would be appropriate. This reduces the width of facility to 2 to 3 metres. As indicated, a shared use cycle track is already proposed between North Burlingham and the B1140 junction. There is scope within the DCO Boundary to provide a new footway / cycleway connection between the B1140 South Walsham Road and the existing footway which commences near The Windle. The works required to provide such a connection would comprise the following:</p> <ul style="list-style-type: none"> i) provision of new lengths of footway / cycleway on both frontage of South Walsham Road and an uncontrolled crossing to link the two;

Reference	Written Representation	Applicant's Response
		<p>ii) conversion of a length of the former A47 carriageway and the former layby (both proposed to be stopped up) to form a footway / cycleway; and</p> <p>iii) provision of a new length of footway / cycleway in the northern verge of the new A47 alignment.</p> <p>There are no significant engineering challenges which would prevent the provision of a footway / cycleway connection, other than a pinch-point in the vicinity of the residential property located immediately to the west of The Windle junction. It would only be possible to implement a substandard facility over this length, both in terms of its width and its separation from the A47 carriageway, due to the limited width of the available verge and the need to introduce a section of VRS.</p> <p>In addition to the above, the existing footway between The Windle and Norwich Road in Acle is only around 1.5m width, so too narrow to be used by both cyclists and pedestrians. Furthermore, the footway cannot be used legally by cyclists. To create a suitable shared footway / cycleway as far as Norwich Road in Acle, the status of the footway would need to be upgraded to that of a cycle track and the existing footway would need to be widened and it would also need to be realigned to provide an appropriate separation between the A47/exit slip road carriageway. There is insufficient width within the boundary of the A47 to accommodate such an improvement.</p> <p>As an alternative to upgrading the existing footway along the A47 and the exit slip road, cyclists could be direct northward along The Windle to connect with the Byway that links to Mill Lane in the centre of Acle.</p>
7.0	<p><u>BUDGET COSTS AND PROGRAMME</u></p> <p>7.1 Both the Active Travel Underbridge and the Active Travel Corridor to Acle have been designed to enable the works to be completed within the current red lines shown on the Order Plans. This should hopefully cut down any need for re-consultation etc if these schemes were going to be included within the scheme.</p> <p>7.2 With respect to the completion of the design we believe that this could</p>	<p>Appendix A to the Applicants Response to the Relevant Representations (REP1-60) sets out the Applicants justification for the walking, cycling and horse-riding provision included in the Scheme.</p> <p>The Applicant cannot comment on the costs provided in the Written Representation as it is not clear on what basis they have been developed.</p>

Reference	Written Representation	Applicant's Response
	<p>easily be completed within around two months which should enable more detailed plans to be submitted as part of this Inquiry, if the Inspector considered that there was real merit in their inclusion in the scheme.</p> <p>7.3 An initial estimate for the provision of the underbridge is £660,000, which does not include land costs. If however this was not included at this stage any potential retrofitting of a crossing once the road was open, is likely to cost at least 4 times this cost.</p> <p>7.4 The estimate for the construction of the Active Travel Corridor Link to Acle is £389,000. Again, as mentioned this could be significantly reduced by using recycled materials for subbase and surfacing. The cost of potentially retrofitting a footway/cycleway link along this route is likely to be considerably more than the above.</p>	
8.0	<p><u>OPPORTUNITY TO EXTEND NATIONAL CYCLEWAY NETWORK</u></p> <p>8.1 One of the major benefits that the above Active Travel Underbridge and Active Travel Corridor Link can provide the opportunity to strategically extend the National Cycleway Network to connect the Broads National Park. At the moment the National Cycleway Network does not connect to the Broads with Cycle Route No 1 connecting Norwich with areas to the south and north. Cycle Route No 31 goes as far as Reedham where it terminates. It clearly looks like the intention was with Route No 31 that it would extend north using Reedham ferry and connect to the Broads. See Appendix F for a plan showing the National Cycleway Network.</p> <p>8.2 With the construction of the Active Travel Underbridge, there is a real opportunity to extend Cycle Route No 31 north from Reedham through Lingwood across the A47 using the new underbridge then using Dell Corner Lane, up into South Walsham then onto Woodbastwick, Salhouse and Wroxham all on relatively quiet rural roads. To the east the new link to Acle would enable a route to be extended to Filby and Ormesby connecting up with Route 517 which runs along the coast, all using lightly trafficked rural lanes. This would enable a large area of the Broads to be readily opened up to cyclists from the south, helping improve tourism and generally accessibility to this important National Park. See Appendix G for</p>	<p>The Applicant is of the view that the suggested underpass would not be suitable for use by cyclists for the reasons outlined above in response to Section 7.</p> <p>The proposed cycle track incorporated into the B1140 junction, which provides a connection between the B1140, South Walsham Road and Main Road in North Burlingham and facilitates safe north to south movements across the A47 for cyclists. This new facility in combination with use of Lodge Road and Acle Road through Lingwood, could form part of any future proposal to extend the National Cycle network for north to south trips as described. The proposed cycle track at the B1140 junction will also facilitate a connection to existing cycle routes between North Burlingham and Acle which could be used for onward cycle trips to destinations further to the east.</p>

Reference	Written Representation	Applicant's Response
	a plan showing how it could be extended.	
9.0	<p><u>CONCLUSIONS</u></p> <p>9.1 In principle BCGA supports the proposed A47 Blofield to North Burlingham Dualling Scheme, our concern relates to the lack of consideration to footpath and cycling crossing points. This has also been picked up by Norfolk County Council who have raised the same objection to the delivery of the scheme. If the scheme is constructed as currently planned it will have a significant impact on the social mobility of the existing residents both north and south of the A47T. The route has caused a significant barrier to movement for years with an impact on decisions such as schooling, shopping, travel to work, leisure opportunities and general sustainable travel.</p> <p>9.2 The construction of the new scheme should attempt to address these issues; however, we feel that as currently proposed it falls short in a number of areas. We are in real danger if this is not changed now that we are missing several major opportunities to not only address these local issues but also miss out on making sure that the villages can improve their sustainability and take part in future advances in sustainable travel such as electric bikes and scooters.</p> <p>9.3 We believe that it is essential that a new Active Travel Underbridge is included within the scheme and that an Active Travel Link is provided to the east connecting Acle. This would open up access for children to walk and cycle to school, residents to reach shops, healthcare and other essential facilities without having to use their car. It will make the Parish of Burlingham and Lingwood well connected with easy access to the rail stations at Lingwood and Acle enabling journeys to destinations further afield through connections to Norwich.</p> <p>9.4 The other major advantage to the proposed changes is that they give a real opportunity to provide an affordable extension to the National Cycle Way network linking the Norfolk Broads National Park into this network.</p>	<p>The Applicant acknowledges the support of the BCGA to the Scheme.</p> <p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Section 2 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>The Applicant considers that attractive routes for walking and cycling trips between North Burlingham and Acle are already provided and the connection to the cycle routes will be improved by the Scheme due to the cycle track proposed between North Burlingham and the B1140 junction. As such, there is no justification for the provision of a dedicated footway/cycleway through to The Windle, as outlined in Section 3 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>The Applicant is of the view that the suggested underpass would not be suitable for use by cyclists for the reasons outlined. However, the proposed cycle track incorporated into the B1140 junction, which provides a connection between the B1140, South Walsham Road and Main Road in North Burlingham, could form part of part of a strategic extension to the to the National Cycle network north to south trips as described. The proposed cycle track at the B1140 junction will also facilitate a connection to existing cycle routes between North Burlingham and Acle which could be used for onward cycle trips to destinations further to the east.</p>

Reference	Written Representation	Applicant's Response
	<p>9.5 Our initial design work has shown that there are no cost or programme issues which should prevent the scheme from being included and we believe that now is the time to address this issue rather than trying to retrofit some form of crossing in future years.</p> <p>9.6 With the above points in mind, I respectfully request that the Inspector takes on board the above points and requests that Highways England and its consultants rapidly review their design proposals and incorporate both the Underbridge and the Eastern Link to Acle</p>	

6 CLIMATE EMERGENCY POLICY AND PLANNING (REP2-018)

Reference	Written Representation	Applicant's Response
	Due to the length of the Written Representation, it has not been repeated in full in this table. The points raised as summarised in the Conclusion to the document are set out below.	
6	<p>CONCLUSION</p> <p>114 CEPP have laid out a Carbon Assessment Architecture which would enable a coherent assessment of the A47BNB scheme's carbon emissions impact, both as the project itself and in-combination and cumulative impacts from other proposed schemes in the Greater Norwich area. We then made an indicative assessment using our architecture, against relevant local transport carbon budgets derived from BEIS historic data, the 4th Carbon Budget and science-based carbon budgets from the Tyndall Centre, University of Manchester.</p> <p>115 In its opening year, the scheme accounts for between 13.4% - 32.5% of Broadlands's transport budget across a range of carbon budget methods. When a realistic indicative cumulative assessment is made in-combination with other schemes planned in the Greater Norwich area, then scheme in-combination accounts for 38% - 91.5% of the transport budget for the GN area. This falls in the 4th carbon budget period, a time critical to make strong progress on decarbonisation both locally and nationally.</p> <p>116 Following these assessments, and conclusions, CEPP object to the scheme because it undermines all attempts to decarbonise transport in Norfolk and the wider UK, as laid out in our substantive text. We strongly recommend that the Secretary of State refuses consent to the DCO.</p> <p>117 There is significant missing data which both leads to an under-estimation the carbon footprint of the scheme, and creates a structural (modelling architectural) barrier to a coherent cumulative carbon assessment. The missing data identified needs to be collected and made available by the Applicant so that the cumulative carbon assessment may be carried out.</p>	<p>The Applicant acknowledges the representation with regards to cumulative assessments and comparison with local carbon budgets. This response addresses matters of relevance to the decision-making process required to be followed by the Planning Act 2008 and the NPS NN. The carbon assessment was undertaken following the methodology set out in DMRB LA 114.</p> <p>The response to Rule 17 request (REP2-009) and the ES Chapter 15 Cumulative Effects Assessment (APP-053) do not include assessment of climate, as these impacts are considered in ES Chapter 14 Climate (REP2-002). The estimated GHG emissions arising from the Scheme have been compared with UK carbon budgets and the associated reduction targets in the climate chapter. NNNPS Paragraph 3.8 sets out that "the impact of road development on aggregate levels of emissions is likely to be very small". It is acknowledged that the Scheme would result in an increase in GHG emissions (25,765 tCO₂e during construction and 1,320 tCO₂e during 60-years of operation) and this would contribute to the carbon budgets.</p> <p>As ES Chapter 14 was written prior to the UK's 6th Carbon Budget being enshrined in law this was not included. The Chapter has been updated (REP2-002) to assess against the 6th Carbon Budget.</p> <p>With regards to land-use emissions, as stated in the Scoping Report Climate Chapters for A47 Blofield to North Burlingham, "the embodied carbon emissions from the use of construction materials are the main contributor to climate change, with additional carbon emissions arising from the transportation of these materials and the use of construction plant". The removal of carbon through vegetation and trees, acting as a</p>

Reference	Written Representation	Applicant's Response
	118 The Applicant has made no assessment against the now enacted UK 6th Carbon Budget.	<p>carbon sink, was not considered likely to result in significant effects and was scoped out of the ES. The assessment did take account of carbon emissions associated fuel use directly related with site clearance. The planting plan shown in the Masterplan (REP1-041) for the Scheme , result in a net gain of biodiversity.</p> <p>Specific comments on this written representation are presented in Appendix A.</p>
	119 The applicant has made no assessment against regional and local levels of carbon emissions, and budgets, in breach of the EIA regulations.	
	120 The application has not assessed land-use emissions, on the scheme, on in-combination with other local schemes, as required by PAS 2080	
	121 The applicant has not assessed cumulative, and in-combination, carbon emissions in breach of the EIA regulations.	
	122 Further our detailed technical appraisal shows that, now, with the current assessment and modelling architecture of NCC and the Applicant, <u>it is not possible to coherently or reliably assess the cumulative carbon emissions related to this scheme and other planned schemes in the Greater Norwich area.</u> NCC and the Applicant are running models over a hotch-potch of "study areas", NATS model baseline years, model configuration, precluding any coherent in-combination assessment of carbon emissions between and across the schemes.	
	123 As the EIA regulations, and Highways England's own license, require such a cumulative environmental assessment, the Applicant must – in consultation with NCC – indicate how they will adapt the assessment and modelling architecture so that a robust and safe cumulative carbon emissions assessment may be carried out.	
	124 No national level cumulative assessment has been made at least the 50 major road schemes under the RIS2 scheme, and also the array of road schemes under Large Local Major funding programme which includes the Norwich Western Link (NWL) in the Greater Norwich area. This is contrary to Highways England license section 5.23(c). It is also under consideration by the High Court following a judicial review.	
	125 The legal status and scope of the NPSNN needs to be clarified to PINS and the parties at the Examination by the NPSNN.	

7 NORWICH CYCLING CAMPAIGN (REP2-019)

Reference	Written Representation	Applicant's Response
3.1.1.	<p><u>National Planning Policy Framework</u></p> <p>Page 27, 3.17 There is a direct role for the national road network to play in helping pedestrians and cyclists. The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes. The Government also expects applicants to identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use ..</p> <ul style="list-style-type: none"> • The requested underpass at North Burlingham appears to address the issue of a barrier which: "...severs communities and acts as a barrier". • the planned cycle route on the overbridge is not "easy and safe". 	<p>The Applicant has sought to both mitigate the environmental and social impacts of the Scheme and provide improved facilities for users by incorporating a reasonable and proportionate package of improvements for walkers and cyclists. With regard to the severing of Burlingham FP3, the Applicant has examined the functionality and character of this footpath and also determined its current usage, to inform the decision regarding the appropriateness of the proposed mitigation, namely, the provision of a new public footpath and crossing facilities at the North Burlingham Junction. The Applicant has also fully investigated the availability of existing walking and cycling routes in the area which provide for connectivity between Blofield, North Burlingham and Acle and has incorporated facilities to improve these connections, where required. As such, the Scheme is compliant with paragraph 3.3 of the National Networks NPS.</p> <p>The Applicant has used reasonable endeavours to address the needs of cyclists and pedestrians in the design of the proposed Scheme. The Scheme provides a new shared footway / cycleway between the Blofield Overbridge and North Burlingham to improve east to west connections and a new public footpath running east to west and to the south of the A47 which will provide an attractive addition to the PRow network and mitigates the severing of Burlingham FP3. Crossing facilities are provided at both the Blofield Overbridge and the North Burlingham Junction to remove the A47 as a barrier for north to south walking and cycling movements thereby correcting an historic problem. As such, the Scheme is compliant with paragraph 3.17 of the NPS.</p> <p>In accordance with paragraph 5.205 of the NPS, the Applicant has considered reasonable opportunities for supporting non-motorised users and has proposed a package of improvements and mitigation measure to address the existing severance issues associated with the A47 thereby removing it as a barrier for users.</p>

Reference	Written Representation	Applicant's Response
		<p>The Applicant has also had regard to the requirements of paragraph 5.216 of the NPS, especially in respect of the reasonableness of the proposed migration to address the severing of Burlingham FP3. Current usage of Burlingham FP3 is very low and it is not a practical route for all weather utility trips between North Burlingham and Lingwood given the quality of the footpath surfacing and the walking distances involved. The low current usage is not sufficient to justify in highway and economic terms the provision of an additional crossing solely for pedestrians. As such, the Scheme is compliant with the policy in this regard.</p> <p>In summary, the Scheme complies with the NPS in that it provides a reasonable package of new and improved infrastructure for pedestrians and cyclists which improves accessibility and is proportionate to user activity in the area. In combination with the existing facilities, the proposed pedestrian and cycling infrastructure will provide improved and safe connections between Blofield and North Burlingham and between Lingwood and North Burlingham. In addition, the two grade separated crossing points proposed at the Blofield Overbridge and at the North Burlingham Junction address remove the A47 as a barrier to non-motorised users thereby mitigating the environmental and social impacts of the Proposed Scheme and correcting an historic problem.</p> <p>When considering reasonable and proportionate mitigation in response to the severing of Burlingham FP3, namely a new length of public footpath connecting to the crossing facilities proposed at the North Burlingham Junction, the legal status of the footpath and the existing level of usage were considered along with the footpath's character, utility and convenience. Burlingham FP3 is a public footpath so cannot be used legally by cyclists or horse-riders. It is not well used, reference to ES Chapter 12: Population and Human Health [APP-050] Table 12.5 and it is not a convenient or attractive route for utility walking trips between North Burlingham and Lingwood due the walking distances involved and the quality of the route being an un-surfaced, part field edge/part field footpath. Burlingham FP3 is used predominantly for recreational walking trips where surface quality and walking distance are less important. As</p>

Reference	Written Representation	Applicant's Response
		such, the additional walking distances required to access the crossing facilities at the North Burlingham Junction are unlikely to be a deterrent to its future use by recreational users.
3.1.2	<p><u>Gear Change</u> July 2020</p> <p>The Government published “Gear Change: A bold vision for cycling and walking for 2020-25” in July 2020. This plan was described by the Prime Minister as “most ambitious plans yet to boost cycling and walking”.</p> <p>It has been suggested that “Gear Change” is concerned only with the Urban environment and does not apply to Rural areas. I can find no statement within the document to this effect, although the emphasis is on the towns and cities . However:</p> <p>P 43: “We will ensure that new local and strategic A road schemes include appropriate provision for cycling The new cycling budget is the largest sum ever committed to active travel in this country. But if we are serious about putting cycling at the heart of transport policy, we must further shift the balance between projects for motoring and projects for cycling. To receive Government funding for local highways investment where the main element is not cycling or walking improvements, there will be a presumption that all new schemes will deliver or improve cycling infrastructure to the new standards laid down, unless it can be shown that there is little or no need for cycling in the particular road scheme.”.</p> <ul style="list-style-type: none"> • If the Applicant. or others, wish to make the case that “Gear Change” is concerned only with the Urban environment and does not apply to Rural areas, they should submit a statement to the Examining Authority, supported by evidence. <p>“A bold new future vision for a new era”, (diagram p2), sets four objectives:</p> <ul style="list-style-type: none"> • Healthier, happier and greener communities • Safer Streets • Convenient and accessible travel 	<p>The Applicant acknowledges that “Gear Change” applies to both urban and rural environments. However, the Applicant is mindful of the statement on page 33 reproduced below:</p> <p><i>“No “one size fits all” approach – This policy, and the standards, recognise that different levels of provision may be appropriate in different places, both within and between local authorities. For instance, in a shire county, the busy, densely-populated county town may be a higher priority for cycling intervention than a small village. We will require more from all local authorities, urban or rural. But our main focus will be on medium-sized towns, larger towns and cities.”</i></p> <p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding improvements, as outlined in Section 1 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060) and shown on the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2), is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users.</p> <p>Page 20 of “Gear Change” states that “We have today, alongside this document, published new cycling design guidance which sets out the much higher standards we will now require if schemes are to receive funding, and we will expect Local Authorities and developers to utilise the guidance in the design of their schemes regardless of whether they are seeking Government funding”. This new guidance is Local Transport Note 1/20 Cycle Infrastructure Design (LTN 1/20).</p> <p>LTN 1/20 applies to local highway schemes as indicated in paragraph 1.1.1, which states that:</p> <p><i>“Local authorities are responsible for setting design standards for</i></p>

Reference	Written Representation	Applicant's Response
	<ul style="list-style-type: none"> At the heart of transport decision making <p>"Key Design Principals" (diagram p21), sets out nine principals:</p> <ol style="list-style-type: none"> 1. Cyclists must be separated from volume traffic; 2. Cyclist must be separated from pedestrians; 3. Cyclists must be treated as vehicles, not pedestrians 4. Routes must join together; 5. Routes must feel direct; 6. Take account of how users actually behave; 7. Cosmetic alterations should be avoided; 8. Barriers should be avoided; 9. Designed only by those who have experience on the road on a cycle. <ul style="list-style-type: none"> The proposals by Highways England do meet these requirements in particular: <ol style="list-style-type: none"> 4. There is no West-East connection for cyclists 5. The route using the overbridge is not direct and does not feel direct 9. We have seen no evidence of this requirement being complied with <p>These Design Principals are supplemented by the statements in Theme 2 (pages 24-27).</p> <p>Appendix p40-49 provides a further 22 summary principals derived from Local Transport Note 1/20</p>	<p><i>their roads. This national guidance provides a recommended basis for those standards based on the overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and in particular, when applying for Government funding that includes cycle infrastructure."</i></p> <p>Guidance for strategic roads is provided by DMRB standards, namely, CD 143 Designing for walking, cycling and horse-riding (for shared use facilities) and CD 195 Designing for cycle traffic (for cycle only schemes). However, it is acknowledged by the Applicant that there is a grey area where the Strategic Road Network interacts with the local highway network.</p> <p>The Applicant has been cognisant of the guidance provided in LTN 1/20 and DMRB standards when identifying the package of Walking, Cycling and Horse-riding improvements for the Scheme.</p> <p>With regard to the suggestion that the Scheme does not meet some of the key design principles outlined in Gear Change, the Applicant would comment as follows:</p> <ol style="list-style-type: none"> A cycle track is proposed in the northern verge of the section of A47 to be de-trunked providing an east to west connection for cyclists between Blofield and North Burlingham. Safe crossing of the new A47 will be facilitated by the proposed Blofield Overbridge. The cycle track incorporated into the B1140 Overbridge will facilitate safe north to south crossing movements of the A47 for cyclists and is a more direct replacement for the existing cycling route which requires cyclist to negotiate the staggered crossroads junction of B1140, A47 and South Walsham Road. A cycle track running east from the B1140 junction will facilitate access into North Burlingham from the B1140 junction. In combination with the cycle track incorporated into junction, this new facility will provide for improved

Reference	Written Representation	Applicant's Response
		<p>and safe access into the village when compared to the use of Lingwood Lane, where a small number of cyclists have been observed walking their cycles across the existing A47 and using the informal crossing point and cul-de-sac to connect with Main Road.</p> <p>(iv) The cycle tracking running between the B1140 junction and North Burlingham will facilitate improved access to the existing cycle routes between North Burlingham and Acle (as outlined in Section 1 of Appendix A of Applicant's Response to Relevant Representations (REP1-060)).</p> <p>With regard to the principle that cyclists must be separated from pedestrians, paragraph 4.4.4, page 33, of LTN 1/20 states, with reference to separation of the facility from the carriageway of a road, that <i>"Although there may be fewer cyclists and pedestrians in rural areas, the same requirement for separation from fast moving motor vehicles applies. A well- constructed shared use facility designed to meet the needs of cycle traffic - including its width, alignment and treatment at side roads and other junctions – may be adequate where pedestrian numbers are very low."</i> It goes on to state at paragraph 5.5.3, page 41, that <i>".... away from the highway, and alongside busy interurban roads with few pedestrians or building frontages, shared use might be adequate</i> Such facilities should be designed to meet the needs of cycle traffic...." Paragraph 5.6.1, page 43 references the use of <i>".... rural shared use facilities where there are few pedestrians..."</i> in the context of selecting cycle design speed and paragraph 5.9.3, page 45 references the use of <i>".... shared use facilities alongside rural highways where there a few pedestrians...."</i> in the context of selecting horizontal curve radii. Additionally, paragraph 6.5.6, page 65 states that <i>"Shared use may be appropriate in some situations, if well designed and implemented. Some are listed below..... Alongside interurban and arterial roads where there are few pedestrians....."</i>. These extracts from LTN 1/20 highlight the fact that Gear Change is not a once size fits all approach and that use of shared use, cycle track, facilities for pedestrians and cyclists are appropriate alongside highways in rural areas where pedestrian flows are known to be low, as is the case in</p>

Reference	Written Representation	Applicant's Response
		the vicinity of the Scheme.
3.1.2	<p>Cycling and Walking Investment Strategy 2016-2020</p> <p>The Government published its Cycling and Walking Investment Strategy for 2016-20 in April 2017. This Strategy set out the Government's "ambition that cycling and walking are the natural choices for shorter journeys, or as part of a longer journey." The Strategy set an objective to double cycling rates and to increase the number of children aged 5 to 10 that usually walk to school from 49% to 55% by 2025.</p> <ul style="list-style-type: none"> • The issue of connections to Lingwood primary school and Acle Academy have not been addressed in these proposals <p>At 3.24, "Strategic Road Network" the document states: "The Department will continue to work closely with Highways England to maximise the impact of their Cycling Strategy, which was published in 2016. This will enable cycle-proofing of the strategic road network and reduce any severance from new road schemes by enhancing access for a variety of users, including pedestrians, horse riders, and people with disabilities or health conditions. Highways England is also committed to upgrading and increasing the number of safe crossings on the network in the interests of the safety and convenience of more vulnerable road users, as well as ensuring they integrate with other networks, including local roads, and existing and emerging rail links."</p> <ul style="list-style-type: none"> • These proposals by Highways England do not directly address the issue of severance • The proposed route on the overbridge at N Burlingham is not a "safe crossing" as it does not address the issue of perceived safety and the high volume of HGVs which will use the bridge. (See Appendix A). <p>At 1.16 it states: "Importantly, two out of every three personal trips are within five miles, the government considers this "an achievable distance to cycle for most people, with many shorter journeys also suitable for walking."</p> <ul style="list-style-type: none"> • Five miles is eight km – the WCHR survey area is five km. Should the WCHR assessment and review take this into account? 	<p>The issue of connections to Lingwood primary school and Acle Academy have been addressed as part of the Scheme, as outlined in Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>The proposed B1140 Overbridge would remove the existing severance effect of the existing A47 for the majority of non-motorised users. It is therefore not possible to justify an additional overbridge at North Burlingham for pedestrians and cyclists. The Applicant's analysis is provided in Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>The shared use facility at the B1140 junction will be a minimum of 2.0 metres wide and a separation distance from the carriageway will be provided which reflects the prevailing speed limit. The cycle track will facilitate safe, grade separated, north to south (and vice versa) crossing movements of the new A47 for pedestrians and cyclists. The B1140 junction is located in the right place to provide both for connectivity and remove a difficult existing junction.</p> <p>The Walking, Cycling and Horse-riding Assessment and Review (WCHAR) was undertaken in accordance with the DMRB standard GG142.</p>

Reference	Written Representation	Applicant's Response
3.1.3	<p>Cycle Infrastructure Design Local Transport Note 1/20 July 2020</p> <p>p 6 states: "This guidance should be applied to all changes associated with highway improvements, new highway construction and new or improved cycle facilities ...".</p> <ul style="list-style-type: none"> • There is no evidence that LTN 1/20 has been considered in relation to these proposals. <p>1.12.3 (page 6) The guidance contains tools which give local authorities flexibility on infrastructure design and sets a measurable quality threshold to achieve when designing cycling schemes. The Cycling Level of Service (CLoS) at Appendix A and the Junction Assessment tools (JAT) at Appendix B are new mechanisms introduced to set minimum quality criteria. Only schemes with a minimum score of 70% under the CLoS, no critical fails and under the JAT no red-scored turning movements will generally be considered for funding. Where schemes are proposed for funding that do not meet these minimum criteria, authorities will be required to justify their design choices. It still gives local authorities flexibility on design of infrastructure, but sets an objective and measurable quality threshold.</p> <ul style="list-style-type: none"> • It does not seem that the Cycling Level of Service (CLoS) has been applied to these proposals. • Neither has the Junction Assessment tools (JAT) . <p>1.1.3 To effectively apply this guidance those designing cycling and walking schemes should have an appropriate level of experience and training. An example would be the Institute of Highway Engineers' Professional Certificate & Diploma in Active Travel that allows applicants to demonstrate their experience and produce work to the required standard.</p> <ul style="list-style-type: none"> • What qualifications have those designing the present scheme? P7 Core design principles: <p>1.5.2 Networks and routes should be Coherent; Direct; Safe; Comfortable and Attractive.</p> <p>1.5.3 Inclusive design and accessibility should run through all five of these core design principles. Designers should always aim to provide infrastructure that</p>	<p>LTN 1/20 applies to local highway schemes as indicated in paragraph 1.1.1, which states that:</p> <p><i>"Local authorities are responsible for setting design standards for their roads. This national guidance provides a recommended basis for those standards based on the overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and in particular, when applying for Government funding that includes cycle infrastructure."</i></p> <p>Guidance for strategic roads is provided by DMRB standards, namely, CD 143 Designing for walking, cycling and horse-riding (for shared use facilities) and CD 195 Designing for cycle traffic (for cycle only schemes). However, it is acknowledged by the Applicant that there is a grey area where the Strategic Road Network interacts with the local highway network.</p> <p>The Applicant has been cognisant of the guidance provided in LTN 1/20 and DMRB standards when identifying the package of Walking, Cycling and Horse-riding improvements for the Scheme.</p> <p>The Applicant considers that many of the factors for consideration identified in the Cycle Level of Service Tool provided in Appendix A of LTN1/20 are not directly applicable to the assessment of cycling facilities provided in a rural setting, i.e. they are more applicable to an urban setting. For example: Cohesion - consideration of density of network; Directness – Time:, frequency of required stops of give way, delay at junctions and delay on links; Safety – avoid complex design, consider and reduce risk from kerbside activity; and Attractiveness – lighting and isolation activity, minimise street clutter, secure cycle parking.</p> <p>The cycle track proposed along the northern frontage the section of the A47 to be de-trunked will provide an appropriate walking and</p>

Reference	Written Representation	Applicant's Response
	<p>meets these principles and therefore caters for the broadest range of people.</p> <p>Coherent Cycle networks should be planned and designed to allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality.</p> <p>Direct Cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles.</p> <p>Safe Not only must cycle infrastructure be safe, it should also be perceived to be safe so that more people feel able to cycle.</p> <p>Comfortable Comfortable conditions for cycling require routes with good quality, well maintained -smooth surfaces, adequate width for the volume of users, minimal stopping and starting and avoiding steep gradients.</p> <p>Attractive Cycle infrastructure should help to deliver public spaces that are well designed and finished in attractive materials and be places that people want to spend time using. There are subtle differences in the interpretation of the five Core principals given in GG 195 Designing for walking, cycling, and horse-riding, Table 2.1.2 page 8. In particular, the statement in 2.1.2, “designed to achieve the best balance” which seems to allow scope for the designers to give priority to motor traffic.</p> <p>Summary Principals pages 9-14 There are 22 Summary Principals which are to be applied. <ul style="list-style-type: none"> • While these design principals do not contradict the similar statement on p8 of DMRB CD 195 they are more detailed. </p>	<p>cycling connection between Blofield and North Burlingham. The cycle tracks proposed at the Blofield Overbridge and the B1140 Overbridge will facilitate the safe north to south crossing of the A47 for pedestrians and cyclists.</p> <p>As indicated, a cycle track will be provided across the B1140 overbridge and this provides a connection between the B1140, South Walsham Road and Main Road in North Burlingham. The fully kerbed cycle track will be separated from the B1140 carriageway, ensuring that this facility is suitable for most people (reference to Figure 4.1, page 33 of LTN 1/20). Also, the speed limit on the approaches to and within the junction will be 30mph to ensure that the speed of general traffic through the junction is minimized. It therefore follows that the B1140 junction does not have any red-scored turning movements under the Junction Assessment Tool provided in LTN 1/20.</p> <p>The Applicant has used reasonable endeavours to address the needs of pedestrians and cyclists in designing the new Scheme. The proposed cycle tracks and crossing facilities adhere to the core design principles outlined in LTN 1/20, as far as is reasonable and practical.</p> <p>The WCHAR Lead is a Technical Director in the Advisory and Planning division of Sweco. Sweco is a multi-disciplinary engineering and architectural consultancy with offices throughout the UK and Europe.</p> <p>He holds the degrees of BEng Civil Engineering and MSc in Transport Engineering & Planning and is a Chartered Member of the Institute of Logistics and Transport (CMILT) and a Member of the Chartered Institution of Highways & Transportation (MCIHT). He has over 34 years' experience in highways, transportation and infrastructure and his experience includes advising public and private sector clients on the highways, environmental and access aspects of development, undertaking transport assessments and contributing to environmental impact assessments. He provides advice on the traffic, road safety and walking, cycling and horse-riding aspects of large-</p>

Reference	Written Representation	Applicant's Response
		<p>scale highway improvement schemes and has considerable experience in the field of highways development control having provided advice to both Strategic and Local Highway Authorities.</p> <p>He has in-depth knowledge of the area surrounding the A47 Blofield to North Burlingham Dualling Scheme. He has visited the study area on a number of occasions, most recently on 21 and 22 June 2021, and is familiar with the existing walking and cycling routes in the immediate area. He is also a keen leisure cyclist.</p>
3.1.4	<p>DfT Road Investment Strategy 2: 2020-2025</p> <p>P41 Investment in the SRN can support this agenda by improving cycling and walking provision along trunk 'A' roads, and reducing severance effects where local cycling and walking routes cross the SRN or are separated completely by it.</p> <p>In the long-term, our vision will mean that non-motorised users will be able to access good quality routes for their journeys segregated from an SRN that primarily serves long distance, higher speed traffic.</p> <ul style="list-style-type: none"> • The issue of severance has been raised above. 	<p>The proposed B1140 Overbridge would remove the existing severance effect of the existing A47 for the majority of non-motorised users. It is therefore not possible to justify an additional overbridge at North Burlingham for pedestrians and cyclists. The Applicant's analysis is provided in Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p>
3.2	<p>3.2 Norfolk County Council Norfolk</p> <p>County Council, the local transport authority, have published a number of policy documents which support and implement Government policy.</p> <p>3.2.1 Greater Norwich Infrastructure Plan June 2021</p> <p>Page 6: 1.13 Many elements of key infrastructure can be implemented incrementally to reflect emerging patterns of growth. This includes: Providing better cycling and walking infrastructure to maximise the benefits of active travel, extending cycle and walking networks that are already established.</p> <ul style="list-style-type: none"> • How do the present proposals support this policy in particular in "extending cycling and walking networks that are already established"? 	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding improvements, as outlined in Section 1 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060) and shown on the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2), is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. This package of improvements complements and extends the limited existing walking and cycling infrastructure thereby according with policy in the Greater Norwich Infrastructure Plan.</p> <p>The issue of connections to Lingwood primary school and Acle Academy have been addressed as part of the Scheme, as outlined in Appendix A of the Applicant's Response to Relevant</p>

Reference	Written Representation	Applicant's Response
	<p>Page 16: 3.14 Strategic priorities: To support the development of safer walking and cycling routes to schools.</p> <ul style="list-style-type: none"> • How do the present proposals support this policy in particular with regard to Lingwood Primary School and Acle Academy.? <p>Page 49: Norwich/Broadland, Yarmouth Road Sustainable Transport Corridor (including BRT and cycling)</p> <ul style="list-style-type: none"> • How do the present proposals support this ambition – a West -East strategic route? 	<p>Representations (REP1-060).</p> <p>The Applicant is not aware of the details of the Norwich/Broadland, Yarmouth Road Sustainable Transport Corridor (including BRT and cycling) but it would appear for the table on page 49 that the proposals at a very early stage in their development since only a project cost is quoted. It would be expected, however, that the package of walking and cycling improvements proposed as part of the Scheme, especially the cycle track adjacent to the section of the A47 to be de-trunked and the proposed new PRow footpath running east to west and to the south of the new A47, will complement any proposals promoted by Norfolk County Council.</p>
3.2.2	<p>Greater Norwich - Local Cycling and Walking Infrastructure Plan May 2021</p> <p>This document quotes from “Gear Change” at p5, and LTN 1/20 at p 9. It also provides at pages 7 and 8 a comprehensive list of local policies to be consulted. The core study area (page 11) includes the 5km WCHR area around the current proposals for the A47 and extends through Acle to Great Yarmouth.</p> <ul style="list-style-type: none"> • Although published after the WHCR Review was signed off, has this document been considered by Highways England? 	<p>This document has not been considered by the Applicant since its publication post-dates completion of the WCHAR Review. On examination of Fig 6 on page 11 and the accompanying text, it is clear that the core study area for the Local Walking and Cycling Infrastructure Plan comprises the strategic growth area which lies to the west of and close to the boundary of the WCHAR study area. The document states that “<i>Any potential cycling and walking improvement schemes which are outside of the core study area will be considered as part of future planning activities.</i>” As such, the package of walking and cycling improvements proposed as part of the Scheme would likely complement any future proposals promoted by Norfolk County Council.</p>
3.2.3	<p>Great Yarmouth Cycle Map 2-17</p> <p>Published by Norfolk County Council and Great Yarmouth Town Council, shows a cycle route (Acle Adventure Cycle) from the centre of Acle, along the A1064, to Stokesbury, Runham and Caister to Great Yarmouth. An alternative route is shown via Maultby to Ormesbury.</p> <p>This route could link via Mill Lane Acle and The Windle to the present scheme. See also 3.2.1 above and Page 49: Norwich/Broadland, Yarmouth Road Sustainable Transport Corridor (including BRT and cycling).</p> <ul style="list-style-type: none"> • How do the present proposals support this ambition – a West -East strategic 	<p>With the Scheme in place, cyclists wishing to travel between North Burlingham and Acle will have a choice of routes. On leaving North Burlingham via the proposed cycle track, they can travel north along South Walsham Road to Green Lane, northeast along Green Lane to Acle Road and then follow Acle Road/South Walsham Road into Acle. Alternatively, cyclists can leave Acle Road at The Windle and travel south before following the Byway which provides access to Mill Lane in the centre of Acle. Both routes are attractive and conducive to cycling. For cyclists not using road bikes, use can also be made of bridleway South Walsham BR11, which would result in a shorter journey than using Green Lane. Therefore, given the choice of</p>

Reference	Written Representation	Applicant's Response
	route	<p>existing cycling routes, there is no requirement for an additional cycling route along the A47 between South Walsham Road and The Windle.</p> <p>The Applicant's observations on the Norwich/Broadland, Yarmouth Road Sustainable Transport Corridor (including BRT and cycling) are presented above.</p>
3.2.4	<p>3.2.4 Norfolk Cycling and Walking Strategy 2017</p> <p>Section 2 (no page number) Our vision is that by 2025 :</p> <ul style="list-style-type: none"> • More people walk and cycle to get to places of work and education, and for leisure; • Walking and cycling are normal activities for most people, most of the time, and routes are direct, convenient and pleasant. • Norfolk provides high quality facilities for active travellers, who will be welcomed as valuable customers for business, and as positive contributors to the community; • Barriers to walking and cycling (such as concerns about safety and security) will have been addressed to ensure that residents and visitors are not put off from active travel; • Norfolk delivers safe and attractive opportunities for cycling and walking for all types of user, including the elderly, those with chronic health conditions including physical and mental disabilities, people with visual impairment and young families; • People can transfer between active travel modes to other public transport services easily due to well-designed interchanges and facilities <p style="text-align: center;">• How do the present proposals support these six points?</p> <p>Section 12 (no page number) Public Consultation Norfolk County Council ran a public consultation between March and April 2016 to gauge public reaction to the plan.</p>	<p>The Applicant has sought to both mitigate the environmental and social impacts of the Scheme and provide improved facilities for users by incorporating a reasonable and proportionate package of improvements for walkers and cyclists. With regard to the severing of Burlingham FP3, the Applicant has examined the functionality and character of this footpath and also determined its current usage, to inform the decision regarding the appropriateness of the proposed mitigation, namely, the provision of a new public footpath and crossing facilities at the North Burlingham Junction. The Applicant has also fully investigated the availability of existing walking and cycling routes in the area which provide for connectivity between Blofield, North Burlingham and Acle and has incorporated facilities to improve these connections, where required.</p> <p>The Applicant has used reasonable endeavours to address the needs of cyclists and pedestrians in the design of the proposed Scheme. The Scheme provides a new shared footway / cycleway between the Blofield Overbridge and North Burlingham to improve east to west connections and a new public footpath running east to west and to the south of the A47 which will provide an attractive addition to the PRoW network and mitigates the severing of Burlingham FP3. Crossing facilities are provided at both the Blofield Overbridge and the North Burlingham Junction to remove the A47 as a barrier for north to south walking and cycling movements thereby correcting an historic problem</p> <p>The Applicant has considered reasonable opportunities for supporting non-motorised users and has proposed a package of improvements and mitigation measure to address the existing</p>

Reference	Written Representation	Applicant's Response
	<ul style="list-style-type: none"> • 90% of respondents agreed with the plan's vision • 80% agreed with suggestions to improve cycle routes • 85% agreed with our recommendations to improve cycle parking facilities • 83% agreed with our suggestion for improved design of public spaces to better accommodate cyclists • 77% agreed with calls for improved signage • 77% agreed that cycle routes should integrate better with public transport • 70% agreed that cycle hire schemes would be beneficial • 83% agreed that it is important to "cycle proof" the strategic road network • 78% agreed that improvements to Norfolk's walking network should be done at a strategic, 'whole network' level • 85% agreed that new developments should be designed to encourage people to cycle and walk more. <p>These results from a large scale public consultation give an indication of public support for improvements to cycle and walking infrastructure. This should be compared with the mediocre efforts at public consultation by Highways England on the present proposals and the conclusions of "no demand etc".</p>	<p>severance issues associated with the A47 thereby removing it as a barrier for users.</p> <p>In summary, the Scheme provides a reasonable package of new and improved infrastructure for pedestrians and cyclists which improves accessibility and is proportionate to user activity in the area. In combination with the existing facilities, the proposed pedestrian and cycling infrastructure will provide improved and safe connections between Blofield and North Burlingham and between Lingwood and North Burlingham. In addition, the two grade separated crossing points proposed at the Blofield Overbridge and at the North Burlingham Junction address / remove the A47 as a barrier to non-motorised users thereby mitigating the environmental and social impacts of the Proposed Scheme and correcting an historic problem.</p> <p>When considering reasonable and proportionate mitigation in response to the severing of Burlingham FP3, namely a new length of public footpath connecting to the crossing facilities proposed at the North Burlingham Junction, the legal status of the footpath and the existing level of usage were considered along with the footpath's character, utility and convenience. Burlingham FP3 is a public footpath so cannot be used legally by cyclists or horse-riders. It is not well used, reference to ES Chapter 12: Population and Human Health [APP-050] Table 12.5 and it is not a convenient or attractive route for utility walking trips between North Burlingham and Lingwood due the walking distances involved and the quality of the route being an un-surfaced, part field edge/part field footpath. Burlingham FP3 is used predominantly for recreational walking trips where surface quality and walking distance are less important. As such, the additional walking distances required to access the crossing facilities at the North Burlingham Junction are unlikely to be a deterrent to its future use by recreational users.</p> <p>As such, the Scheme accords with the Norfolk Walking and Cycling Strategy.</p>

Reference	Written Representation	Applicant's Response
3.2.5	<p>Norfolk Access Improvement Plan</p> <p>This plan supports and confirms the plans set out in other local strategy documents.</p> <p>However, in addition, it identifies opportunities for cycle and other green tourism:</p> <p>Section 3 Future User Needs: “ Collaborate with the National Trust, bird reserves, the Broads Authority, the Norfolk Coast Partnership, the Marine Partnership., and others to develop linked trails and cycle routes which encourage tourists to visit popular areas out of season...”</p> <ul style="list-style-type: none"> • As tourism is not mentioned in the WCHR review, how do the present proposals support this important local industry? 	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding improvements, as outlined in Section 1 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060) and shown on the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2), is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. This package of improvements complements and extends the limited existing walking and cycling infrastructure thereby supporting tourism in the area of the Scheme.</p>
3.3	<p>3.3 Broadland District Council</p> <p>3.3.1 East Broadland Green Infrastructure Project Plan Dec 2015</p> <p>3.3.1.1 Neighbourhood Plans</p> <p>A number of Local Neighbourhood plans in the East Broadland area are in the process of or have been adopted:</p> <p>Acle Neighbourhood Plan highlights the need for improving the footpaths, cycleways and bridleways connecting Acle to the surrounding villages and countryside,</p> <p>The Brundall Neighbourhood Plan identifies the improvement and joining up of the network of footpaths and cycleways to help the safe movement by foot and bicycle of residents or visitors and reduce car reliance, forming an orbital route around the village.</p> <p>The 'Plumsteads' Neighbourhood Plan highlights the provision of walking and</p>	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding improvements, as outlined in Section 1 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060) and shown on the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2), is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. This package of improvements complements and extends the limited existing walking and cycling infrastructure. The package of improvements proposed also complements the aspirations of the various neighbourhood plans in respect of improving facilities for users.</p>

Reference	Written Representation	Applicant's Response
	<p>cycling opportunities between Great Plumstead, Little Plumstead and Thorpe End Garden Village, the improvement of the footpath and cycleway along Water Lane, the extension of the woodland walk around Thorpe End Garden Village, and a safe cycling and walking NDR crossing point at Low Road.</p> <p>The Blofield Parish Neighbourhood Plan mentions the creation of facilities to encourage walking and cycling within and between Blofield and Blofield Heath, construction of a footpath or cycleway between Blofield and Blofield Heath, alongside Woodbastwick Road or Ranworth Road. The development of a connected network of high quality footpaths or rights of way, for better cycling and walking links from new developments to village amenities and the countryside,</p> <p>The Strumpshaw Parish Council Neighbourhood Plan mentions the completion of the footpath along Norwich Road in Strumpshaw between Beech Drive and Goat Lane</p> <p>• How do the present proposals support these Neighbourhood plans?</p>	
3.3.1.2	<p>3.3.1.2 The 16 Projects</p> <p>The Plan details 16 Projects to be considered of which the following are particularly relevant to the present proposals:</p> <p>Project 5: A47 Safe Foot and Cycle Crossing</p> <p>A safe foot and cycle crossing over the A47 between Lingwood and North Burlingham. This will provide a vital link between the settlements and the Burlingham Trails to the north and south of the A47, as the fast road severs access for active transport, while it is difficult for cars to cross. The 2015-2021 A47 dualling plans for the Blofield and Burlingham section will increase the severance effect. This crossing would provide a way to integrate communities on both sides of the road, whereby at present pedestrian crossings are at Blofield and Acle. North of the Blofield crossing, there is currently no formal walking link (see Project 8).</p>	<p>With reference to Project 5, the Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Section 2 of Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>Project 8 was evaluated as a potential improvement opportunity as part of the WCHAR process. This opportunity would make use of the Plantation Road overbridge to cross the existing dual carriageway section of the A47 lying immediately to the north of Blofield. The delivery of this opportunity is not therefore dependent upon the Scheme and could be implemented independently. As such, the opportunity was not taken forward as part of the Scheme.</p>

Reference	Written Representation	Applicant's Response
	<p>Justification</p> <ul style="list-style-type: none"> • Consideration should be given to the project, as it is in a central location within the East Broadland area making it a key site for a safe crossing point to link the settlements on the north and south sides of the A47. • The A47/A12 Feasibility Study (AECOM, 2015b) highlights that between Blofield and North Burlingham, the average daily speed is 72km/h and average daily traffic volume is approximately 27,000 vehicles. This presents a significant barrier to pedestrians, cyclists and wildlife. With predicted traffic growth of 21% by 2021 and 45% by 2031 (from a base year of 2013) and the impact of dualling is considered, there is a greater need for a safe crossing point. • Since there is growth expected in the region, especially in the Blofield area which currently has no formalised walking and cycle links North of the A47, the crossing will form a crucial link between settlements either side of the A47. It would also form a green corridor for wildlife and people by connecting both sides of the Burlingham Trails network. <p>Project 8: Link from Blofield to Blofield Heath</p> <p>Conduct a feasibility study into the creation of a link between Blofield and Blofield Heath. This would provide a crossing point over the A47 with the potential further links from Blofield Heath East to the Burlingham Trails and West to the 'Plumsteads'. Since Blofield has good PROW links to the settlements south of the A47, it would be key in integrating the communities both north and south. A potential route could follow north from the new development sites in Blofield over the A47 using the bridge with an existing path, then along a new path by the side of road which turns right onto Bullacebush Lane and then left onto Ranworth Road until it joins with the pavement in Blofield Heath. In the project development stage, a feasibility study will investigate the possible routes and costs and involve landowner consultation to identify the best route.</p> <p>Justification</p> <ul style="list-style-type: none"> • In the stakeholder meetings, the project was a high priority for Blofield Parish Council. • A feasibility study to assess the potential of the project and provide a detailed 	

Reference	Written Representation	Applicant's Response
	<p>understanding of the advantages and disadvantages in which to make an informed decision can be achieved at a low cost.</p> <ul style="list-style-type: none"> • It follows Theme 4 of the GI Strategy (GNBP, 2007) by encouraging people to adopt lowcarbon lifestyles with minimal requirements for car use. <p>• How do the present proposals support these two plans?</p>	
3.3.2	<p>3.3.2 Local Impact report</p> <p>LOCAL IMPACT REPORT BROADLAND DISTRICT COUNCIL APPLICATION BY: Highways England for an Order Granting Development Consent for the A47 Blofield to North Burlingham project PLANNING INSPECTORATE REF: TR010040 District Council Ref: 20210720</p> <p>To support the delivery of green infrastructure in the District in the short, medium and long term, Broadland District Council has had prepared, on its behalf, the East Broadland Green Infrastructure Project Plan (See appendix 2 of the LIR). The plan is intended to support the future growth of the region by proposing green infrastructure projects with the capacity to accommodate future developments. Project 5 of the plan "A47 Safe Foot and Cycling Crossing" seeks to deliver a safe foot and cycle crossing over the A47 between Lingwood and North Burlingham. This will provide a vital link between the settlements and the Burlingham Trails to the north and south of the A47. The project plan identifies that the A47 dualling plans would increase the severance of the A47 and that a new crossing would provide a way to integrate communities on both sides of the road.</p> <p>Highways England has dismissed these projects, despite the comments by Broadland District Council. It can be seen from the Stakeholder meetings, and the detailed submissions from members of the public there is considerable local support for these projects. Also, the results of the Public Consultation published in the Norfolk Cycling and Walking Strategy 2017 show that there is majority support in the wider Norfolk community for improvements to cycling facilities.</p> <ul style="list-style-type: none"> • How do Highways England, a body with limited local responsibilities, knowledge, commitment, and no democratic mandate justify the 	<p>The East Broadland Green Infrastructure Project Plan is not a policy document and instead supports the delivery of potential green infrastructure projects. The reasons why Project 5 of this Project Plan (a footbridge crossing over the A47) is not included within the Scheme are summarised below and in Appendix A to the Applicants Response to Relevant Representations (REP1-060).</p> <p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Appendix A to the Applicants Response to Relevant Representations (REP1-060).</p> <p>The WCH survey results suggest that the cycle track over the proposed B1140 Overbridge would remove the existing severance effect of the existing A47 for the majority of non-motorised users.</p> <p>The B1140 Overbridge also provides a reasonable alternative route for cyclists and the single pedestrian crossing at Lingwood Lane. Importantly, Lingwood Lane is equidistant between the overbridge identified as Project 5 footbridge suggested by the RRs and the B1140 Overbridge and is therefore likely to provide an equally convenient diversion.</p> <p>At Lingwood Road/Dell Corner Lane the survey did not reveal any pedestrians crossing of the A47. The cyclists using Lingwood Road would be expected to divert across the Blofield Overbridge.</p>

Reference	Written Representation	Applicant's Response
	dismissal of the concerns of the representatives of local people?	<p>Burlingham FP3 is only a right of way for those on foot and it does not therefore provide a legitimate crossing point for cycles. Given the sizeable walking distances and walking times involved and the fact that part of the route is via an un-surfaced, part field edge/part field footpath, it is concluded that Burlingham FP3 is not a practical route for everyday utility trips on foot between North Burlingham and Lingwood. This would continue to be the case if an overbridge of the A47 at North Burlingham were to be provided. Therefore, it is unlikely that provision of such an overbridge would lead to a significant increase in utility walking trips between Lingwood and North Burlingham.</p> <p>With the Scheme implemented as proposed in the application, users undertaking recreational walking trips would experience increases in walking time and walking distance when accessing the Burlingham Woodlands Walks network from Lingwood. railway station. However, the increased walking distances are unlikely to be a deterrent to recreational users and the creation of additional lengths of footpath can be seen to provide additional walking opportunities for them.</p> <p>It is therefore not possible to justify an additional overbridge at North Burlingham for pedestrians and cyclists.</p> <p>The Applicant has consulted widely in its proposals from the early stages on the projects' development through to the submission design. The details of this consultation are set out in the Consultation Report and its associated Annexes (APP-022 to APP-038). Annex O provides the Table Evidencing Regard Had to Consultation Responses (APP-037).</p>
3.4	<p>3.4. Highways England "Cycling Strategy Our Approach" 2016</p> <p>"Our Cycling Strategy shows how our planned roads improvements programme will provide integrated schemes which improve cycling facilities. This will contribute towards the development of an integrated, safe, comprehensive and high quality cycling network. For our network this means cycling facilities which are safe, separate from traffic and that enable users of all abilities to cycle,</p>	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding improvements, as outlined in Section 1 of Appendix A to the Applicant's Response to Relevant Representations (REP1-060) and shown on the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2), is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. This package of</p>

Reference	Written Representation	Applicant's Response
	<p>encouraging cycling as a sustainable form of transport. “</p> <ul style="list-style-type: none"> How do the present proposals meet these requirements? <p>“Progressively creating comprehensive and coherent cycle networks with our key stakeholders and delivery partners.”</p> <p>“In particular, we want to contribute to a connected, comfortable, attractive and high quality cycling network, suitable and safe for use by people of all ages and abilities.”</p> <p>Our guiding principles To support the delivery of this vision, we have identified a number of key principles:</p> <p>Planning for cycling – we will improve our capability to ensure the needs of cyclists are considered.</p> <p>Improving cycling facilities – we will plan and deliver an investment programme to improve cycle facilities which are safe and separate from traffic. Over time we will improve the safety, convenience and environment for cycling.</p> <p>Partnership working – we recognise the role of our partners and stakeholders in helping us to identify and support the delivery of cycling facilities and will work closely with them.</p> <p>Impact – our cycling improvements will have a positive impact on communities, such as improving connections across roads that divide communities and providing an integrated and safe cycling network. Direction of travel – we will play our part in delivering the Government's ambition.</p> <ul style="list-style-type: none"> How do the present proposals meet these principals in particular: <ul style="list-style-type: none"> “safety, convenience and environment” “Partnership working” Impact” “Direction of Travel” - does this mean accepting and implementing Government policy as set out in “Gear Change” and “LTN 1/20” 	<p>improvements complements and extends the limited existing walking and cycling infrastructure. As such, the Scheme meets the requirements of the Cycling Strategy.</p> <p>LTN 1/20 applies to local highway schemes as indicated in paragraph 1.1.1, which states that:</p> <p><i>“Local authorities are responsible for setting design standards for their roads. This national guidance provides a recommended basis for those standards based on the overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and in particular, when applying for Government funding that includes cycle infrastructure.”</i></p> <p>Guidance for strategic roads is provided by DMRB standards, namely, CD 143 Designing for walking, cycling and horse-riding (for shared use facilities) and CD 195 Designing for cycle traffic (for cycle only schemes). However, it is acknowledged by the Applicant that there is a grey area where the Strategic Road Network interacts with the local highway network.</p> <p>The Applicant has been cognisant of the guidance provided in LTN 1/20 and DMRB standards when identifying the package of Walking, Cycling and Horse-riding improvements for the Scheme.</p>

Reference	Written Representation	Applicant's Response
4.1	<p>4.1 WCHR Assessment and Review</p> <p>GG 142 page 6 a diagram, sets out the WCHR process and shows the Assessment and Review as separate stages. Paragraphs 4.2 and 4.6 appear to confirm the Assessment and Review are separate stages.</p> <p>We have asked Highways England for sight of the Assessment on several occasions with no response except an indication that it may not exist.</p> <ul style="list-style-type: none"> • Can Highways England provide the WCHR Assessment for the Inquiry or a copy of the exemption notice (GG 142 1.3) 	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (TR010040/APP/9.10 (REP2-012))</p>
4.2	<p>4.2 The WCHR review</p> <p>We refer to the Highways England, A47 Blofield to North Burlingham Dualling, Walking Cycling and Horse-riding Review. HE551490-GTY-HKF-000-RP-CH-3002, signed of 10/08/2020.</p> <p>Page I of the document contains a statement headed "Notice", which describes it's somewhat convoluted origins and includes statements restricting the use that can be made it.</p> <ul style="list-style-type: none"> • Will the Examining Authority accept this document as evidence? <p>This document is dated 10/08/2020. However, as set out in detail below it does not appear to take into account the policy documents which were published in 2020, including;</p> <p>"Gear Change" July 2020 Local Transport Note 1/20 July 2020 DMRB CD 143 March 2020 CD 195 March 2020 CD 239 March 2020</p>	<p>LTN 1/20 applies to local highway schemes as indicated in paragraph 1.1.1, which states that:</p> <p><i>"Local authorities are responsible for setting design standards for their roads. This national guidance provides a recommended basis for those standards based on the overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and in particular, when applying for Government funding that includes cycle infrastructure."</i></p> <p>Guidance for strategic roads is provided by DMRB standards, namely, CD 143 Designing for walking, cycling and horse-riding (for shared use facilities) and CD 195 Designing for cycle traffic (for cycle only schemes). However, it is acknowledged by the Applicant that there is a grey area where the Strategic Road Network interacts with the local highway network.</p> <p>The Applicant has been cognisant of the guidance provided in LTN 1/20 and DMRB standards when identifying the package of Walking, Cycling and Horse-riding improvements for the Scheme.</p> <p>The Applicant submitted the Walking, Cycling and Horse-Riding</p>

Reference	Written Representation	Applicant's Response
	<ul style="list-style-type: none"> Can Highways England explain how the requirements of these policy documents were applied to the preparation of the WCHR assessment and review. <p>The WHCR Review, includes at Appendix B, a diagram , Figure 1-1 which illustrates the WHCHAR study area. However, it excludes, on the West side, the area adjacent to the NDR (A1270) which is within 5 km zone. The excluded area contains several roads which were severed by the NDR and have affected cycling access to the area of the scheme.</p> <p>The WCHR Review contains at Appendix B drawing HE551490-GTY-EPC-000-DR-LX30002 which shows the various opportunities. However, it is difficult to understand how these fit in with the scheme as the diagrams in the series HE1490-GTY-EPC-000-DR-CH30001 seem to be incomplete and do not show all the cycling and walking provisions.</p> <ul style="list-style-type: none"> Can Highways England supply detailed diagrams which show the width and elevation, and segregation provision for the cycling infrastructure. Also the design, and full information, on the highway crossing points for cyclists 	<p>Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p> <p>The WCHAR Review was completed at the end of the preliminary design. The detailed design has not yet commenced so full design information is not yet available. The package of walking and cycling improvements to be provided as part of the Scheme are shown in the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2).</p> <p>The aims of carrying out a review are:</p> <ol style="list-style-type: none"> To review the proposals for pedestrians, cyclists and equestrians throughout the highway design process. To review the potential impact of the proposed highway scheme on users in the area and on existing facilities. To identify new opportunities for improvement (or constraints) for users that may arise from the development of the highway scheme that are not evident during the assessment phase. <p>The Review report is required to record the design decisions relating to the provision of walking, cycling and horse-riding facilities. Actions to implement the opportunities should be recorded and where opportunities are not proposed to be implemented, the reasoning for this needs to be recorded in the Review report.</p>
4.3	<p>4.3 DMRB, GG 142</p> <p>p5. "Introduction" "The purpose of this document is to facilitate the inclusion of all walking, cycling and horseriding modes in the highway scheme development process from the earliest stage, enabling opportunities for new or improved facilities and their integration with the local and national network(s). This could include the creation and/or improvement of facilities for pedestrians, cyclists and equestrians that are separate from the highway. WCHAR is intended to provide increased collaboration, interaction and engagement with key stakeholders.</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p> <p>The aims of the WCHAR Review are outlined above.</p> <p>The WCHAR Lead is a Technical Director in the Advisory and Planning division of Sweco. Sweco is a multi-disciplinary engineering and architectural consultancy with offices throughout the UK and Europe.</p>

Reference	Written Representation	Applicant's Response
	<p>The WCHAR process is not an independent audit of walking, cycling and horse-riding matters related to the highway scheme.”</p> <ul style="list-style-type: none"> Can Highways England provide evidence of inclusion of all walking, cycling and horse-riding modes in the highway scheme development process from the earliest stage of this project. Can Highways England provide evidence of increased collaboration, interaction and engagement with key stakeholders. Much of the WCHR review document (HE551490-GTY-HKF-000-RP-CH-30002 11/08/20 is devoted to what appears to be for all intents and purposes an audit of opportunities. How is this justified? <p>GG 142 Strategic Networks p 18 4.16 The assessment of existing walking, cycling and horse-riding facilities shall include information on all of the main walking, cycling and horse-riding strategic networks within or connecting to the WCHAR study area for large highway schemes.</p> <p>NOTE Assessment of strategic walking, cycling and horse-riding networks can include a county-wide or a town/city-wide area for large highway schemes. NOTE 1 Walking, cycling and horse-riding strategic networks can include National Cycle Network (NCN) routes, public rights of way, bridleways and byways open to all traffic. NOTE 2 A crucial element of the strategic network assessment is to establish the longer term plans for county-wide and town/city-wide strategic networks.</p> <ul style="list-style-type: none"> Can Highways England provide the information as required by GG 142 para 4.16 and the accompanying notes <p>DMRB, GG 142 p6. “WCHR process summary”</p>	<p>He holds the degrees of BEng Civil Engineering and MSc in Transport Engineering & Planning and is a Chartered Member of the Institute of Logistics and Transport (CMILT) and a Member of the Chartered Institution of Highways & Transportation (MCIHT). He has over 34 years’ experience in highways, transportation and infrastructure and his experience includes advising public and private sector clients on the highways, environmental and access aspects of development, undertaking transport assessments and contributing to environmental impact assessments. He provides advice on the traffic, road safety and walking, cycling and horse-riding aspects of large-scale highway improvement schemes and has considerable experience in the field of highways development control having provided advice to both Strategic and Local Highway Authorities.</p> <p>He has in-depth knowledge of the area surrounding the A47 Blofield to North Burlingham Dualling Scheme. He has visited the study area on a number of occasions, most recently on 21 and 22 June 2021, and is familiar with the existing walking and cycling routes in the immediate area. He is also a keen leisure cyclist.</p> <p>The WCHAR Review was completed at the end of the preliminary design. The detailed design has not yet commenced so full design information is not yet available. The package of walking and cycling improvements to be provided as part of the Scheme are shown in the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2).</p>

Reference	Written Representation	Applicant's Response
	<p>Box top left; "Design team leader appoints Lead Assessor". There is no allowance here for sub-contracting or delegation of this authority. This raises questions about the subcontracting process.</p> <ul style="list-style-type: none"> As this WCHR review has been produced by subcontracting is the appointment of the lead assessor valid? <p>It also raises questions about the "Lead Assessor and expected competencies" (see GG 142 p 13, 3 Assessment and review team competencies, Table 3.1.1). We have an assertion by the Design Team Leader (3.1.3 WCHR review team statement) but an assertion unsupported by evidence is a fallacy. The list of competencies is long and demands a broad range of skills and experience. A typical candidate would have particular strengths and weaknesses and a balance view in making the appointment would be logical.</p> <ul style="list-style-type: none"> Can the Design Team leader refer to his records and provide a brief summary of the facts which support the appointment of the Lead Assessor. Dates and times of interviews may also be helpful. Personal information on the candidate list may be restricted to a reference such as "Candidate A" etc. <p>Box centre right "WCHAR review (preliminary design)" indicates that the WCHAR should be a primary document in the design process and should be available before design work commences. In the case of the current document, the dates indicate that it was prepared after design work has commenced.</p> <ul style="list-style-type: none"> The timetable for the production of the WCHAR review should be made available to the Inquiry. It should include details of all meetings and correspondence in which the WCHAR assessment and review stages were mentioned and any decisions taken. <p>If as it seems that the WCHAR review was produced after the design work commenced then it is virtually a review. DMRB, GG 142 p5. "Introduction", states; "The WCHAR process is not an independent audit of walking, cycling and horse-riding matters related to the highway scheme."</p>	

Reference	Written Representation	Applicant's Response
	<p>DMRB, GG 142 p5. "Introduction", states: "WCHAR is intended to provide increased collaboration, interaction and engagement with key stakeholders". It appears that Highways England have had very little, " collaboration, interaction and engagement with key stakeholders", as there is no mention of such activities in the WCHR Review.</p> <ul style="list-style-type: none"> Can Highways England provide details of the "Key Stakeholders" and the extent of the collaboration. <p>DMRB, GG 142, p16 para 4.8 "The assessment report shall contain analysis of the walking, cycling and and horse-riding policies and strategies relevant to the WCHAR study area." The relevant policy statements to be considered should include those covered in Section 3 Policy above.</p> <p>DMRB, GG 142, p16 para 4.9, states, "Personal injury collision data shall be obtained ..." and at 4.10, "Where damage only collision data is available it should be analysed ..."</p> <p>No information is included in the WCHAR review. It is well-established that there is considerable under-reporting of collision and accident data relating to cyclists and pedestrians. There are available processes and methodologies which attempt to address this problem. There is also the issue of near miss and the effect on cyclists. If required we are prepared to supply detailed information on these matters.</p> <ul style="list-style-type: none"> Can Highways England explain why this information has been omitted. <p>DMRB, GG 142,para 4.11, states. "Multi-modal transport services , associated infrastructure and interchanges within the WCHAR study area shall be identified and recorded."</p>	
4.11.1	<p>4.11.1 Access to and from multi-modal transport services, interchanges and facilities should be assessed in the context of the proposed highway scheme.</p> <p>4.11.1 Destinations for multi-modal transport services, together with their</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p>

Reference	Written Representation	Applicant's Response
	<p>frequencies and interchange facilities, should be identified and assessed as part of the assessment. "</p> <p>There is limited coverage of the railway stations and the Park and Ride</p> <p>para 4.12 states, "4.12 The assessment shall include an analysis of local trip generators and amenities in the WCHAR study area to identify likely desire lines for pedestrians, cyclists and equestrians."</p> <p>Very little information is included in the WCHAR review. There are two schools within the study area of which are likely to be relevant:</p> <ul style="list-style-type: none"> • Lingwood Primary Academy • Acle Academy <p>There are many other desire lines mentioned in the 67 submissions by members of the public.</p> <p>The present road structure, with the dominance of the A47, acts as a constraint on recreational cycling and Green (cycling) tourism. The Foreword to the "Norfolk Walking and Cycling Strategy" states: "We want to encourage visitors that add significantly to the economy whilst having a low impact on our overall costs. Both cyclists and walkers fit this criteria admirably. Both also have a low impact on the infrastructure and tend to spend proportionately more than some other types of tourist. In particular they spend locally providing much needed support for Small and Medium Enterprises (SMEs). Increased diversity in the range of tourist-specific interests helps to increase the diversity of SMEs." (see also tourism at 3.2.5</p> <p>Para 4.13 states: "The Lead Assessor shall conduct a site visit to the WCHAR study area during the assessment."</p> <ul style="list-style-type: none"> • Can Highways England provide details of the site visit and the mode of transport used 	<p>The Lead Assessor has visited the study area on a number of occasions, most recently on 21 and 22 June 2021, and is familiar with the existing walking and cycling routes in the immediate area.</p>

Reference	Written Representation	Applicant's Response
	<p>4.14, Liaison with key stakeholders. There is limited evidence of liaison with key stakeholders – the 67 private submissions make no reference to liaison with Highways England. Also there is no evidence of liaison with groups or organisations representing cyclists. The national cycling organisations, British Cycling and Cycling UK would be able to supply details of local clubs etc or a Google search would bring up many.</p> <p>Section 5. Walking, cycling and horse-riding review. (page 20).</p> <p>As we have pointed out above, the Review stage seems to have been undertaken after the detailed design work was started. which is not in accordance with Table 5.3.</p> <p>It is not possible to comment on paras 5.3.1 to 5.13 as we do not have the Assessment to refer to.</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p> <p>The WCHAR Review was completed at the end of the preliminary design. The detailed design has not yet commenced so full design information is not yet available. The package of walking and cycling improvements to be provided as part of the Scheme are shown in the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2).</p>
	<p>GG 119 Road Safety Audit</p> <p>WE have been unable to obtain a copy of the Road Safety Audit, Stage 1 - Completion of preliminary design, or Stage 2 – Completion of detailed design.</p> <p>These documents should be available at this time as they would be useful in establishing the safety for cyclists of the scheme.</p> <p>They will also be helpful in understanding the Walking, Cycling and Horse-riding review in particular the implications for cyclists safety.</p>	<p>The road safety audit process is carried out at various stages of the design, prior to opening and during operation, with a further assessment due to be carried out during detailed design early next year.</p>
5.1	<p>5 An alternative WCHR Assessment</p> <p>5.1 The WCHR area</p> <p>This area of Norfolk is dominated by the River Bure to the North and East and</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p>

Reference	Written Representation	Applicant's Response
	<p>the River Year to the South. There are roads crossing the Bure; the A1151 at Wroxham and the A1064 at Acle . Road crossings of the Yare are at the Southern Bypass at Postwick and the Reedham Ferry.</p> <p>There is a summer-time ferry for pedestrians and cyclists at Horning / Woodbastwick on the Bure and cyclists use the footway on Southern Bypass bridge at Postwick to cross the Yare.</p> <p>The landscape is open rolling countryside with few hills and many minor roads. The road network is dominated by the A47 which cuts the area in two on the east-west axis. In the sugar beet season, from October to February, the B1140, Wroxham to Cantley Road is dominated by HGVs and is avoided by cyclists (see Appendix A).</p> <p>Two railway lines pass through the area; Norwich to Sheringham and Norwich to Great Yarmouth and Lowestoft. There are railway stations at:</p> <ul style="list-style-type: none"> • Brundall Gardens • Brundall • Lingwood • Acle • Buckenham <p>A new station has been planned for Dussingdale to serve the Broadland Business Park area but it has been delayed in favour of more road construction on several occasions.</p> <p>The 5 km survey area begins at the Western edge (as the crow flies) just short of the important Postwick interchange on the A47, but includes part of the Norwich Northern Distributor Road (aka Broadland Northway), A1270. Further to the West, and strictly outside of the 5 km zone, is the NDR, and the Broadland Business Park.</p>	<p>Much of the information provided in the alternative WCHR assessment provided by Norwich Cycling Campaign is not directly relevant to the proposed Scheme. The DMRB standard GG 142 Walking, cycling and horse-riding assessment states at paragraph 4.7.1, page 16, (in relation to Table 4.7 Information requirements for large and small highway schemes) that "<i>The Lead Assessor should determine the appropriate quantity of the information to be captured, such that only information which can be used to help inform the highway scheme design is collated.</i>"</p> <p>To comply with the requirements of the National Networks National Policy Statement, the Applicant has sought to both mitigate the environmental and social impacts of the Scheme and provide improved facilities for users by incorporating a reasonable and proportionate package of improvements for walkers and cyclists.</p> <p>As part of the Environmental Impact Assessment, the Applicant has undertaken an assessment of the effects of the proposed Scheme on land-use and accessibility, which includes the effects on walkers, cyclists and horse-riders (WCH), in accordance with DMRB standard LA 112 Population and human health. LA112 of the Design Manual for Roads and Bridges recommends that the study area for the assessment of the effects on land use and accessibility shall comprise the construction footprint/project boundary plus a 500 metre area surrounding the project boundary. It goes on to state that where likely effects are identified outside of the 500 metre area, the study area should be extended accordingly.</p> <p>In identifying the package of walking and cycling improvements to be provided as part of the Scheme, the Applicant has been cognisant of extent of the likely effects.</p>
	<p>5.2 Intra modal sites</p> <p>The relevant WCHR area (5km around the scheme) includes the following:</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p>

Reference	Written Representation	Applicant's Response
	<p>West</p> <ul style="list-style-type: none"> Postwick interchange of the A47 and the NDR Cycleway on the East side the the A1270 Great Plumstead Little Plumstead Blofield Corner Blofield Heath <p>North</p> <ul style="list-style-type: none"> Paxworth Ranworth South Walsham Pilson Green Cargate Green Upton <p>East</p> <ul style="list-style-type: none"> Acle Acle Bridge Stokesbury Tunstall Halvergate <p>South</p> <ul style="list-style-type: none"> Blofield Brundall including the Cucumber Lane roundabout Lingwood Strumpshaw <p>To the south, and north of the A47 at the Postwick Interchange is a Park and Ride site.</p>	

Reference	Written Representation	Applicant's Response
5.3	<p>5.3 Dedicated cycling provision</p> <p>A hard surfaced cycleway runs south, parallel to the NDR, from the over-bridge on Middle Road to the signalised junction with Yarmouth Road. At this point the cycleway turns east to the junction with Church Road. This gives access to Brundall via Postwick Lane.</p> <p>This cycleway also runs parallel to the NDR, north from the over-bridge on Middle Road to Rackheath and beyond.</p> <p>The signalised junction at the NDR and Yarmouth Road has no provision for a direct northsouth cycle crossing to give access to the Park and Ride, or the cycleway which runs parallel to Yarmouth Road westward on the overbridge over the A47.</p> <p>This section of shared/cycleway gives access to the Meridian Business Park, the Broadland Business Park, St Andrews Business Park, the Yarmouth Road to Norwich, and the Green Pedalway to Norwich. Immediately beyond the roundabout (A1194/A1042) heading south west is a section of paved path leading down the A47 over the Yare where it connects with the maintenance footway on the bridge. This gives access to Whittlingham Country Park, County Hall, the Trowse area, and National Cycleway Route 1. This path has an ambiguous status as it not defined as a PROW, however a survey conducted by Norwich Cycling Campaign some years ago as part of the DCO Inquiry into the Postwick Interchange recorded 20 plus cyclists using this route in a morning.</p> <p>To the south of the signalised junction at the junction of the NDR and the Yarmouth Road is a recently constructed cycleway which leads south and then turns east to run parallel to the railway line to a junction with Oaks Lane to give access to Brundall. Although pleasant to ride along at the western side there is a steep incline at Cuttings Hill which can be avoided by using the Church Lane route.</p> <p>It is also possible for cyclists to use the exit road (heading east) from the Park</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p>

Reference	Written Representation	Applicant's Response
	<p>and Ride to the roundabout at Oaks Lane and the cycle path beside the A1042 (Yarmouth Road) to the junction with Church Lane and onwards to Brundall.</p> <p>Between Middle Road and the signalised junction at the junction of the NDR and the Yarmouth Road there is no crossing available to cyclists to access the Broadland Business Park. From time to time cyclists can be seen pushing their bikes on the grass verge northwards which indicates a desire line.</p> <p>As part of the construction of NDR, the minor roads at Smee Lane and Low Road, which were used by cyclists travelling west-east, were stopped up.</p> <p>Water Lane, which runs from Middle Road/Church Road, north-east to Little Plumstead has two unconnected sections of separated cycle way on the west side which lead to the junction with Hospital Road. The cycle way continues parallel to Hospital Road and turns left to continue north parallel beside Salhouse Road to Little Plumstead.</p> <p>Church Road leads south from Great Plumstead to the A47. This junction is impassable for cyclists wanting to continue south.</p> <p>The junction between Hall Road and the A47 is indicate as a track which purports to connect with the bridleway/track running east parallel to the A47 to join Cucumber Lane for access to Brundall. This junction is too dangerous for cyclists to cross.</p> <p>The roundabout at Cucumber Lane is the subject of consideration by Norfolk County Council at the present time for "improvement". At present this roundabout offers no advantage to cyclists and my recent attempt to navigate around it following the advice given in "Bikeability" training resulted in threatening behaviour by motorists.</p> <p>Until the late 1950s, there was a ferry at Coldham Hall connecting Surlingham to Brundall railway station. There was talk of reviving this ferry in 2009. There is potential for a hand cranked ferry (following the Dutch design) which is worthy of further investigation as there is no proper crossing of the Yare available for</p>	

Reference	Written Representation	Applicant's Response
	<p>cyclists between Carrow Bridge in Norwich and Reedham Ferry (approx 15 miles by road). It would also connect with National Cycle Route 1 at Surlingham.</p> <p>The present north south junction of the A47, High Noon Lane and Hamblington Road is almost impossible for cyclists to navigate.</p> <p>The next section of the present A47 is too dangerous for cyclists, as are the junctions at Lingwood Road, Dell Corner Lane and the eastern exit from Main Road to the A47. The crossing at Lingwood Lane has been stopped up, thus severing the connection between North Burlingham, Lingwood and the railway station.</p> <p>The next junction at the South Walsham Road (B1140) and Acle Road is dangerous for cyclists at anytime and is particularly intimidating during the Sugar Beet Campaign from October (see Appendix A).</p>	
5.4	<p>5.4 West-East strategic cycle route</p> <p>The basis of strategic west-east cycle routes already exist. The Green Pedalway runs from the centre of Norwich to Broadland Business Park and there are cycleways and minor roads that lead to the centre of Brundall. The minor road network then leads to Blofield (to connect with the proposed scheme through North Burlingham and north over the North Street/Plantation Road to link with the cycleways described above at 5.3 above. It would also connect with Project 2: Burlingham Trails Cycling and Walking Routes and Project 4: Long Distance Cycle Loop described in the East Broadland Green Infrastructure Plan.</p> <p>An alternative route would be through Strumpshaw and Lingwood and using the proposed under-pass to North Burlingham. It would also offer a route through Freethorpe to the ferry crossing at Reedham</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p>
5.5	<p>5.5 The strategic cycle route on the A47</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous</p>

Reference	Written Representation	Applicant's Response
	<p>At approximately 500 metres east of the point where the Main Road (North Burlingham) joins the present A47 there is a lay by (the original Yarmouth Road) of about 430 metres and at an additional 70 metres is The Wendles (a road running north-south). The junction of The Wendles must present a safety hazard for vehicles on the proposed dual carriageway. Traffic wishing to turn left into The Wendles must slow down as this is a dead 90 degree turn and this risks shun collisions. Similarly traffic exiting The Wendles will enter the 70mph traffic stream on the A47 and present a risk of collisions. I have been reminded by friends of the problems with the Station Road junction on the A47 at Hethersett after the dual carriageway was opened.</p> <p>If The Wendles was stopped up it could present an opportunity for an ingenious design to allow cyclists to use this route to Acle.</p> <p>At 400 metres on The Wendles, on the right is Mill Lane (bridle way), which connects to the centre of Acle. The surface of Mill Lane is poor having been damaged by motor vehicles. Mill Lane gives a direct connection to Acle Academy and the centre of Acle.</p> <p>On the Great Yarmouth Cycle map 2017, a Green cycle route is shown through Acle along the A1064, passing over Acle bridge and turning right to Stokesby, Runham and Caister to Great Yarmouth.</p> <p>Thus we have a strategic route from Norwich to Great Yarmouth</p>	<p>comments (REP2-012).</p>
5.6	<p>5.6 "Green Tourism"</p> <p>In the south west of the area there are tourist attractions which are accessible by cycle.</p> <p>Strumpshaw Fen is a nature reserve managed by the Royal Society for the Protection of Birds, and offers free entrance to cyclists. It is situated at Strumpshaw on the River Yare in the English county of Norfolk around 6 miles east of Norwich. The Buckenham Marshes RSPB reserve borders the reserve to the east.</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p>

Reference	Written Representation	Applicant's Response
	<p>Strumpshaw Hall Steam Museum, at Old Hall, Strumpshaw, Norwich NR13 4HR, is an attraction easily reached by cycle.</p> <p>The marinas on the Yare south of Brundall could benefit from a cycle path connection to the railway station and the centre of the village. The potential of a ferry to Surlingham has been covered above in 5.3.</p> <p>The issue of the link between North Burlingham and Lingwood is covered in Section Policy Broadland, as are the other significant cycle based projects at 3.3 Policy Broadland District Council</p>	
6	<p>6 The plans for the North Burlingham overbridge</p> <p>We refer to the documents Drawing Numbers:</p> <ul style="list-style-type: none"> • HE551490-GTY-LSI-000-DR-ZL-30001 to 30008 inclusive [WORKS PLANS REGULATION 5(2)(j)] • HE551490-GTY-EPC-000-DR-CH-30001 to 30007 inclusive [RIGHTS OF WAY AND ACCESS PLANS REGULATION 5(2)(k) and 5(2)(o)] • HE551490-AME-HGN-BBFXB-DR-HE-0102 [A47 CORRIDOR STAGE 1] <p>If these drawings have been amended or superseded we would like to have sight of the current drawings.</p>	<p>The documents are as follows:</p> <ul style="list-style-type: none"> • Works Plans (APP-006) • Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2) – submitted at Deadline 3. <p>The document HE551490-AME-HGN-BBFXB-DR-HE-0102 [A47 CORRIDOR STAGE 1] has been superseded by the information in the application.</p>
6.1	<p>6.1 “Gear change” 27 July 2020</p> <p>It has been suggested that this policy document applies only to the urban environment however, the following statement is on page 24:</p> <p>“We will ensure that new local and strategic A road schemes include appropriate provision for cycling</p> <p>The new cycling budget is the largest sum ever committed to active travel in this country. But if we are serious about putting cycling at the heart of transport policy, we must further shift the balance between projects for motoring and projects for cycling.</p>	<p>See the response provided above in relation to Gear Change.</p>

Reference	Written Representation	Applicant's Response
	<p>To receive Government funding for local highways investment where the main element is not cycling or walking improvements, there will be a presumption that all new schemes will deliver or improve cycling infrastructure to the new standards laid down, unless it can be shown that there is little or no need for cycling in the particular road scheme. “</p> <p>“Gear Change”, page 21 Diagram design principles –</p> <ul style="list-style-type: none"> • Cyclists must be separated from volume traffic, both at junctions and on the stretches of road between them.[a] • Cyclists must be separated from pedestrians.[b] • Cyclists must be treated as vehicles, not pedestrians.[c] • Routes must join together; isolated provision are of little value.[d] • Routes must feel direct, logical and be intuitively understood by all road users.[e] • Routes and schemes must take account of how users actually behave.[f] • Purely cosmetic alterations should be avoided.[g] • Barriers, such as chicane barriers and dismount signs should be avoided.[h] • Routes should be designed only by those who have have experience on the road on a cycle.[i] <p>These principles will be referred to as in comments below. See also Appendix pages 40 – 48; 22 principles derived from LTN 1/20 (see below).</p> <p>Page 25 We will make sure the railways work better with cyclists Cycles and trains should be ideal partners, complementing each other and extending the range of both. Cycling can make public transport journeys door-to-door, matching the convenience of the car. We will invest substantial sums on safe cycle routes to stations, particularly in commuter towns such as Guildford, and increase cycle storage at stations, including at city-centre termini, where it is currently limited.</p> <ul style="list-style-type: none"> • The links to the stations have been dismissed by Highways England – can they explain how their policy is superior to Government policy 	

Reference	Written Representation	Applicant's Response
	<p>Page 31 Funding only schemes which meet the new standards We will not fund or part-fund any scheme that does not meet the new standards and principles described in theme 1 and in the Appendix. We will not allow any other agency or body to fund such schemes using any of our money.</p> <ul style="list-style-type: none"> How does Highways England justify the expenditure of many millions on these proposals that do not meet the new standards 	
6.2	<p>6.2 Cycle Infrastructure Design Local Transport Note 1/20 July 2020</p> <p>To effectively apply this guidance those designing cycling and walking schemes should have an appropriate level of experience and training. An example would be the Institute of Highway Engineers' Professional Certificate & Diploma in Active Travel that allows applicants to demonstrate their experience and produce work to the required standard.</p> <ul style="list-style-type: none"> Can highways England provide information on the appropriate level of experience and training relating to the designers of this schemes/ <p>LTN 1/20 1.5 Core design principles 1.5.1 There are five core design principles which represent the essential requirements to achieve more people travelling by cycle or on foot, based on best practice both internationally and across the UK. 1.5.2 Networks and routes should be Coherent; Direct; Safe; Comfortable and Attractive. Inclusive design and accessibility should run through all five of these core design principles. Designers should always aim to provide infrastructure that meets these principles and therefore caters for the broadest range of people.</p> <p>Figure 1.1: Core design principles</p> <p>Coherent Cycle networks should be planned and designed to allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality.</p>	<p>See the response provided above in relation to the experience of the Lead Assessor.</p> <p>LTN 1/20 applies to local highway schemes as indicated in paragraph 1.1.1, which states that:</p> <p><i>"Local authorities are responsible for setting design standards for their roads. This national guidance provides a recommended basis for those standards based on the overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and in particular, when applying for Government funding that includes cycle infrastructure."</i></p> <p>Guidance for strategic roads is provided by DMRB standards, namely, CD 143 Designing for walking, cycling and horse-riding (for shared use facilities) and CD 195 Designing for cycle traffic (for cycle only schemes). However, it is acknowledged by the Applicant that there is a grey area where the Strategic Road Network interacts with the local highway network.</p> <p>The Applicant has been cognisant of the guidance provided in LTN 1/20 and DMRB standards when identifying the package of Walking, Cycling and Horse-riding improvements for the Scheme.</p>

Reference	Written Representation	Applicant's Response
	<p>Direct Cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles.</p> <p>Safe Not only must cycle infrastructure be safe, its should also be perceived to be safe so that more people feel able to cycle.</p> <p>Comfortable conditions for cycling require routes with good quality, well maintained -smooth surfaces, adequate width for the volume of users, minimal stopping and starting and avoiding steep gradients.</p> <p>Attractive Cycle infrastructure should help to deliver public spaces that are well designed and finished in attractive materials and be places that people want to spend time using.</p>	
6.3 (6.3.1)	<p>6.3 The North Burlingham Bridge</p> <p>This document refers to drawing. HE551490-GTY-EPC-000-DR-CH-30007 6.3.1</p> <p>Origins of the design</p> <p>I is not clear how and when the design originated. As far as can be understood so far the design was probably established before the Assessment stage (if it was ever undertaken) was available and the process was not in accordance with WCHR process summary (p 6 GG142).</p> <p>This proposal does not support the strategic cycle route from Norwich to Great Yarmouth as described at section 5 WCHR alternative. The requirement in GG142, Table B.9 p 26 “Strategic Opportunities” applies here.</p> <p>There does not appear to be an acknowledgement of the danger (real and perceived) to cyclists of the large numbers of HGVs using this junction – see appendix A.</p> <p>The proposal does not meet the requirements of DMRB CD 143 and CD 195. It</p>	<p>The Applicant submitted the Walking, Cycling and Horse-Riding Assessment and Review at Deadline 2 in response to previous comments (REP2-012).</p> <p>LTN 1/20 applies to local highway schemes as indicated in paragraph 1.1.1, which states that:</p> <p>“Local authorities are responsible for setting design standards for their roads. This national guidance provides a recommended basis for those standards based on the overarching design principles and 22 summary principles. There will be an expectation that local authorities will demonstrate that they have given due consideration to this guidance when designing new cycling schemes and in particular, when applying for Government funding that includes cycle infrastructure.”</p> <p>Guidance for strategic roads is provided by DMRB standards, namely, CD 143 Designing for walking, cycling and horse-riding (for shared use facilities) and CD 195 Designing for cycle traffic (for cycle only schemes). However, it is acknowledged by the Applicant that there is a grey area where the Strategic Road Network interacts with the local highway network.</p>

Reference	Written Representation	Applicant's Response
	falls short of the statements of Government policy set out in "Gear Change" and "LTN 1/20" (see above). It does not meet the standards set out in "Greater Norwich Local Cycling and Walking Infrastructure Plan".	The Applicant has been cognisant of the guidance provided in LTN 1/20 and DMRB standards when identifying the package of Walking, Cycling and Horse-riding improvements for the Scheme.
6.3.2	<p>6.3.2 DMRB CD143 p8 2 General Design principals</p> <p>Coherence and Directness The proposal does not link trip origins and destinations giving an advantage in terms of distance and journey time:</p> <ul style="list-style-type: none"> • Lingwood and Acle railway stations • Reedham Ferry • Schools at Lingwood and Acle • Acle local economic centre <p>Comfort and Attractiveness The proposal does not offer comfort or attractiveness for cyclists. They will have to ride on what appears to be a segregated cycle path, beside a road with up to 700 HGVs a day (for half the year). They will be subjected to risk of injury from overruns. They will be subject to air and noise pollution, aggravated by the HGVs climbing up to the bridge, with gear changes, manoeuvring etc</p> <p>Safety The B1140 is a no-go area for cyclists for six months of the year due to the large numbers of HGVs using this road (see Appendix A – HGVs and cyclists). Cyclists will be required to cross the carriageway at the exit road to the new A47 (indicated by SU10 and SU11 on the plan). CD 195 p 24, Table E4/4.1 sets out the requirements for cycle crossings and indicates that a signal controlled crossing will be required. After a few metres cyclists will be required to rejoin the carriageway which they will have to share with 700 HGVs a day before turning left (and crossing the carriageway on Acle Road to access Lingwood. Although Highways England may argue that this plan is safe for cyclists it is the perception of safety that really matters if the Government's policy to increase cycling is to be met.</p> <ul style="list-style-type: none"> • How does this plan address the fact that about two thirds of the 	<p>The package of walking and cycling improvements proposed as part of the Scheme is proportionate and accords with the general design principles for cycling as far is reasonably practical.</p> <p>With regard to coherence and directness, the issue of connectivity to the railway station, Lingwood primary school, Acle Academy and Acle itself have be addressed as part of the Scheme, as outlined in Appendix A of the Applicant's Response to Relevant Representations (REP1-060). The Scheme also provides a cycle track adjacent to the section of the A47 to be de-trunked providing a direct east to west connection between Blofield and North Burlingham. Consideration of a linkage to Reedham Ferry lies outside of the scope of the Scheme.</p> <p>Air pollution and noise pollution are assessed and reported in the ES Chapter 5 Air Quality (APP-043) and Chapter 11 Noise and Vibration (REP1-028).</p> <p>The methodology is in accordance with DMRB and the assessment includes impacts from HGVs and PM2.5 and PM10.</p> <p>The proposed cycle tracks will be segregated from the running carriageway, thereby avoiding the need for cyclists to mix with general traffic. The cycle tracks will be constructed with an appropriate bituminous macadam surface to ensure their comfort for cycling.</p> <p>With regard to safety at the B1140 junction, the proposed cycle track will be segregated for the running carriageway of the B1140 and an appropriate level of separation will be provided in accordance with the proposed 30mph speed limit. The cycle track will provide a safe route for pedestrians and cyclists to cross the new A47.</p>

Reference	Written Representation	Applicant's Response
	<p>population think that the roads are too dangerous to cycle on?</p> <ul style="list-style-type: none"> Would you allow an unaccompanied 12 year old to use this bridge? 	<p>A signal-controlled crossing is not the preferred crossing type where cyclists are required to cross the carriageway at location SU10/SU11 on Sheet 6 of the Rights of Way and Access Plans (TR010040/APP/2.4 Rev 2). The need for the preferred form of crossing facility will be investigated as part of the detailed design and will have regard to the rural nature of the crossing location and the low numbers of pedestrians and cyclists anticipated.</p>
7	7 Appendix A HGVs and cyclist's safety	
7.1	<p>7.1 Policy statements</p> <p>2Gear change2 27 July 2020 Page 39 We will mandate higher safety standards on lorries. A highly disproportionate number of cyclists are killed and seriously injured by lorries.</p> <p>2Cycling Strategy Our Approach2 Highways England 2016 Consider how we can improve cycling safety across a broad range of initiatives, such as improving cycling safety measures for construction vehicles working on our network.</p>	<p>An Outline Traffic Management Plan has been submitted as part of the Application (REP1-050).</p> <p>This Plan sets out that one of the main traffic management objectives during the construction period is:</p> <ul style="list-style-type: none"> <i>to ensure the safety of road users (including non-motorised users) as they approach and travel through sections of the A47 and other routes affected by roadworks</i> <p>This Plan is secured by requirement 10, Traffic management, to the Draft DCO (TR010040/APP/3.1 Rev 2).</p>
7.2	<p>7.2 Cantley sugar beet factory</p> <p>During the Sugar Beet Campaign, October to February, large numbers of HGVs arrive at the Cantley sugar beet factory via the A47; some use the South Walsham Road (B1140). We have heard that more HGV drivers may choose to use the B1140 from the junction with the A1150 via the roundabout due to the congestion at the roundabout junction with the A1270 NDR.</p> <p>"I can confirm that at the peak of our operational period, we potentially have up to 500 Beet delivery lorries per day, and a further 200 lorries per day for items such as Sugar Collection, Liquid Sugar Collection, Animal Feeds Collection and Various Deliveries."</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>

Reference	Written Representation	Applicant's Response
	<p>Email British Sugar to Ms C. Pye (Chair N Burlingham and Lingwood PC) 27 May 2021</p> <p>This could mean 1400 HGVs per day using the North Burlingham over-bridge: about one per minute in each direction, not comfortable for cyclists.</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> <p>According to the 2019 October data around 700 2-way HGV vehicles were recorded along the B1140 over a 12-hour period (07:00-19:00). This demand has been included in the VISSIM operational assessment.</p> <p>Furthermore, according to the 2019 survey data the dominant movement for B1140 HGV demand is to/from the A47. Overall, only about 10% of this HGV demand is B1140 through traffic which would travel across the A47 over bridge.</p>
7.3	<p>7.3 Large scale construction projects involving HGV movements There are a number of large scale construction projects, planned in Norfolk, with time scales that could overlap, or have knock on effects, including:</p> <ul style="list-style-type: none"> • Western Extension to the NDR • Thickthorn Interchange • Dualling of the A47: <ul style="list-style-type: none"> ◦ Kings Lynn area ◦ N Burlingham ◦ Tuddeham to Easton • New Bridges at Great Yarmouth and Lowestoft • Colmans site redevelopment in Norwich • 10,000 houses NE of Norwich (see below) • Offshore electricity distribution network • Long Stratton bypass • County Hall renovation • Food Enterprise Park Easton <p>The transport plan for these projects will probably be approved by the District authority but We can find no evidence that Norfolk County Council, as the Transport Authority, have an overall plan.</p>	<p>The ES Chapter Cumulative effects Assessment (APP-053) considers cumulative effects in accordance with DMRB LA 104 and the Planning Inspectorate Advice Note Seventeen.</p> <p>The assessment includes other developments in consultation with Norfolk County Council, Suffolk County Council and Broadland District Council.</p>

Reference	Written Representation	Applicant's Response
	<p>There are two railheads for aggregates and other construction materials in the Norwich area:</p> <ul style="list-style-type: none"> • Thorpe Station, Carrow Road Norwich • Former Trowse Station, Bracondale, Trowse <p>These two sites feed HGVs onto the local road network which then leads to the Southern bypass and the Northern Distributor Road.</p> <p>There are many important junctions and roundabouts which are already overloaded at peak times that could be affected. Most of these junctions and roundabouts do not have crossings for cyclists which meet the standards set out in the Design Manual for Roads and Bridges and Local Transport Note 1/20</p>	
7.4	<p>7.4 Cycling UK Campaigns Briefing on Goods Vehicles January 2018</p> <p>Heavy goods vehicles (HGVs) account for only around 3.6% of non-motorway motor traffic mileage on British roads, yet are involved in around 17.5% of cyclist fatalities. HGVs on average account for around 2% of urban and 5% of rural motor traffic, yet are involved in almost a quarter of cyclist urban fatalities and just over 12% of cyclist rural fatalities.</p> <p>Cyclists' collisions with HGVs are far more likely to prove fatal than those involving cars: the cyclist is killed in about a fifth of serious injury cyclist/HGV collisions. This figure is around 2% for cyclists/cars.</p> <p>The figures for rural roads should be noted.</p>	No response required
7.5	<p>7.5 Vehicle speed compliance 2020</p> <p>DfT figures for 2020 (DfT. Vehicle speed compliance statistics for GB: 2020. July 2021) Table 1: Proportion of vehicles exceeding the speed limits by road class</p>	No response required

Reference	Written Representation	Applicant's Response															
	<table border="1"> <thead> <tr> <th></th><th>Articulated HGVs</th><th>Rigid HGVs</th></tr> </thead> <tbody> <tr> <td>Motorways</td><td>2</td><td>..</td></tr> <tr> <td>National Speed Limit</td><td>35</td><td>41</td></tr> <tr> <td>Single Carriageways</td><td></td><td></td></tr> <tr> <td>30mph roads</td><td>46</td><td>49</td></tr> </tbody> </table> <p>These latest figures are a stark reminder of the danger that HGVs present to cyclists</p>		Articulated HGVs	Rigid HGVs	Motorways	2	..	National Speed Limit	35	41	Single Carriageways			30mph roads	46	49	
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7.6	<p>7.6 Operation Tramline, Norfolk 4-6 May 2021 report in local newspaper</p> <p>Police in Norfolk stopped 125 vehicles (including 43 HGVs and 63 LGVs) on the A47 and A11, and detected 191 offences, between Tuesday 4 May and Thursday 6 May.</p> <p>A total of 191 Traffic Offence Reports were issued:</p> <ul style="list-style-type: none"> • 36 for not wearing a seatbelt • 72 for construction and use • 14 for using a mobile phone • 36 for an insecure load • 12 weight offences • 4 for no insurance or no licence • 10 for number plate offences • 2 for driving without due care and attention • 5 for excess speed <p>Again these figures show the risks to cyclists/</p>	No response required															
7.7	<p>7.7 Cyclists and HGVs air and noise pollution</p> <p>The information above sets out the physical risks that HGVs present to cyclists but there are two other risks which should be taken into account; air pollution and noise pollution.</p>	<p>Air pollution and noise pollution are assessed and reported in the ES Chapter 5 Air Quality (APP-043) and Chapter 11 Noise and Vibration (REP1-028).</p>															

Reference	Written Representation	Applicant's Response
	<p>HGVs are significant contributors to air pollution in particular PM 2.5 and PM10 – WHO states that there is no safe level for Particulate Matter.</p> <p>Noise could be a problem on the Burlingham bridge with HGVs climbing the incline and turning bends.</p> <p>Although it may be claimed by road engineers that there is no risk from air and noise pollution these two pollutants affect the comfort and experience of cyclists. Cyclists will avoid riding in areas where this problem exists.</p> <p>An of course it breaches the Core principles (CD 143 2.1.2 p 8) of:</p> <p>Attractiveness – noise reduction</p> <p>Safety – how safe the environment is</p> <ul style="list-style-type: none"> We are not qualified to give evidence on these matters but the Examining Authority may consider seeking advice from suitably qualified experts. 	<p>The methodology is in accordance with DMRB and the assessment includes impacts from HGVs and PM2.5 and PM10.</p>
7.8	<p>7.8 Real and perceived danger to cyclists</p> <p>We know from a number of surveys that about two thirds of people in the UK think that the roads are too dangerous to cycle on.</p> <p>If the Government is to meet it's target for increasing cycle use then this issue must be addressed.</p> <p>HGVs frighten people, even those who are not aware of the facts as set out in 7.4, 7.5 and 7.6 above.</p> <ul style="list-style-type: none"> What steps have Highways England taken to address the issue of perceived danger in the plans 	<p>The shared use cycle tracks to be provided as part of the Scheme will be designed in accordance with the DMRB standard CD 143 in terms of their width and levels of separation from the running carriageways of the adjacent roads.</p>
7.9	<p>7.9 The Clocs Scheme for construction industry vehicles</p> <p>HGVs are disproportionately involved in collisions with Vulnerable Road Users. In 2015, HGVs comprised only 4% of urban traffic miles in London but involved with 20% of pedestrian fatalities and 78% of cyclist fatalities; HGVs were involved in 53% of Vulnerable Road User fatalities across Great Britain in 2016.</p> <p>Contrast that with the 30 fatalities on all UK construction sites. Considerable and sustained corporate and regulator effort has seen fatalities and reportable injuries on construction sites fall significantly from 154 in 1990, to 105 in 2000 to 30 in 2016.</p>	<p>Galliford Try are Champions of the CLOCS Scheme.</p> <p>A CLOCS Champion commits to:</p> <ul style="list-style-type: none"> Sharing a clear plan to get most of its sites and/or fleet operating centres to be CLOCS compliant within two years Encouraging other organisations to adopt the CLOCS Standard Strongly advising its key supply chain partners to also become CLOCS Champions <p>CLOCS Champion members are party to the CLOCS Memorandum</p>

Reference	Written Representation	Applicant's Response
	<p>Over half (54%) of the 463 vulnerable road users that were Killed or Seriously Injured in collisions with HGVs were injured on urban roads in 2016 – compared to just 17% of other</p> <p>KSI casualties in the same collisions</p> <p>Local authorities already have powers to regulate lorry traffic. Under the Road Traffic Regulation Act 1984, they can introduce lorry control measures such as weight and loading restrictions or restrictions/prohibitions on movements by vehicles of certain widths, heights and weights, in certain streets/areas, at certain times of day etc. They can also insist on limiting lorry movements as part of the conditions for planning permission for construction depots and sites, and new developments.</p> <p>CLOCS is a national Standard that requires all stakeholders in construction to take responsibility for health and safety beyond the hoardings.</p> <p>It demands collaborative action to prevent fatal or serious collisions between vehicles servicing construction projects and vulnerable road users: pedestrians, cyclists, and motorcyclists.</p> <p>CLOCS Standard, Version 3, January 2019 states:</p> <p>Regulators (particularly planning and highways authorities) shall</p> <ul style="list-style-type: none"> • embed the requirement to operate to the CLOCS Standard into policy and guidance documents • ensure the planning process requires submission and approval of an outline and/or detailed CLP that addresses the main transport impact/risks in delivering the project safely before consent is granted] • require a project to have effective CLOCS implementation monitoring mechanisms and to provide to the authority (if requested) CLOCS compliance performance data • have in place effective enforcement mechanisms to secure prompt action by the project team should a breach occur 	<p>of Understanding and CLOCS Terms of Reference.</p>

Reference	Written Representation	Applicant's Response
	<p>The objectives of the scheme are:</p> <ul style="list-style-type: none"> • Zero collisions between construction vehicles and the community • Improved air quality and reduced emissions • Fewer vehicle journeys • Reduced reputational risk <p>The London Borough of Camden saw a 47% reduction over two years when it implemented CLOCS, though absolute cause-effect cannot yet be proved.</p> <p>Norfolk County Council and Highways England could implement the Clocs scheme at minimal costs to themselves.</p> <p>All information above relating to the CLOCS scheme, except as stated, is taken from: CLOCS The Crown Estate Summary Report, [No date but c. 2020]</p> <ul style="list-style-type: none"> • Have Highways England adopted the CLOCS scheme please give reasons if not adopted. 	

8 ANGLIAN WATER SERVICES LIMITED (REP2-020)

Reference	Written Representation	Applicant's Response
Submission ID: 3451	<p>Anglian Water Services Limited (Anglian Water) is in active discussion with Highways England regarding the form of modified protective provisions within the DCO. These discussions include the approach to be taken to the A47 Blofield scheme and 4 other NSIP projects (A428 Black Cat, A47 Tuddenham, A47 Thickthorn and A47 Wansford). We note that Book of Reference identifies some 71 plots of land where Anglian Water assets will need to be moved or protected during construction of the project. Anglian Water is submitting this Written Representation in agreement with Highways England to ensure clarity on our position as a utility provider and occupier affected by the proposed scheme and so to assist the Examining Authority. This follows written advice from PINS on 12 July that as a statutory consultee Anglian Water could make Written Representations without the need to submit Relevant Reps. Anglian Water has no in principle objection to the scheme and seeks to ensure that through the agreement of protective provisions, we continue to provide customers with uninterrupted water and wastewater services during construction and then the operation of the scheme. The issues on which we are in discussion with Highways England on this and other Highways England applications include:</p> <ol style="list-style-type: none"> 1. Definitions, in particular apparatus. 2. The application of NRSWA and specifically where it applies, notification(s) to Anglian Water. 3. Anglian Water's facilities and rights when alternative apparatus has been constructed and is in operation to our reasonable satisfaction. 4. Step in rights for approved works and notification. 5. Clarity regarding the undertakers works near to or which affect Anglian Water apparatus in part to assist the undertaker in flagging and so minimise the risk of damage by Highways England's contractors. 6. Time limits being able to be altered by written agreement between the undertaker and Anglian Water. 7. Safeguards to ensure emergency works on our apparatus by the undertaker are carried using best endeavours to keep the impact of those emergency works on Anglian Water's apparatus and network on end- 	<p>The Applicant is working with Anglian Water Services to reach agreement on the Protective Provisions included as Schedule 9 Part 1 to the Draft DCO (TR010040/APP/3.1 Rev 2).</p>

Reference	Written Representation	Applicant's Response
	<p>users/Anglian Water customers to a minimum.</p> <p>8. Tightening up references so that paragraphs are self- contained were possible including when we incur expense on the undertaker's behalf.</p> <p>9. Costs as a result on the undertaker's scheme which necessitate the provision of new Anglian Water infrastructure.</p> <p>10. Ensuring definitions provide for adequate compensation following damage to Anglian Water's network by the undertaker.</p> <p>11. The processes for exchange of documentation and requests by Anglian Water.</p> <p>12. Pre - construction surveys and a Memorandum of Understanding on stage payments to Anglian Water with reconciliation at the end or works. With reference to the project timescales set out in Environmental Management Plan and Table 1-1 in that Plan, Anglian Water would welcome these steps - to assist scheme collaboration and to reduce potential abortive costs - being included with the scheme Implementation Plan developed during the NSIP determination process.</p>	

APPENDIX A - CLIMATE EMERGENCY POLICY AND PLANNING (REP2-018)

Paragraph	Written Representation text	Comment
39	"the study area chosen for the traffic and carbon modelling of the A47BNB is irrational"	<p>The assessment follows DMRB LA 114 (paragraph 3.9) ensuring that the assessment of operational road user GHG emissions is consistent with the Affected Road Network (ARN) defined by the project's traffic model. This model (described in ES Chapter 5 – Air Quality (REP1-022)) uses the screening criteria outlined in DMRB LA 105 and models road likely to be impacted by the Proposed Scheme meeting the following criteria:</p> <ul style="list-style-type: none"> • An annual average daily traffic (AADT) flow change of 1,000 or more • A heavy duty vehicle (HDV) flow change of 200 or more • A change in speed band • A change in carriageway alignment by greater than 5m <p>Once road links triggering this criteria have been identified, all adjoining roads within 200m are also required to be selected.</p>
51-54 and Table 1	Various comments regarding PAS 2080	<p>Figure 7 in PAS 2080 (2016) Carbon Management in Infrastructure shows the structure for reporting on construction products, processes and services. Table 1 of your Written Response has stated that land-use and land-clearance is part of module A-5 (Construction/installation process). Annex A5 of PAS 2080 states that land use change is not included in the categories of capital, operational and user carbon as they could be classed as capital or operational carbon. Further, Table A 2 (Annex A6) of PAS 2080 provides the boundary of the construction process stage (Module A5) which does not include 'land-use emissions from land-clearance' in the construction site works activities.</p>
121	The applicant has not assessed cumulative, and in-combination, carbon emissions in breach of the EIA regulations.	<p>The purpose of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 is to ensure that the decision-maker has adequate information on likely significant effects of a proposed development to take into account in determining an application. The environmental information provided informs the consenting process. The appropriate scale at which the cumulative assessment should be provided for the DCO application is advised in the NPS NN and it is in the context of the carbon budgets. The Applicant have provided the information on carbon emissions that are relevant for the decision-making process as advised in the NPS NN.</p>
122	Further our detailed technical appraisal shows that, now, with the current assessment and modelling architecture of	<p>The NPS NN sets out the approach to the evaluation of the carbon effects of the Proposed Scheme.</p>

Paragraph	Written Representation text	Comment
	NCC and the Applicant, <u>it is not possible to coherently or reliably assess the cumulative carbon emissions related to this scheme and other planned schemes in the Greater Norwich area.</u> NCC and the Applicant are running models over a hotch-potch of “study areas”, NATS model baseline years, model configuration, precluding any coherent in-combination assessment of carbon emissions between and across the schemes.	
123	As the EIA regulations, and Highways England's own license, require such a cumulative environmental assessment, the Applicant must – in consultation with NCC – indicate how they will adapt the assessment and modelling architecture so that a robust and safe cumulative carbon emissions assessment may be carried out.	Please see above. The Applicant has provided the information that is required in the context of the decision-making process defined by the NPS NN.
124	No national level cumulative assessment has been made at least the 50 major road schemes under the RIS2 scheme, and also the array of road schemes under Large Local Major funding programme which includes the Norwich Western Link (NWL) in the Greater Norwich area. This is contrary to Highways England license section 5.23©. It is also under consideration by the High Court following a judicial review.	The High Court dismissed the application for permission to judicially review RIS2 and makes clear in the judgment handed down on 26 July 2021 that it rejected the arguments advanced by the claimants.
125	The legal status and scope of the NPSNN needs to be clarified to PINS and the parties at the Examination by the NPSNN.	The Planning Act 2008, section 104 applies to decision-making in cases where a national policy statement has effect. The current scheme is such a case. The Secretary of State is required to decide the application in accordance with the NPS NN, except to the extent that one of four subsections applies. It is not considered that any of these apply in the current case. Further, in a written statement made on 22 July 2021 the Secretary of State for Transport confirmed that the NPS NN remains relevant Government policy pending a

Paragraph	Written Representation text	Comment
		<p>review that is expected to conclude in 2023:</p> <p>"The current National policy statement (NPS) on national networks, the government's statement of strategic planning policy for major road and rail schemes, was written in 2014 – before the government's legal commitment to net zero, the 10 point plan for a green industrial revolution, the new sixth carbon budget and most directly the new, more ambitious policies outlined in the transport decarbonisation plan.</p> <p>While the NPS continues to remain in force, it is right that we review it in the light of these developments and update forecasts on which it is based to reflect more recent, post-pandemic conditions, once they are known.</p> <p>The aim is to begin the review later this year and for it to be completed no later than spring 2023. This review will include a thorough examination of the modelling and forecasts that support the statement of need for development and the environmental, safety, resilience and local community considerations that planning decisions must take into account.</p> <p>Reviewing the NPS will ensure that it remains fit for purpose in supporting the government's commitments for appropriate development of infrastructure for road, rail, and strategic rail freight interchanges.</p> <p>While the review is undertaken, the NPS remains relevant government policy and has effect for the purposes of the Planning Act 2008. The NPS will, therefore, continue to provide a proper basis on which the Planning Inspectorate can examine, and the Secretary of State for Transport can make decisions on, applications for development consent."</p> <p>https://questions-statements.parliament.uk/written-statements/detail/2021-07-22/hcws235</p>