

A47 Blofield to North Burlingham Dualling

Scheme Number: TR010040

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9.21 Applicant's Response to Deadline 4 Submissions

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

Planning Act 2008

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

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Deadline 5

Infrastructure Planning

Planning Act 2008

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

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

APPLICANT'S RESPONSE TO DEADLINE 4 SUBMISSIONS

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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 Deadline 4 submissions by other parties. It also sets out a response to the Deadline 3 submission by Lingwood and Burlingham Parish Council.

2 BROADLAND DISTRICT COUNCIL (REP4-054)

Reference	Deadline 4 submission	Applicant's Response
	<p>Issue Specific Hearing 1 – Draft Development Consent Order (dCO) - Tuesday 17 August 2021 Item 11.</p> <p>Broadland District Council considers that the general arrangement plans, which do not include details of elevations/sections/design/materials of the structures, would be insufficient for the purposes of R3.</p>	<p>Requirement 3 refers to the Works Plans (REP4-003) and the Engineering Drawings and Sections (REP4-005). The Engineering Drawings and Sections include full and adequate details of elevations and sections for the purposes of the APFP Regulation 5(2)(o), 5(2)(p) and 6(2) and include a level of detail commensurate if not greater than other DCOs.</p> <p>Notwithstanding Broadland District Council's comments, the fixing of the design of the scheme against what is shown on the engineering drawings and sections only is well rooted and established in precedent, in orders such as the A19 Downhill Lane Junction Development Consent Order 2020, the A19/A184 Testo's Junction Alteration Development Consent Order 2018, the A19/A1058 Coast Road (Junction Improvement) Development Consent Order 2016 and the A14 Cambridge to Huntingdon Improvement Scheme Development Consent Order 2016.</p>

3 CLIMATE EMERGENCY PLANNING AND POLICY (REP4-057)

The Written Representation submitted at Deadline 4 has been examined and the 18 non-compliance issues raised have been responded to in the following table.

Reference	Deadline 4 submission	Applicant's Response
N_C-1	The Environmental Statement does not comply with the requirements of the NPS NN and the EIA Regs. The absence of cumulative, and short, medium and long-term, impact assessment of carbon emissions renders the Environmental Statement inadequate under the EIA Regs, and CEPP respectfully request that the ExA consider this under EIA Reg 20 (see Appendix B).	This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).
N_C-2	The applicant has not complied with the NPS NN, EIA Regs, DMRB LA 103 as the Environmental Statement provides no cumulative assessment of carbon emissions.	This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).
N_C-3	The applicant has not complied with the EIA Regs and the guidance, nor with the NPS NN invocation of the EIA Regs, in only attempting to assess the scheme itself, and only providing a national assessment against national whole economy GHG targets (ie: no local and regional assessments have been attempted).	This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).
N_C-4	Local cumulative carbon assessment cannot currently be done because no rational choice of study area has been made which would enable it to be calculated coherently across different schemes. By definition, coherent cumulative assessment requires a common and standard study which enables all relevant schemes in the local area to be assessed against the same baseline area. The applicant, and also Norfolk County Council, have not chosen a standard study area across the relevant local schemes.	This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051). With regards to study area, the study area assessed for the Scheme is in accordance with paragraphs 3.8 and 3.9 of DMRB guidance <i>LA 114 Climate</i> .
N_C-5	Carbon assessment requires a study area that reflects the specific characteristics of carbon. Appropriating a "study area" used for air quality assessment to carbon assessment ignores the differences in the fundamental physical science and impacts between air pollutants and carbon emissions. As the affected road network (ARN) derived for air quality is different across each scheme, cumulative carbon assessment across schemes in the area as part of compliance with the EIA regs is	The study area assessed for the Scheme is in accordance with paragraphs 3.8 and 3.9 of DMRB guidance <i>LA 114 Climate</i> . It should be noted that it is not possible to attribute a specific local emission of carbon to effects on a local receptor and that, as made clear in the Applicant's Written Response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral

Reference	Deadline 4 submission	Applicant's Response
	precluded.	Submission at Hearings (REP4-051), the Applicant has complied with the EIA Regulations and NNNPS paragraphs 5.16 – 5.19.
N_C-6	The applicant has not complied with DMRB LA 104 by not considering road projects (locally, regionally and nationally) which are confirmed for delivery over a similar timeframe for cumulative carbon effects.	This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).
N_C-7	The applicant has not provided any assessment of national cumulative carbon emission impacts for the scheme despite the requirement for cumulative assessment across Highway's England networks under section 5.3(c) of the Highways England licence, and the requirement for national cumulative assessment in the EIA Regs guidance, and the NPS NN which requires compliance with the EIA Regs.	This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).
N_C-8	No assessment of the scheme has been made against the period 2038-2049 when the UK is required legally to achieve net-zero and over-all eliminate all carbon emissions. Significant additional emissions from road use in Norfolk are inherent in each year of this period from the applicant's data. Further additional emissions would accrue from cumulative assessment with other local schemes, which the applicant has not carried out. Together these have an, as yet not fully assessed, material impact on the ability of Government to meet its carbon reduction targets.	<p>This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.1) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).</p> <p>The UK carbon budgets are the only measures against which to assess emissions and, as highlighted within the response, an assessment has been made against each relevant carbon budget.</p>
N_C-9	No assessment of the scheme has been made against the 35-year period 2050-2084, post the 2050 net-zero target. Irrespective of UK legislative dates, scientists are clear that a net-negative world, with massive extraction of CO ₂ is required urgently (ie actually before 2050). Yet significant additional emissions from road use in Norfolk are inherent in each year of the 2050-2084 period in the Environmental Statement making the scheme net-positive. Further additional net-positive emissions would accrue from cumulative assessment with other local schemes, which the applicant has not carried out. Together these have an, as yet not fully assessed, material impact on the ability of the UK to its obligations under the global endeavour to stabilise global heating at 1.5°C enshrined in the Paris agreement.	<p>This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.1) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).</p> <p>The UK carbon budgets are the only measures against which to assess emissions and, as highlighted within the response, an assessment has been made against each relevant carbon budget.</p>

Reference	Deadline 4 submission	Applicant's Response
N_C-10	The lack of transparent information and data about the traffic models on which operational carbon emissions are based does not allow any independent review and scrutiny of the high-level figures published in the Environmental Statement. The applicant is in contravention of the terms of the Aarhus Convention.	The development of the traffic model scenarios used in the assessment are described in the Transport Assessment (APP-122), submitted with the DCO application in December 2020. This document has been available for independent review and scrutiny since the DCO application was made public on 18 January 2021.
N_C-11	NB: This non-compliance applies directly to the A47NTE4 scheme, and indirectly to the A47BNB scheme. The applicant has ignored PINS advice in the EIA Scoping opinion on the A47NTE scheme to do cumulative assessment with the Norwich Western link road (NWL) on the A47NTE schemes. It applies indirectly on the A47BNB scheme as local cumulative carbon assessment of the A47BNB should include both the A47NTE and NWL schemes.	Although this point is indirectly linked to the proposed Scheme, this has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051), with regards to the requirements followed for assessing carbon emissions from the Scheme and the cumulative assessment that is embedded within the carbon budgets.
N_C-12	In two recent DCO applications, the SoS is requiring cumulative carbon assessment in line with the NPS NN and EIA Regs. This implies that the Environmental Statement for the scheme, which has no cumulative carbon assessment, is inadequate under the EIA Regs, and the ExA should consider this under EIA Reg 20.	This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).
N_C-13	NB: This non-compliance applies directly to the A47NTE scheme, and indirectly to the A47BNB scheme. PINS requested that cumulative environmental assessment is done for A47NTE including the NWL, but traffic modelling for the two schemes uses different base years, and there is a major loss of traffic from one model which remains unexplained. The applicant must provide new traffic modelling that allows cumulative environmental assessment, which is consistent between both schemes, and corrects errors. It applies indirectly on the A47BNB scheme as local cumulative carbon assessment of the A47BNB should include both the A47NTE and NWL schemes, and we previously raised it in REP2-018.	Although this point is indirectly linked to the proposed Scheme, this has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051), with regards to the requirements followed for assessing carbon emissions from the Scheme.
N_C-14	Even before cumulative carbon emissions are considered, the applicant's carbon assessment does not reduce operational carbon emissions (from vehicle use) over the 60-year appraisal period, as is required to comply with the government's Transport Decarbonisation Plan (TDP) for ambitious quantifiable carbon reductions in transport at the local level. It shows an addition of 596,000 tCO ₂ e over the already very high baseline	This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.1) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051). Section 14.9 of ES Chapter 14 Climate (REP2-002), highlights mitigation options that have been implemented and that are being considered during

Reference	Deadline 4 submission	Applicant's Response
	<p>of over 53,000,000 tCO₂e over the study area. In the critical 4th carbon budget that spans half of this decade in which United Nations have said we must halve emissions, an additional 111,626 tCO₂e will be emitted from construction and operation of the scheme. Such additional carbon emissions without any mitigation plan are not acceptable in the Climate Emergency.</p>	<p>future design stages and construction of the Scheme.</p>
N_C-15	<p>(reworded for A47BNB) Whilst, the applicant has provided the traded and nontraded operational emissions, they should make the 60-year appraisal and the TAG GHG workbook available to the Examination.</p>	<p>ES Chapter 14 Climate (REP2-002) has complied with the guidance from DMRB LA 114 (Climate) in providing a 60-year appraisal of GHG emissions. This appraisal is summarised within the Chapter in Table 14-9.</p>
N_C-16	<p>CEPP do not accept that only comparing carbon emissions from the scheme against carbon budgets for the entire UK economy is a credible assessment method. It makes no sense from a scientific perspective where reference data for comparison should always carefully chosen. It is a deliberate tactic to "loose the signal in the noise", and it is antithetical to good science. Further, it does not comply with the EIA Regs guidance for local, regional and national assessment, against known local, regional and national carbon targets, as invoked by the NPS NN. The Environmental Statement is narrow, inadequate, and noncompliant in ignoring the wider scope of the EIA Regs.</p>	<p>This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).</p>
N_C-17	<p>Additional new local transport emissions are introduced by the scheme in the BBSNN area. Between 2025 to 2027, these would add between 3.0% (scheme alone) and 25.9% (scheme in cumulation with other schemes) new emission sources when compared against the 2019 transport emissions for the area, as reported by BEIS, as a baseline. When assessed against the opening year 2025 using the 4th carbon budget as the baseline, the equivalent figures are very similar at 2.7% and 23.1%. By not considering or assessing these impacts, the applicant does not comply with the EIA Regs guidance to take relevant greenhouse gas reduction targets at the national, regional, and local levels into account. These additional emissions also fall in the period leading up to the UK international commitment, via its NDC under the Paris Agreement, to reduce emissions by 68% by 2030 (relative to 1990 levels). Additional local emissions of this magnitude, with no evident mitigation strategy, will impact national efforts, and therefore create a serious risk against the UK delivering on its NDC commitment by 2030. Accumulated with other</p>	<p>This has previously been addressed in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.4) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).</p> <p>Mitigation of carbon emissions is also addressed in Section 14.9 of ES Chapter 14 Climate (REP2-002), and in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.1) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).</p>

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	<p>schemes in the local area, and nationally, this risk cannot be ignored, but has not been addressed in the Environmental Statement.</p>	
<p>N_C-18</p>	<p>Even without cumulative effects, the applicant's figure for carbon emitted from the scheme and in the wider road network (ARN) is approximately 7 times the entire carbon budget from BBSNN (Broadland, Breckland, South Norfolk and Norwich, a larger area) area for the period from 2038 to the net-zero date 2050 using science-based carbon budgets from the Tyndall Centre. For the period, after 2050, the corresponding applicant's figure is over 100 times greater than the available science-based carbon budget, and infinitely greater than the Government and CCC's implied budget for the post net-zero era. The applicant has provided no indication of how these additional carbon emissions would be mitigated. This has a clear material impact on the ability of the UK to contribute to the global endeavour to stabilise global heating at 1.5oC, and it does not comply with the UK obligations under the Paris Agreement.</p>	<p>Mitigation of carbon emissions is also addressed in Section 14.9 of ES Chapter 14 Climate (REP2-002), and in the Applicant's written response under Agenda Item 4 – Climate Change (Ref 4.1) within the Applicant's Written Summary of Oral Submission at Hearings (REP4-051).</p>

4 ENVIRONMENT AGENCY (REP4-058)

Reference	Deadline 4 submission	Applicant's Response
	<p>Response to Applicant's Response to Written Representations (REP3-025), and comments in respect of Issue Specific Hearing 1 (dDCO) Hearing Action Points.</p> <p>In paragraph 1.6 of our Written Representation [REP2-013], we requested that Requirement 6 Contaminated land and groundwater, part (2) be amended. This was because we felt it appropriate that the determination of the need for remediation should be based on a consideration of the risk assessment by all parties, rather than determined solely by the undertaker.</p> <p>We note the Applicant's response on this point, which highlights that remediation will not always be necessary, and that we will be consulted on the details of any proposed remediation scheme under R6 (2). However, our view remains that all parties, not just the undertaker, should contribute at the earlier stage in respect of deciding whether remediation is necessary based on the risk assessment completed under R6 (1). We do accept that specific reference to controlled waters is not strictly necessary in R6 (2), but we would prefer to see it included if possible.</p>	<p>The Applicant has amended Requirement 6 in the dDCO (TR010040/APP/3.1 Rev 4) accordingly.</p>
	<p>As highlighted in our Written Representation at paragraph 1.8, we welcome the specific reference to the Environment Agency as a named consultee in respect of Requirement 8 Surface and foul water drainage part (1). We note the discussion at ISH1 regarding the further addition of the Environment Agency as a consultee for part (2) of R8, and the corresponding request at Note 14 of the Hearing Action Points for the Applicant to amend the dDCO accordingly. We can confirm that the addition of the Environment Agency as a named consultee in part (2) of R8 is something we would welcome and support.</p>	<p>The Applicant amended Requirement 8 in the dDCO at the previous deadline.</p>
	<p>In paragraph 2.5 of our Written Representation, we highlighted that Appendix A in Revision 1 of the Consents and Licences Position</p>	<p>The Applicant has discussed this clarification with the Environment Agency and has amended the Consents and Licences Position Statement</p>

Reference	Deadline 4 submission	Applicant's Response
	<p>Statement [REP1-011] makes reference to dewatering exemptions, but that those exemptions are only applicable if the works will take less than 6 months. Revision 2 [REP3-009] has an added line in the section on temporary abstraction for construction dewatering so that it reads (addition underlined):</p> <p>Works within the saturated aquifer may require dewatering. Dewatering volumes above 100m³/day require a transfer or abstraction licence. <u>Exemptions may apply but are only applicable of (if) the works will take less than 6 months.</u> A licensing exemption limit may be reduced to 50m³/day, depending on whether there are conservation sites within 500m or springs, wells or boreholes used to supply water for any lawful use within 250m of the proposed abstraction. Licensing will be subject to further impact assessments on any identified receptors</p> <p>We would clarify that dewatering at rates of up to 100m³/day (or 50m³/day within the restricted areas identified) is exempt from the need for an abstraction licence if the works would take less than 6 months in total. If the works take place over a longer time period, an abstraction licence will be required for any dewatering at rates over 20 m³/d. The exemption allows increased dewatering to occur without the need for an abstraction licence for short term works of less than 6 months.</p>	<p>accordingly. This document (clean and tracked changes) has been submitted at Deadline 5 (TR010040/APP/3.3 Rev 4).</p>

5 CREATE CONSULTING ENGINEERS LTD ON BEHALF OF BURLINGHAM COTTAGE GARDENS ASSOCIATION (REP4-055)

Reference	Deadline 4 submission	Applicant's Response
2.2 – 2.6	<p>Barrier To Sustainable Travel</p> <p>In our view we believe that this approach to assessing potential demand is fundamentally flawed. They have not at all assessed the potential crossing demand that could be unlocked from the residents living in the villages to the north and south of the A47. At the moment, modal shift for trips north and south of the A47 is heavily weighted towards the use of the private car as it is currently the only way of being able to travel between the two areas safely. Many activities such as schools, football and sports clubs, dog training groups, exercise classes, leisure walking etc are attended by residents living both sides of the A47. In addition, there are several rural employment sites either side of the A47 which currently can only be accessed by the car.</p> <p>A detailed survey should have been undertaken of the residents of the villages listed in paragraph 1.4 looking at a potentially much wider catchment, asking residents whether or not they would use an Underbridge if one was provided at North Burlingham. We believe that the level of demand would have been considerably higher if this had been undertaken providing clear justification for the inclusion of a crossing facility in this location. We believe that this additional work on demand needs to be completed prior to any final decision on whether or not overbridge/underbridge is provided as part of this scheme.</p> <p>For decades young people have grown up in the area not being able to cycle safely between the north and south of the A47 to see friends from school or attend sporting clubs, due to the barrier caused by the road, whereas if a safe crossing point was provided this would greatly open social mobility for both the young and older generations in the area.</p> <p>The introduction of electric bikes has revolutionised how people now cycle in the UK and the distances that they are happy to travel to reach</p>	<p>The Walking, Cycling and Horse-Riding Assessment and Review were undertaken in accordance with DMRB standard GG 142 Walking, cycling and horse-riding assessment and review. In accordance with GG 142, WCH surveys were undertaken to provide an indication of existing usage of the WCH facilities likely to be affected. Consideration was also given to the latent demand potential for use of Burlingham FP3 having regard to existing usage, the quality of the footpath and the walking distances between North Burlingham and local facilities provided in Lingwood. A more detailed analysis of these aspects is provided in Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>With regard to the suggested need for an assessment of potential additional demand from a wider catchment area comprising the various villages to the north and south of the A47, as set out by Create Consulting Engineers in paragraph 1.4, with the exception of North Burlingham, Lingwood and Hemblington all of the villages identified are located between 5km and 11km travel distance away from the location of the suggested underpass at North Burlingham via the available routes. When considering these travel distances, it is highly likely that any residents of these villages wishing to undertake an active travel trip to North Burlingham and beyond would choose cycling as the most appropriate mode of travel. Safe north to south movements across the new A47 for pedestrians and cyclists will be facilitated by the proposed B1140 Overbridge and the Blofield Overbridge so there is no requirement for an underpass at North Burlingham.</p>

Reference	Deadline 4 submission	Applicant's Response
	<p>employment, shops, leisure, and onward journeys by other modes such as rail and buses. During the hearing on the 20 July 2021 it was inferred that the people are only likely to use the underpass for leisure use. Whilst we agree that this will be an essential part of its day-to-day function, we do believe that the provision of the underpass and the link to Acle will enable cyclists to travel to a wide range of facilities in Acle as well as allow residents in the villages to the north/south to access shops, employment opportunities and access to rail services to Norwich and Great Yarmouth.</p> <p>Drawing Number E21-067-03-004 shows the cycling distances that will be achieved if the Underbridge is provided as well as clearly identifying the additional distance that is required</p>	
<p>3.0 (3.1 – 3.4)</p>	<p>Technical Details Of The Underpass</p> <p>At the hearing session held on the 20 July 2021, the representatives of SWECO gave the only reason why an Underbridge would not be acceptable in this location being a perceived surface water drainage problem. Looking at the details of the underlying soil strata in the area (see Appendix A) in particular the area where the Underbridge is proposed, shows the first 2 to 3m appears to be formed by granular material which should be suitable for drainage by soakage. This will significantly cut down the quantity of water draining towards the Underbridge.</p> <p>Below this granular material the soil is more cohesive and will therefore be unsuitable for soakage. We therefore propose that the top part of the ramps down will be drained by soakage with the lower area of the ramps being drained to a small sump, from where it will be pumped up to the higher ground to discharge into the proposed soakaway/filter drain system. The water will be drained using trapped gullies which will prevent debris from being washed into the system.</p> <p>None of this involves any difficult engineering solutions and can be easily</p>	<p>If an underpass were included in the Scheme then the Applicant would have to consider all the technical requirements of the proposal as well as the long term operation and maintenance of the facility, of which drainage would be a key factor.</p> <p>As previously set-out in the Applicant's Response to Relevant Representations (REP1-060) and in the Applicant's Response to the Written Representations (REP3-025, page 25),</p> <p><i>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.</i></p> <p>An underpass is therefore not required and technical considerations are not the reason for such a facility not being included in the Scheme.</p> <p>Also as previously set out in the Applicant's Response to the Written Representations (REP3-025, page 26),</p> <p><i>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</i></p>

Reference	Deadline 4 submission	Applicant's Response
	<p>incorporated into the scheme at nominal cost, as identified in the breakdown of anticipated costs.</p> <p>No other technical issues or evidence has been submitted in relation to problems associated with the provision of the Underbridge. On this basis we believe that SWECO concerns in relation to drainage issues is a red herring and that there are no technical constraints that would prevent the scheme from being brought forward.</p>	<p><i>potential to result in significant adverse effects, including; landscape and visual, land take, water environment, geology and soils, and biodiversity.</i></p>
<p>4.0 (4.1 – 4.7)</p>	<p>Bridleway Crossing/Horse Movements</p> <p>The proposed Underbridge scheme could be used by horses as part of a bridleway system which could link equestrian facilities north and south of the A47. At the moment there are no safe crossing points for horses and even the new proposals do nothing to improve these arrangements. There are several equestrian facilities located to the north of the A47 and the provision of a new Underbridge would potentially open a wide network of quiet road and lanes which would provide excellent routes for horseriders.</p> <p>At the hearing on the 20 July 2021 the proposed Underbridge scheme was criticised by SWECO for only having a height clearance of 2.7m which would require any horse riders to dismount before passing through the Underbridge. SWECO believed that this would deter horse riders from using the underpass and that it was generally safer for a horse rider to stay in the saddle when approaching features of this nature.</p> <p>Following discussions with British Horse Society (BHS), they have a completely different view to the representatives of SWECO. Whilst BHS state that ideally a cover height of 3.4m would be better if it was intended for horse riders were to pass through mounted. However, many horse riders will regularly dismount when they approach a feature of this nature as it is always easier to control the horse when dismounted. This is in stark contrast to the views of SWECO. It is not clear what experience or expertise that SWECO have on this issue. We however recommend to the Inspector that the British Horse Society are better positioned to comment on these issues, (see letter dated enclosed in Appendix B) and therefore there are no major issues in relation to the proposed height of the</p>	<p>As previously set out in the Applicant's Response to the Written Representations (REP3-025, page 18),</p> <p><i>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.</i></p> <p><i>WCH (non motorised user) surveys were conducted at 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.</i></p> <p>Although it is an abstract question, since the Applicant is not proposing to construct an underpass, where an underpass is installed on the trunk road, the design has to accord with Design Manual for Roads and Bridges (DMRB) standard CD 143 Designing for walking, cycling and horse-riding, in addition to other relevant DMRB standards.</p> <p>CD 143 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. The verb 'shall' in this context indicates a requirement of the Overseeing Organisation, namely, Highways England. Avoiding the need for horses to be led is therefore a</p>

Reference	Deadline 4 submission	Applicant's Response
	<p>Underbridge</p> <p>In order to facilitate riders having to dismount, it is proposed that mounting blocks will be provided at either side of the Underbridge.</p> <p>A comment was made by SWECO in relation to the potential of horse manure causing pollution events to the proposed surface water system. This would be no different to any other rural lane used by horses or a section of bridleway which was positively drained and in our view with careful specification of the type and nature of the gulley, this would not be an issue.</p> <p>Whilst the current proposed scheme has been based on a 2.7m clearance height, this was mainly to keep the costs down and the amount of earthworks required. If, however it was considered that the need to provide a greater head clearance was essential then there are no physical constraints that would prevent a larger 3.4m high Underbridge from being provided.</p> <p>In the hearing session again, it was clear that SWECO were attempting to discredit the proposed Underbridge proposal, without any real evidence to back up their statements.</p>	<p>design consideration.</p>
5.0	<p>Access To Burlingham Country Park</p> <p>One of the main benefits that the provision of an Underbridge will provide is greatly enhanced access to the developing countryside leisure feature known as Burlingham Country Park. This is a key part of Norfolk County Council's Strategic Infrastructure Plan....</p> <p>The construction of the proposed A47 Dualling Scheme will effectively prevent walkers and cyclists from the south of the A47 from safely accessing this important community facility. The Underbridge proposal will effectively open access to this area for all providing a suitable link for walkers, cyclists and horse riders. If this crossing is not included within this scheme, then the increased cost of potentially retrofitting something in</p>	<p>The latest publicly available information indicates that proposals for Burlingham Country Park are at the Design Feasibility and Master Planning stage but there is no clear indication of when proposals will be taken forward to public consultation.</p> <p>Safe north to south movements across the new A47 for pedestrians and cyclists will be facilitated by the proposed B1140 Overbridge and the Blofield Overbridge. These new grade separated crossing facilities will likely complement any proposals for improving access by active travel modes which come forward as part of the Master Planning exercise for the proposed Burlingham Country Park.</p>

Reference	Deadline 4 submission	Applicant's Response
	<p>the future will effectively prevent the link from ever being provided, which will result in people still having to use their car to reach these facilities or even worse travelling further putting even more pressure on the Broads National Park.</p> <p>The Burlingham Country Park proposal is also identified as a scheme of High Priority in the Greater Norwich Growth Board Greater Norwich Infrastructure Plan....</p> <p>The proposed A47 Dualling Scheme provides an excellent opportunity to ensure that some of the key infrastructure is provided in terms of enabling accessibility by public transport, walking, cycling and by horse riders. The proposed Underbridge provides excellent opportunity for residents and visitors of all ages to be able to access the Burlingham Country Park safely. In our view it is essential that this key element of infrastructure is provided now as part of this scheme providing an excellent return on investment in terms of meeting regional and local green infrastructure policies.</p>	
<p>6.0 (6.1 – 6.2)</p>	<p>Cost Breakdown Of Underbridge</p> <p>The following is a breakdown of the key costs associated with the provision of the Underbridge:</p> <p>Underbridge Structure £250,000 Earthwork/Ramps £75,000 Footway/Carriageway Construction £135,000 Surface Water Drainage £30,000 Pumping Station £20,000 Toucan Crossing A47 £50,000 Signage and White Lines £20,000 Service Connections £15,000</p> <p>Sub Total £595,000</p> <p>Fees 10% £59,500</p>	<p>The Applicant cannot comment on the figures provided or on the specifics of other schemes.</p>

Reference	Deadline 4 submission	Applicant's Response
	<p>Contingencies 15% £89,250</p> <p>Total Budget Cost £743,750</p> <p>We have been advised from Elveden Parish Council that the underpass constructed under the A11 at Elveden was provided for a contribution of £357,000 at 2013 prices which would be like the scheme that we are proposing at Burlingham. On this basis and allowing for inflation the above budget cost would seem to be robust. If this is not provided now the cost of attempting to provide a crossing facility at some time in the future when the road is opened is likely to be significantly higher in the region of £4m to £5m.</p>	
<p>7.0 (7.1 – 7.7)</p>	<p>Conclusion</p> <p>At the hearing session held on the 20 July 2021 focussing on Footpaths/Cycleways facilities and potential severance to the communities, SWECO on behalf of the Highways England made a number of derogatory statements about the potential benefits of a proposed Underbridge. It was clear however that they had not reviewed the proposals in detail, nor had they prepared any supporting evidence to support their statements.</p> <p>SWECO/HE both stated that the proposed crossing facility at Burlingham was discounted and removed from the scheme due to lack of demand for such a feature and therefore general cost benefit. From reviewing the evidence presented in terms of potential demand this is fundamentally flawed and does not in any way consider the suppressed demand for crossing that exists in the wider catchment area including villages such as South Walsham, Upton, Ranworth, Salhouse and North Burlingham to the north of the A47 and Freethorpe, Lingwood, Beighton, Cantley and Reedham to the south. The A47 has significantly split these communities for decades, resulting in the only way of getting between the two areas safely being by the private car.</p> <p>There is also no information provided by SWECO/HE in why the crossing</p>	<p>As set out previously the Applicant considers that the overall package of walking, cycling and horse-riding improvements, as shown on the Works Plans (REP4-003), the Rights of Way and Access Plans (REP4-004) and the General Arrangement Plans (REP4-006) is appropriate and the two proposed overbridges crossing the new A47 provide appropriate crossings to meet the needs of such users. The package of improvements complements and extends the existing limited walking and cycling infrastructure.</p> <p>The Walking, Cycling and Horse-Riding Assessment and Review were undertaken in accordance with DMRB standard GG 142 Walking, cycling and horse-riding assessment and review. In accordance with the GG 142, WCH surveys were undertaken to provide an indication of existing usage of the WCH facilities likely to be affected and consideration was also given to the latent demand potential for use of Burlingham FP3.</p> <p>With regard to the suggested need for an assessment of potential additional demand from villages in a wider catchment area, given the travel distances between the identified villages and the location of the suggested underpass, it is highly likely that any residents of those villages wishing to undertake an active travel trip to North Burlingham and beyond would choose cycling as the most appropriate mode of travel. Safe north</p>

Reference	Deadline 4 submission	Applicant's Response
	<p>facility was dropped from any of the Options 1 to 4 which were taken forward from the original 8 options. We request through the Inspector that any information on this aspect should be presented to the Inquiry so that it can be demonstrated that all the options outlined in the Environmental Statement had been considered appropriately.</p> <p>Several technical points were raised by SWECO during the hearing, in particular drainage, however none of these have been shown to be an issue and a review of the underlying ground strata in the area of the Underbridge has been shown to be granular and suitable for drainage by soakage. The actual Underbridge and the lower parts of the ramp will be drained by a small pumping station, which will lift the water to the soakaways/filter drains at road level. All standard drainage techniques and regularly adopted engineering solutions.</p> <p>We believe that it would be worthwhile, if possible, to design for the inclusion of horses into the crossing scheme and the introduction of mounting blocks will facilitate dismounting prior to entry into the underpass. The head clearance of 2.7m is suitable for horses which has been confirmed by British Horse Society.</p> <p>The cost summary outlined in Section 6 shows the key elements of the scheme and in comparison, with earlier proposals constructed along the A11 in 2013 shows a fairly accurate estimate of costs being £743,750, which we believe is good value for money. The proposal opens opportunities to expand the regional cycleway network, it provides access to the Burlingham Country Park, as well as enabling communities both north and south of the A47 to integrate without having to rely on the private car.</p> <p>We therefore respectfully request that the Inspector direct HE/SWECO to reconsider the inclusion of the proposed Underbridge proposal at Burlingham and include it in the Orders being considered as part of this scheme.</p>	<p>to south movements across the new A47 for pedestrians and cyclists will be facilitated by the proposed B1140 Overbridge and the Blofield Overbridge so there is no requirement for an additional underpass at North Burlingham.</p> <p>The Scheme Assessment Report (2017)</p> <p>[REDACTED] set out that continuity of the PRow route required further assessment in future stages, and if required, could be maintained by either a diversion or the provision of a footbridge over the new A47 highway. Since 2017 the design has been further developed including WCH surveys and a review of the WCH Assessment and Review, concluding that a central crossing is not required.</p> <p>If an underpass were included in the Scheme then the Applicant would have to consider all the technical requirements of the proposal as well as the long term operation and maintenance of the facility, of which drainage would be a key factor.</p> <p>Although it is an abstract question, since the Applicant is not proposing to construct an underpass, where an underpass is installed on the trunk road, the design has to accord with Design Manual for Roads and Bridges (DMRB) standard CD 143 Designing for walking, cycling and horse-riding, in addition to other relevant DMRB standards.</p> <p>CD 143 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. The verb 'shall' in this context indicates a requirement of the Overseeing Organisation, namely, Highways England. Avoiding the need for horses to be led is therefore a design consideration.</p> <p>As noted above the Applicant cannot comment on the figures provided or on the specifics of other schemes.</p>

6 CHRIS GATES (REP4-056)

Reference	Deadline 4 Submission	Applicant's Response
1	<p>Additional Information (photos)</p> <p>I have since learned that the large, functional, vehicular gate at this site was installed for the use of North Burlingham farmer David Morton, in order he might continue to access Lingwood Lane.</p> <p>'Standing Orders' are that he should drive onto the carriageway when safe with a tractor/trailer, stop in the carriageway to halt traffic and safely leave his cab to close the gate, then regain the cab and complete the crossing. Mr Morton has not been seen by Highways England to discuss the impact dualling will have on this arrangement.</p>	<p>Accesses are provided to allow a landowner to gain access from their land to the highway network. A right to take access to the highway is entirely different from a public right of passage (such as the one users currently enjoy to progress from the existing A47 onto Lingwood Lane). That is a public right which would be removed by the proposed stopping up of the junction of the existing A47 with Lingwood Lane to allow the new A47 to be installed. Access to Lingwood Lane will still be possible for all highway users, via the proposed B1140 Overbridge.</p> <p>The access referred to by Mr Gates is not affected by the Scheme. There is a concrete bollard in place (along with signage and a lamp post) which would prevent vehicular access onto the highway in this location.</p>
2	<p>Additional Information</p> <p>I now know from another IP that the 'Designated Fund' is wholly controlled by HE and that it's not available for the funding of such as the Acle path and Burlingham crossing. That being the case, why did Team Leaders Jonathan Donlevy and Gemma Malone allow the Lingwood and Burlingham Community to believe not only that application had been made to it - shortage of 2019 funds failing the application - but that a second application in 2020 could be more successful? I would like HE to explain this apparent misinformation.</p>	<p>Designated Funds are controlled by Highways England and cover all aspects where there may be opportunities for local improvements. An application for the Burlingham crossing was submitted to Designated Funds in 2019 and was rejected.</p> <p>A further funding round has commenced within RIS2, however the key focus of RIS2 designated funds is biodiversity improvements.</p>
3	<p>Further Information</p> <p>The HE representative attempted to portray the prospect of horses dunging in the proposed underpass a health hazard, particularly if pumped out into a nearby ditch or soakaway following rain. I would respectfully point out that horses, being vegetarian, present little 'threat by effluence' to humans and that here in Norfolk horse dung and urine have been spread on fields for centuries. Just at this moment (post-harvest) we have the annual spreading of human sewage fertiliser on fields - many</p>	<p>If an underpass were included in the Scheme then the Applicant would have to consider all the technical requirements of the proposal as well as the long term operation and maintenance of the facility, of which drainage would be a key factor.</p> <p>Although it is an abstract question, since the Applicant is not proposing to construct an underpass, where an underpass is installed on the trunk road, the design has to accord with Design Manual for Roads and Bridges</p>

Reference	Deadline 4 Submission	Applicant's Response
	<p>alongside HE's network.</p> <p>HE were most assertive that should a rider have to dismount to lead their horse through an underpass, that horse is less under control than if ridden. This presumably to support an argument that the headroom suggested in Create Consulting Engineer's design (2.7m) makes passage through impracticable when mounted. This is not the experience of the British Horse Society and to the contrary, it remains their advice that a rider should dismount to have maximum control when any circumstance demands it. It may well be possible to ride through a 2.7m headroom, but if not, dismount and lead. A rider will introduce the underpass to their horse, mounted or unmounted, at a quiet time and not persist with use should it react badly.</p> <p>The proposed overbridge crossings to east and west provide no alternative. No horse rider asked locally will use the White House or Blofield crossings, involving as they do additional road-riding distance and citing traffic proximity and lack of safety screens on the crossings themselves. I would respectfully direct the Examining Authority to provision of the A11 'Elveden Monument' underpass. There was little demonstrable demand at the time of its construction but with foresight it was provided and it's been much used since by mounted horse riders, cyclists and ramblers - sometimes at the same time.</p> <p>Response includes email from the British Horse Society</p> <div style="background-color: black; width: 100%; height: 40px; margin-top: 10px;"></div>	<p>(DMRB) standard CD 143 Designing for walking, cycling and horse-riding, in addition to other relevant DMRB standards.</p> <p>CD 143 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. The verb 'shall' in this context indicates a requirement of the Overseeing Organisation, namely, Highways England. Avoiding the need for horses to be led is therefore a design consideration.</p> <p>As previously set out in the Applicant's Response to Written Representations (REP3- 025, page 18),</p> <p><i>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.</i></p> <p><i>WCH (non motorised user) surveys were conducted at 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.</i></p>

7 LINGWOOD AND BURLINGHAM PARISH COUNCIL (REP3-026 AND REP4-059)

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	<p><u>Clause 1.3 - WCHAR study area. (Assumed should read 'WCAHR'.)</u></p> <p>Clause 1.3.1 states, "..... <i>The study area includes the A47, the villages of Blofield, North Burlingham, Lingwood and the small market town of Acle.</i> .</p> <p>Why, then, has Highways England ignored essential amenities in Lingwood and Acle?</p> <p>Clause 1.3.1, Fig 1-1 This defines the 5km area around the scheme and highlights the 'proposed route' of the A47 between Blofield and Acle. It shows the Parish of Lingwood and Burlingham sitting astride the A47 mid-way between the villages of Blofield and Acle.</p> <p>Whilst the populations of Acle, Lingwood and Blofield are roughly similar in size, the villages are very different in character and purpose. Blofield and Lingwood have only one small local convenience store each, although Blofield has a farm shop on the edge of the village and a few other specialist shops.</p> <p>In contrast, Acle is much more commercially developed and has far superior facilities. It is the only village in the area with multiple shops and businesses including a supermarket, a chemist shop, many independent shops and a regular farmers' market. Thus, Acle is generally recognised as a 'market town' which serves all the nearby villages including Lingwood and Blofield. Acle is also home to designated educational and medical facilities serving the Parish of Lingwood and Burlingham.</p> <p>It is difficult to understand, therefore, why Highways England has (literally) removed Acle from the map and continues to insist most local facilities are</p>	<p>Numerous local amenities are available in Blofield in close proximity to the Scheme extents and these can be accessed in the future using the new shared footway / cycleway to be provided along the former A47. Although numerous other local amenities are located in Acle, Acle itself is not impacted by the Scheme.</p> <p>The Design Manual for Roads and Bridges (DMRB) standard GG142 Walking, cycling and horse-riding assessment and review states at paragraph 4.7.1, page 16, (in relation to Table 4.7 Information requirements for large and small schemes) that "<i>The Lead Assessor should determine the appropriate quality 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 (2014), 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 LA112 Population and human health. LA112 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</p>

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	situated in Blofield.	provided as part of the Scheme, the Applicant has been cognisant of the extent of the likely effects.
	<p><u>Clause 2.5.2 Appendix A: WCH facilities and local amenities.</u> (Assumed should read WCHR.) This clause states, <i>'It can be seen from the drawing that the majority of the local amenities are located within Blofield'</i>.</p> <p>Acle has been cut off this map by Highways England and no amenities or facilities in Acle are highlighted. Why not?</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 LA112 Population and human health. LA112 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><u>Clause 2.4.1</u></p> <p>Table 2.1 – <i>Bus stop locations and services.</i></p> <p>Why are only bus-stops in Blofield and Acle listed in Table 2.1? Bus stops in Lingwood are closer to North Burlingham but have been omitted from the list.</p> <p>LISTED - Blofield bus-stops 2.4 miles walking distance approximately from Main Road, North Burlingham, using the proposed northern footpath and crossing the proposed Blofield overbridge (desk-based exercise).</p> <p>LISTED - Acle bus-stops 3.5 miles walking distance approximately from Main Road, North Burlingham, using the most direct route on the Burlingham Woodland Trails (desk-based exercise). If walking along the A47, this distance shrinks to 2.3 miles. However, there is no footpath or cycle path along the A47!!!</p>	<p>The omission of the bus stops in Lingwood is an oversight. However, this omission does not change the conclusions from the assessment of the effects of the Scheme on land use and accessibility.</p>

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	<p>OMITTED - Lingwood bus-stops. 1.1 miles walking distance approximately from Main Road, North Burlingham, using existing footpaths crossing the A47. The 15A is an hourly bus service which runs between Lingwood and Wymondham via local villages and Norwich. The bus-stops in Lingwood are within walking distance of North Burlingham but are inaccessible to pedestrians because the A47 acts as a barrier.</p> <p>Table 2.1 also mentions Lingwood Train Station which serves North Burlingham. Again, the A47 prevents pedestrians from the north of our parish from accessing it.</p> <p>The approximate walking distances between Main Road, North Burlingham, and the various stations listed in Table 2.1 are as follows (desk-based exercise): - Lingwood Station - 1.1 miles using existing footpaths over the A47. Acle Station – 3.5 miles using existing footpaths. Or 2.1 miles if a footpath/cycle path is provided along the A47. Brundall Station – 3.3 miles. Brundall Gardens Station – 4 miles.</p> <p>Table 2.1 includes details of cycle storage spaces at these stations. This information is academic since, I am assured by local residents, most cyclists from North Burlingham believe the routes to the stations are too dangerous to navigate.</p>	
	<p><u>Clause 2.5 - Key trip generators and local amenities.</u></p> <p>Table 2.2. The column headed 'Approximate Location' is clearly misleading. It gives a distance between the chosen amenity and the nearest point on the A47, but it does not show the distance of that amenity from any named settlement which might depend upon it.</p>	<p>The presence of local amenities in Acle is acknowledged, but Acle itself is not impacted by the Scheme.</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</p>

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	<p>The list of amenities within the prescribed study area is blatantly incomplete. It would seem Table 2.2 is designed to persuade the reader that Blofield is the main provider for the whole area rather than Lingwood or Acle.</p>	<p>and horse-riders (WCH), in accordance with DMRB standard LA112 Population and human health. LA112 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><i>Education facilities.</i> (As listed.)</p> <p><u>Lingwood Primary Academy</u> is the designated school for ALL primary-age children from our parish, including those north of the A47. (Confirmed by Norfolk County Council Education Department.)</p> <p>This school is approximately 1.2 miles from Main Road, North Burlingham, using existing footpaths. However, the A47 is a barrier to pupils wishing to walk or cycle to their school.</p> <p>If the proposed overbridge is used, the distance will increase to approximately 2.3 miles (desk based exercise). This journey will necessitate travelling beside convoys of HGVs on the overbridge (seasonal). Once across the overbridge, the children will need to dodge the HGVs turning across their path. Then they will face a journey of 1.3 miles along a narrow, dangerous, winding road with blind hairpin bends and no footpath (Acle Road/Lodge Road, Lingwood.). (Please refer to our Deadline Submission 2 for details of HGVs.)</p> <p><u>The Compass School</u> is another school south of the A47. However, this is a special school and does not serve the local community in general education.</p> <p><u>Blofield Primary School</u> is NOT the designated school for pupils from the parish of Lingwood and Burlingham. (Misleadingly, this school is listed as being 150m south of the A47 (0.09 miles), whereas it is approximately 2.4</p>	<p>The suitability of the use of Burlingham FP3 as a practical route for everyday utility walking trips between North Burlingham and Lingwood, which includes trips to Lingwood Academy, is examined in Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</p> <p>The availability of existing walking and cycling routes between North Burlingham and Acle is also outlined in Appendix A of the Applicant's Response to Relevant Representations (REP1-060).</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 LA112 Population and human health. LA112 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>As previously set out in the Applicant's Written Summary of Oral Submissions at Hearings (REP4-051, page 85),</p> <p><i>The Applicant has investigated the potential for a footway connection between North Burlingham and Acle in the vicinity of The Windle.</i></p> <p><i>At the pinch point adjacent to the Hall Cottages, there is</i></p>

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	<p>miles walking distance from Main Road, North Burlingham.)</p> <p>Why are pre-school facilities in Blofield listed, but not those in Lingwood or Acle which serve parishioners both north and south of the A47? No mention is made of Lingwood Nursery, attached to Lingwood Academy. No mention is made of Tiny Tots play group which meets in Lingwood Village Hall. No mention is made of Butterflies play group which meets in Lingwood Methodist Chapel. These parish facilities are all within walking distance of North Burlingham.</p> <p>No mention is made of any SECONDARY SCHOOLS. Acle Academy is the designated secondary school for Lingwood and Burlingham and is within the study area. Why is it omitted from the list of schools? We would appreciate a safe cycle path to Acle from Lingwood and Burlingham so our children can access their secondary education by bike.</p> <p>Please note - As mentioned in previous submissions made to the Inspector by Lingwood and Burlingham Parish Council, the statutory walking distance between home and school for children under 8 years is 2 miles. Between 8 and 11 years, this increases to 3 miles. (Govt 'Home to School Travel and Transport Guidance, July 2014'.)</p>	<p><i>insufficient width to provide a footway / cycle track of the required standard. This takes into consideration the alignment of the existing A47, the proposed noise barrier, vehicle restraint system and provision of adequate visibility from The Windle junction.</i></p>
	<p><u>Places of worship.</u></p> <p>Why are only Church of England facilities listed in Table 2.2? No mention is made of Lingwood Methodist Chapel which is within walking distance of North Burlingham but inaccessible on foot because of the A47. No mention is made of the Methodist and Roman Catholic facilities in Acle. (Roman Catholic worshippers from our parish attend services at</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 LA112 Population and human health. LA112 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</p>

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	<p>Acle St Edmund Church.)</p> <p><u>Recreational Space.</u></p> <p>Why are only facilities in Blofield listed? No mention is made of Lingwood's Millenium Green which is a large recreational space with a play park, picnic tables, a trim trail, goal posts, dog exercise area and outdoor gym equipment. No mention is made of Lingwood's sports fields, official park-run track and floodlit multiple use games area. These are all parish facilities within walking distance of our residents north of the A47, but they are inaccessible to them unless they can drive.</p> <p>No mention is made of Acle Recreation Centre and Social Club which houses league standard football, cricket and bowls, and which offers multiple indoor and outdoor sporting facilities.</p> <p><u>Community building.</u></p> <p>Lingwood Village Hall is the hub of our parish. Unlike the other two buildings which are listed in Table 2.2, (both in Blofield!), our Village Hall is open to the community every day and is fully used. It houses a community cafe, licensed social club, mini produce market, weekly car boot sales, a gym, specialist recycling facilities, various clubs and classes, rooms for private hire and organised community events. Again, our parishioners north of the A47 are unable access any of this without a car. No mention is made of Lingwood Scout Hut. No mention is made of Lingwood Reading Room. No mention is made of Lingwood St Peter's Church Hall. No mention is made of Lingwood Methodist Hall.</p> <p><u>Allotment</u></p>	<p>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>

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	<p>Why is only Blofield allotment listed? No mention is made of Lingwood Parish Allotments, some of which are held by North Burlingham residents who need a car to get here.</p> <p><u>Library.</u></p> <p>Why is only the small library at Blofield mentioned? No mention made of Acle Library which offers more services than Blofield Library.</p> <p><u>Medical facility.</u></p> <p>Why is only Blofield doctors surgery listed? No mention is made of Acle Medical Partnership which serves most of the residents of North Burlingham and Burlingham Green. (Information supplied by Blofield and Acle surgeries.)</p>	
	<p><u>Clause 2.6 - Future trip generators</u></p> <p><u>Clauses 2.6.1/2.6.2</u> refer to Broadland District Council's Joint Core Strategy, 2011. Again, only Blofield is mentioned and it is suggested very little future development will take place there.</p> <p>No mention is made of outstanding planning allocations in Lingwood and Acle. (Figures not checked.)</p> <p>No mention is made of the Greater Norwich Local Plan, 2021, which runs from 2018 – 2038. This is currently with the Planning Inspector and allocates land for development until 2038. Proposed allocations within the study area are as follows: Blofield - 316 homes. Lingwood – 137 homes. Acle - 540 homes.</p>	<p>The Development Plans and planning policies are considered within the Case for the Scheme (REP1-042), and the Applicant's responses to the Norfolk County Council and Broadlands District Council Local Impact Reports (REP3-022 and REP3-023 respectively). The Applicant and Broadlands District Council have also set out their response to the planning framework in their Statement of Common Ground (TR010040/EXAM/8.2 Rev 1)</p> <p>The Walking, Cycling and Horse-riding Assessment was completed in January 2020 and includes consideration of committed future developments in the study area identified at that time, in accordance with DMRB standard GG 142 Walking, cycling and horse-riding assessment and review.</p>

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	<p>This amounts to 993 new homes which are 'likely to be future sources of the WCHR trips', in contrast to the '50 houses as a minimum' mentioned in Clause 2.6.</p>	
	<p><u>Clause 2.9 – Site visits and usage information</u></p> <p><u>Clause 2.9.2</u> acknowledges the 'severance effect' of the A47.</p> <p><u>Clause 2.9.7</u> - "During the Sunday survey periods, a maximum two-way flow of 10 users was recorded using Burlingham FP3, the majority of which crossed the A47."</p> <p>Highways England recorded several other people crossing the A47 at other points and other times, which proves pedestrians and cyclists do need to cross the road. Most local walkers and cyclists would not try.</p> <p>Highways England has ignored a petition signed by over 1,000 people who say they would use an underpass or footbridge if there was one. Also, it would appear Highways England has ignored previous submissions and remarks made to the Inspector by Lingwood and Burlingham Parish Council, by individual walkers and cyclists, and by various interested organisations.</p> <p>A detour from the point where FP3 meets the A47 to the corresponding point north of the A47 using the proposed overbridge at the B1140 is approximately 2 miles. (Desk-based exercise.) How many pedestrians would (or could) add this distance to their walk through the woods?</p> <p><u>Clause 2.9.11</u> - "The surveys recorded high usage of Burlingham FP1, which runs north to south from Main Road to the north of North Burlingham, A maximum two-way flow over the 12hr survey period of around 70 users was observed on a weekday whereas the maximum flow on a Sunday was around 90 users."</p>	<p>The Applicant considers that the overall package of Walking, cycling and horse-riding facilities is appropriate and the two overbridges crossing the new 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 Applicant's Response to Relevant Representations (REP1-060)</p> <p>The Applicant has been cognisant of the strength of feeling expressed by the local community and visitors to the area regarding a requirement for an overbridge across the new A47 to carry 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. There is no evidence of commuter, utility walking trips using Burlingham FP3.</p>

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	<p>There is a car park at the start of FP1 which would account for the high usage. If some of the people using FP1 had been asked where they had travelled from, Highways England would have learnt that many people from Lingwood like to walk in Burlingham Woods, but we are forced to drive to North Burlingham because we cannot cross our parish on foot!</p> <p>Several published guides lead walkers across the A47.</p> <p>Norfolk County Council's official guide to Burlingham Woodland Trails states, "<i>There are a variety of walks to suit all abilities allowing you to choose a short, medium or longer walk, or even circular or linear. They will take you through the quiet hamlet of Burlingham Green, the parishes of Lingwood and Burlingham, Hemblington, South Walsham and the thriving historic market town of Acle.</i>"</p> <p>It goes on to say, "<i>The walks can be accessed at a number of start points, including from North Burlingham (parking off the A47 opposite St Andrews church at the west end of the village), Acle, Fairhaven Gardens and Lingwood (requires crossing A47 to join the main network of paths). They are also easily reached by public transport, with train stations at Acle and Lingwood plus regular bus services to both.</i>" (Please note, since Norfolk County Council produced its map of Burlingham Trails, a new wood – Peter's Wood - has been established as part of the trails in Lingwood, south of the A47.)</p> <p>Norfolk's local newspaper, the Eastern Daily Press, published an article on 27th December, 2020, entitled, "<i>7 of the best places in Norfolk for a winter walk</i>". The article included Burlingham Woodland Walks and advised, "<i>You can start in North Burlingham, Acle ..., Fairhaven Gardens or Lingwood.</i></p> <p>'Walking World' has this to say about part of the the trails, "<i>The route then heads through the Church Plantation and past North Burlingham Church After crossing the A47 the route takes a more Norfolk Countryside</i></p>	

Reference	Deadline 3 Submission (Response to Highways England Deadline 2 Submission)	Applicant's Response
	<p><i>appearance as it follows field edges to Lingwood and then over to Beighton".</i></p>	
	<p><u>Appendix B - WHC opportunities.</u> (Assumed WCHR.)</p> <p><u>Opportunity P6/C3</u> - "Provide a pedestrian and cycle crossing to link the Burlingham Trails network north and south of the proposed A47"</p> <p><u>Opportunity P8</u> - "Provide a new footway on the northern frontage of the new A47 alignment between South Walsham Road and the junction with The Windle".</p> <p>The Revised Assessment does not include decisions made concerning these opportunities but attaches another Appendix, the previous WCHR Review dated 11th August, 2020. That document makes it clear Highways England will not fulfil opportunities P6/C3 and P8.</p> <p>Why not?</p>	<p>The Walking, cycling and horse-riding review (REP2-012) provides the reasons for not taking forward opportunities P6/C3 and P8.</p> <p>Subsequent to the Walking, cycling and horse-riding review, the Applicant has investigated the potential for a footway connection between North Burlingham and Acle in the vicinity of The Windle.</p> <p>As previously set out in the Applicant's Written Summary of Oral Submissions at Hearings (REP4-051, page 85),</p> <p><i>The Applicant has investigated the potential for a footway connection between North Burlingham and Acle in the vicinity of The Windle.</i></p> <p><i>At the pinch point adjacent to the Hall Cottages, there is insufficient width to provide a footway / cycletrack of the required standard. This takes into consideration the alignment of the existing A47, the proposed noise barrier, vehicle restraint system and provision of adequate visibility from The Windle junction.</i></p>

Reference	Deadline 4 Submission	Applicant's Response
	<p>1. Concerning the footpath on the proposed eastern overbridge at the B1140 junction, Highways England has said this was incorporated, 'after consultation with Lingwood and Burlingham Parish Council'. This is true, but it was never suggested by the Council that this footpath should be built instead of a WCHR underpass at FP3!!!</p> <p>At a meeting with local parish councils a year or two back,</p>	<p>This comment has been accepted.</p>

Reference	Deadline 4 Submission	Applicant's Response
	<p>Highways England presented a map showing a 'traffic only' overbridge. When I queried why no footpath was incorporated, we were told it was because there was no existing footpath to link into Acle Road/Lingwood Lane on the Lingwood side of the overbridge. I mentioned Lingwood is an expanding village and, at some time in the future, there will almost certainly be a footpath along the road towards the overbridge, by which time it would be too late for Highways England to incorporate one. I was trying to save Highways England money and hassle in the future, NOT suggesting an alternative place for a WCHR crossing!</p>	
	<p>2. Highways England has promised a new permissive path south of the A47 between the B1140 overbridge and Lingwood Lane. Presumably, Highways England considers this to be a safer route into Lingwood for walkers, cyclists and horse riders coming off the overbridge, rather than using Acle Road/Lodge Road which has no footpath. However, this route is much longer than the direct route along Acle Road/Lingwood Lane. Also, in the end, this route will deposit the walker/cyclist/horse rider onto the most dangerous bend on Lingwood Lane!!! (Please see previous submissions.)</p> <p>As far as the parish is concerned, there is no alternative route between Lingwood and North Burlingham for walkers, cyclists and horse riders except across the A47 at the point of FP3 (or close).</p>	<p>The proposed path was previously a public footpath (i.e. a highway) as opposed to a permissive path. The Applicant has changed the status of the proposed east-west footpath to cycle track status along the entire length, again as a highway.</p> <p>The Rights of Way and Access Plans (REP4-004), the General Arrangement Plans (REP4-006), and the draft DCO (REP4-007) have been updated to reflect this change.</p> <p>The Applicant considers that the overall package of Walking, cycling and horse-riding facilities 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 conclusion, is set out in Appendix A to the Applicant's Response to Relevant Representations (REP1-060)</p>
	<p>3. I am aware Highways England carried out an independent survey of the number of beet lorries turning off the A47 at the B1140 White House junction. This survey was carried out over a very limited period of time. Did Highways England also request British Sugar to supply relevant details of all lorry visits to its Cantley factory? The Planning Inspector has my reply from British Sugar regarding the potential number of lorries which will cross the eastern overbridge in peak periods. British Sugar gave this information to me freely.</p>	<p>See Applicant's Response to Written Representation (REP3-024) – response to Create Consulting Engineers Ltd On Behalf Of Burlingham Cottage Gardens Association (Refs 2.0 (2.5 – 2.7) Page 15, and 7.2 Page 70))</p>

8 NORFOLK COUNTY COUNCIL (REP4-060 AND REP4-061)

Reference	Deadline 4 Submission	Applicant's Response
Post-hearing notes from Issue Specific Hearings 1 to 3 (REP4-060)		
ISH 3 6	<p>Comment on the Arboricultural Impact Assessment [REP1-36]</p> <p>NCC Response:</p> <p>The Arboricultural Impact assessment (TR010040-000394-6.2 Appendix 7.7 Arboricultural Impact Assessment Rev 1) is broadly in line with BS5837 (2012) Trees in Relation to Design, Demolition and Construction and has been assessed as a desk-based exercise.</p> <p>It is noted that the construction of footpaths within the Root Protection must be in line with best practice and use the 'No-Dig' construction with cellular confinement systems used as outlined in section 3.4 and that this recommendation, along with all other tree protection recommendations, is reflected in the final detailed construction design.</p> <p>NCC recommends that:</p> <ul style="list-style-type: none"> • An assessment in line with BS5837 for the additional trees (table 3) is carried out. The current information is missing the required measurements and detail. • As per the recommendation in 3.3 the stem locations and stem diameter measurements are taken to establish the full impact of trees proposed for retention in groups and the AIA updated. • In addition to the Arboricultural Impact Assessment an Arboricultural Method Statement detailing the protection of trees and special construction, working methods and monitoring is required. This must include clear Tree Constraints and Tree Protection Plans and be incorporated and considered in all other relevant plans. • On completion of the works a final appraisal of the condition of trees must be made and appropriate tree works carried out to 	<p>The NCC recommendations have been noted and the Applicant can confirm that a full arboricultural method statement and survey will be completed as per LV2 and LV3 of the REAC in the EMP (REP4-041).</p>

Reference	Deadline 4 Submission	Applicant's Response
	<p>ensure that the tree stock is in good condition.</p> <ul style="list-style-type: none"> For all tree losses associated with this scheme appropriate replacements must clearly be shown in the landscaping plan to demonstrate that there has been a net increase in tree cover and value on completion of the works and in line with NCC's Tree Planting and Resilience Strategy (Tree planting resilience strategy (8).pdf) and NCC's Tree Safety Management Policy (NCC Tree Safety Management Policy.pdf). 	
<p>Written summary of oral submissions given at Issue Specific Hearings 1 to 3 and Compulsory Acquisition Hearing 1 (REP4-061)</p>		
<p>ISH3 Session 3</p>	<p>Flood and Water Requirement in the DCO The LLFA would like the draft DCO to be updated to recognise the right organisations by naming them rather than the planning authority (who does not normally get involvement in these aspects).</p> <p>Please see the proposed wording below.</p> <p>Proposed wording</p> <p>Requirements Surface and foul water drainage</p> <p>8.—(1) No part of the authorised development is to commence until for that part written details of the surface water drainage system, reflecting the drainage strategy and the mitigation measures set out in the REAC including means of pollution control, have been submitted to and approved in writing by the Secretary of State following consultation by the undertaker with Norfolk County Council as Lead Local Flood Authority on matters related to its function as statutory consultee.</p> <p>(2) No part of the authorised development is to commence until for that part written details of the foul drainage system, reflecting the drainage strategy and the mitigation measures set out in the REAC including</p>	<p>The current dDCO (REP4-007) contains the following requirement:</p> <p>Surface water drainage</p> <p>8.—(1) No part of the authorised development is to commence until, for that part, written details of the surface water drainage system, reflecting the drainage strategy and the mitigation measures set out in the REAC including means of pollution control, have been submitted and approved in writing by the Secretary of State following consultation by the undertaker with the Environment Agency, the relevant planning authority and the lead local flood authority, on matters related to their functions.</p> <p>(2) The surface water drainage system must be constructed in accordance with the approved details, unless otherwise agreed in writing by the Secretary of State following consultation by the undertaker with the Environment Agency, and the relevant planning authority and the lead local flood authority, on matters related to their functions, provided that the Secretary of State is satisfied that any amendments to the approved details would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement.</p> <p>It also includes a definition of lead local flood authority as follows:</p>

Reference	Deadline 4 Submission	Applicant's Response
	<p>means of pollution control, have been submitted to and approved in writing by the Secretary of State following consultation by the undertaker with Anglian Water on matters related to its function. provided that the Secretary of State is satisfied that any amendments to the approved details would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement.</p> <p>(3) The surface water drainage system must be constructed in accordance with the approved details, unless otherwise agreed in writing by the Secretary of State following consultation by the undertaker with the Norfolk County Council as Lead Local Flood Authority on matters related to its function as statutory consultee, provided that the Secretary of State is satisfied that any amendments to the approved details would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement.</p> <p>(4) The foul water drainage system must be constructed in accordance with the approved details, unless otherwise agreed in writing by the Secretary of State following consultation by the undertaker with Anglian Water on matters related to its function, provided that the Secretary of State is satisfied that any amendments to the approved details would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement.</p> <p>In addition, we noted that there was no mention of the ordinary watercourse consenting process. Therefore, we would like to include the proposed wording below into the DCO.</p> <p>Works in a watercourse(s) x.— (1) No stage of the works involving the crossing, diversion, alteration, replacement and installation of new structures of any designated main river or ordinary watercourse may commence until a scheme and programme for any such permanent or temporary crossing, diversion, alteration, replacement and installation of new structure in that stage has</p>	<p>“lead local flood authority” has the same meaning as in section 6 (other definitions) of the Flood and Water Management Act 2010;</p> <p>This reflects the fact that there is no foul water drainage system comprised in the scheme and accepts that the lead local flood authority should be consulted.</p> <p>The Applicant has not removed the reference to consultation with the local planning authority as Broadland District Council has not requested that change.</p> <p>No works are proposed in watercourses, and Article 20 has been amended accordingly. Accordingly no requirement relating to works in watercourses has been included as it is not necessary.</p> <p>The proposed wording for Requirement 8 has been shared with the LLFA for agreement.</p>

Reference	Deadline 4 Submission	Applicant's Response
	<p>been submitted to and, approved by the Secretary of State in consultation with Norfolk County Council, the Environment Agency, relevant drainage authorities and Natural England.</p> <p>(2) The designated main river or ordinary watercourse must be crossed, diverted, alteration, replacement and installation of new permanent or temporary structures in accordance with the approved scheme and programme.</p> <p>(3) Unless otherwise permitted under paragraph (x.1), throughout the period of construction of the works, all ditches, watercourses, field drainage systems and culverts must be maintained such that the flow of water is not impaired or the drainage onto and from adjoining land rendered less effective.</p>	
	<p>Furthermore, we note that there is no mention of the need to involve the LLFA in relation to the review of the temporary surface water drainage plan as part of the EMP. This needs to be addressed. Please can we add a requirement for this to happen, maybe as a part 3 to 8 for the temporary works.</p>	<p>The current dDCO (REP4-007) contains the following requirement:</p> <p>Environmental Management Plan</p> <p>4.—(1) 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 the local highway authority and the lead local flood authority to the extent that the content of the EMP (Second Iteration) relates to matters relevant to their functions.</p> <p>(2) The EMP (Second Iteration) for a part must be written in accordance with ISO14001 and so far as is relevant to that part of the authorised development, must reflect the mitigation measures required by the REAC and set out in the Environmental Statement and must include as many of the following plans and strategies as are applicable to the part of the authorised development to which it relates—</p>

Reference	Deadline 4 Submission	Applicant's Response
		<ul style="list-style-type: none">(a) Biosecurity management plan;(b) Construction communications strategy;(c) Construction noise and dust management plan;(d) Materials management plan;(e) Landscape and ecology management plan;(f) Site waste management plan;(g) Soil management plan to include soil resource plan and soil handling strategy;(h) Traffic management plan; and(i) Water monitoring and management plan. <p>The Water Monitoring and Management Plan is the proposed temporary surface water drainage plan and therefore the LLFA will be consulted in the production of this plan.</p>

9 NORWICH CYCLING CAMPAIGN (REP4-062)

Reference	Deadline 4 Responses	Applicant's Response
Written summary of oral submissions given at Issue Specific Hearing 3 (REP4-062)		
3	<p>Designated Funds</p> <p>We have heard (from another IP) in the last few days of an application by Highways England in August 2019 for funding relating to the provision of cycling infrastructure in relation to this scheme, to a "Designated Fund". We understand that this application was rejected.</p> <p>This is the first time we have heard about an application to a "Designated Fund" with regard to this scheme. There is no mention in the WCHR review. However, there is no reference to an application to a "Designated Fund" in the "WCHAR process summary" diagram on page 6 of DMRB GG 142 Walking, cycling and horse-riding assessment review.</p> <p>We assume that whoever administers this Fund has considerable power and influence if proposals based on Government policy and supported by local aspirations can be considered in private without consultation and the outcome withheld from this Inquiry.</p> <p>We have an email from Roger Geffen, Policy Director, Cycling UK, (16 August 2021):</p> <p><i>"HE does have a Designated Fund Stakeholder Advisory Group, which I sit on. However as its name suggests, our role is purely advisory. At our meetings (which happen 3-4 times a year), Highways England provides updates on progress in spending its DF budgets. I have persistently badgered them for better information on whether the schemes they have built with the DFs have achieved their objectives. They have admitted that monitoring was badly overlooked at the start of the DF process 5 years ago.</i></p> <p><i>However, I'd have to say that the DF money should not be used when HE</i></p>	<p>Designated Funds are administered by a team within Highways England. Any projects approved by them sit in isolation from this Scheme. Details of any designated funds applications would not be included within the WCHR review as they would not form part of this Scheme.</p>

Reference	Deadline 4 Responses	Applicant's Response
	<p><i>is building a new scheme. When that is happening, it should include walking and cycling infrastructure, designed in accordance with CD 195 and the WCHAR process, and this should come from the scheme's own budget. "</i></p> <p>We note in "Review of Highways England's engagement approach with local and regional partners", June 2020 Office of Road and Rail, page 51, Recommendations: [6c] NT - Highways England should continue to monitor stakeholder awareness and take up of Designated Funds under the revised structure and processes for RIS2, including the communication and transparency of the Designated Funds' process and how interested stakeholders can contribute on the deployment of those funds.</p> <p>We also note on page 65 - 15 Designated Funds, Desire for more clarity mentioned in response to consultation.</p> <p>It is regrettable that Highways England have not acted on the Recommendation [6c] NT referred to above and in the interest of "communication and transparency" made the fullest information available to the Examining Authority.</p>	
4	<p>Walking Cycling and Horse-riding assessment and review</p> <p>We have previously commented (TR010040/TR010040-000446-D2-Norwich-CyclingCampaign) on the WHCR Assessment and Review submitted by Highways England. HE have responded. TR010040/TR010040-000466-9.10 WCH Assessment and Review</p> <p>We refer to the introduction, page 5, GG 142 Walking Cycling and Horse-Riding review: the statements in the third and fourth paragraphs have not been met.</p> <p>The process is defined as being made of two distinct parts; the process summary diagram (page 6, reproduced as Appendix A) shows how the parts are applied. Why has HE condensed these two distinct parts into</p>	<p>The third paragraph on page 5 of GG142 Walking, cycling and horse-riding assessment and review states that</p> <p><i>"The purpose of this document is to facilitate the inclusion of all walking, cycling and horse-riding modes in the highway scheme in the 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."</i></p> <p>The Applicant considers that the overall package of Walking, cycling and</p>

Reference	Deadline 4 Responses	Applicant's Response
	<p>one?</p> <p>There is little evidence of interaction with stakeholders.</p> <p>We feel that there is much more evidence to be taken into account from the submissions by:</p> <ul style="list-style-type: none"> • Norwich Cycling Campaign; TR010040/TR010040-000446-D2-Norwich-CyclingCampaign • Lingwood and Burlingham Parish Council; TR010040/TR010040-000474-DL3- Lingwood-and-Burlingham-Parish-Council • Broadland District Council ;(TR010040/TR010040-000344-D1-Broadland-DistrictCouncil-Local-Impact-Report) • Signatures collected by Mr Chris Gates • Create Consulting Engineers ; TR010040/TR010040-000473-D2-BurlinghamCottages-Garden-Association • The many IP submissions <p>Norwich Cycling Campaign very much regret that the opportunities presented by the three "aims" of each of the two parts of the WCHR process have not been taken up.</p>	<p>horse-riding facilities is appropriate and the two proposed overbridges crossing the new 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 conclusion, is set out in Appendix A to the Applicant's Response to Relevant Representations (REP1-060)</p> <p>The fourth paragraph on page 5 of GG142 states that</p> <p style="text-align: center;"><i>"WCHAR is intended to provide increased collaboration, interaction and engagement with key stakeholders.</i></p> <p>Details of consultation and engagement with key stakeholders are provided in the Consultation Report (APP-022) and the accompanying Annexes (APP-023 to APP-038).</p>
5	<p>Time-table of events</p> <p>We have raised the matter of the time-table of events in order to establish which came first – the design concept or the WCHR assessment. This time-table should be derived from minutes and reports of meeting and should give at least the exact dates of:</p> <ul style="list-style-type: none"> • the first meeting about the scheme • the first concept discussion • first discussion with Norfolk County Council • first provisional design assessment • issue of the WCHR assessment specification and invitation to tender • contract date for the WCHR assessment • delivery of the WCHR assessment 	<p>The A47 Blofield to North Burlingham Scheme has been in development since 2016.</p> <p>The Scheme Assessment Report (2017) sets out the options considered for the route. The Preferred Route Announcement (PRA) was made in August 2017.</p> <p>As set out in the Consultation Report (APP-022) non- statutory consultation was carried out between March to April 2017 prior to the announcement of the Preferred Route.</p> <p>In August 2018 consultation on the draft Statement of Community Consultation (SoCC) which set out how the statutory consultation would be undertaken. The Statutory consultation was completed in September to October 2018.</p> <p>There has been ongoing engagement with Norfolk County Council, Broadland District Council and other statutory and non-statutory bodies</p>

Reference	Deadline 4 Responses	Applicant's Response
	<ul style="list-style-type: none"> • public consultations • preliminary design • Safety audit of the preliminary design • stakeholder input • WCHR review • detailed design • stakeholder input • Safety Audit of the detailed design • application to Designated Fund • any other relevant dates <p>Further delays in producing this time table will make it difficult for Norwich Cycling Campaign to raise important issues within the Examination schedule.</p> <p>We have also asked to see the Safety Audit Report stages 1 and 2 which should have been completed shortly after the design stage was completed. We have had not had a response from Highways England.</p>	<p>throughout.</p> <p>Following the submission of the application for a DCO PINS confirmed that the consultation had been adequate to allow the application to be accepted for examination.</p> <p>The WCHR assessment was initially completed in February 2018 and was later reviewed and updated in January 2020.</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> <p>In preparation for the application for a DCO, the Applicant completed Preliminary Design. Detailed design is due to be completed in Summer 2021, in which time the Road Safety Audit Stage 2 will be completed and approved by the Overseeing Organisation.</p>
6.0/6.01	<p>The B1140 overbridge</p> <p>We refer to drawing number HE551490-GTY-EPE-000-DR-CH-3007 /TR010040/TR010040-000480- .4 Rights Way Access Plan 20 202</p> <p>Cycle track over the bridge</p> <p>A "New Cycle Track" is shown from North Burlingham Access, SU7, to SU7 on Cox Hill Road, B1140. This is referred to by HE as a route to be used by pedestrians and cyclists to access Lingwood and should therefore be referred to as a "shared-use" path.</p> <p>It is described as 2 metres wide, the minimum width described in Table E/3.1 page 11, CD 195. Is this appropriate for cycles, buggies, electric delivery cycles, and disability scooters?</p>	<p>As is confirmed in the Applicant's Response to the Rule 9 Letter (AS-001) the term 'cycle track' refers to shared use highways (available for use by pedestrians and cyclists).</p> <p>The structures drawing, included within the Engineering Drawings and Sections (REP4-005), include a cross-section through the B1140 bridge. The cross-section (Section B-B) through the bridge indicates that the width of the proposed cycle track varies but will be a minimum of 2.5 metres wide.</p> <p>In acknowledgement of DMRB CD353, Design criteria for footbridges, in relation to the design of shared use routes across highway bridges, the Applicant will undertake a review of the widths of the proposed cross-section at the detailed design stage, in conjunction with Norfolk County</p>

Reference	Deadline 4 Responses	Applicant's Response
	<p>In view of the combined use, and the importance that Highways England have attached to this facility, DMRB CD 353, Design criteria for footbridges should apply.</p> <p>There is also mention of some kind of segregation: the design, purpose and function is not clear. If this segregation is to provide physical protection from HGVs it will have to be substantial. If it is merely a token design feature to provide assurance to walkers and cyclists then it is probably a waste of money. Either way any form of segregation is an admission by HE of the danger, real and perceived, of this plan.</p>	<p>Council.</p> <p>The proposed cycle track will be separated from the running carriageway of the B1140. The separation distance from the carriageway will be provided in accordance with paragraph E/3.5.1 of DMRB standard CD143 Designing for walking, cycling and horse-riding and will reflect the proposed 30mph speed limit at the overbridge.</p>
6.02	<p>The approach to the bridge No information has been provided regarding the gradient; CD 353 Design criteria for footbridges, 5.8, page 14, specifies 1/20.</p>	<p>The long sections are provided in the Engineering Drawings and Sections (REP4-005), which confirm that the gradients are less than 1/20 (see Engineering Drawings and Sections (Side Road Long Sections) Sheet 3 of 4)</p>
6.03	<p>Highway crossing at SU8/9 No information has been provided on this crossing.</p>	<p>Details of the crossing will be confirmed in Detailed Design and provided in accordance with the appropriate design standards.</p>
6.04	<p>Highway crossing at SU10/11 No information has been provided on this crossing. This will be the major route for HGVs accessing and leaving the B1140 for Cantley, as well as traffic to and from Lingwood, joining and leaving the new A47.</p> <p>(See Appendix A, on our submission, for dangers of HGVs. (TR010040/TR010040-000446-D2-Norwich-Cycling-Campaign))</p>	<p>Details of the crossing will be confirmed in Detailed Design and provided in accordance with the appropriate design standards.</p>
6.05	<p>Abrupt end of shared-use cycle and footway at SU12 This will dump cyclists and pedestrians on the B1140 to share the space with up to 1,000 HGVs and other vehicles per day. (LTN 1/20, Core Design Principals, 4.2.4 Coherent)</p>	<p>The cycle track has been extended onto Acle Road, to point SU13, as shown on the Rights of Way and Access Plans (REP4-004) submitted at Deadline 4.</p>
6.06	<p>Application of LTN 1/20 Cycle Infrastructure design This design breaches all of the five Core design principles set out in Section 4, pages 30 and 31 of LTN 1/20 (Appendix B):</p> <ul style="list-style-type: none"> • 4.2.4 and 4.2.5 Coherent • 4.2.7 and 4.2.8 Direct 	<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 as is reasonably practical. The cycle track at the B1140 Overbridge and the connecting cycle tracks achieve a balance of the five core design principles.</p>

Reference	Deadline 4 Responses	Applicant's Response
	<ul style="list-style-type: none"> 4.2.9 and 4.2.11 Safe 4.2.14 and 4.2.2.16 Comfortable 4.2.17 Attractive [in particular, noise and air pollution from HGVs] 	<p>With regard to coherence and directness, the issues of connectivity to day to day destinations 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>Air pollution and noise pollution are assessed and reported in the ES Chapter 5 Air Quality (APP-028) and Chapter 11 Noise and Vibration (REP1-028). The methodology is in accordance with DMRB and the assessment includes impacts from HGVs and PM2.5 and PM10.</p> <p>The proposed cycle track will be separated from the running carriageway, thereby avoiding the need for cyclists to mix with general traffic. The cycle track will be constructed with an appropriate bituminous macadam surface to ensure their comfort for cycling.</p> <p>With regard to safety, the proposed cycle track will be separated from the running carriageway of the B1140 and the separation distance will reflect the proposed 30mph speed limit at the overbridge. The cycle track will provide a safe route for pedestrians and cyclists to cross the new A47.</p>
7	<p>The underpass proposal</p> <p>Create Consulting Engineers on behalf of Mr Chris Gates (TR010040/TR010040-000473- D2-Burlingham-Cottages-Garden-Association) has submitted a proposal for an underpass which is worthy of detailed consideration by the Examining Authority. This proposal meets the requirements of "Gear Change" and Highways England statement of cycling policy 2016 regarding the separation of communities. It is also less visually intrusive than a second footway/cycleway bridge.</p> <p>Any argument regarding costs by Highways England should be clear about the difference in costs of construction between works carried out as part of the major scheme and a stand-alone operation.</p> <p>It may be worthwhile HE submitting detailed costings so that Create</p>	<p>As previously responded, the Applicant considers that the overall package of Walking, Cycling and Horse-Riding improvements is appropriate and the two overbridges crossing the new A47 provide appropriate crossings to meet the needs of such users.</p>

Reference	Deadline 4 Responses	Applicant's Response
	Consulting Engineers and others may comment	
8.02	<p>Local Opinion The submissions by:</p> <ul style="list-style-type: none"> • Broadland District Council (TR010040/TR010040-000344-D1-Broadland-DistrictCouncil-Local-Impact-Report) • Lingwood and Burlingham Parish Council TR010040/TR010040-000474-DL3- Lingwood-and-Burlingham-Parish-Council) • Local IP submissions • Create Consulting Engineers on behalf of Mr Chris Gates (TR010040/TR010040- 000473-D2-Burlingham-Cottages-Garden-Association) <p>represent an expression of local opinion by people who know the area and live here.</p> <p>Highways England have no local connections or interests; they have conducted a consultation exercise which at best could be described as a "selling operation". The Walking Cycling and Horse-Riding Assessment and Review is seriously deficient and appears to have been conducted mainly as a map and document-based exercise.</p> <p>Highways England have no long-term local interest and will transfer responsibility for this project to Norfolk County Council upon completion and move on to the next project.</p>	<p>The Applicant has been consulting on its proposals since 2017 through the non-statutory and statutory consultations undertaken and through ongoing engagement with local organisations. Details of how this consultation has been undertaken and the consideration given to feedback is set out in the Consultation Report and its Annexes (APP-022 to APP-038).</p> <p>Throughout the Examination the Applicant has responded to the points raised by other parties:</p> <ul style="list-style-type: none"> - Applicants Response to Relevant Representations (REP1-060) - Applicant's Response to Broadland District Councils' Local Impact Report (REP3-022) - Applicant's Response to Norfolk County Councils' Local Impact Report (REP3-023) - Applicants Response to Written Representations (REP1-060) - Applicant's Written Summary of Oral Submissions at Hearings (REP4-051) - Applicants Response to Deadline 4 Submissions (TR010040/EXAM/9.21) <p>In response to comments made the Applicant has amended the rights of way provision in three areas:</p> <ul style="list-style-type: none"> - including an additional cycle track between Dell Corner Lane and Main Road along the line of the existing A47; - Acle Road to the south of the new B1140 overbridge – extending the cycle track south of where it meets the footpath, southwards into Acle Road; and - changing the status of the proposed east-west footpath to cycle track status along the entire length. <p>The Walking Cycling and Horse Riding Assessment as required by DMRB</p>

Reference	Deadline 4 Responses	Applicant's Response
		<p>has been undertaken (REP2-012). Information for a number of sources was used in undertaking this assessment including the results of surveys. Further surveys have been undertaken and as presented in Appendix A to the Applicants Response to Relevant Representations (REP1-060).</p> <p>Once completed the new A47 will form part of the Strategic Road Network and will remain the responsibility of Highways England. The responsibility for other elements of the Scheme, for example the detrunked A47, will become the responsibility of Norfolk County Council and discussions are continuing between the Council and the Applicant as to how this will be achieved.</p>

10 TIM KNIGHTS (REP4-071 AND REP4-072)

Reference	Deadline 4 Responses	Applicant's Response
	<p>Written summary of oral submissions given at Compulsory Acquisition Hearing 1</p> <p>In CAH1 I raised the concern that in a preliminary planning meeting we had been informed that it was likely we would have no vehicular access to our property for a time, and in this case it was possible we may have to relocate, though compensation for this would be available. Due to the health situation with my mother who has required several emergency medical interventions in the last years, vehicle access is a necessity. Mr Bratten and Mr Fouchet confirmed in the hearing that there would not be a problem with vehicle access being maintained to the property throughout the development.</p>	<p>The Applicant can confirm that, as stated in ISH 3, vehicle access to the property will be maintained throughout the development.</p>
	<p>Written summary of oral submissions at Issue Specific Hearing 3</p> <p>In the Issue Specific Hearing 3, Environmental Issues, Session 1 at approximately 1H28 in the recording I raised the issue that the long term maintenance of the low noise road surface proposed for the project did not appear to be secured within the application.</p> <p>The provision and maintenance of the low noise surface is critical to meeting the noise targets for many of the residents close to the scheme. Additionally it would increase the number of properties which would suffer a material noise impact from the scheme.</p>	<p>The Applicant can confirm that the Environmental Management Plan (REP4-040) was updated to ensure the long term maintenance of the low noise road surfacing is secured.</p>