

# A47 Blofield to North Burlingham Dualling

**Scheme Number: TR010040**

**Volume 9**

## **9.28 Applicant's Response to Deadline 7 Submissions**

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

Planning Act 2008

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

December 2021

Deadline 8

Infrastructure Planning

Planning Act 2008

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(Applications: Prescribed Forms and  
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**A47 Blofield to North Burlingham Dualling  
Development Consent Order 202[x]**

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**APPLICANT'S RESPONSE TO DEADLINE 7 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 National Highways' (the Applicant) response to the Deadline 7 submissions by other parties.

## 2 BRYAN ROBINSON (REP7-026)

Reference	Deadline 7 Submission	Applicant's Response
	<p>Extract from full representation, (<a href="#">REP7-026</a>)</p> <p>A47NTE uses the mainline flow constraint in UK DMRB, CD 122, Clause 2.2.1 as the overriding determinant factor negating the use of a compact grade separated junction as an option.</p> <p>This is not considered in A47BNB and I suggest that clarification is required on when compact grade separated junctions are acceptable. In this connection it would be useful to understand the intended differentiation between the wording of Clause 2.2 in CD122 which states "Compact grade separated junctions shall not be used on motorways" and Clause 2.2.1 which states "Compact grade separated junctions should not be used on dual and single carriageway roads when mainline flows are above 30,000 AADT".</p> <p>If both are mandatory prohibition statements, then the compact grade separation junction for A47BNB does not comply.</p>	<p>As set out in DMRB GG101, Introduction to the Design Manual for Roads and Bridges, pg 4, "the verb 'should' indicates advice expressed as a recommendation" and is not statutory or legislative requirements. These recommendations are good practice and where they are not followed they require justification.</p> <p>The A47 Blofield to North Burlingham B1140 junction was assessed for various junction layouts, including full grade separation. It was determined that a compact grade separated junction (CGSJ) would be best option due to the negative impacts a fully grade separated junction would cause.</p> <p>The negative impacts included compulsory purchase of The White House property, to the east of the B1140, increased land take and a greater environmental and ecological impact due to the increased footprint of the arrangement.</p> <p>A review by road safety specialists recommended improvements to the standard CGSJ merge/diverge provision, by providing extended merge/diverge auxiliary lanes. This would allow drivers to accelerate/decelerate in the auxiliary lane rather than the shorter merge/diverge tapers of a typical CGSJ.</p> <p>This decision has also been justified by carrying out the VISSIM operational modelling, as set out in the Applicant's Response to Relevant Representations (<b>REP1-060</b>) (RR-054), to ensure that the junction operates effectively, causing minimal delay on all merges and diverges.</p>

### 3 ELEANOR LAMING (REP7-027)

Reference	Deadline 7 Submission	Applicant's Response
	<p><u>Comments for the ISH on 9 November 2021</u>            Mr Chairman</p> <p>This scheme does not exist in isolation as the County Council has plans for other road expansion schemes such as dualling of the A47 at another location and changes to the Thickthorn Junction in the radial area surrounding Norwich, the Norwich Western Link and the Long Stratton bypass.</p> <p>These schemes are scheduled for completion in a similar time period.</p> <p>All of these schemes will produce carbon emissions, from road construction and ongoing and increasing motor vehicle use and so the cumulative impact should be taken into account.</p> <p>Instead the Environmental Impact Assessments take the effect of the schemes separately which does not give an adequate overview of the situation. My understanding is that the EIA regulations require a cumulative carbon assessment to be carried out.</p>	<p>This has been addressed in 'Appendix A – Hearing Action Points – 7, 8 &amp; 9' of the Applicants Written Summary of Oral Submissions at Hearings (REP7-025)</p>
	<p>The UK has been given guidance by the Climate Change Committee to reduce net annual emissions by 78% by 2035 (from a 1990 baseline). It recommends reduction of emissions through all types of decisions made about infrastructure, and this includes roads.</p> <p>NPPF paragraph 152 requires the planning system to support the transition to a low carbon future and contribute to radical reductions of greenhouse gas emissions. Paragraph 7 defines sustainable development at a very high level as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.”</p> <p>Increasing carbon emissions will add to the impact of climate change which will alter the lives of future generations negatively.</p>	<p>Please see the Applicant's response at Appendix A to (REP6-006) to Climate Emergency Planning and Policy (REP5-019 to REP5-022 AND AS-030), which addresses relevant aspects of the NNNPS, the Government's Net Zero Strategy and the Climate Change Committee's Independent Analysis of the Government's Net Zero Strategy and other strategies, including the Transport Decarbonisation Plan. The latter provides clear policy recognition that there is a need for further road investment: “In 2019, our roads handled 88 per cent of all passenger travel by distance, the vast majority of it by car or van. Even doubling rail use across the country would only reduce this proportion to 75 per cent, assuming that overall demand did not rise. The roads also carry more than three-quarters of freight traffic, and of course nearly all pedestrian,</p>

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	<p>Paragraph 11a requires development to improve the environment and mitigate climate change. The process of road construction and road use damages the environment and contributes to climate change.</p> <p>The Net Zero Strategy was published by the UK government in October 2021 and outlines a strategy to reduce domestic transport emissions by up to 45% by 2030.</p> <p>Decarbonisation is stated as an aim in the transport sector. The continuation of new road building and expansion schemes will not enable the UK to reach the stated goals. Instead, vast investment in active travel and public transport is needed.</p>	<p>cycling, bus and coach journeys. Continued high investment in our roads is therefore, and will remain, as necessary as ever to ensure the functioning of the nation and to reduce the congestion which is a major source of carbon." (page 103)</p> <p>The Net Zero Strategy and the Transport Decarbonisation Plan set out a wide range of mechanisms outside of the planning system that are proposed to be utilised to deliver the net zero by 2050 target and the shift to zero emission road transport. In considering whether or not to grant consent for a development, a decision maker is entitled to assume that other regimes will operate effectively: <i>Gateshead MBC v Secretary of State for the Environment</i> [1995] Env. L.R. 37.</p> <p>The Transport Decarbonisation Plan recognises that there are uncertainties and a need to continue to develop and refine the range of policies and proposals to ensure that the transport sector fulfils its contribution to the legally binding climate targets, with Government taking such additional targeted action as is needed to enable the targets to be met "We will regularly review progress against our targets, and continue to adapt and take further action if needed"(page 92).</p>