



14<sup>th</sup> June 2022

Planning Inspector, Adrian Hunter  
Examining Authority (ExA),  
A47 North Tuddenham to Easton Examination,  
National Infrastructure Planning,  
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Dear Inspector Hunter,

**A47NTE – Traffic Forecasts and Carbon Emissions.**

I refer to the letter dated 1 June 2022 from the Department for Transport (DfT) requesting comments from the Applicant on cumulative carbon emissions from both the scheme and other projects.

Although IPs are not included in the list of invitees requested to respond, I consider both you and DfT should be aware of a recent material development.

Norfolk County Council (NCC) Cabinet at its meeting of 6 June 2022 resolved to approve and recommend to Full Council that the Local Transport Plan, comprising the Local Transport Plan 4 Strategy and Implementation (separate documents) is adopted at the Council meeting in July.

The Cabinet was advised in a supplementary agenda paper that LTP4 is compliant with “everything that should be done” which includes delivery of the government Transport Decarbonisation Plan (TDP) through the introduction of annual emission targets to the year 2037.

When adopted, LTP4 will establish local carbon reduction targets for transport in Norfolk under both TDP and the statutory Local Transport Plan requirements of the Transport Act 2000.

The decision date for A47NTE is 12 August 2022 meaning that the targets will apply at the time of the decision, but nevertheless I believe should be taken into account as an emerging local policy if an earlier decision is envisaged.

The current Government carbon reduction targets are as the Sixth Carbon Budget (to 2037) and TDP, both of which inform the targets in Norfolk Local Transport Plan to be adopted in July as the contribution from reductions to carbon emissions on the county’s roads towards the national overall commitment and the legislated carbon account at least 100% lower than the 1990 baseline.

National Policy Statement for National Networks (NPSNN) which governs process and substance for the Strategic Road Network schemes confirms at paragraph 1.2 that decisions is governed by section 104 of the Planning Act 2008<sup>1</sup>.

Under subsection 104(3) which says *“The Secretary of State must decide the application in accordance with any relevant national policy statement, **except to the extent that one or more of subsections (4) to (8) applies.**”*

The exception at Subsection (5) states “This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would lead to the the Secretary of State being in breach of any duty imposed on the Secretary of State by or under any enactment”.

I conclude these subsections to mean that the SoS should not grant a DCO if he is satisfied that it would lead to a breach of any legislation. It must therefore be assumed that opposite, whether the SoS must also be satisfied that there will be no breach if the DCO is granted, must also apply.

To establish whether the DCO would breach the legislated government commitment to a carbon account of 100% lower than 1990 baseline by 2050 and the trajectory for carbon emissions from domestic road transport are the key considerations.

I do not consider that the application and data provided in this NSIP application is adequate to enable determination by the SoS (or Examining Authority) of the impact of carbon emissions for A47NTE, either on its own or cumulatively with other projects, lacking sufficient appropriate detail to assess one way or the other of breaches of the targets in the Climate Change Act 2008.

Guidance from IEMA (February 2022) and the European commission on EIA best practice **strongly recommend** that **local and regional assessment** of carbon emission from projects is carried out as also noted in NPSNN<sup>2</sup>. The applicant was requested to do this during the examination, but serially refused to do so

The targets now provided in the LTP, which NCC is adamant for compliance with the TDP, now provide the benchmark against which to do this. The SoS in considering his decision must give weight to the strong recommendations of the guidance for best practice.

I consider that in the presence of the strong recommendation for local and regional assessment of carbon impacts in relevant guidance, and the new policy statement from the County Council which clearly provides the required local benchmark carbon targets and budgets, that the Environment Statement is now inadequate under EIA Regulation 20. The application should be refused consent in the absence of action by the Applicant to offer evidence to the contrary.

The A47NTE application confirms that there will be an **increase** arising from the works of 402,694tCO<sub>2e</sub> above the DM projections between 2025 and 2037 (end year of the government sixth carbon budget) which will have a material impact on the carbon reduction targets for Norfolk and consequentially nationally.

The road to zero emissions by 2050 has two main actions;

Change from petrol/diesel to electric vehicles; **AND**

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<sup>1</sup> Section 104 of the Act is entitled “Decisions in cases where national policy statement has effect”

<sup>2</sup> Paragraph 4.4

A reduction in road traffic by changing to other forms of transport.

What the whole life carbon assessments in A47NTE do not tell us is how the DM, DS0 and DS1 calculations compare with the current level of emissions in Norfolk, specifically we are not told;

What allowance is made in the DM for general traffic growth or reduction? Or

What carbon emission reductions have been assumed for the roll out of electric vehicles?

The current presentation of whole life carbon assessments is unsuited to determination of a quantifiable trajectory against the local annual targets.

The carbon targets in LTP4 for Norfolk over the same period 2025 to 2037 is 1,591.30ktCO<sub>2e</sub> reducing to 477.53ktCO<sub>2e</sub> and it is unclear from the application whether the A47NTE figures will assist or work against these targets.

For information the annual targets in LTP4 are:

Year	Target Emissions (ktCO <sub>2</sub> )	Annual Reductions	
	Base	ktCO <sub>2</sub>	%
2019	1,717.70		
2022	1,657.32	60.38	-3.52%
2023	1,636.25	21.07	-1.27%
2024	1,616.58	19.67	-1.20%
2025	1,591.30	25.28	-1.56%
2026	1,522.48	68.82	-4.32%
2027	1,453.66	68.82	-4.52%
2028	1,345.52	108.14	-7.44%
2029	1,242.99	102.53	-7.62%

Year	Target Emissions (ktCO <sub>2</sub> )	Annual Reductions	
		ktCO <sub>2</sub>	%
2030	1,125.01	117.98	-9.49%
2031	1,016.86	108.15	-9.61%
2032	903.10	113.75	-11.19%
2033	751.41	151.69	-16.80%
2034	669.95	81.46	-10.84%
2035	591.30	78.65	-11.74%
2036	530.90	60.40	-10.21%
2037	477.53	53.37	-10.05%

In the circumstances, assuming the adoption of LTP4 in July by full Council as proposed, I suggest that DCO approvals for A47NTE, and the concurrent applications for A47 Blofield to North Burlingham and A47 Thickthorn, are deferred until the carbon emissions can be presented in a format which will enable review against the LTP4 annual carbon emission targets.

There is no point in a Local Transport Authority setting targets in accordance with national carbon policies such as TDP which are unachievable through actions and schemes promoted by Central Government using conflicting assessment criteria based on outdated legislation which predates the Government's commitment to net zero and the more ambitious policies of TDP.

Judgement of evidence against compliance with local and regional targets reflecting the legal overriding commitment to net zero must be the priority in decisions.

"Countywide" evidence must therefore reflect the cumulative nature of all schemes under consideration as two projects individually may accord with the targets, jointly they may not.

Currently there are eight road schemes note in LTP4 including the three A47 projects.

This evidential requirement debate reopens earlier concerns regarding differing traffic models for contemporary schemes. To date both NCC (for NWL) and NH (for A47NTE) have consistently

ignored requests for a common traffic model for the two schemes to eliminate the discrepancies of traffic forecasts which then form the basis of carbon emissions calculations.

NH has consistently downplayed this during the Public Inquiry concluding<sup>3</sup> that

*It is noted that the 2025 NCC NATS model has been further developed to enable the assess of the Norwich Western Link and the impacts of the scheme locally. **The 2025 A47 NATS model has more focus on the strategic road network.** As a consequence of the slightly **more detailed local road network included in the 2025 NCC NATS model**, any differences between the models can be seen to be related those additional network links being used; [Emphasis added] and*

*It is agreed between Highways England and NCC that the differences between the 2025 NCC NATS model and the 2025 A47 NATS model are understood and acceptable.*

I question the validity of these statements as it seems inconceivable that NH would knowingly use a model which minimises consideration of known impact on minor roads with stopping off of numerous junctions to the former major road route.

Also if the differences are understood why NH/HE has not answered many of the traffic questions submitted by IPs.

If this premise by both parties is true, an explanation is required why there are differing traffic forecasts for locations on strategic road network (SRN) and side roads. **These are not trivial, and in some cases differences of many thousands of daily vehicle trips have been reported between the A47NTE and NWL traffic models for what should be an identical scenario.** In the following tables, we compare the figures from the two different traffic modes at the 2025 opening and 2040 design years for various locations on the SRN. In each table/location:

1. **column (e)** [the A47NTE DS1 sensitivity test with no NWL ie: should closely equate to NWL DM] and **column (f)** [NWL DM] should be similar, or identical; and
2. **column (d)** [A47NTE DS0 containing both the A47NTE and NWL] and **column (g)** [NWL DS containing both the A47NTE and NWL] should be similar, or identical.

Location: A47 West of Lyng Road (A47 Station 26)						
Base		A47NTE 2025 <sup>4</sup>			NWL 2025 <sup>5</sup>	
(a)	(b)	(c)	(d)	(e)	(f)	(g)
2015 (A47)	2019 (NWL)	DM	DS0	DS1 <sup>6</sup>	DM	DS
24,000	25,100	31,000	39,000	35,000	39,400	35,900
		A47NTE 2040			NWL 2040 <sup>7</sup>	
		36,000	49,000	43,000	47,100	40,100

Evaluation: (e) to (f) 2025 – NWL assessment 12.6% greater

Evaluation: (e) to (f) 2040 – NWL assessment 9.5% greater

<sup>3</sup> Statement of Common Ground with NCC item 116 – REP4-003

<sup>4</sup> Figures from TR010038/App/7.1 Figures 4.18

<sup>5</sup> Figures from Appendix D of NWL OBC Traffic Forecasting Report

<sup>6</sup> Figures from TR010038/App/7.1 Figures 4.27

<sup>7</sup> Figures from Appendix D of NWL OBC Traffic Forecasting Report

Evaluation: (d) to (g) 2025 – NWL assessment 7.9% lower

Evaluation: (d) to (g) 2040 – NWL assessment 22.2% lower

Location: A47 Between two junctions (A47 Station 8)						
Base		A47NTE 2025			NWL 2025	
(a)	(b)	(c)	(d)	(e)	(f)	(g)
2015 (A47)	2019 (NWL)	DM	DS0	DS1	DM	DS
24,000	n/a	22,000	34,000	36,000	41,100	37,300
		A47NTE 2040			NWL 2040	
		23,000	44,000	45,000	49,500	44,800

Evaluation: (e) to (f) 2025 – NWL assessment 14.2% greater

Evaluation: (e) to (f) 2040 – NWL assessment 10% greater

Evaluation: (d) to (g) 2025 – NWL assessment 9.7% greater

Evaluation: (d) to (g) 2040 – comparable assessments

Location: A47 East of former Easton roundabout (A47 Station 14)						
Base		A47NTE 2025			NWL 2025	
(a)	(b)	(c)	(d)	(e)	(f)	(g)
2015 (A47)	2019 (NWL)	DM	DS0	DS1	DM	DS
30,000	25,800	27,000	36,000	40,000	41,600	36,800
		A47NTE 2040			NWL 2040	
		32,000	46,000	49,000	50,400	43,400

Evaluation: (e) to (f) 2025 – comparable assessments

Evaluation: (e) to (f) 2040 – comparable assessments

Evaluation: (d) to (g) 2025 – comparable assessments

Evaluation: (d) to (g) 2040 – NWL assessment 6% lower

Location: NWL (A47 Station 6)						
Base		A47NTE 2025			NWL 2025	
(a)	(b)	(c)	(d)	(e)	(f)	(g)
2015 (A47)	2019 (NWL)	DM	DS0	DS1	DM	DS
n/a	n/a	18,000	21,000	0	0	24,700
		A47NTE 2040			NWL 2040	
		20,000	28,000	0	0	34,600

Evaluation: (d) to (g) 2025 – NWL assessment 17.6% greater

Evaluation: (d) to (g) 2040 – NWL assessment 23.6% greater

There are also noticeable differences for some of the minor roads including;

Location: Sandy Lane (A47NTE Station 3)						
Base		A47NTE 2025			NWL 2025	
(a)	(b)	(c)	(d)	(e)	(f)	(g)
2015 (A47)	2019 (NWL)	DM	DS0	DS1	DM	DS
800	70	0	300	1,700	100	60
		A47NTE 2040			NWL 2040	
		0	1,400	2,900	100	60

Location: Wood Lane (A47NTE Station 5)						
Base		A47NTE 2025			NWL 2025	
(a)	(b)	(c)	(d)	(e)	(f)	(g)
2015 (A47)	2019 (NWL)	DM	DS0	DS1	DM	DS
2,500	4,600	2,100	2,300	5,400	6,000	1,400
		A47NTE 2040			NWL 2040	
		1,700	2,300	4,900	7,800	2,100

Location: Taverham Road (A47NTE Station 10)						
Base		A47NTE 2025			NWL 2025	
(a)	(b)	(c)	(d)	(e)	(f)	(g)
2015 (A47)	2019 (NWL)	DM	DS0	DS1	DM	DS
600	250	0	200	5,400	1,800	1,100
		A47NTE 2040			NWL 2040	
		400	400	4,900	2,600	1,200

Location: Heath Road (A47NTE Station 2)						
Base		A47NTE 2025			NWL 2025	
(a)	(b)	(c)	(d)	(e)	(f)	(g)
2015 (A47)	2019 (NWL)	DM	DS0	DS1	DM	DS
1,000	1,700	100	200	200	1,400	1,100
		A47NTE 2040			NWL 2040	
		100	200	300	1,700	1,100

Again the lack of consistency on forecasts for minor roads across the Wensum Valley arising from the two models does not instil confidence in the algorithms and specialist software used.

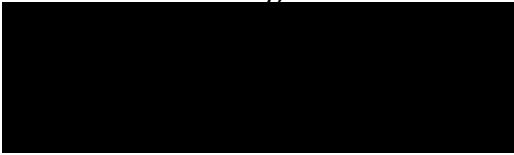
There seems little justification for the common ground statement that the differences from the two models are understood and acceptable. **If they are understood:**

- **why have the above discrepancies been allowed to go into formal documents in each scheme (the NWL OBC funding bid, and the A47NTE Environmental Statement)?; and**
- **why have related questions raised by Interested Parties serially not been answered during the A47NTE Inquiry?**

The Government TDP policy has fundamentally changed the requirements of carbon emissions assessments nationally and locally, and I would appreciate clarification of how this is being dealt with by both the Planning Inspectorate and the Department.

NH are developers clinging to historic arguments and models which are no longer suited or relevant to the specific local road transport emission targets prepared against current legislation and if it is not prepared to provide adequate evidence to align with current legislation and policies, a plethora of legal challenges must be anticipated.

Yours sincerely,

A large black rectangular box redacting the signature of Bryan Robinson.

Bryan Robinson (IP reference 20028154)