
The Norfolk County Council (Norwich Northern Distributor Road (A1067 to A47(T))) Order

Applicant's comment on Written Representations by Mr L Gray

Planning Act 2008

Infrastructure Planning

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

PINS Reference Number: TR010015

Document Reference: NCC/EX/19

Author: Norfolk County Council

Version	Date	Status of Version
0	21 st July 2014	Final

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Introduction This document provides the Applicant's responses in respect of issues raised by Interested Parties in their Written Representations to the Examining Authority.

The points have been responded to where possible in the order they were raised. Each issue, or in some cases a summary of it, is shown in italics.

This document should also be read in conjunction with the Statement of Common Ground NCC/EX/6.

Applicant's comment on Written Representations

1.1. Main Representations – the complete text has not been repeated (refer to Section 3 of the full Written Representation)

Applicant's comment

- 1.1.1. The closure of Drayton Lane (south) at its junction with Reepham Road was introduced following the 2012 consultation to address concerns about increased forecast traffic flows through the centre of Drayton. The proposed change was highlighted as part of the consultation carried out in February/March 2013. The purpose of the 2013 consultation was to provide feedback on the results of the 2012 consultation and show how the NDR proposals had changed as a result of these comments.
- 1.1.2. Representations were made during the February/March 2013 consultation about the closure of Drayton Lane (south). Norfolk County Council (NCC) considered these representations but decided to retain the closure of Drayton Lane due to the anticipated forecast increase in traffic on School Road through the centre of Drayton.
- 1.1.3. Following the Section 47 consultation NCC considered the provision of a roundabout at the junction of Drayton Lane (south) and Reepham Road but decided not to progress this modification as it would have resulted in a forecast increase in traffic on School Road.
- 1.1.4. A number of meetings have been held between NCC, Mr Gray, some of his neighbours, Drayton Parish Council and the local County Councillor. Mr Gray was also representing the views of other residents of Hall Lane and Reepham Road who live adjacent to and opposite his property.

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- 1.1.5. At these meetings local residents raised, in their opinion, fundamental concerns regarding the current NDR proposals for Drayton. These concerns relate mainly to the proposed main route between the NDR and Drayton being via the Reepham Road, Hall Lane (north) and their junction, and in particular the closure of Drayton Lane (south) at its junction with Reepham Road.
- 1.1.6. A number of alternatives have been considered by NCC in reviewing the issues raised by Mr Gray and his neighbours. These are:
- providing a 4 arm roundabout at the Reepham Road/Drayton Lane junction;
 - providing a 4 arm roundabout at the Reepham Road/Drayton Lane junction, plus a closure of Hall Lane south of Reepham Road;
 - providing a 4 arm roundabout at the Reepham Road/Drayton Lane junction, plus a closure of Hall Lane south of Reepham Road and traffic calming on Hall Lane south of its junction with Drayton Lane;
 - maintaining the currently proposed arrangement at the Reepham Road/Drayton Lane junction but removing the Drayton Lane closure and traffic calming on Hall Lane south of its junction with Drayton Lane;
 - maintaining the currently proposed arrangement at the Reepham Road/Drayton Lane junction but removing the Drayton Lane closure and providing a closure of Hall Lane south of Reepham Road and traffic calming on Hall Lane south of its junction with Drayton Lane.
- 1.1.7. NCC has tested these options using the NDR's strategic transport model and considers that tests of options for providing a roundabout at Reepham Road/Drayton Lane (with and without a closure of Hall Lane south of Reepham Road) show an increase in traffic flow of up to 30% on School Road south of Hall Lane.

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- 1.1.8. Taking into consideration the views of the local community and Drayton Parish Council on balance it was considered that a change to the scheme which kept Drayton Lane (south) open would provide a safer and more acceptable solution for the local community and all road users. Refer to Statement of Common Ground (Document Ref NCC/EX/6).
- 1.1.9. An amendment to the DCO Scheme has been promoted to keep Drayton Lane (south) open. Refer to the report Proposed Minor Change to the Application for Development Consent: Drayton Lane (south) (Document Ref. 5.13). The Planning Inspectorate in the Rule 9 letter dated 16 July 2014 has stated that the revised proposal can be considered as part of the existing application.
- 1.1.10. NCC would not wish to progress a roundabout at Reepham Road/Drayton Lane because of the forecast increase in traffic flows on School Road through the centre of Drayton.
- 1.1.11. The Scheme now includes both Drayton Lane and Hall Lane open which retains the current road layout. This is considered to be a reasonable compromise with only a slight increase in traffic on School Road through the centre of Drayton compared to the originally submitted scheme. Refer to Figure 6.4 in Appendix E of the report Proposed Minor Change to the Application for Development Consent: Drayton Lane (south) (Document Ref. 5.13).
- 1.1.12. The Scheme would improve safety at the Reepham Road/Hall Lane junction with a simplified three arm priority junction. In addition there would be less right turning traffic from Reepham Road compared to the originally submitted NDR scheme.
- 1.1.13. Operational analysis results contained within Appendix E of the Proposed Minor Change to the Application for Development Consent: Drayton Lane (south) (Document Ref. 5.13) shows that the junctions on Reepham Road with Drayton Lane (south), Hall Lane (north) and the link to the NDR will operate within desirable capacity in forecast years

even with all traffic movements uplifted by an additional 10-20% in sensitivity tests. It is therefore concluded that the modification would be acceptable in operational terms.

1.2. Modelling Guidance and Representations – the complete text has not been repeated (refer to Section 4 of the full Written Representation)

Applicant's comment

- 1.2.1. The traffic model developed for Norwich and for the appraisal of NDR is designed so that it is capable of forecasting the traffic impacts of the proposed measures, or alternatives to these, across the city network and surrounding area. To produce the most likely and credible forecasts it is necessary to start with a base model of sufficient accuracy and realistic assumptions about the changes in traffic demand and the behaviour of users. The Department for Transport (DfT) produce best practice guidance that sets standards that should be met in the development of the base model, and provides guidance and data for the realistic estimation of the future. The traffic model development has complied with this guidance and used the data made available by the DfT.
- 1.2.2. The traffic model was validated to meet DfT guidance targets and the validation results that support the latest traffic model are set out in the Highway Model - Local Model Validation (Document Ref. 5.9).
- 1.2.3. This sets out how the latest survey data collected in 2012 has been used to build the traffic model shows that it provides a good representation of traffic behaviour in the study area. The base model is checked by comparing overall modelled flows across strategic cordons (rings) and screen lines. These global checks meet DfT criteria. On this basis it is considered that the base model forms a robust basis from which future year forecasts for the NDR scheme can be developed.

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- 1.2.4. The calibration and validation in the local area around Drayton is considered to be good. This is illustrated by the results for the calibration screen line D shown in Tables S4, S15 and S26 for Drayton High Road (location D5), Reepham Road (D6) and Hall Lane (D7) and the validation screen line I shown in Tables S11, S22 and S33 for Hall Lane (I6) and School Road (I7).
- 1.2.5. Further counts were also carried out in 2013 on Drayton Lane and Hall Lane to support the investigation of a number of options to address the concerns raised regarding the closure of Drayton Lane. These showed noticeable differences on these two roads compared with the model although adding the two counts together produced corridor counts that matched very closely with the validation count at location I6. Therefore it is considered that the model is acceptable for the appraisal of the Scheme and an alternative with Drayton lane kept open.
- 1.2.6. With this good quality base information in the local Drayton area it means that credible forecasts have been produced for the impacts of the NDR proposals in the local area. The forecasts are reported in Norwich NDR Traffic Forecasting Report (Document Ref. 5.6). This shows in Appendix I in Figure I1 the forecasts of Annual Average Daily Traffic flows in the local Drayton area with and without the current proposals for NDR (with Drayton Lane closed).
- 1.2.7. The traffic model has proved extremely useful in enabling a comparative assessment in traffic flows in the Drayton area for the various options that have been investigated to address the concerns raised as a result of the proposed closure of Drayton Lane.
- 1.2.8. Reopening of Drayton Lane (south) and a roundabout junction with Reepham Road would make the route shorter and quicker between the A1067 and NDR and thus a more attractive route for drivers to use. Traffic modelling has been carried out and in reflecting these changes it showed that there would be an increase in traffic on this route and through Drayton, which is a logical outcome. It is not accepted that the outcome from the modelling is inaccurate in this respect.

*1.3. Safety Audit Representations – the complete text has not been repeated
(refer to Section 5 of the full Written Representation)*

Applicant's comment

- 1.3.1. The Scheme has been the subject of a number of road safety audits carried out by independent audit teams in accordance with NCC procedures and the DMRB HD 19/03 Road Safety Audit. The audits are scheduled on pages 3 and 4 of Road Safety Audits and Briefs (Document Ref 10.1).
- 1.3.2. The audits comprise an evaluation of all works that involve construction of new highways or permanent change to the existing highway layout or features in accordance with the guidance in paragraph 1.15 and 1.17 of HD19/03 and this includes the junctions of radial routes with the Scheme and any off-line improvements proposed on these radial routes. Road safety audit is an ongoing process and further audits will be carried out as the scheme progresses through detailed design, completion of construction and post construction monitoring.
- 1.3.3. In addition to the formal road safety audit process Chapter 10 of the Transport Assessment (Document Ref 5.5) includes a high level Personal Injury Collision (PIC) data analysis carried out as part of a wider road safety review of the Scheme. This analysis considers all the principal routes in the study area, and identifies accident cluster sites. It then identifies the changes in traffic flow on the approaches to a cluster site junction and then provides a commentary on the likely implications for each site as a result of the Scheme. The conclusions of this analysis can be found in paragraphs 10.6.1 to 10.6.5 of the Transport Assessment. Where cluster sites are subject to forecast increases in traffic with the Scheme NCC will monitor these sites on a quarterly basis. This regular investigation of the detailed accident records will determine whether the road environment was a factor and what, if any, measures could be implemented to improve road safety.

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- 1.3.4. The Stage 1 Road Safety Audit to consider the Drayton Lane/Hall Lane alternatives (contained in Appendix C of the report Proposed Minor Change to the Application for Development Consent: Drayton Lane (south) (Document Ref. 5.13)) did consider the character of the road links between junctions as well as the junctions themselves. This was confirmed to Mr Gray via email by a member of the Audit Team. The email dated 30 April 2014 is included as Appendix A.

1.4. Environmental /Cost Representation – the complete text has not been repeated (refer to Section 6 of the full Written Representation)

Applicant's comment

- 1.4.1. As explained above in paragraph 1.1.9 an amendment to the DCO Scheme has been promoted to keep Drayton Lane (south) open and can now be considered as part of the existing application.
- 1.4.2. The Scheme now includes both Drayton Lane and Hall Lane open which will result in a reduction in forecast traffic flows on Hall Lane (north) as shown in Table 4.1 in Appendix E of the report Proposed Minor Change to the Application for Development Consent: Drayton Lane (south) (Document Ref. 5.13).
- 1.4.3. NCC would not wish to progress a roundabout at Reepham Road/Drayton Lane because of the forecast increase in traffic flows on School Road through the centre of Drayton which is considered by the Applicant to conflict with the concept of the NDR, which is to reduce traffic within communities where possible.

1.5. *Lack of Transparency and Even-Handedness by NCC – the complete text has not been repeated (refer to Section 7 of the full Written Representation)*

Applicant's comment

- 1.5.1. The views in 7.2a to d are those of Mr Gray and his local community and not NCC which is why they were not included in the localised consultation letter.

Appendix A

Dear Mr Gray,

Thank you for your email regarding the above Stage 1 Safety Audit. I am pleased that you believe the report provides a balanced safety view of the different junction options. However, I note you are concerned that a variety of safety issues associated with the Hall Lane (north) link were not assessed (e.g. verge erosion, roadside telegraph poles etc.). I can assure you that the audit team considers all aspects of road safety, but as most road accidents occur at junctions it is not unusual for the majority of points raised to focus on junction locations. It is also the case that the audit submission concerned several junction options so as a natural consequence will refer to these in the majority of the points raised. To answer the 2 specific questions you ask, I have the following response:

- 1) Hall Lane (north) and Drayton Lane (south) are similar in terms of carriageway width and are also similar in verge width and alignment over much of their lengths. I accept that Hall Lane (north) is more eventful, with a sweeping bend, sections with narrow verge and driveways. There are also some roadside telegraph poles. However, the safety risk that these features present is mitigated by a lower 40mph speed limit on Hall Lane (north), whereas Drayton Lane (south) has a 60mph speed limit. I would also say that both roads are fairly atypical rural/semi-rural Norfolk C and U class roads with no unusual features. This is reflected in the good injury accident record for both roads with none on Drayton Lane (south) and one slight injury accident recorded on Hall Lane (north) in the last 3 years. This accident was somewhat anomalous involving a car and pedestrian in dark conditions at 05:30 on a Saturday morning.
- 2) With regard to the other specific items on your list I have not mentioned above, I have the following comments:
 - a) Abuse of HGV restriction on Hall Lane (north) - HGV restrictions with signing (as is the case on Hall Lane (north)) is a standard approach to prohibiting inappropriate HGV use across the country. Investigating widespread abuse of HGV restrictions is beyond the scope of Road Safety Audit although no HGV's were observed during the safety audit site inspection. However, I agree that inappropriate HGV use should be prevented and should be raised with Norfolk Constabulary for enforcement.
 - b) Verge Erosion – Unfortunately erosion of the highway verge is a common feature on much of Norfolk's unimproved rural road network. I do not consider the degree of verge erosion on Hall Lane (north) to be unusual. In view of the lower 40mph speed limit and lack of associated accident record it has not been raised as a safety issue. However, it does support your observations of HGV abuse and further demonstrates that Police enforcement should be considered.
 - c) Telegraph Poles – considered in 1) above.

- d) Bend on Hall Lane (north) – considered in 1) above.
- e) Safety at Hall Lane/Reepham Road junction – The appropriate junction form was considered in the Stage 1 Safety Audit and preference stated for a roundabout in para. 3.1.
- f) Police T40 – See e) above
- g) Right turns in to Hall Lane (north) from Reepham Road – See e) above
- h) Paragraph 3.3 of the Audit Report states that Hall Lane should be closed and movements catered for by a roundabout at Reepham Road/Drayton Lane. This concurs with the route hierarchy designation of the two routes that you refer to.
- i) Speeding on Hall Lane (north) - Speed limit compliance on Hall Lane is an existing issue that is neither reduced or exacerbated by the proposed NDR should Hall Lane (north) remain open. In view of the good accident record on Hall Lane no undue safety concern has been raised.
- j) No footway on Hall Lane (north) – This is an existing issue and the NDR proposal has a neutral effect should Hall Lane (north) remain open. It has therefore not been commented on within the Safety Audit.
- k) Cycle Route on Hall Lane – I agree that closure of Hall Lane (as discussed in para. 3.3 of the audit report) would make cycling more attractive on Hall Lane.
- l) Provision of roundabout – This is discussed within the audit report.
- m) Drayton Hall Park Access - I agree that Hall Lane (north) is more eventful than Drayton Lane (south) and is the reason for the 40mph speed limit, which reduces risk of conflict (see 1 above).
- n) Access to St Faith's Surgery – This is an access rather than a safety issue. It was therefore not considered.

I hope the above clarifies the scope of the Road Safety audit and reassures you that both the junction options and the Drayton Lane, Hall Lane and Reepham Road links have been audited as well as the junction options.

Kind regards

Kevin

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From: Les Gray Gmail [REDACTED]
Sent: 25 April 2014 16:15
To: Allen, Kevin
Cc: Karen Campbell-Broome; Lester Broome; Jimmy Hall; Jeff Anderson; Graham Everett; Adams, Anthony; Frances Bushnell; Sue Fenner; Nora O Connor
Subject: Re: NDR - Drayton Lane / Hall Lane - Stage 1 Safety Audit Report - File Ref: Gen 188

Apologies - with attachment this time

From: [Les Gray Gmail](#)
Sent: Friday, April 25, 2014 3:52 PM
To: [Kevin Allen](#)
Cc: [REDACTED]
Subject: NDR - Drayton Lane / Hall Lane - Stage 1 Safety Audit Report - File Ref: Gen 188

Dear Mr Allen

I write, on behalf of our local community, following receipt of your above mentioned Safety Audit Report dated 27 January 2014 and understand Mark Kemp (NCC Project Engineer - NDR Team) has already spoken to you about this matter. Indeed it was Mark who suggested I contacted you in the first instance.

As you will be aware, the Stage 1 Safety Audit was commissioned following specific and ongoing discussions between our Local Community, Drayton Parish Council, Norfolk Police, our County Councillor and NCC's NDR Design Team. During these discussions, considerable road safety issues / hazards were pointed out to NCC, mainly regarding the bend on Reepham Road, the many hazards (including another bend) along Hall Lane (north) and the (proven) dangerous junction between those two roads. You will of course be aware of the accident records for this local road network.

In the main, all of the issues we have identified are backed up with clear and substantial evidence, accordingly, I attach to this email a summary of the main hazards and our conclusion, together with the following link (https://www.dropbox.com/sh/9cr15xj57e9zxh0/Dn0c_ky0u5) which contains the Appendices referred to therein.

We note the Design Team's Stage 1 Safety Audit 2014 (effectively the Audit Brief) failed to specifically point out any of the known hazards of which they were fully aware (as set out in the attached document / link), rather, their remit to yourselves was a more general aim "to assess the safety implications of the current proposal and the possible alternative options", which centered around (incorrect) traffic modelling / PICADY assessment and alternative junction forms.

We believe your report is a balanced and well written view of the junction options (and you will see our attached conclusion agrees with your recommendation in 3.3), however, there are two issues about the report we strongly disagree with, these are:

1) In 1.1 of the report, you state Drayton Lane (south) and Hall Lane (north), "in terms of safety", "are very similar in standard and alignment". Clearly, as the evidence before us shows, this is simply not the case. Drayton Lane has no hazardous sloping bend and none of the other safety hazards, as pointed out in the attachment, in contrast to Hall Lane (north).

2) Despite legislation stating a Stage 1 Safety Audit should "identify potential road safety problems that may affect any users of the highway and to suggest measures to eliminate or mitigate those problems" and that an Audit Brief shall include "any relevant factors which may affect road safety" and "the specific road safety problems identified", many of the hazards we (and the Police) identified have not been specifically referred to or covered within your report. You will also be aware that an Audit Report "shall contain a separate statement for each identified problem describing the location and nature of the problem and the type of accidents considered likely to occur as a result of the problem".

You will also be aware that Stage 1 Checklists are available, specifying such hazards as those we have pointed out (and recognising specific constraints and unusual features) which should be identified and covered.

We appreciate the NCC Design Team's Audit Brief did not point out any of the known hazards on Hall Lane (north) and they generally expected the Audit Team to address all "safety implications", however, it is clear this has not been done as part of your remit or Report. Mark Kemp is trying to say you have covered all these things which, quite frankly, is ridiculous. There are some very substantial safety implications with these issues and they need full and proper consideration, especially if Hall Lane (north) is to remain open with the NDR in place (even if Drayton Lane also remains open).

Accordingly, we would be grateful to receive your confirmation that these critical safety issues have not yet been addressed by your department or, if you should claim they have been, then please provide us with full details of all the points and how you consider each of them should be addressed.

We look forward to hearing from you as soon as possible please and if you wish to meet and/or discuss any issues, feel free to contact me.

Regards

Mr Les Gray - on behalf of our local community.