

# Norfolk County Council

## Record of Individual Cabinet Member Decision

**Responsible Cabinet Member: Cllr Martin Wilby (Cabinet Member for Highways, Infrastructure & Transport)**

### **Background and Purpose:**

The Department for Transport has awarded Norfolk County Council capital funding from the Transforming Cities Fund (TCF). Norfolk County Council's successful application is based on a vision to "invest in clean and shared transport creating a healthy environment, increasing social mobility and boosting productivity through enhanced access to employment and learning".

Prior to formally advertising the Traffic Regulation Order (TRO) required to deliver the mobility hub proposals for Norwich rail station and surrounding roads, consultation was carried out on the proposals from January 2021 to March 2021. The outcome of this consultation was presented at the June 2021 Transport for Norwich (TfN) Joint Committee, as well as suggested amendments to the original proposals based on feedback. The Committee approved the proposals presented and for the statutory processes associated with relevant TROs to be carried out. This report outlines the outcome of the TRO process.

### **Decision:**

- 1. To implement the scheme as detailed on the plan in Appendix A and the Traffic Regulation Order in Appendix B.**

**Is it a key decision? No**

**Is it subject to call-in? Yes**

**If Yes – the deadline for call-in is: 4pm, Wednesday 29 December 2021**

### **Impact of the Decision:**

As detailed in the attached Report.

### **Evidence and reason for the decision:**

As detailed in the attached Report.

### **Alternative options considered and rejected:**

As detailed in the attached Report.

**Financial, Resource or other implications considered:**

As detailed in the attached Report.

**Record of any conflict of interest:**

None

**Background documents:**

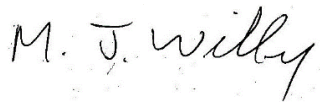
- [Transforming Cities Joint Committee \(June 2021\) – Norwich Rail Station Mobility Hub \(Item 9\)](#)
- Appendix A – Consultation plans
- Appendix B - Traffic Regulation Order
- Appendix C – Comments received with Officer comments
- Appendix D – Local Member's comments

**Date of Decision: 16/12/2021**

**Publication Date of Decision: 17/12/2021**

**Signed by Cabinet Member:**

I confirm that I have made the decision set out above, for the reasons also set out.

A handwritten signature in black ink, appearing to read 'M. J. Wilby', with a light blue circular stamp or watermark behind it.

**Print name: Cllr Martin Wilby**

**Date: 16/12/2021**

**Accompanying documents:**

Report to Cabinet Member - Norwich – A1242 Thorpe Road - Norwich Rail Station Mobility Hub improvements.

# Individual Cabinet Member Decision Report

**Item No:**

**Report Title:** Norwich – A1242 Thorpe Road - Norwich Rail Station Mobility Hub improvements.

**Date of Meeting:** N/A

**Responsible Cabinet Member:** Cllr Martin Wilby (Cabinet Member for Highways, Infrastructure & Transport)

**Responsible Director:** Tom McCabe (Executive Director, Community and Environmental Services)

**Is this a Key Decision?** No

**If this is a Key Decision, date added to the Forward Plan of Key Decisions:** N/A

## Executive Summary / Introduction from Cabinet Member

The Department for Transport has awarded Norfolk County Council (NCC) capital funding from the Transforming Cities Fund (TCF). NCC's successful application is based on a vision to "invest in clean and shared transport creating a healthy environment, increasing social mobility and boosting productivity through enhanced access to employment and learning". This report sets out proposals to support the Norwich Rail Station Mobility Hub improvements, which are part of this TCF programme.

Prior to formally advertising the Traffic Regulation Order (TRO) required to deliver the mobility hub proposals for Norwich rail station and surrounding roads, consultation was carried out on the proposals from January 2021 to March 2021. The outcome of this consultation was presented at the June 2021 Transport for Norwich (TfN) Joint Committee, as well as suggested amendments to the original proposals based on feedback. The Committee approved the proposals presented and for the statutory processes associated with relevant TROs to be carried out. This report outlines the outcome of the TRO process.

**Recommendations:**

1. To implement the scheme as detailed on the plan in Appendix A and the Traffic Regulation Order in Appendix B.

## 1. Background and Purpose

- 1.1 The Department for Transport (DfT) has awarded Norfolk County Council (NCC) capital funding from the Transforming Cities Fund (TCF).
- 1.2 The proposals fulfil the key TCF programme objectives to improve bus travel, along with walking and cycling improvements, and the creation of a mobility hub at this key transport interchange. They also build on the recent improvement works on Prince of Wales Road and link with the bus and cycle contraflow scheme currently being constructed along Thorpe Road between Clarence Road and Carrow Road.
- 1.3 The June 2021 Transport for Norwich (TfN) Joint Committee approved proposals presented for Norwich rail station and surrounding roads, as well as for the statutory processes associated with relevant Traffic Regulation Orders (TROs) to be carried out. This report outlines the outcome of the TRO process.

## 2. Proposal

- 2.1 The proposals are to construct a mobility hub within the vicinity of Norwich rail to improve access to station for those travelling on bus, by foot and by bicycle. Some of these proposals require new Orders to be made under the Road Traffic Regulation Act 1984 and Highways Act 1980, which will restrict traffic inbound on Thorpe Road to buses, cycles and taxis only, prohibit the left turn of vehicles and cycles from Thorpe Road into Riverside Road, provide additional bus layover space, implement a 20mph speed limit adjacent to the rail station on Thorpe Road, provide a new zebra crossing and shared use footway/cycleways. These were consulted on as per the drawing in **Appendix A**.

## 3. Impact of the Proposal

- 3.1 The proposed new Orders will:
  - Restrict traffic towards the city centre on Thorpe Road between Lower Clarence Road and Foundry Bridge to buses, cycles and taxis only.
  - Prevent left turns from Thorpe Road into Riverside for all highway users.
  - Reduce the current speed limit on Thorpe Road between Lower Clarence Road and Foundry Bridge to improve safety for all highway users and pedestrians.
  - Provide additional bus layover space on Thorpe Road.

- Improve pedestrian crossing facilities and footways through installing a zebra crossing, footway widening and reduction in street clutter.
- Footways within the vicinity of the Mobility Hub will be converted to shared-use cycleway/footway facility.

## 4. Evidence and Reasons for Decision

- 4.1 The proposals fulfil the key TCF programme objectives of improving bus travel and the environment for walking and cycling.
- 4.2 The proposals build on the recent cycle and pedestrian improvement works on Prince of Wales Road and complement the bus and cycle contraflow scheme recently constructed along Thorpe Road between Clarence Road and Carrow Road.
- 4.3 At the June 2021 TfN Joint Committee, approval was given for the requirement to engage further with residents of St Matthews Road, Chalk Hill Road and the surrounding area to identify appropriate traffic management arrangements that may be needed to mitigate any increases in traffic on these roads. This will address local member concerns raised in **Appendix D**.
- 4.4 The TRO consultation received one objection, full details of which can be found in **Appendix C** together with an officer response.
- 4.5 The proposals are supported by Norfolk Constabulary, Norwich Cycling Campaign and First Bus.

## 5. Alternative Options

- 5.1 Retaining the current layout would result in no action to mitigate either bus journey time delays or the completion of the cycle route from the rail station to the city centre. It would also leave crowded and inadequate footway crossings from the rail station into the city. Improving public transport to give better access to education, employment and services is a key objective of the TCF programme and the associated funding awarded to NCC by the DfT.
- 5.2 Alternative scheme layouts were considered during the scheme design development. However, these introduced significant traffic delays to the Foundry Bridge junction and did not deliver the full range of benefits delivered by the proposed scheme.

## 6. Financial Implications

- 6.1 Funding is available through the TCF to deliver improvement works to the Norwich Rail Station area.
- 6.2 The TCF funding requires the works to be completed by March 2023.

## **7. Resource Implications**

**7.1 Staff:** Scheme will be designed and delivered utilising existing resources

**7.2 Property:** Nil

**7.3 IT:** Nil

## **8. Other Implications**

**8.1 Legal Implications:** Nplaw have advised on the making of this Traffic Regulation Order and confirmed that actions taken to date have been compliant with the legislative requirements.

**8.2 Human Rights Implications:** Nil

**8.3 Equality Impact Assessment (EqIA) (this must be included):**

An Equality Impact Assessment has been carried out as part of the development of the wider scheme and for these proposals.

**8.4 Data Protection Impact Assessments (DPIA):**

As part of the consultation and implementation process all personal data has been removed from reports being put into the public domain. Personal data has been stored as per NCC standards and is GDPR compliant to allow further correspondence as part of the delegated decision process.

**8.5 Health and Safety implications (where appropriate):** The proposed scheme will improve road safety and provide sustainable travel options for users which will provide long term health benefits.

**8.6 Sustainability implications (where appropriate):**

The proposed scheme will help create an environment to encourage greater use of public transport, walking and cycling, improving the impact transport has on carbon emissions, air quality and public health, positively contributing to sustainability.

**8.7 Any Other Implications:** The one objection received is anonymous and for this reason, in this instance only the officer will erect a decision notice on site, as this is the only form of communicating with the objector.

## **9. Risk Implications / Assessment**

**9.1** The implementation of the proposed scheme will prevent general traffic from accessing the city via Thorpe Road. However, alternative routes are available for vehicles making this manoeuvre. We are looking at options to improve the coordination of the signal timings on alternative routes to improve traffic flow.

## 10. Select Committee Comments

10.1 N/A

## 11. Recommendations

1. To implement the scheme as detailed on the plan in Appendix A and the Traffic Regulation Order in Appendix B.

## 12. Background Papers

- [Transforming Cities Joint Committee \(June 2021\) – Norwich Rail Station Mobility Hub \(Item 9\)](#)
- Appendix A – Consultation plans
- Appendix B – Traffic Regulation Order
- Appendix C – Comments received with Officer comments
- Appendix D – Local Member's Comments

### Officer Contact

If you have any questions about matters contained within this paper, please get in touch with:

**Officer name: Harrison Matthews**

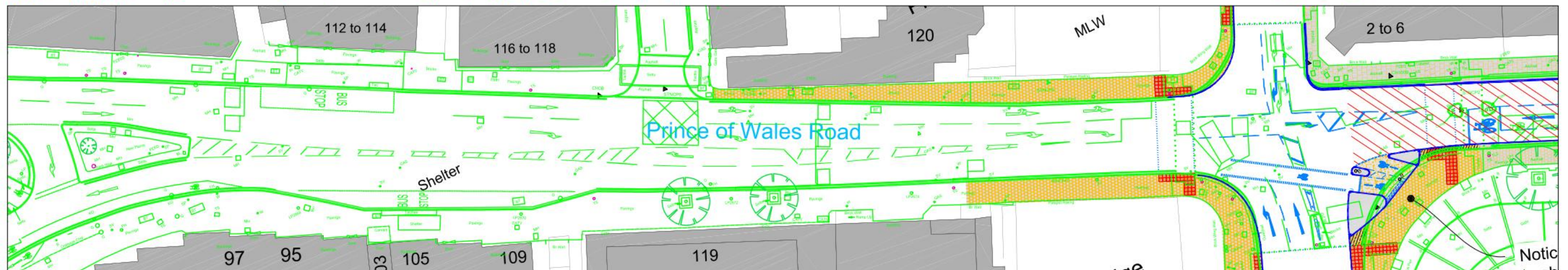
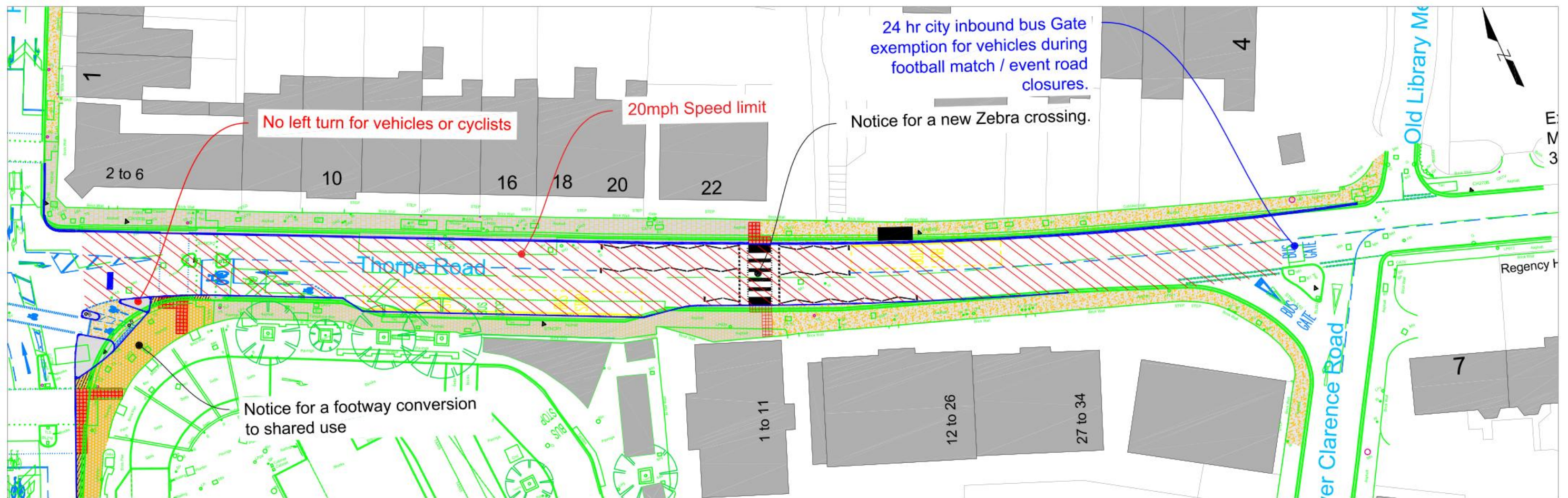
**Telephone no.: 01603 222893**

**Email: [harrison.matthews@norfolk.gov.uk](mailto:harrison.matthews@norfolk.gov.uk)**



If you need this report in large print, audio, braille, alternative format or in a different language please contact 0344 800 8020 or 0344 800 8011 (textphone) and we will do our best to help.





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Funded by:



**Tom McCabe**  
Executive Director of  
Community and Environmental Services  
Norfolk County Council  
County Hall, Martineau Lane  
Norwich NR1 2SG

DRAWING TITLE

Transforming Cities Fund  
PBA020 Foundry Bridge Junction & Train Station Mobility Hub  
Traffic Regulation Orders Plan

REV.	DESCRIPTION	DRAWN BY	CHECKED	DATE
A	Removal of floating bus stop order	MB	DW	11/21

SURVEYED BY	INITIALS	DATE	DRAWING No.
PC	PC	03/20	PBA020-TCF2-HP1-012A
DESIGNED BY	INITIALS	DATE	PROJECT TITLE
MB	MB	03/21	Transforming Cities Fund 2
DRAWN BY	INITIALS	DATE	Foundry Bridge Junction
MB	MB	06/21	
CHECKED BY	INITIALS	DATE	SCALE
DW	DW	06/21	1:500 @A3
			FILE No.
			PBA020



**NORFOLK COUNTY COUNCIL**  
**(NORWICH, A1242 THORPE ROAD) PROPOSED TRAFFIC ORDERS,**  
**PEDESTRIAN CROSSING AND FOOTWAY/CYCLEWAY NOTICE**

The Norfolk County Council propose to make the following three Orders under the Road Traffic Regulation Act 1984 to have the effects as follows:-

**Norfolk County Council (Eastern Controlled Parking Zone)**  
**(Norwich, Thorpe Road) Amendment Traffic Regulation Order 2021**

would be to amend the Norwich City Council Eastern Controlled Parking Zone Traffic Regulation Order 1999 (as amended) to shorten the length of time limited waiting restrictions on the South side of Thorpe Road by 18m to the length set out in the Schedule below to facilitate an increase in length of the existing bus stop for which it will be used as a layover bay.

**Norfolk County Council**  
**(Norwich, A1242 Thorpe Road) (20mph Speed Limit) Order 2021**

would prohibit any vehicle from exceeding 20 miles per hour along the A1242 Thorpe Road from a point 5 metres west of the centre line of its junction with the U42625 Lower Clarence Road to its junction with the A147 Riverside Road/A147 Riverside.

**Norfolk County Council**  
**(Norwich, A1242 Thorpe Road) (Traffic Management) Order 2021**

**Prohibition of left turn** – to prohibit all vehicles including cycles from turning left (southbound) from the A1242 Thorpe Road into the A147 Riverside at any time.

**Bus, cycle and taxi gate** – to prohibit all vehicles except buses, cycles, hackney carriages and taxis from proceeding in and along the A1242 Thorpe Road from its junction with the western kerbline of U42625 Lower Clarence Road north-westwards for a distance of 20m except for access to and egress from property number 36 Lower Clarence Road.

Any objections and representations relating to any of these Orders must be made in writing and must specify the grounds on which they are made. All correspondence for these proposals must be received at the office of nplaw, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH, marked for the attention of Mrs Simmons by 30<sup>th</sup> November 2021. They may also be emailed to [TrafficOrders@norfolk.gov.uk](mailto:TrafficOrders@norfolk.gov.uk).

**SCHEDULE**

Proposed Limited Waiting Parking Place, 30 Minutes Duration, No Return Within 1 Hour Mon-Sat 8am-6.30pm

**Thorpe Road (south side)**

From a point 10m east of the boundary between no.11 and no.13 to 17 (Royal Mail sorting office) Thorpe Road to a point 34m east of that same boundary line.

**THE NORFOLK COUNTY COUNCIL  
NORWICH, A1242 THORPE ROAD  
ZEBRA PEDESTRIAN CROSSING NOTICE 2021.**

As required under the Road Traffic Regulation Act 1984, Part III Sections 23 and 25, notice is hereby given that the Norfolk County Council propose to install a new pedestrian crossing and Zebra controlled area on the A1242 Thorpe Road from 75 metres west of its junction with the centre line of Lower Clarence Road. The Zebra crossing will be 2.7 metres wide and for the full width of the carriageway. Distances measured from the centre of the junction to the centre of the crossing.

The reason for providing the Zebra crossing is to provide a safer environment for pedestrians.

**THE NORFOLK COUNTY COUNCIL  
NORWICH, A1242 THORPE ROAD  
FOOTWAY CONVERSION TO CYCLEWAY/FOOTWAY NOTICE 2021**

The Norfolk County Council is proposing to convert a length of existing footway to combined cycleway/footway using powers under Section 66(4) and Section 65(1) of the Highways Act 1980, on the A1242 Thorpe Road on the southern side of the carriageway from a point opposite the boundary line between No 2 to 6 and No 8 to its junction with the eastern kerblineline of Riverside.

The conversion of the existing footways to accommodate a combined cycleways/footways 4 metres in width. Pedestrians and cyclists will have joint use and will not be segregated.

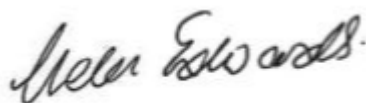
The reason for this proposal is to provide a safer route for cyclists and is part of the overall strategy for improving cycling infrastructure in the city.

Any person who wishes to comment on the proposals for the Zebra Crossing and footway/cycleway conversion should write to nplaw, Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH, marked for the attention of Mrs Simmons, by 30<sup>th</sup> November 2021. They may also be emailed to [trafficorders@norfolk.gov.uk](mailto:trafficorders@norfolk.gov.uk).

Details of all the above proposals and a plan may be viewed online at <https://norfolk.citizenspace.com/>. They may also be inspected during normal opening hours at Norfolk County Council, County Hall, Martineau Lane, Norwich or via [transportfornorwich@norfolk.gov.uk](mailto:transportfornorwich@norfolk.gov.uk). However, during the current epidemic staffing levels have been reduced and viewing online would be recommended in keeping with the government guidelines.

The Officer dealing with the public enquiries concerning these proposals is Mr M Balan, telephone 01603 217688 or 0344 800 8020.

DATED this 5<sup>th</sup> day of November 2021



Helen Edwards  
Chief Legal Officer

County Hall  
Martineau Lane  
Norwich  
NR1 2DH

Note: Information you send to the Council will be used for any purpose connected with the making or confirming of this Order and will be held as long as reasonably necessary for those purposes. It may also be released to others in response to freedom of information requests.

*HKS/79149(ThorpeRdPBA020Notice1)21*

## APPENDIX C

### Point 1)

**We firstly object to the sign off** which says that any objector's personal details and missives will be used for any reason and kept for as long as you deem. This is not legal and you do not have this right.

This is a blatant breach of the General Data Protection Regulations and other privacy laws. Data is computer fodder; our private correspondence, IP, address, name, and anything else you can pick up is the private confidential property of the individual, and you cannot take nor retain that.

As you should know, any contract does not stand if–

- a) it is not individually negotiated and not in the customers' favour
- b) there is not equitable consideration and meeting of minds
- c) there is not full disclosure; the blanket nature of your statement renders it invalid under this clause
- d) free positive choice has not been exercised in direct relation to the matter

Furthermore, you are using this breach as a deterrent against objections, and yet, your own missives are faceless and hard to reply to. Hence, it is not equitable and not acceptable.

Hence, this practice and that standard ending on all your public legal notices needs to be removed, forthwith.

### **Officers' response:**

Concerns around personal details being shared are noted. However, it should be noted, as set out in the Notice, that information sent to the Council will only be used in connection with the making or confirming of this Order. This is in accordance with the Road Traffic Regulation Act 1984 and the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 which prescribes the basis of the consultation and the process to be followed.

For objections relating to all TROs, the County Council only requests contact information. Without this information, such as in this case, it is impossible for the County Council to consult with the objector and therefore comply with their statutory obligations.

Once the Traffic Regulation Order is sealed, this information will no longer be kept.

**It is known that you were served orders to Cease and Desist in April and June this year regarding these road proposals and are again now.**

### **Officers' response:**

No other objections or orders have been received in relation to this specific scheme.



### Point 3)

Residents and visitors alike comment on the mess of this city because of your incessant road works, causing noise, inconvenience, distress, and loss. They are not beneficial to the public, and they are costing a huge amount from the public purse at a crucial time economically, often taking advantage of lockdowns and the attention of citizens elsewhere to put out notices and carry out the work, such as happened last December.

The Thorpe area, like almost everywhere in the city, has already suffered, such as the 15 weeks from mid-March this year, and the current works on Riverside road, again affecting drivers citywide. We see no reason for that work and especially not to undergo more, so soon.

We note that citywide, works are taking many weeks but what is done seems minimal; hence we query

- a) the use of funds
- b) the length of time and the distress and inconvenience this causes for residents, businesses and more
- c) what is really being done here.

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What is the driving factor behind the push to spend on cycle ways and new paths – hardly a priority after all we've suffered since last March?

**We also ask why public money should be spent on curtailing our own transportation and assisting private companies**, many of whom we do not contract with; for example, if we do not ride a bike, scooter, take a bus, use taxis. Why should our money be used in building gates to cause danger to others and to exclude our own private vehicles? It is reiterated that 'public' transport is in fact private corporations offering to contract with us, which you are therefore effectively advertising with and for. We also note the mixed message: that councils wish for the revenue of motorists' parking, including victimless violations of parking fees; that indirectly of the sales, registration and insurance of vehicles; and yet attempts to curtail use of motor vehicles via ever more street changes, including loss of lanes, speed, and parking, and sometimes, loss of the use of roads.

### **Officers' response:**

These proposals are being promoted with the aim of fulfilling Norfolk County Council's vision to invest in clean and shared transport creating a healthy environment, increasing social mobility and boosting productivity through enhanced access to employment and learning.

It is appreciated that highway works can cause some amount of disturbance and inconvenience, which we aim to minimise at all times. However, due to the sensitive location of the works, we are unable to carry out these works overnight and therefore the works must be completed during the day.

These proposals are being promoted to encourage greater use of public transport, walking and cycling, improving the impact transport has on carbon emissions, air quality and public health. These proposals will also improve safety for all highway users, including pedestrians and cyclists, within the vicinity of a key transport hub.

#### **Point 4)**

**Your proposals materially affect the worth and use of property** – not just its commercial value, but the ability to quietly enjoy, to receive visitors, supplies, be picked up by the above buses and taxis which councils are so keen for us to co-contract with. These reductions to waiting times affect daily life of residents and to no end. We ask how you and your colleagues would welcome such sanctions on your doorstep, especially the anxiety over fines. One might query the introduction of these measures against the revenue for the council it might attract.

#### **Officers' response:**

Properties adjacent to these proposed works will see no change to the current loading and waiting restrictions and vehicular access to properties remains. The walking and cycling environment in this area will be enhanced and access to buses and the facilities and amenities at the rail station will be significantly improved.

#### **Point 5)**

**We also object to the augmenting surveillance** of all road and street users, including pedestrians. This is purely for control, not 'safety'; and the taking and retaining of our image attracts a fee.

And yet, council staff are increasingly faceless and distant from the people.

**Norfolk county council is required to Cease and Desist** from using and installing cameras and other surveillance devices, and recording the public via any other sense or means; from all road work other than replacing potholes and cracks and genuine burst pipes, and using such works as a guise to implement other, hidden, agendas; from attaching devices to street furniture and homes which are a) surveillance and b) emitting harmful frequencies of any kind; and of complying with, and issuing any 'guidance', 'mandates', or otherwise promoting contracts with pharmaceutical companies under testing, tracing, the publication of false figures, the fraudulent dispersal of fabricated fear via media of any form; the requirement for employees, visitors, service users, including children, to wear masks, take tests, or experimental 'vaccines'; to require some or all citizens to stay in designated places and/or be excluded from specific places and activities; for implied participation in government overreach, and the witting or unwitting participation in the cause of harm, to body, mind and soul, to any person or creature that this council serves. We are also aware that this council masquerades as government when it is a private corporation, contracting in contravention to the aforementioned, and coercively taking the public's private money, which is an act of extortion.

We also aver that we do not consent, contract, especially to the use of our non-voluntary given money, to further the clear fiscally advantageous relationship you have with Tarmac and other road firms, of the losses of use of private transport, the slowing of journeys and curtailment of movement, and the access to our own homes and that of our friends, clients, and to receive from or serve the same.

#### **Officers' response:**

The introduction of new statutory instruments in November 2005 under the Transport Act 2000 allows for the enforcement of Bus Lanes through camera technology by approved Local Authorities outside of the Greater London Area. This type of enforcement for traffic regulations by CCTV cameras is one part of a wide-ranging program of measures to improve the reliability and punctuality of public transport, reduce congestion and pollution. Any future introduction of CCTV monitoring of traffic regulations would be with the intention of reducing the level of any contraventions and so reduce delays on the highway network.

Tarmac was awarded the Norfolk County Council term contract via a competitive tendering process.

## APPENDIX D

### Train Station

I believe this will negatively impact a lot of local residents in terms of an increase in air pollution along Carrow Road and Riverside Road. Riverside Road already often exceeds safe levels for air quality. I believe this proposal could be subject to legal challenge in the future as poor air quality has now been shown as a potential factor in the death of children who live on busy main roads. I don't believe the traffic light sequencing will reduce the negative impact on air quality significantly enough to justify the proposal. I'm not convinced that the reduction in public transport journey times is beneficial enough to outweigh the reduction in air quality. Local residents with mobility issues will have increased car journeys which will exacerbate local traffic and air quality issues.

I have discussed this proposal with residents of both Chalkhill road and St. Matthew's road and not a single resident I spoke to liked this proposal. They accept that there will need to be some mitigation to avoid rat running but to make these roads one way will mean that it becomes highly inconvenient for them when making car journeys and impossible for them to use their cars during icy weather as the road is too steep to exit at the top. Also Rosary Road has a sharp bend, and the exits from Chalkhill Road and St. Matthew's Road are very narrow at the top, which results in most residents entering from the top, and leaving from the bottom of the road. One alternative suggestion is to make it no left turn from the bottom end of Rosary Road St Matthew's Road and Chalkhill Road ,but this will also increase journey times and will also make it difficult exiting right onto the busy Riverside Road. Speed bumps along Rosary Road and Chalkhill road and St Matthew's Road could help reduce rat running. Making it no right turn from Riverside Road on to Rose Lane would stop rat running far more effectively than making Chalkhill Road and st. Matthew's Road one way.

I do not believe that the overall scheme achieves the required improvements to the busy Foundry Bridge junction that have been necessary for a number of years. I have not been convinced of the public transport benefits enough to justify negative impacts upon air quality and traffic flow. I don't believe it's been possible for the council to measure traffic in this area during football match crowds and pre-covid levels of traffic to substantiate the impacts on local traffic distribution.

I think the consultation should include air monitoring data that has been recorded for the modelling of this proposal. Also evidence of the mitigation through traffic light sequencing and the subsequent modelling data from that study should have been included. Both of these data sets should have been made public in the consultation for residents to be in a informed position to complete this consultation adequately.