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Your ref: TR010037

7<sup>th</sup> July 2021

Dear Sir/Madam,

**South Norfolk Council – Response to S56 Consultation**

**Location: A11/A47 Thickthorn Junction**

**Proposal: Alterations to the single-lane free-flowing link road connecting the A11 northbound to the A47 eastbound via two underpasses (under the A11 and A47 respectively)**

This letter sets out South Norfolk Council's Relevant Representation in respect of the above application.

The District Council fully supports the principle of the scheme to upgrade the Thickthorn junction. The delivery of the Thickthorn improvement is a significant piece of infrastructure required to enable planned growth and the need to upgrade the junction was established in the Greater Norwich City Deal.

The Environmental Impact Assessment has been conducted using appropriate and agreed methods and has been informed by relevant and up to date surveys, modelling, evidence gathering and desk studies. The scope and methodology of these has been agreed with key stakeholders and consultees throughout the process. Overall the ES is comprehensive and of good quality and there are no substantive issues arising from it, subject to the following comments:

*Impact on Heritage Assets*

The Council is broadly happy with Cultural Heritage Statement. Our main concern is the protection of the grade II listed milestone along Norwich Road. The submitted statement indicated the scheme has been designed around this to stay in place and it will be protected during construction, this approach is endorsed.

The scheduled ancient monument to the south is close to the new link road between Norwich Road and Cantley Lane South, however the Council is aware that the applicant has been liaising directly with Historic England and so we would defer to Historic England's view on the matter. Likewise,



other archaeological features potentially impacted upon that require assessment, mitigation and consideration in the planning balance in determining the application are being picked up by Norfolk County Council in their representations on the application.

There are some former estate houses next to the lodge on Norwich Road and along Cantley Road South (the latter quite altered) which have not been identified as non-designated heritage assets. The Council does not consider that the impact will be that significant on these properties in terms of heritage significance to make changes to the scheme, however we would question why these are not identified as Non designated heritage assets (NDHAs) at least potential NDHAs as these too have heritage connections to the house.

#### *Landscape and visual impact*

The ES includes a Landscape and Visual Impact Assessment and this is fit for purpose; the viewpoints used within this are as agreed with the Council. It was our suggestion that, as the likely master plan was known for the emerging ST Giles Park development, that viewpoint 5 might be better positioned on the known extremity of the housing area, but it remained at the PRoW. We do not consider that this has significantly affected the findings of the study. I do not dispute the findings of the LVIA in terms of the significance of the anticipated landscape and visual effects.

There is concern about the proposed losses of veteran trees and would welcome any further evolution of the proposal to avoid these. Notwithstanding the description of themes expressed at 7.3.2 of Chapter 7 of the ES, it will be difficult to replace these trees with ones of a similar amenity. Furthermore, there appears to be some ambiguity regarding the status of woodland W2; whether it is ancient woodland needs to be confirmed and the consideration adapted accordingly.

The scheme appears to have differentiated between 'important' and other hedgerows (as defined by the Hedgerows Regulations. Seemingly only one short section of 'important' hedgerow is proposed to be removed as part of the current proposals and this is not contested.

#### *Noise, Pollution and Lighting*

The key concerns from an Environmental Health Viewpoint are the impacts on residents (including future residents of dwellings not yet built/occupied but having a valid planning permission) as a result of the:

- Construction Phase - particularly:
  - Air Quality
    - Dust from construction operations
    - Increased traffic emissions as a result of construction operations e.g. traffic congestion and traffic diversions.
  - Noise and vibration from construction works including traffic congestion and traffic diversions.
  - Lighting – it is assumed lighting will be required for the construction operations
- Operational Phase – particularly:
  - Air Quality – any increase in traffic emissions at residential premises (including future residents of dwellings not yet built/occupied but having a valid planning permission) as a result of the proposal once completed.
  - Noise and vibration – any increase in noise and vibration at residential premises (including future residents of dwellings not yet built/occupied but having a valid planning permission) as a result of the proposal once completed.
  - Lighting – it is assumed lighting will be required for the proposal once completed which could be at a significant height relevant to neighbouring residential premises (including future residents of dwellings not yet built/occupied but having a valid planning permission).

Requirement 4 of the draft DCO requires an Environmental Management Plan which in turn includes a Construction noise and dust management plan and a Construction communication strategy. This would go some way to addressing concerns regarding the Construction Phase. The Statement Relating to Statutory Nuisance implies lighting will be managed via the lighting plan and thus it would appear sensible for it to be specifically mentioned in Requirement 4 of the draft DCO.

Arguably the issues relating to the operational phase need to be resolved up front as they may be difficult / impracticable to resolve once any DCO is issued.

*Conclusion*

The Council is fully supportive of the principle of the scheme and the economic benefits and planned growth that this supports and unlocks. The Council wishes to continue to work proactively with the applicants as the application is progressed through to Examination to try to resolve some of the outstanding matters.

Yours faithfully

**Tracy Lincoln BSc(Hons) MSc MRTPI  
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Planning and Environment**