

From: [REDACTED]
To: [A47-A11.Thickthorn](#)
Cc: [REDACTED]
Subject: Thickthorn ExQ1 Deadline
Date: 26 October 2021 17:22:11
Attachments: [image004.png](#)
[image006.png](#)
[image008.png](#)
[NCC A47 A11 Thickthorn - ExQ1.pdf](#)

Dear James,

Please find attached Norfolk County Council's responses to the ExQ1 for Deadline 2 (26.10).

Please note, due to staff availability we were unable to prepare our responses for questions CI.1.8 and TT.1.1 in time for the deadline. Our response to these questions will be submitted by no later than 2nd November, but will likely be submitted in the next few days.

If you have any queries please let me know.

Best wishes,
Alice

Alice Craske, Project Support Officer
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Norfolk County Council



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ExQ1	Question to:	Question:
GC	General and Cross-topic Questions	
GC.1.2	All relevant planning authorities	<p>Provide an update of any planning applications that have been submitted, or consents that have been granted, since the Application was submitted that could either effect the proposed route or that would be affected by the Proposed Development and whether this would affect the conclusions reached in ES Chapter 15 [APP-052] or associated Appendices 15.1 and 15.2 [APP-117] and [APP118].</p> <p>Provide a response alongside question DE.1.6.</p>
	NCC Response:	<p>As the minerals and waste planning authority the County Council is not aware of the grant of any planning permissions or the submissions of any planning applications, since the submission of the DCO that would either effect the route or the cumulative impact of the proposal in combination with other development proposals.</p> <p>Other matters will be for South Norfolk District Council to provide a response.</p>
GC.1.3	The Applicant Relevant planning authority	<p>The ExA observed on an Unaccompanied Site Inspection [EV-001] that a housing scheme at Cringleford to the east of the A47 Thickthorn Junction is currently under construction and is aware the provision of potential public open space is anticipated as part of extant housing development close to the Thickthorn road improvement scheme.</p> <p>Are there adequate provisions in place to ensure that the use of designated or potential planned public open space will not occur? Explain your reasons.</p>
	NCC Response:	This is a South Norfolk District Council matter.
GC.1.9	Link Road between B1172 and Cantley Lane The Applicant	<p>Relevant Representations received [RR-009, RR-012, RR-013] refer to the traffic currently using the B1172 increasing due to development occurring at Wymondham.</p> <ul style="list-style-type: none"> i) Detail the surveys have been undertaken or information gathering exercises to gauge any potential uplift in traffic on the B1172. ii) Can the applicant provide clarification and further justification of the basis for a T-junction design proposed for the link between B1172 and Cantley Lane South (Work No.1 and Work No.2). iii) What evidence is available that the proposed junction design is sufficient to deal with existing traffic and any potential uplift in traffic. Please signpost analysis of junction capacity measurements and if these

	<p>Relevant Highway Authority</p> <p>Interested Parties</p>	<p>have considered new development occurring. If there is no such information detail, what are the reasons?</p> <p>iv) Is there flexibility in the design of the scheme to increase junction capacity using an alternative junction design upgrade such as a roundabout system if that is required? If so, detail that.</p> <p>v) If alternatives have already been considered please signpost those or provide information to the extent of junction provision considered?</p>
	NCC Response:	<p>Norfolk County Council require National Highways to confirm the latest modelling assessment and answer point (i) above, before we can provide comment on points (ii) and (iii) of the same.</p> <p>NCC are unable to comment on appropriateness of junction form as we have not seen traffic modelling. Potential housing expansion to the southeast and fears of rat running may lead to provision of a ghost island right turn lane, but this would be dependent on modelled flows at the junction exceeding the 300 veh/day figure from CD123 (figure 2.3.1)</p>
GC.1.10	<p>Link Road between B1172 and Cantley Lane</p> <p>The Applicant Relevant</p> <p>Highway Authority</p> <p>Interested Parties</p>	<p>In terms of forthcoming Traffic Management Plan formulation and updating explain the extent to which new development in the area and potential for increased traffic levels arising from that has been/can be considered.</p>
	NCC Response:	<p>A Traffic Management Plan is usually prepared which sets out the temporary highway arrangements during construction for agreement with the Highway Authority. The expectation is that this would take account of traffic associated with development sites.</p>
GC.1.11	CA public highway	<p>Relevant Representations received [RR-011] questions the extent of land take in so far as sections of public highway should not be acquired permanently.</p>

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	<p>The Applicant</p> <p>Norfolk County Council</p> <p>Relevant Highway Authority</p> <p>Interested Parties</p>	<p>Provide justification (or provide further clarification) for your views on this issue giving reasons for the favoured approach.</p>
	<p>NCC Response:</p>	<p>Norfolk County Council would expect that any new highway constructed by HE, which would be a part of the local road network (ie not part of the trunk road network) would be passed over to NCC as the local highways authority including that the land ownership be passed over too.</p>
<p>Policy</p>		
<p>GC.5.1</p>	<p>Central Government Policy and Guidance</p> <p>The Applicant</p> <p>The relevant planning authorities</p>	<p>With respect to any relevant updates or changes to Government Policy or Guidance that have occurred since the Application was submitted. Can the Applicant or Relevant Planning Authorities identify any relevant changes, and if so, what are the implications in your view?</p>
	<p>NCC Response:</p>	<p>The County has not adopted any new planning policy since the application for a DCO was lodged. The National Planning Policy framework was amended on the 20 July 2021 but did not contain and specific changes for minerals and waste. NCC can therefore confirm there have been no relevant changes to minerals and waste planning policy since the application was lodged.</p>

BIO	Biodiversity, Ecology and Natural Environment (including Habitats Regulation Assessment (HRA))	
BIO.1.1	<p>Surveys</p> <p>Natural England</p> <p>Relevant planning authorities</p> <p>Interested parties</p>	<p>i. Confirm whether you are satisfied with the range of surveys for ES Chapter 8 Biodiversity [APP-045]; and</p> <p>ii. If you consider the baseline information presented to be a reasonable reflection of the current situation?</p> <p>iii. In respect of i) and ii) if not, why not and what would resolve any residual concerns?</p> <p>You may wish to combine the answer to this question with the answer to question BIO.3.6.</p>
	NCC Response:	<p>i. The range of ecological surveys will have been agreed in advance by Natural England.</p> <p>ii. Surveys should be undertaken in accordance with best practice guidelines (for example LD 118 and standing advice) and the results submitted prior to determination of the application (ODPM Circular 06/2005).</p> <p>iii. Chapter 8 of the ES should be updated with the results of any outstanding surveys undertaken since its submission (for example the eDNA survey results for great crested newts were to be undertaken in 2021 (Chapter 8, para 8.5.3)), so that the baseline reflects the current situation.</p>
BIO.2.4	<p>Cantley Stream alignment</p> <p>The Applicant</p> <p>Norfolk County Council / IPs</p>	<p>ES Chapter 13 [APP-050] Paragraph 13.9.44 states that for the Cantley Stream realignment, the detailed design including water vole enhancements will be agreed in consultation with the Environment Agency, Norfolk County Council and other stakeholders.</p> <p>i. Justify why such an approach can or should be undertaken post potential confirmation of any DCO, also acknowledging that the realignment works may also require provision for water resource licences, integration with other works for potential species benefit.</p> <p>ii. In respect of groundwater resources and quality explain what mechanisms are/will be in place to ensure that no private water supply can be derogated because of the works or operation of the scheme, even temporarily, without the prior written consent of the owner and the provision of mitigation measures?</p>

		<p>iii. Regarding potential impacts during construction and any proposed horizontal directional drilling (HDD) activity. Clarify what investigations, assessments, mechanisms, and consultation requirements are to be secured to ensure HDD works will not pose a risk to groundwater resources.</p> <p>iv. Explain what scope is available to coordinate stream realignment works with other engineering and new landscaping works to enable ecological corridors the earliest chance of re-establishment prior to completion of all works. Also explain how such potential provision could be secured.</p> <p>Norfolk County Council/Interested Parties: Provide any comments you wish to make on the above.</p>
	<p>NCC Response:</p>	<p>Works affecting water voles will be undertaken under licence granted by Natural England. A [REDACTED] can only be used in relation to development where actions will result in a conservation benefit for water voles. [REDACTED] states that applicants should use Natural England's Pre-submission Screening Service (PSS) to review the draft wildlife licence application (which will include enhancement measures) before the DCO is granted so that either a Letter of No Impediment (LONI), or letter identifying any outstanding issues, can be issued for examination. This enables the inspector to consider the likelihood of any protected species licence (including for water voles) being obtained and to be in a position by the end of the examination to report to the Secretary of State on the likelihood of any necessary protected species licence being obtained.</p>
<p>BIO.3.2</p>	<p>Trees</p> <p>The Applicant</p> <p>Relevant Planning Authorities</p> <p>Interested Parties</p>	<p>Clarify tree planting proposed via APP-123 Environmental Masterplan by the scheme and any scope to increase capacity for that provision including the following points:</p> <p>i. Have all relevant spaces in the vicinity of the junction improvement been considered for further additional new planting, as well as for replacement planting? If not, why not?</p> <p>ii. How would any potential tree planting/ related landscaping unreferenced in the dDCO be secured?</p> <p>iii. Has tree planting (or other related landscaping) been considered to further complement local informal nature corridors on the ground? If not, why not?</p> <p>iv. Explain if planting/ landscaping schemes can be coordinated in a way to ensure they establish and provide positive links with existing wildlife corridors whilst construction activity takes place.</p> <p>Relevant Planning Authorities/Interested Parties: Do you have any further comments on tree planting or landscaping provision?</p>

	<p>NCC Response:</p>	<p>Norfolk County Council's comments relating to tree planting were included in our written representation and cover any additional points:</p> <p>████████████████████</p> <p>The Environmental Masterplan details replanting proposals in a clear visual format but without species detail or quantification. It is not clear at this stage, how planting design has been calculated to ensure adequate replacements for losses incurred will be achieved? This requires clarification.</p> <p>Trees and woodlands are part of the wider landscape mitigation that will be required, and it should be the quality and resilience of the resulting landscape, taking all habitats into account, rather than the number of replacement trees that will dictate whether the mitigation is acceptable. We would expect a minimum 30-year compensation strategy to be submitted, based on a calculation of habitat loss and demonstrating net gain. This strategy would usually include the area surrounding the application boundaries and should consider the following examples: -</p> <ul style="list-style-type: none"> • Planting of new woodlands, hedgerows with trees, individual and tree groups • Management plans and schedules to maintain newly planted trees and woodlands • Connecting woodland and ancient and veteran trees separated by development with green bridges • Planting individual trees that could become veteran and ancient trees in future • Management agreements with adjacent landowners to provide or assist with woodland management to improve tree resilience and biodiversity • Providing management schedules for existing veteran and ancient trees / woodlands nearby • Extending existing woodland and ancient woodland through natural regeneration / rewilding • Selective veteranisation of specific trees
<p>CI</p>	<p>Construction Impacts</p>	
<p>CI.1.3</p>	<p>Park and Ride car park site</p> <p>The Applicant</p>	<p>Existing obligations for securing land to expand the existing Park and Ride Site and for the construction of a new slip road from the A11 to reduce traffic at the Thickthorn Junction are referred to in Relevant Representation [RR-011].</p> <p>Applicant, Highway Authority and Planning Authority, CM Watt Residual Trust:</p>

	<p>CM Watt Residual Trust</p> <p>Relevant Highway Authority and Planning Authority</p>	<p>To what extent is any existing legal agreement covering the park and ride car park planned improvements potentially undermined by the proposed scheme and is proactive engagement forthcoming to resolve any aspect of obligation already entered, if necessary.</p>
	<p>NCC Response:</p>	<p>A strip of land was secured by the county council under a legal agreement to enable a slip road to be built at some time in the future to secure access to an expanded park and ride site. The county council has been in discussion with the applicant and has received reassurances that – in relation to the proposed expansion of the park and ride site – the scheme provides sufficient capacity such that a dedicated slip road from the A11 is not required. Consequently, the land secured under legal agreement is not required for that purpose if the junction improvement goes ahead. This has been set out in a statement of common ground with the applicant. The other matters raised in RR011 are a matter between that party and the applicant.</p>
<p>CI.1.9</p>	<p>Phasing / Access</p> <p>The Applicant</p> <p>The relevant highways authority</p> <p>Relevant planning authority</p> <p>Interested parties</p>	<p>There are a range of impacts referred to in RR-038. Can the Applicant provide further clarification of the following:</p> <ul style="list-style-type: none"> i. Phasing of the works for Cantley Stream with respect to holiday cottage occupation. ii. Farm access details including provision/specification, ownership and associated rights under consideration iii. Retention of boundary treatments as well as new or additional boundary treatments envisaged iv. Phasing of drainage/“lagoon” works the RR refers. <p>Relevant Planning/Highway Authority and Interested Parties: Provide any comments on these issues you wish to make.</p>

	NCC Response:	The LLFA would like to confirm that appropriate drainage arrangements are needed during the construction phase of the works and that on construction completion the permanent drainage structures are all checked to ensure that the drainage is operating as designed and without any damage due to the construction works themselves.
DE.1.6	Built Environment The applicant Relevant planning authority	Have there been any changes to the built environment in the vicinity of the land subject to scheme improvement currently submitted? If so, please identify where, and consider if the plans and statements would need to be updated/ amended. Please provide a response alongside question GC.1.2.
	NCC Response:	As the minerals and waste planning authority, the County Council is not aware of the grant of any planning permissions or the submissions of any planning applications, since the submission of the DCO that would either effect the route or the cumulative impact of the proposal in combination with other development proposals.
DCO Draft Development Consent Order - Articles		
DCO.2.2	Article 2 – definition of “commence” The Relevant Planning Authorities	The effect of the definition proposed may permit some works before the discharge of the requirements. Confirm whether you are concerned with any particular works that could be carried out prior to the discharge of requirements giving reasons inclusive of regard to works which could, or are, controlled by a requirement.
	NCC Response:	NCC as the county planning authority is content with the exclusions from the definition of consent contained in the draft development consent order.
DCO.2.4	Article 4 The Applicant Relevant Planning Authorities	Ensures drainage provision falls to the appropriate undertaker. Do you have any comments to make on the scope and extent of that power?

	<p>Relevant Highway Authorities, Flood Authority and Drainage Board</p>	
	<p>NCC Response:</p>	<p>Norfolk County Council was conferred new status as a Lead Local Flood Authority (LLFA) under the Flood and Water Management Act 2010 (FWMA). This Act was part of the legislative response to Sir Michael Pitt’s review into the flooding of 2007 and tasks the County Council with leading the coordination of Local Flood Risk Management across Norfolk. Local Flood Risk is defined as flooding from; surface runoff, ordinary watercourses and groundwater.</p> <p>There are several stakeholders identified by the FWMA who have a role in the management of surface runoff flooding, these are; Lead Local Flood Authorities, Local Planning Authorities, Water Utilities Companies, Highways Authorities and Riparian Owners.</p> <p>The LLFA’s “flood risk management function” is defined by Section 4 of the Flood and Water Management Act 2010. The “flood risk management function” is given in accordance with Part 1 of the Flood and Water Management Act 2010, Section 159 or 160 (and a flood defence function within the meaning of section 221) of the Water Resources Act 1991, The Land Drainage Act 1991, Sections 100, 101, 110 or 339 of the Highways Act 1980, The Flood Risk Management Functions Order 2010. A function which may be exercised by the LLFA for a purpose connected with managing flood risk would include the issuing of ordinary watercourse consents or enforcement notices by Internal Drainage Boards or the Lead Local Flood Authorities and the investigation of significant flooding by the Lead Local Flood Authority.</p>
<p>DCO.2.14</p>	<p>Article 39 The relevant planning authorities</p>	<p>Noting the recent request for more information on A63 Castle Street where the Secretary of State expressed that he was concerned that the loss of trees is limited to those included within the Environmental Statement, and the final drafting of art 35 of the A63 (Castle Street Improvement, Hull) Development Consent Order 2020, the ExA may wish to ask the applicant to justify the powers provided by the current drafting, or to consider alternative drafting that would restrict the loss of trees only to those included in the environmental statement.</p>

	NCC Response:	This is a South Norfolk District Council matter.
DCO.2.16	Article 43 The relevant planning authorities	Are the Relevant Planning Authorities satisfied with the defence to proceedings in respect of statutory noise nuisance and, if not, what alternative wording would they suggest?
	NCC Response:	This is a South Norfolk District Council matter.
DCO.2.21	Schedules 3 and 4 The relevant highway authorities The relevant planning authorities	Confirm that the streets, bridleways, cycle tracks and footpaths listed in these schedules accurately reflect your understanding of the streets, bridleways, cycle tracks and footpaths that would be affected as a result of the proposed development and if not, why not?
	NCC Response:	<p>The county council can confirm that the streets, bridleways, cycle tracks and footpaths listed in the schedules reflect our understanding of assets affected by the proposed development.</p> <p>Norfolk County Council is holding fortnightly de-trunking meetings with the applicant National Highways to discuss the potential processes for hand-over of assets and recording, as well-as agreeing such issues as highway boundaries. The county council is awaiting information from the applicant in terms of the detail of the assets to be handed over.</p> <p>The matter of a suitable commuted sum for future maintenance has not yet been agreed in principle or quantum but discussions are ongoing.</p>

HE	Historic Environment	
HE.1.1	<p>Heritage Assets/ Additional Information</p> <p>The Applicant</p> <p>Historic England</p> <p>South Norfolk District Council</p> <p>Norfolk County Council</p>	<p>Historic England/ South Norfolk District Council/Norfolk County Council:</p> <ul style="list-style-type: none"> i. Can you detail what additional heritage/archaeological impact surveys (if any) should be required of the applicant, in your view, together with their specific scope and content. Please also detail any other information you deem to be required giving specific reasons for that inclusion. ii. Set out any suggested amended requirement wording to the dDCO to ensure appropriate mitigation/consultation is secured, or by what other means you consider appropriate.
	<p>NCC Response:</p>	<ul style="list-style-type: none"> i. The Historic Environment team are in the process of approving a revised version of the report on the archaeological trenching carried in July and August 2020. The Historic Environment's understanding is that the applicant is planning to commission a limited amount of additional archaeological trenching partly to cover the area of the proposed construction compound and some other areas. This additional trenching could be carried out as part of a post-consent programme of mitigation secured through appropriately worded requirement. ii. Wording of requirement relating to archaeological mitigation is as in existing draft DCO is as follows; <p><i>9.—(1) No part of the authorised development is to commence until for that part a written scheme of investigation of areas of archaeological interest, reflecting the relevant mitigation measures set out in the REAC, has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant planning authority.</i></p>

		<p><i>(2) The authorised development must be carried out in accordance with the approved scheme referred to in sub-paragraph (1).</i></p> <p>We suggest that the following sub-paragraph is added to the requirement wording;</p> <p><i>(3) The authorised development shall not be put into first use until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the scheme referred to in sub-paragraph (1) and the provision to be made for analysis, publication and dissemination of results and archive deposition has been secured'.</i></p>
NV	Noise and Vibration	
NV.1.4	<p>Noise and vibration from traffic</p> <p>The Applicant</p> <p>Relevant Planning Authorities</p> <p>Interested Parties</p>	<p>Paragraph 11.7.5 of Chapter 11 [APP-048] states that within the 300m construction noise study area, a total of 481 noise and vibration sensitive receptors have been identified.</p> <p>Planning Authority/Interested Parties: Are you satisfied relevant receptors applicable have been considered? If not give your reasons.</p>
	NCC Response:	This is a South Norfolk District Council matter.
NV.1.5	<p>Monitoring</p> <p>The Applicant</p>	<p>Relevant Planning Authorities/Interested Parties: Comment on the need for monitoring of operational phase noise and mitigation.</p>

	The Relevant Planning Authorities	
	Interested Parties	
	NCC Response:	This is a South Norfolk District Council matter.
TT	Traffic and Transport	
TT.1.2	Road Speeds The applicant Relevant highway authority	Cantley Lane South is referred to in relevant representation [RR-039] as a popular cyclist route. Can you: <ol style="list-style-type: none"> i. Explain the basis for the speed restrictions Cantley Lane South set out in the dDCO having regard to cyclists. ii. Clarify to what extent speed restrictions specified in the dDCO considered the potential presence of cyclists and the potential for a lower limit. iii. If the potential for increased presence of cyclists using the lane has not been considered, explain how those circumstances would/could be proactively factored into any resultant road speed designation.
	NCC Response:	The proposals show speed restrictions of 40mph and 20mph on Cantley Lane South. The Cycle Infrastructure Guidance (LTN120 2020) notes that roads with a 20mph speed limit offer conditions where most people would feel confident in riding in the primary position (in centre of the traffic lane) This makes cyclists more visible to motorists and also car drivers are more likely to accept a short delay due to the lower speed limit.
	Public Rights of Way, including cycle routes	
TT.2.1	Public rights of way The applicant Norfolk county council	RR-001 highlights that some of the concerns of Norfolk County Council relate to the potential taking on of responsibilities for assets including significant new infrastructure comprising a link from the B1172, across the A11 trunk road and Norwich-Cambridge railway line, to Cantley Lane south and the proposed classification of this new link as a B class road. <ol style="list-style-type: none"> i. Can Norfolk County Council provide further details of those concerns if they have not already done so, and, provide justification of their current position on these particular matters?

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		<p>ii. The new overbridge Work No.35 that is to become a public right of way. Provide an update of discussions to facilitate that alongside potential consideration of a ceiling enclosure or other such barrier which could be included in the final design of the overbridge with respect to safety provision as well as potential future user's perception of safety.</p>
	<p>NCC Response:</p>	<p>Norfolk County Council seek to have sufficient funding provided for maintenance of new assets, otherwise the County Council will face future financial pressure. NCC members confirmed they wanted this to be funded from National Highways or Department for Transport.</p> <p>NCC are holding fortnightly de-trunking meetings with National Highways to discuss the potential processes for hand -over of assets and recording, as well-as agreeing such issues as highway boundaries. The county council is awaiting information from the applicant in terms of the detail of the assets to be handed over.</p> <p>The matter of a suitable commuted sum for future maintenance has not yet been agreed in principle or quantum but discussions are ongoing.</p>