


ExQ1	Question to:	Question:
GC General and Cross-topic Questions		
General		
GC.2.1 Update on development	SNDC All Relevant Planning Authorities	<p>Following responses to the ExA's WQ1 at Deadline 2 which are acknowledged. For the avoidance of any doubt:</p> <ul style="list-style-type: none"> i) Detail any further 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 [APP-118]. ii) Also confirm if any planning applications are either likely or are expected to be submitted between now and the close of the Examination where possible.
	NCC Response:	<ul style="list-style-type: none"> i. The County Planning Authority has not granted any consents that could either, effect the proposed route, or, that would be affected by the Proposed Development since the Application has been submitted. <p>The County Planning Authority has received an application from NCC Highways, which may affect the proposed route or could be affected by the Proposed Development. The application reference is FUL/2021/0064 and the description of the proposal given by the applicant is, "<i>The extension to the existing park and ride facility comprising additional car, coach, disabled and motorcycle spaces; provision of bus shelter, cycle storage, and Amazon hub facilities; installation of attenuation basin and associated drainage infrastructure, and landscaping.</i>" The application is not yet valid. The Site Location Plan and the Proposed Site Plan has been attached for your consideration & ease of reference. Further details are available on request.</p> <ul style="list-style-type: none"> ii. The County Planning Authority has not been made aware of any other planning applications that are either likely or are expected to be submitted between now and the close of the Examination.
GC.2.2 Update on development	NCC	As context to inform the Examination the following further information is requested:
	SNDC	<ul style="list-style-type: none"> i) Advise if there is a CILCS in place for the administrative area the application scheme falls within, as well as any neighbouring administrative boundaries with a CILCS.

	<p>Relevant Planning Authorities</p> <p>Interested Parties</p>	<ul style="list-style-type: none"> ii) Are there any planned or known improvements to the local area which are separate to the scheme under consideration but potentially complimentary to it arising from the CILCS? iii) Notwithstanding any CILCS mechanism in place, advise if there are any other planned or known separate local capital investments, projects, or other planned initiatives in the vicinity of the area proposed for improvement or nearby could potentially compliment the scheme. For the avoidance of any doubt the planned improvements queried/referred to may cover any aspect of the local environment and could be wide ranging in their purpose. iv) Explain how any existing separate local capital investments, projects or other initiatives would complement the scheme if there are any which are known or are being advanced.
	<p>NCC Response:</p>	<p>The below comments were made in our follow up written response to the Thickthorn hearings:</p> <p>In regard to Cantley Lane there are currently no funded schemes or identified schemes without funding. There is currently a proposal for an extension to Thickthorn Park and Ride.</p> <p>The route is identified in the draft Greater Norwich Local Cycling and Walking Infrastructure Plan (LCWIP). This was consulted on in May and June 2021. The outcome has been reported to our Infrastructure & Development Committee and will go to Cabinet for approval early in the new year.</p> <p>Cantley Lane is identified as a neighbourhood route but does not have any projects identified for it. The route and those identified projects in the short to medium term in Greater Norwich are shown on the following plan </p> <p>The LLFA have no further information available in relation to CILCS for the proposed development area.</p>
<p>GC.2.4 Road Signage</p>	<p>The Applicant</p> <p>NCC</p> <p>SNDC</p> <p>Interested Parties</p>	<p>Local representations (including an additional submission [AS-014] from Hethersett Parish Council) have been received in relation to the volume of traffic potentially using the proposed new Cantley Lane link road to the B1172 as a 'through route'.</p> <ul style="list-style-type: none"> i) Irrespective of any road designation issues being referred to by NCC which are acknowledged. Clarify/ advise how any road signage deemed crucial to the efficient and safe operation of the new link, road as part of the public road network, when considering local representation on this issue would be controlled. ii) Detail if road signage provision as a defined mechanism in the DCO itself would be a suitable or necessary mechanism assuming excessive traffic is anticipated on the new link road.

		<p>iii) If there is a case for a specific requirement to deal with signage owing to any likely traffic implications using the 'T' junction indicate that alongside any suggested wording. Also indicate how any monitoring process which could be employed to ensure the junction would operate satisfactorily in the event traffic using the route did become excessive and how such measures could be secured.</p>
	<p>NCC Response:</p>	<p>The county council remains in discussion with the applicant on a number of matters including road signage. The county council is pleased to note the applicants' confirmation that it would be led by the county council in any discussion relating to classification of non-trunk roads (this would include the proposed new link from the B1172 to Cantley Lane) (Ref 1.6 of REP 3-02, Deadline 3 Submission - 9.12. Post hearing submission including written summaries of oral case at Issue Specific Hearing 2).</p> <p>In respect of (i): The county council would want to agree the nature of the signing for the new link road with the applicant prior to construction. Following construction of the scheme, this part of the network would become part of the local highway network managed and maintained by the county council. Any changes to signing or restrictions on vehicular movement would become the responsibility of the county council and would be dealt with in the usual way.</p> <p>In respect of (ii): The county council accepts the applicant's assessment of the likely impacts of the proposal as derived from the traffic modelling. This is that there is unlikely to be significant traffic movements through this part of the network (Comment 3 of REP4-026 Deadline 4 Submission - 9.13 Applicant's Response to submissions received at Deadline 3).</p> <p>In respect of (iii): The county council does not consider there is any specific requirement in this respect, except that it would want to agree the nature of the signing for the new link road with the applicant prior to construction. The county council is willing to discuss a suitable monitoring arrangement post-construction with the applicant, including the inclusion of any trigger points that would require action to be considered. The county council considers that, as any such requirement – if considered necessary – arises from the proposed scheme, it would be a matter for the applicant to deliver in agreement with the county council. Following construction of the scheme and, if agreed, any post-scheme arrangements, this part of the network would become part of the local highway network managed and maintained by the county council. Any changes to signing or</p>

		<p>restrictions on vehicular movement would become the responsibility of the county council and would be dealt with in the usual way.</p>
<p>GC.2.6 Thickthorn Park and Ride planned expansion</p>	<p>SNDC NCC Interested Parties The Applicant</p>	<p>With respect to the Applicant's response to Deadline 3 Submission - 9.10 Comments on Responses to the Examining Authority's First Written Questions (ExQ1s) [REP3-018].</p> <p>It is acknowledged that the scheme has been designed to accommodate future extension/increased capacity of the Thickthorn Park and Ride which is suggested as allowed for in the NATS traffic model, in the Case for the Scheme Chapter 4 [APP-023]. In addition, the ExA notes that the Scheme design incorporates an access to the boundary of the Park and Ride facility for pedestrians and cyclists from the Cantley Lane Link Road shared Cycleway/footway which would be delivered as part of the Scheme.</p> <p>Nonetheless, the Section 106 Agreement for the Hethersett Development (South Norfolk Council Planning Permission Ref: 2011/1804/O) is also being referred to by parties and provides that the developer should do various things including completion of the Lease for the Park and Ride Site and either the dedication or securing of the dedication of the Slip Road to enable full access to the Park and Ride Site.</p> <p>The ExA notes the Applicant is considering the inclusion of wording in the dDCO that would disapply Part 9, Paragraph 2 in the Schedule to the Section 106 Agreement, on the basis the slip road is no longer necessary to make the Park and Ride development acceptable in planning terms and it will not be possible to comply following implementation of the Thickthorn Scheme. The aim of that is to ensure the landowner and developer are not liable for any breach of that specific planning obligation. The compensation code is also referred to by the Applicant and that discussions are ongoing between the District Valuer and the landowner.</p> <p>SNDC and NCC</p> <p>In addition to the applicant's submission on this matter to provide a safeguard mechanism in the dDCO, the authorities as signatories of the agreement appear to have expediency powers to either enforce the agreements terms or not. Such an expediency decision may fall outside the formal requirement to amend the existing agreements wording. Can you confirm:-</p> <p>i) If expediency advice on the terms of the agreement should the DCO be granted can be given for the benefit of all relevant parties? If expediency advice can be given and issued this should be submitted to the examination by Deadline 6.</p>

		<p>ii) If the variation of the agreement would be a necessary step to be undertaken by relevant parties please indicate that. Alongside when such variation expected and can be confirmed to the examination?</p> <p>Applicant/NCC/ SNDC/ Interested Parties</p> <p>i) iii) Provide any comments you deem appropriate.</p>
	NCC Response:	The obligation in respect of the slip road in the Section 106 Agreement for the Hethersett Development (South Norfolk Council Planning Permission Ref: 2011/1804/O has been discharged). The land was dedicated to the county council for delivery of the slip road as required by the agreement, so it is not considered that any variation or expediency advice is necessary.
BIO Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))		
Trees		
BIO.2.2 Trees	NCC SNDC The Applicant	<p>Do NCC or SNDC have any further comments on the Applicant's intention to stick to the 5-year landscape planting maintenance period (SNDC requested 10 years) [REP3-018]?</p> <p>If there are specific local reasons/requirements for seeking 10 years such as known soil/weather considerations detail those in full.</p>
	NCC Response:	<p>NCC would support a 10 year maintenance period in agreement with South Norfolk Council; 5 years is a very short space of time for the establishment of what will amount to quite extensive planting. Considering the large percentage of failures in other similar road schemes in Norfolk, it does not seem unreasonable to request a longer maintenance period. This will ensure that mitigation and replacements grow to a level of maturity where they are effective.</p> <p>Norfolk County Council ask for a 10 year maintenance period on other large-scale schemes, so we feel this is not an unusual expectation.</p>
BIO.2.5 Compensation Strategy	NCC Interested Parties	<p>With respect to NCC expectation for the minimum of a 30-year compensation strategy under RR-010 submitted at Deadline 1 - the ExA notes the applicant's response, at REP2-008.</p> <p>NCC/Interested Parties Provide any comments you wish to make giving full reasons for any areas of disagreement.</p>

	The Applicant	The Applicant If you have any further comments provide those.
	NCC Response:	<p>The below comments were made in our follow up written response to the Thickthorn hearings:</p> <p>The reason that 30 years was used was because this is what we would expect for a compensation strategy on our own land, based on the fact that we require commuted sums from developers for a 30-year maintenance period under S278 of the Highways Act and that compensation strategies for veteran tree removal often include ongoing woodland maintenance both inside and outside the red line of a development depending on the strategy requirements.</p> <p>However, the Woodland Management Planning Grant (WMP) is a one-off payment to create a 10-year Woodland Management Plan which is UK Forestry Standard (UKFS) compliant. Therefore a 10-year compensation strategy with tree and woodland management plans may be more appropriate, however again, we can only recommend this rather than enforce it for this scheme (as this does not affect county council owned land).</p> <p>To summarise, although Norfolk County Council would recommend a 30-year compensation strategy, if it is not considered reasonable, a compensation strategy in accordance with the NPPF (2021) Section 180c will be required to address the loss of veteran trees.</p>
CC Climate Change		
CC.2.2	The Applicant	NCC state they are seeking to work with Highways England to identify measures to reduce carbon emissions on the trunk road network e.g., by installation of electric vehicle charging points to encourage electric vehicles.
	NCC	
	Interested Parties	Can the Applicant give further details and clarification on this proposal in relation to the application applied for and also any relevant nearby locations which would be beneficial to achieving national climate objectives?
	NCC Response:	The county council considers this question should be addressed by the applicant.
DE Design		
DE.2.3	NCC	For the avoidance of any doubt. Have there been any further changes to the built environment in the vicinity of the land subject to scheme improvement currently submitted?
Built Environment	SNDC	If so, please identify where, and consider if the plans and statements would need to be updated/ amended.


	Interested Parties	
	NCC Response:	Norfolk County Council have no further information to provide.
DCO Draft Development Consent Order (DCO)		
Articles		
DCO.2.8 Articles 13 and 18	The Applicant NCC Interested Parties	<p>It is acknowledged that the Applicant as per REP3-020 stated it would be led by NCC in any discussion relating to classification of nontrunk roads.</p> <p>Regard has also been given to other Orders such as the A1 Birtley to Coal House Development Consent Order 2021 and the A303 Sparkford to Ilchester Dualling Development Consent Order 2021.</p> <p>It remains the case that variation of the application of provisions in these articles is possible under any enactment and arguably this has the effect of disapplying section 153 which provides a procedure for changing a DCO. There may be precedent in other made DCOs for the same drafting, but it should be clear under which section 120 power these articles are made and if necessary, justification provided as to why the provisions are necessary or expedient to give full effect to any other provision of the DCO.</p> <p>NCC/Interested Parties Provide any comments you deem necessary.</p>
	NCC Response:	<p>In relation to Article 13, Schedule 3 Part 2 of the draft DCO sets out that the Cantley Lane Link Road is classified as a B road. The county council refers the Inspectorate to the applicants' confirmation that it would be led by the county council in any discussion relating to classification of non-trunk roads including the proposed new link from the B1172 to Cantley Lane (Ref 1.6 of REP 3-02, Deadline 3 Submission - 9.12. Post hearing submission including written summaries of oral case at Issue Specific Hearing 2). The Development Consent Order needs to reflect the county council's view that this new link road should not be classified as a B road. The county council supports its designation as a C class road, which ties in with the existing designation of Cantley Lane (south).</p> <p>Regarding Article 18, the county council are confident the article is reasonable, and any specifics will need to be discussed if they affect NCC responsibilities.</p>
DCO.2.12	The Applicant	The extent of Two Tumuli in Big Wood as a known historic burial ground lies outside the application scheme improvement boundary [referred to in APP-043]. The overall ES for the scheme highlights scheme

Removal of Human remains	NCC Historic England Interested Parties	<p>improvement works have been designed to not to directly involve land encompassing the scheduled monument.</p> <p>Nonetheless, the dDCO may still need to include an article to deal with the removal of human remains (see article 17 of the model provisions) on a precautionary basis.</p> <p>Ancient burial remains unknown in the wider vicinity may be a reason to include that.</p> <p>If the applicant cannot categorically rule risk of that it may be optimal to amend the next draft to include an appropriately worded article.</p> <p>Indicate if archeogonial advice has been obtained in your response if such provision is not accepted as to be included on a precautionary basis. Also indicate the mechanism of how unexpected human remains would be dealt with if they were discovered during construction activity.</p>
	NCC Response:	<p>The Historic Environment team concur with this; an appropriately worded article or requirement dealing with potential removal of human remains is required.</p> <p>The applicant is in receipt of advice from an archaeological consultant. The Historic Environment team would expect the mechanism for dealing with unexpected human remains to be detailed in the archaeological Written Scheme of Investigation, probably through having a reporting mechanism and provision for a retained archaeologist.</p>
Requirements		
DCO.2.3 Discharge of Requirements	The Applicant NCC SNDC Interested Parties	<p>It is noted by the ExA that there are ongoing discussions between the applicant NCC and SNDC in relation to the best way to undertake the discharge of requirements. One suggested option being floated is that there might be a single "lead" Authority discharging the requirements. An alternative option would be that each local authority discharge those.</p> <p>The ExA is seeking clarification from NCC and SNDC of the intended approach on this matter along with the applicants preferred option.</p>
	NCC Response:	<p>The County Planning Authority agree that a single planning authority should act as the relevant planning authority and is content that South Norfolk District Council, act as that planning authority. Subject to the</p>

		<p>provision that the relevant planning authority is required to consult the county council on matters for which the County Council holds technical competence and general responsibility.</p> <p>For clarity, it is noted that the County Council, as the relevant highway authority, must be consulted under requirements 4 and 10, but this should be extended to requirement 8 where the county council should be consulted as the Lead local Flood Authority and requirement 9 to enable the Historic Environment Service to provide scrutiny.</p> <p>LLFA comments: As per the dDCO, the applicant would need to obtain ordinary watercourse consent for relevant works prior to their beginning their works on site. Normally, this consent does not involve either the LPA or SNDC. However, the LLFA are open to practical suggestions should the normal process not be considered appropriate.</p>
FR Flood Risk and Drainage		
FRD.2.1 Updated Flood Information Update	The Applicant	In respect of fluvial flood risk and Chapter 13 of the ES [APP-50] provide any necessary updates to the examination documents presently being considered since the completion of Deadline 3.
	NCC	Interested parties if you have any further comments submit those.
	Interested Parties	
	NCC Response:	In relation to the fluvial flood risk and chapter 13, the LLFA have no additional comments beyond those already made.
HE Historic Environment		
HE.2.1 Heritage Assets / Information	The Applicant	Provide any necessary updates in relation to cultural heritage or archaeological interests which may have occurred since the completion of Deadline 3.
	NCC	
	Interested Parties	

	NCC Response:	Further archaeological evaluation by trial trenching, initiated by the applicant, was completed 07/12/2021. We are expecting a draft interim report on these works before Christmas. When a full report is in place, we would expect to have discussions with the applicant's archaeological consultants around the scope and nature of archaeological mitigation and the drafting of a Written Scheme of Investigation.
HE.2.2 Heritage Assets / Information	The Applicant	Taking into account APP-043 Environmental Statement Chapter 6 – Cultural Heritage which identifies Two Tumuli in Big Wood as a scheduled monument.
	NCC Interested Parties	Has the potential risk for the unexpected discovery human remains been adequately accounted for by application and the present inclusions within the dDCO?
	NCC Response:	Please see the Historic Environment team's response to DCO.2.12, above.
NV Noise, Vibration and Light		
Light		
NV.2.2 Lighting	NCC SNDC Interested Parties	The content of APP-086, Appendix 7.7 Lighting Assessment is noted by the ExA alongside the responses given at Deadline 3 as to the extent of lighting. NCC/SNDC Have any local accessibility groups or horse-riding groups been included in your responses to date, if not why? Interested Parties Provide any comments you wish to make.
	NCC Response:	The county council remains in discussion with the applicant regarding the lighting. The county council has not specifically consulted with local representatives including the groups referred to in the question. The county council considers formal engagement activities to be a matter for the applicant.

TT Traffic and Transport		
TT.2.1 Traffic Management	NCC SNDC The Applicant Interested Parties	<p>i) Explain/clarify what formal provisions are available, in your view, for allowing the monitoring and/or regulation of operational traffic to ensure it would not lead to overly excessive volumes of vehicles using the new link road between Cantley Lane South and the B1172 (Norwich Road) rather than routes via the Thickthorn Junction, B1172, A11 or A47.</p> <p>ii) If the integration of roadside signage or markings on the road network would support cyclists also indicate that in your response or any other mechanism potentially available to support cycling activity.</p> <p>Interested parties are invited to comment if they deem it appropriate.</p>
	NCC Response:	<p>i. National Highways could agree to monitor traffic levels on the new link between Cantley Lane South and the B1172 as part of a Monitoring and Evaluation Plan for the scheme. This would then determine whether the link has made the Cantley Lane route from Station Lane more attractive than it is at present. If it is, National Highways could agree to implement measures to reduce its attractiveness. The county council also refers the Inspector to our response to GC.2.4 Road Signage (iii).</p> <p>ii. As stated in the county council's response to TT.2.4 Public Rights of Way (below), Norfolk County Council has recently consulted on its Local Cycling and Walking Infrastructure Plan for the Greater Norwich region. This did not identify a potential project at this location on the Pedalway. Additionally, the county council has not sought such provision as part of the A47/A11 Thickthorn proposals. The county council supports the applicant's proposals. It is noted that these proposals provide a grade-separated crossing of the A47 at Cantley Lane from the B1172 via the new link road across the A11. If a Monitoring and Evaluation Plan is agreed and identifies issues that need to be addressed, the county council considers that, as any such requirement – if considered necessary – arises from the proposed scheme, it would be a matter for the applicant to deliver in agreement with the county council.</p>
Public Rights of Way, including cycle routes		
TT.2.2 Public Rights of Way	NCC SNDC	With respect to any other known planned initiatives which have not been submitted to the examination to further increase walking and cycling or public transportation improvements being considered locally and potentially complimentary to the scheme improvement within the application.

	Interested Parties	Indicate those and any reasoning of how they provide complimentary benefits (if there are any).
	NCC Response:	As stated in our written response to the Thickthorn hearings, with regard to Cantley Lane there are currently no funded schemes or identified schemes without funding. Cantley Lane is identified as a neighbourhood route but does not have any projects identified for it. The route and those identified projects in the short to medium term in Greater Norwich are shown on the following plan 
TT.2.3 Public Rights of Way	The Applicant NCC SNDC Interested Parties	<p>With regard to existing cycling and pedestrian routes in use by people in the local area.</p> <p>The Applicant/ NCC</p> <p>The ExA notes the cycle path signs/route along the B1172 (Norwich Road) and observed cyclists using the route heading from and to Wymondham/Hethersett areas via the B1172, over the Thickthorn Junction using pedestrian crossings at the junction and via Newmarket Road [EV-019]. The route eventually allows access to Norwich.</p> <ul style="list-style-type: none"> i) Further explain/clarify how existing used cycle crossings/pedestrian facilities and routes would be supported by the improvement scheme. Confirm if the existing cycle route referred to would still be possible both during construction and post construction. ii) Have local cycling groups or other relevant associations been adequately included for input about any implications for the use of the route, and in any ongoing discussions or consultation either by the applicant, or through informal channels available to NCC and SNDC in discussion with the applicant? iii) If not, what are the reasons? <p>Interested Parties</p> <ul style="list-style-type: none"> i) iv) Provide any comments you deem necessary.
	NCC Response:	The scheme does not impact the existing cycling route between Wymondham/ Hethersett and Norwich. The plans have been provided to the Local Access Forum which contains representatives for all access types to provide feedback to the applicant.
TT.2.4 Public Rights of Way	The Applicant	<p>Again, with regard to existing cycling and walking routes in use by people and available in the local area.</p> <p>The Applicant/NCC/SNDC</p>

	<p>NCC SNDC Interested Parties</p>	<p>i) Can any further enhancements be identified to enable betterment to the existing cycling/pedestrian crossing facilities at the Thickthorn Junction itself giving passage to and from the B1172 and Newmarket Road?</p> <p>ii) Above DMRB standards and the applicants general design principles already being referred to have other national and local best practice standards been given full regard to, if not why?</p> <p>Responses to (i) should include not only function and safety considerations but also pleasantness/attractiveness levels with the aim of improving the desirability of the environment for cyclists and pedestrians using any infrastructure facilities being provided or enhanced through embedded design features by the scheme (having the NPPF also in mind).</p> <p>iii) set out how any provisions identified at (i) would be captured by the DCO.</p> <p>Interested Parties</p> <p>iv) v) Provide any comments you deem necessary.</p>
	<p>NCC Response:</p>	<p>The A11 Newmarket Road / B1172 Norwich Road corridor forms part of the Pedalway network in Norwich and would be considered to be the major active travel corridor linking Norwich to Hethersett and Wymondham. At present, the A11 and B1172 are separated by the A47 and users have to cross the A47 slip roads close to Thickthorn Junction via at-grade signalised facilities. Norfolk County Council has recently consulted on its Local Cycling and Walking Infrastructure Plan for the Greater Norwich region. This did not identify a potential project at this location on the Pedalway. Additionally, the county council has not sought such provision as part of the A47/A11 Thickthorn proposals.</p> <p>The county council supports the applicant's proposals. It is noted that these proposals provide a grade-separated crossing of the A47 at Cantley Lane from the B1172 via the new link road across the A11.</p> <p>The council will continue to take into account matters at the A47 Thickthorn Junction at-grade crossings. If, in the future, it is considered that an alternative solution is required for non-motorised users in this vicinity to connect the A11-B1172 pedalway corridor, the council would look to progress with the identification and development of a suitable solution, subject to a range of considerations including availability of funding. The county council would want to do this in dialogue with the applicant, given that any crossing would be of the trunk road network, including to identify if there are any funding opportunities the applicant might be able to provide should it be determined that an alternative facility is needed.</p>

<p>TT.2.6 Work No.29</p>	<p>The Applicant NCC SNDC Interested Parties</p>	<p>Taking into account the additional submission AS-015 referring to Work 29. The ExA has viewed the junction at Station Lane and the A11.</p> <p>Applicant/NCC/SNDC</p> <p>i) Do you have any response/comments on the safety implications being raised in relation to the use of the junction during construction stages and also assuming the DCO is granted, the operation of the road network which would be apparent post such consent?</p> <p>ii) If further safety risk improvements can be identified please specify those.</p> <p>Interested Parties</p> <p>iii) Provide any further comments you deem necessary.</p>
	<p>NCC Response:</p>	<p>Regarding the use of the junction at Station Lane. NCC would seek to agree the current condition of any County road to be 'used' by construction works with National Highways and gain agreement that any damage would be repaired.</p> <p>There is no evidence of any safety concerns that need addressing at this location and the design conforms to national standards; therefore, NCC supports National Highway's proposed design.</p>