

**From:** [REDACTED]  
**To:** [REDACTED]@dft.gov.uk  
**Subject:** A47/ A11 Thicket Junction: National Highway's response to DfT consultation letter of 19th August 2022  
**Date:** 11 September 2022 18:55:45

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Dear Mr Dunn [A47A11Thicket@planninginspectorate.gov.uk](mailto:A47A11Thicket@planninginspectorate.gov.uk) [REDACTED]

**Planning Act 2008 (as amended) and the Infrastructure Planning  
(Examination Procedure) Rules 2010  
Application by National Highways Limited ("the Applicant") for an Order  
granting Development Consent for the A47/ A11 Thicket Junction**

**A47THI Registration: 20028381**

I refer to National Highway's response to your second consultation on the above scheme (ie your August 19th letter).

This contains an Annex with a "Statements of Common Ground" with Natural England.

With respect to European Protected Species, I note for otters that Natural England state:

"Given the potential risk to Otters, a European Protected Species and interest feature of the Broads SAC, associated with **the realignment of Cantley stream** we advise that you may need to consider whether this element of the work will need licensing, further information regarding this is provided within **Annex 1**."

And National Highways respond to NE "The Applicant notes Natural England's comments. Mitigation to deal with **the impacts of lighting** is listed in table 3-1 (REAC) of the Environmental Management Plan (EMP) (APP-128)."

I wish to point out that NE raise realignment of Cantley stream as an issue with licencing implications for otters, and NH respond that they have dealt with lighting issues in the REAC.

It, therefore, appears that NH have not dealt with issue of licencing w.r.t. otters for the work in realignment of the stream.

There, also, appears to be no "letter of no impediment" (LONI) w.r.t to otter licencing for the scheme from NE.

I strongly advise that the SoS will need to address this in their consideration of the scheme.

Yours sincerely

Dr Andrew Boswell

**± SCIENCE ± POLICY ± LAW ±**

Independent Scientist/Consultant, Climate Emergency Planning and Policy

Fellowship [REDACTED] "Exposing the flaws in carbon assessment and transport modelling for road schemes"

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