

**Application by Highways England for A47 North Tuddenham to Easton  
The Examining Authority Written questions and requests for information (ExQ1)  
Responses from Breckland Council**

Air Quality and Emissions

Q2.0.5	The approach is based on the one advocated in the LA105 Air quality guidance document used by Highways England to assess air pollution. This document states that 'There should be no need to model PM2.5 as the UK currently meets its legal requirements for the achievement of the PM2.5 air quality thresholds and the modelling of PM10 can be used to demonstrate that the project does not impact on the PM2.5 air quality threshold.' There is no local monitoring of PM10 or PM2.5 so the assessment is based on nationally produced data by Defra. PM10 and 2.5 are mainly linked with emissions from vehicle engines. It is difficult to know if localised emissions reflect those predicted and as such it is recommended that predictions and modelling are supported by localised monitoring.
Q2.0.8	Breckland Council is satisfied that the appropriate receptors have been identified.
Q2.0.11	The approach is that by modelling PM10 emissions this will demonstrate that the project does not impact on the PM2.5 air quality threshold smaller PM2.5 LA105 suggests that there are very few areas in the UK outside of London that exceed the air quality thresholds for particulate matter (PM10 or PM2.5). It is difficult to be able to support this statement without more data and to know if localised emissions reflect those predicted. As such it is recommended that predictions and modelling are supported by localised monitoring.

Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))

Q3.0.1	Breckland Council note that Natural England are satisfied with the approach taken by the applicant. The Council is content to rely on the views of Natural England as the Statutory body in this matter.
Q3.0.4	Breckland Council are satisfied that this section provides an accurate and robust assessment of the baseline conditions.
Q3.0.5	Breckland Council considers that any survey should be less than 24 months old. Any survey that is more than 24 months old should be updated in line with professional guidance
Q3.0.6	Breckland Council is content with the approach set out at paragraph 8.8.6 and the justification and evidence for it.
Q3.0.11	Breckland Council is content with the proposed receptor sites.
Q3.0.14	It is noted that there are two paragraphs 8.12.2. Breckland Council awaits the response of the applicant to this question but is content to rely on the opinions of Natural England and /or the Ecologist at Norfolk County Council on this matter.

Climate

Q4.0.3	Breckland Council will await the response of the applicant before commenting on this matter.
Q4.0.6	Breckland Council will await the response of the applicant before commenting on this matter.

Cumulative Effects

Q6.0.1	Breckland Council is satisfied with the Applicants cumulative assessment as set out in Appendix 15.2 [APP-133]
Draft Development Consent Order	
Q7.0.33	The date relates to Tree Preservation orders made after that time. There is a need to understand the context of the date and why it is considered necessary.
Historic Environment	
Q9.0.4	Breckland Council is in agreement with the list and the overall assessment.
Landscape and Visual	
Q10.01	Breckland Council has previously agreed these viewpoints and is satisfied that they are adequately representative of the proposed development
Q10.0.2	Breckland Council is broadly content with the general indicative proposals shown on the Environmental Masterplan subject to details which it is assumed will be agreed post decision.
Q10.0.3	Breckland Council is satisfied with the applicants approach to defining the baseline conditions.
Q10.0.4	Breckland Council will wait for the response from the applicant before responding to this question.
Q10.0.8	Breckland Council is content that 1km from the DCO boundary is sufficient for assessment purposes.
Q10.0.9	Breckland Council is satisfied that the evaluation provides an accurate evaluation of the existing baseline conditions.
Q10.0.11	Breckland Council will wait for the response from the applicant before responding to this question.
Q10.0.13	Breckland Council considers that the assumptions for year 15 tree heights within Table 7.6 are reasonable. There should be more information in relation to tree types and planting conditions to allow a proper assessment to be made.
Material Assets and Waste	
Q11.0.2	Breckland Council is content to rely on the view of Norfolk County Council as the Minerals and Waste Planning Authority in respect of this issue.
Noise and Vibration	
Q12.0.1	Breckland Council is satisfied that all receptors have been correctly identified.
Q12.0.2	Breckland Council considers that this is acceptable.
Q12.0.3	Breckland Council considers that this is acceptable.
Q12.0.6	Breckland Council considers that this is acceptable.

Q12.0.10	The applicant has stated 'Mitigation measures in the form of temporary noise barriers or site hoarding shall be considered to mitigate construction noise effects at the residential receptors presented in Table 11-12. These shall be provided where construction activity in the vicinity of the receptor is expected to exceed 10 days or nights in any 15 consecutive days or nights; or for a total number of days exceeding 40 in any six consecutive months.' BDC is concerned that mitigation will only be provided if noisy night work is carried out for more than 10 days or nights and as such believe that noise levels shall be assessed at the time and temporary barriers provided at the time to protect residents particularly if sleep disturbance is expected. Mitigation shall be based on noise levels not on how long it continues.
Population and Human Health	
Q13.0.1	Breckland Council is satisfied with the assessment methodology.
Q13.0.2	Breckland Council is satisfied with the assessment of the baseline conditions. It should be pointed out that the Local Plan reference for the allocation – Land East of Heath Road is LP[044]005.
Q13.0.4	Breckland Council is satisfied that the data is sufficient to enable the Applicant to state that they are representative of the average use.
Q13.0.11	Breckland Council considers that there appears to be an inconsistency between the receptors within Table 12.5 and those within Table 12.6.
Q13.0.12	Breckland Council notes that there have been no usage studies carried out for the Combined footway/cycleway linking Main Road and The Street at Hockering set out in Table 12.6. Given its quality and importance an understanding of its level of usage would enable a proper understanding of its importance given it is not able to be substituted.
Transportation and Traffic	
Q14.0.1	Breckland Council is satisfied with the applicants Transport Case for the scheme and is supportive of the proposal in general terms.
Q14.0.2	Breckland Council will rely on the comments of Norfolk County Council as the Highway Authority in relation to this matter.
Water Environment	
Q15.0.1	Breckland Council will rely on the comments of Norfolk County Council as the Lead Local Flood Authority in relation to this matter.
Q15.0.6	Breckland Council will rely on the comments of Norfolk County Council as the Lead Local Flood Authority in relation to this matter.
Q15.0.7	Breckland Council will rely on the comments of Norfolk County Council as the Lead Local Flood Authority in relation to this matter.
Q15.0.11	Breckland Council will rely on the comments of Norfolk County Council as the Lead Local Flood Authority and those of the Environment Agency in relation to this matter.
Q15.0.13	Breckland Council will rely on the comments of Norfolk County Council as the Lead Local Flood Authority and those of the Environment Agency in relation to this matter.
Q15.0.14	Breckland Council will rely on the comments of Norfolk County Council as the Lead Local Flood Authority and those of the Environment Agency in relation to this matter.

Q15.0.15

Breckland Council will rely on the comments of Norfolk County Council as the Lead Local Flood Authority and those of the Environment Agency in relation to this matter.