

ExQ1	Question to:	Question:
2.	Air Quality and Emissions	
2.0.5	NCC, BC, BDC, SNC	ES Chapter 5: Air Quality [APP-044] paragraph 5.4.10, are the parties happy with the approach taken with regards to PM2.5? If not, please explain.
	NCC Response:	District colleagues should be contacted/involved so as able to add more detail about PM10 and PM2.5 calculations as these may feature in their ASR returns. Please note PM2.5 limits may be impacted by the Environment Bill so current non-exceedance may potentially change in the future. Whilst these levels may not be known for certain it may be that WHO levels become a longer-term aspiration.
2.0.8	NCC, BC, BDC, SNC	ES Chapter 5: Air Quality [APP-044], paragraph 5.4.39 states that professional judgement was used when selecting the ecological receptors. Are the parties satisfied that this approach has identified all the appropriate receptors?
	NCC Response:	The air quality assessment states that professional judgement was used when selecting the ecological receptors. The sensitivity of notified features for nationally and internationally important designated nature conservation sites in the UK that are sensitive to air pollution can be found through the APIS 'Site Relevant Critical Loads Tool'. It is noted that the APIS website was used as part of the assessment to identify which feature of the identified designated habitats is sensitive to nitrogen deposition (section 5.8.14) and this is an acceptable approach.
2.0.11	NCC, BC, BDC, SNC	ES Chapter 5: Air Quality [APP-044], section 5.7, Baseline conditions, are the parties satisfied that this provides an accurate assessment of the current conditions? If not, please explain why.
	NCC Response:	NCC are unable to add any comment on this given the detailed assessment and mapping of the area by the applicants. There is no clear basis on which to challenge or confirm these baseline measurements. However, it is important to understand the interaction between measurements and distance of populations as well as how different pollutants disperse (e.g. NOx and PM behave in different ways and have different impacts at varying concentration levels)
3.	Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))	
3.0.1	NE, NCC, BC, SNC, BDC	Can the parties comment on the approach taken by the Applicant in its HRA Report [APP139] and confirm whether it is satisfactory? If not, please explain why.

	NCC Response:	Norfolk County Council is satisfied by the approach taken by the applicant in its HRA Report which appears to have followed accepted guidance.
3.0.5	The Applicant, NE, NCC, BC, SNC, BDC	ES Chapter 8: Biodiversity [APP-047], Table 8.3, please confirm that all the surveys are still valid and in-date and can therefore be relied upon by the ExA during the course of the Examination and Recommendation stage. If not, please explain what is required to address them.
	NCC Response:	Some of the survey data collected is considered out of date in accordance with CIEEM's advice note on the lifespan of ecological reports and surveys (CIEEM; 2019). NCC recommend where survey data is out of date that updated surveys are carried out in accordance with best practice guidance.
3.0.6	NE, NCC, BC, SNC, BDC	ES Chapter 8: Biodiversity [APP-047], paragraph 8.8.6, please confirm that you are content with the approach and the justification and evidence for it? If not, please explain why.
	NCC Response:	Norfolk County Council is satisfied by the approach taken by the applicant in its HRA Report which appears to have followed accepted guidance.
3.0.11	NE, NCC, BC, SNC, BDC	ES Chapter 8: Biodiversity [APP-047], in general, are the parties content with the proposed receptor sites? If not, why not.
	NCC Response:	No details of the proposed receptor sites (for example locations, suitability of the sites to support the translocated populations) appear to have been provided and therefore it is not possible to determine if the proposed receptor sites referred to in the Biodiversity Chapter are suitable.
3.0.14	The Applicant, NE, NCC, BC, SNC, BDC	ES Chapter 8: Biodiversity [APP-047], paragraph 8.12.2 states that the underpasses on the Proposed Scheme are not directly on existing bat flight paths as that could not be designed into the Proposed Scheme but will have planting to encourage bats to use them. Please provide further justification to explain this statement. Are NE, NCC, BC, BDC and SNC satisfied with this approach?
	NCC Response:	Section 4.5 of LD 118 Biodiversity design states "only mitigation measures that are effective and proven shall be included in project design". It has not been demonstrated that mitigation measures, such as underpasses and planting to encourage bats to use them, would be effective where proposed.
4.	Climate	

4.0.3	The Applicant, NE, NCC, BC, SNC, BDC	ES Chapter 14: Climate [APP-053], paragraph 14.4.3, can the Applicant explain why no further consultation has taken place? Are NE, NCC, BC, BDC and SNC satisfied with approach?
	NCC Response:	The LLFA has briefly viewed Chapter 14. The LLFA notes that the climate change allowances for the assessment of flood risk relate to the Flood Risk Assessment Climate Change Allowance guidance. This guidance was updated on 20 th July 2021 to adjust the revised fluvial peak flows.
4.0.6	The Applicant, NE, NCC, BC, SNC, BDC	ES Chapter 14: Climate [APP-053] paragraph 14.5.2 please explain what levels of maintenance are expected? Are NE, NCC, BC, BDC and SNC satisfied with approach?
	NCC Response:	The LLFA has briefly viewed Chapter 14 and did not observe any information on the levels of expected maintenance. Therefore, no further comments are possible.
6.	Cumulative Effects	
6.0.1	NE, HE, NCC, BC, BDC, SNC	Are the parties satisfied with the Applicant's cumulative effects assessment and the shortlist of projects considered, as set out in Appendix 15.2 [APP-133]. If not, please explain why.
	NCC Response:	Norfolk County Council has got no views to offer on this and would accept the advice of Natural England.
7.	<u>Draft Development Consent Order (DCO)</u>	
7.0.21	The Applicant, NCC	Art 15 Street works: Should this article be restricted to specific streets set out in a Schedule? Should it confirm that the power is "without the consent of the street authority"? Should the powers be exercised with the consent of the street authority subject to consultation? What is the view of NCC in respect of this Article?
	NCC Response:	NCC's view is that roads within the limits of the DCO do not necessarily need to be notified via the permit system, and NCC would not necessarily need to be consulted, as they are not public highway at the time. However, if there are any potential highway assets in the ground at that time (drainage/culverts/street lighting etc), then NCC would need to be informed of any potential alterations to them that could affect their function, as it may affect assets outside the DCO limits. On this basis, NCC would like to be consulted.
7.0.22	NCC	Art 16 (6): Are NCC happy with a period of 28 days.

	NCC Response:	NCC's standard request period for temporary road closures is 6 weeks (42 Days). NCC would request that this be the minimum lead in. This is particularly so in the case of closures that affect roads outside the DCO limits.
7.0.27	NCC	Art 28: Are NCC content with a period of 28 days?
	NCC Response:	NCC are content with the time period stated.
7.0.33	NCC, BC, SNC, BDC	Art41: What are the respective parties views of the imposition of a date of 24 July 2020?
	NCC Response:	Norfolk County Council has got no views to offer on this and would accept the view of the district council.
7.0.50	NCC	R19: Do the parties consider 10 business days sufficient time to respond to consultation on the discharge of requirements?
	NCC Response:	The material that remains to be resolved through the discharge of requirements is very substantial the County is therefore concerned that the default "approval" in the instances that timescales are met is not in the public interest. A matter that is compounded by the extremely short timescales proposed by the developer. NCC recommend that the period is extended to 15 working days and the overall time period for discharge is extended accordingly.
9.	Historic Environment	
9.0.4	HE, NCC, BC, SNC, BDC	ES Chapter 6: Cultural Heritage [APP-045], Section 6.7, identifies the baseline conditions. Are BC, SNC, BDC, NCC and HE in agreement with this list and the overall assessment of effects on these?
	NCC Response:	NCC are in agreement with the overall assessment of effects.
10.	Landscape and Visual	
10.0.1	NCC, BC, SNC, BDC	ES Chapter 7: Landscape and Visual Effects [APP-046], Are the Council's satisfied that the viewpoints and photomontage locations selected (as shown on ES Figure 7.5 [APP-093]) are adequately representative of the Proposed Development?
	NCC Response:	NCC are satisfied the viewpoints selected offer a representative view of the Proposed Masterplan.

Norfolk County Council

Identification No: TR010038

Registration identification number: 20028295

10.0.2	NCC, BC, SNC, BDC	Are the parties satisfied with the Environmental Masterplan [APP-138] and the indicative proposals shown for the Proposed Development?
	NCC Response:	NCC find the plan acceptable but suggest more detailed design may be required.
10.0.3	NCC, BC, SNC, BDC	ES Chapter 7: Landscape and Visual Effects [APP-046], Are the Council's satisfied with the Applicant's approach to defining the baseline conditions?
	NCC Response:	NCC are satisfied the baseline is suitable.
10.0.4	The Applicant, NCC, BC, SNC, BDC	ES Chapter 7: Landscape and Visual Effects [APP-046], what level of lighting/height/numbers etc was assessed. How does this compare to the existing situation? Are the parties happy with this?
	NCC Response:	Norfolk County Council has got no views to offer on this and would accept the view of the district council.
10.0.8	NCC, BC, SNC, BDC	ES Chapter 7: Landscape and Visual Effects [APP-046], 7.6.2 – are the parties content that 1km from the DCO boundary is sufficient for assessment purposes?
	NCC Response:	NCC are content this is sufficient.
10.0.9	NCC, BC, SNC, BDC	ES Chapter 7: Landscape and Visual Effects [APP-046], 7.7 Baseline Conditions – are the parties satisfied that the assessment provides an accurate evaluation of the existing baseline conditions? If not, please explain where it is lacking.
	NCC Response:	NCC are satisfied the baseline is suitable.
10.0.11	The Applicant, NCC, BC, SNC, BDC	ES Chapter 7: Landscape and Visual Effects [APP-046], 7.7.35, please provide further explanation as to how the 20 viewpoints were selected and were any proposed locations discounted? What level of input was received from the Councils over their selection? Are the Councils happy that the viewpoints are representative?
	NCC Response:	The district councils were involved in the selection process. NCC are satisfied with the process.
10.0.13	NCC, BC, SNC, BDC	ES Chapter 7: Landscape and Visual Effects [APP-046], Table 7.6 - are the assumptions around tree heights for Yr15 reasonable? If not, please explain.

	NCC Response:	The assumptions of tree height estimates for Yr15 are possibly conservative, but reasonable considering the likely broad spectrum of growing conditions.
11.	Material Assets and Waste	
11.0.1	NCC	ES Chapter 10: Material assets and waste [APP-049], identifies that the Proposed Development intersects part of a known sand and gravel reserve (Mineral Safeguarding Area) as shown in Norfolk County Council's mineral safeguarding area mapping. Does NCC consider that this designation has any implications for the Proposed Development and if so, what?
	NCC Response:	Mineral Safeguarding Areas have potential implications for development located within them due to the need to comply with national policy on resource safeguarding (paragraph 212 of the NPPF), and the prevention of 'needless sterilisation' of mineral resources. However, Norfolk County Council, in its capacity as the Mineral Planning Authority, considers that the Proposed Development has suggested suitable measures to address these issues through the reuse of onsite resources, and these measures would prevent 'needless sterilisation'.
11.0.2	NCC, BC, SNC, BDC	ES Chapter 10: Material assets and waste [APP-049], are the Councils satisfied with the identified study areas and with the baseline conditions. If not, please explain why.
	NCC Response:	Norfolk County Council, in its capacity as the Mineral Planning Authority, is satisfied with the identified study areas and with the baseline conditions.
12.	Noise and Vibration	
12.0.1	NCC, BC, SNC, BDC	ES Chapter 11: Noise and Vibration [APP-050] are the parties satisfied that the baseline conditions as identified in Section 11.7 is accurate? Have all the receptors been correctly identified? If not, please explain.
	NCC Response:	Norfolk County Council has got no views to offer on this and would accept the view of the district council.
12.0.2	NCC, BC, SNC, BDC	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.4.3, are the parties satisfied with the changes to the assessment methodology from the scoping report? If not, please explain why.
	NCC Response:	Norfolk County Council has got no views to offer on this and would accept the view of the district council.
12.0.3	NCC, BC, SNC, BDC	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.4.11 are the parties satisfied with this approach? If not, please explain why.

	NCC Response:	Norfolk County Council has got no views to offer on this and would accept the view of the district council.
12.0.6	NCC, BC, SNC, BDC	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.7.3 are the parties content with the way the appellant has addressed the issue of undertaking surveys during the COVID19 pandemic? If not, why not.
	NCC Response:	NCC agree it is sensible to consider pre-lockdown traffic flows as well as those measured during lockdown and recommend more recent data now that restrictions and movements are likely to be returning to previous levels.
12.0.10	NCC, BC, SNC, BDC	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.9.6 are the parties content with the triggers for the implementation of temporary mitigation? If not, please explain why.
	NCC Response:	Norfolk County Council has got no views to offer on this and would accept the view of the district council.
12.0.12	Applicant, NCC, BC, SNC, BDC	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.9.29 are the parties satisfied with the justifications provided for the exclusion of these mitigation measures from the proposed scheme? As a result, do the parties consider that the proposed noise barriers are in accordance with NPS NN as mitigation measures that are considered to be proportionate and reasonable? If not, please explain why.
	NCC Response:	Norfolk County Council has got no views to offer on this and would direct this to the district councils, in their function as Environment Health / Statutory Noise Nuisance management.
13.	Population and Human Health	
13.0.1	NCC, BC, SNC, BDC	ES Chapter 12: Population and human health [APP-051] are the parties satisfied with the assessment methodology? If not, please explain.
	NCC Response:	Subject to following set down process following agreed statutory and PHE guidance there is no basis upon which to challenge the methodology. The only caveat being to ensure economic factors are considered as a key determinant to population health, as well as those mentioned elsewhere.
13.0.2	NCC, BC, SNC, BDC	ES Chapter 12 : Population and human health [APP-051] are the parties satisfied that Section 12.7 provides an accurate assessment of the baseline conditions?
	NCC Response:	NCC are unable to provide comment on this given the detailed assessment and mapping of the area by the applicants. There is no basis on which to challenge or confirm these baseline measurements. NCC recommend seeking local knowledge and specialist knowledge of district council colleagues. NCC also note

		that some key health outcomes, determinants and deprivation measures do seem to have been actively considered at Tables 12.8 and 12.9
14.	Transportation and Traffic	
14.0.1	NCC, BC, SNC, BDC	Are the parties satisfied with the Applicant's Transport Case for the Scheme as set out in Chapter 4 of the Case for the Scheme [APP-140]? Please provide reasons for any disagreement with any aspect of it.
	NCC Response:	Norfolk County Council are satisfied with the Transport Case for the Scheme.
14.0.2	NCC, BC, SNC, BDC	Are the parties satisfied with the Applicant's revised outline TMP [APP-144] (which includes details of construction traffic routing)? Please provide reasons for any concerns with any aspect of it.
	NCC Response:	Norfolk County Council have no issues at present.
15.	Water Environment	
15.0.1	EA, NCC, BDC, BC, SNC	ES Chapter 13: Road drainage and the water environment [APP-052], are the parties content with the Applicant's Flood Risk Assessment (FRA) and drainage proposals? If not, please explain why and what additional information is required.
	NCC Response:	<p>The LLFA has raised a couple of concerns regarding the FRA and drainage proposals that relate to Hockering culvert and Oak Farm culvert and the potential floodplain storage compensation. The current Environmental Statement chapter has overstated the position of the LLFA, while the Flood Risk Assessment presents a fairer summary of the current position, although it is still misleading compared to what was discussed in February 2021. The disconnect between these documents is significant and should be updated to ensure the information being presented is consistent.</p> <p>Further information is given in 15.0.15 in relation to the Oak Farm culvert.</p> <p>The LLFA note the culvert at Hockering is within the Norfolk Rivers IDB area of jurisdiction who would provide any formal agreement or approval on this element of the scheme. However, the LLFA would query the extent and the location of the River Tud Floodplain and the tributary's floodplain. Based on the information presently available from a limited 1D model, it is not clear whether the proposed crossing is causing a loss in either the tributary's or the River Tud's floodplains. The 1D modelling results have not been provided as a flood extent</p>

		<p>map. In addition, the model results do not appear to consider the effects of the River Tud's water levels on those of the tributary. Consideration of the River Tud's water levels would be appropriate given the close proximity of the road crossing to the confluence. The LLFA would suggest that further work is undertaken by the applicant to ensure that the scheme would not increase flood risk elsewhere. At present that evidence base is not presented.</p> <p>In addition, the LLFA would like to correct an assertion made in the ES Chapter 13, to date no agreement has yet been reached with the LLFA regarding the flood storage compensation at either the Oak Farm and Hockering culverts. In addition, the LLFA have not stated that no flood floodplain compensation storage is acceptable.</p> <p>The LLFA seeks assurances this work will be undertaken to determine the impacts of the current proposed design in its ability to manage the potential future flood risk that could be derived from this scheme.</p> <p>In addition, the LLFA are aware that the temporary drainage design during construction is yet to be developed and confirmed. At present, the high-level summary of the temporary drainage approach requires some clarifications. For example, are the proposed settlement ponds mentioned in section 13.5.6 of the Environmental Statement (ES) temporary ponds or are they the proposed permanent ponds? The LLFA seeks assurances that further information and work will be undertaken in the interests of managing potential future flood risk that could be derived from this scheme. In relation to the drainage strategy, no information regarding the proposed drainage approach is provided for the construction stage. Therefore, the information presented in the ES chapter 13 is not substantiated by the current evidence base. The LLFA seeks assurances that further information will be provided regarding the construction drainage strategy to ensure there is no increase in flood risk during the construction phase, prior to the permanent surface water drainage system becoming operational.</p>
15.0.3	Application, NCC, BC, SNC, BDC	ES Chapter 13: Road drainage and the water environment [APP-052], do the parties agree that section 13.7, baseline conditions, is an accurate assessment of the current situation? If not, why not.
	NCC Response:	It is only appropriate for the LLFA to respond on aspects of this section based upon their area of responsibility. Therefore, aspects relating to the Groundwater Quality, Aquifer Properties, Groundwater Vulnerability, Water Framework Directive, Abstractions and Discharge Consents, Aquatic ecology and main river flood risk from the River Tud would all be under the jurisdiction of the Environment Agency to comment upon as the lead consultee. While the Recreation and Human Health section would be considered mostly by another body.

		<p>The climate change section is likely to be considered out of date as the Met Office report stated in 13.7.94 is likely to have been succeeded by UK Climate Predictions 2018 report in December 2018. This report has been the basis for the Environment Agency to update their climate change allowances guidance for flood risk assessments amongst many other activities.</p> <p>In section 13.7.98, Table 13-7, the LLFA observes that the main rivers are assessed as separate features for their importance of water environment attributes in study areas, while the two ordinary watercourses that have properties potentially at flood risk are considered as one feature. This does seem to limit the quality of the targeted nature of the assessment.</p> <p>The remaining aspects of the section have been reviewed and considered acceptable.</p>
15.0.6	EA, NCC, BC, BDC, SNC	ES Chapter 13: Road drainage and the water environment [APP-052], paragraph 13.7.6 states that as the works will not impact on the water environment, the River Wensum is not considered a direct receptor. Are the parties content with this conclusion and the justification given for it?
	NCC Response:	The LLFA is satisfied. Figure 13.2 demonstrates the catchment and site boundaries. The LLFA is not aware of any proposed changes to drainage to the site within the River Wensum catchment.
15.0.7	EA, NCC, BC, BDC, SNC	ES Chapter 13: Road drainage and the water environment [APP-052], paragraphs 13.7.65-13.7.69, are the EA and the Councils content that these are correct?
	NCC Response:	The LLFA is satisfied the statements made regarding main river and coastal flooding are correct. The LLFA notes that the absence of a flood zone along an ordinary watercourse does not mean that flooding does not occur, rather than no assessment of the extent of flooding has not occurred. This absence of information has led to the development of hydraulic models for the ordinary watercourses for the two tributaries at Oak Farm and Hockering.
15.0.11	EA, NE, NCC, BC, BDC, SNC	ES Chapter 13: Road drainage and the water environment [APP-052], paragraph 13.9.15 refers to the provision of replacement ponds. Are the parties satisfied that the replacement proposals will deliver the necessary mitigation? Do they provide an improvement to the current situation?
	NCC Response:	The limited information about these ponds in Chapter 13 from a local surface water drainage network perspective and does not clear identify the seven ponds that are to be replaced. From looking at Figure 13.1 (sheets 1 and 2) and the catchment plans in the Drainage Strategy, the ponds are indicated to appear offline

		from the local surface water drainage network. However, the chapter acknowledges that the developer's investigations are limited, and that uncharted drainage system may exist.
15.0.13	EA, NE, NCC, BC, BDC, SNC	ES Chapter 13: Road drainage and the water environment [APP-052], paragraph 13.9.22 refers to the Drainage strategy (Appendix 13.2 (TR010038/APP/6.3)) which proposes all road drainage will drain by surface water outfalls to the River Tud and its tributaries at twelve locations, utilising nine new outfalls. Is this approach acceptable to parties and in their view, is it adequate to deal with surface water and does it make suitable allowances to cover the design life of the Proposed Scheme?
	NCC Response:	<p>The GI results reported in section 4.3 indicate that infiltration to ground is poor to very poor in the Lowestoft formation while in the Sheringham Cliff Formation were moderate to good. However, the availability of the Sheringham Cliff Formation is limited along the route and are mostly small isolated areas of the formation that is surrounded by the Lowestoft Formation. Therefore, the opportunity in most areas is limited across the site. Along the existing A47 road there are 9 outfalls that discharge to the local surface water drainage network. The approach of discharging to a watercourse is considered acceptable. Supplementary GI was indicated for the first quarter of 2021, although as yet the LLFA has not had sight of this information.</p> <p>In section 6.6.3 of Appendix 13.2, the LLFA notes that the developer proposes to attenuate flow only in catchments where any increase in flow is found to be excessive. The developer confirms their intention to use either oversized pipes in the verge or ditches. This is considered by the LLFA to be a traditional drainage solution and would not be in accordance with the NPPF principles that seek the inclusion of SuDS on major developments and that there should be no increase in flood risk elsewhere from the development. It has not been possible to compare the pre and post development run off rates as no comparable information has been provided. The LLFA had previously raised the lack of clarity on this matter prior to DCO submission but there has not been addressed as yet.</p> <p>The scheme's drainage design has relied heavily on the guidance that is provided in the DMRB, yet there is only limited consideration of the LLFA guidance on the inclusion of SuDS that is derived from National Policy. The LLFA observes that of the 18 surface water drainage networks only 13 of the networks include SuDS features. This means that 5 of the networks are not including SuDS. The use of attenuation basins is the limited way that SuDS have been included within the scheme. Based on the report, the attenuation basins are used to address only one of the four pillars of SuDS; water quantity. The rest of the proposed drainage scheme relies on traditional road drainage structures that do not provide value in terms of water quality,</p>

Norfolk County Council

Identification No: TR010038

Registration identification number: 20028295

		amenity or biodiversity. This is at an odd position to the scheme's proposals to seek to replace the ponds and the associated habitat that would be lost but has missed an opportunity to better incorporate SuDS within the proposed scheme. The LLFA is yet to see the supporting pre and post development calculations. Therefore at this stage, the LLFA are not in a position to determine whether there is adequate capacity within the proposed drainage systems.
15.0.14	EA, NCC, BC, BDC, SNC	ES Chapter 13: Road drainage and the water environment [APP-052], paragraph 13.9.29, are parties satisfied that these are sufficient allowances to cover the design life of the proposed scheme?
	NCC Response:	The LLFA is satisfied with the 40% climate change allowance for the 100-year design life that would be associated with the 2080s epoch for the peak rainfall intensity allowances. It is noted that the drainage design life is considered to be 60 years in ES Appendix 13.2 Drainage Strategy. However, when assessing essential transport infrastructure in terms of assessing flood risk a 100 year design life would be applied.
15.0.15	EA, NCC, BC, BDC, SNC	ES Chapter 13: Road drainage and the water environment [APP-052], paragraph 13.9.32, are parties content that these measures are sufficient to address the identified flooding? If not, please explain.

	<p>NCC Response:</p>	<p>The LLFA is broadly satisfied with the proposed approach, however, there is one issue that the LLFA considers that further information is required.</p> <p>The LLFA would like to correct an assertion made in the ES Chapter 13, to date no agreement has yet been reached with the LLFA regarding the flood storage compensation at both the Oak Farm and Hockering culverts. In addition, the LLFA have not stated that no flood floodplain compensation storage is acceptable. The LLFA does acknowledge that, in principle, flood compensatory storage at Oak Farm and Hockering might not possible due to the local topography and land availability. However, before this can be decided further information and evidence is required to determine the extent of the upstream off-site impacts before NCC can form an informed opinion.</p> <p>At the Oak Farm Culvert, the LLFA seek clarification and further information that demonstrates the flood storage volume is maintained, even if changed in its level, along with information quantifying the displaced volume. At present in the FRA, there is an assessment of volume for the post development scenario but not for the pre-development scenario. This prevents a suitable comparison identifying the areas of potential loss and whether suitable compensation can be identified.</p> <p>At the Oak Farm Culvert, no information has been presented to the LLFA that justifies the selection of the orifice type and size as a suitable flow control structure for this location. In addition, no debris assessment has been presented for the structure. This would feed into the development of a credible blockage scenario being modelled and the results presented.</p>
--	--------------------------	--