

A47 Blofield to North Burlingham Dualling

Scheme Number: TR010040

Volume 9 **9.23 Applicant's Response to Deadline 5** **Submissions**

The Infrastructure Planning (Examination Procedure) Rules 2010
Rule 8(1)(c)

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Infrastructure Planning (Applications: Prescribed
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**The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009**

A47 Blofield to North Burlingham Dualling
Development Consent Order 202[x]

APPLICANT'S RESPONSE TO DEADLINE 5 SUBMISSIONS

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1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 Blofield to North Burlingham scheme was submitted on 30 December 2020 and accepted for examination on 27 January 2021.
- 1.1.2 The purpose of this document is to set out Highways England's (the Applicant) response to the Deadline 5 submissions by other parties.

2 CHRIS GATES (REP5-018)

Reference	Deadline 5 submission	Applicant's Response
	<p>In their latest written response (Scheme ref TR010040 doc ref TR010040/APP6.1) "community land and assets" 126.9 Highways England repeat their assertion that "Blofield is the main source of community assets within the study area, providing assets such as supermarkets..."</p> <p>They go on to say, rather dismissively, that there are also some shops in Acle and Lingwood.</p> <p>We and others have attempted to correct this misrepresentation before. We understand why HE wish it were so and continue to peddle it - if they can convince the Inspector that Blofield provides everything "locals" need, then access to Lingwood and Acle from Burlingham may seem superfluous.</p> <p>For the record: There is not a single supermarket in Blofield. There is only a small Spar convenience store as part of Blofield Post Office and a small Farm Shop at Norwich Camping, Blofield...</p> <p>Acle has full-size Co-op supermarket. There is also a Marks and Spencers "mini supermarket" with greater floor area than Blofield shops combined (and consequent choice) at the filling station which alone would be more attractive. There is also a well established Butchers, a Chemist, Post Office, Newsagents, Pet and Livestock Feed store, Food Takeaways, Library, Tyre Fitters, Hairdressers, Beauty Salons, Pubs, Auction Mart plus rail and bus connections to Yarmouth, Norwich and beyond. Lingwood and Acle are our school providers. Lingwood has our Parish Community Hall and Playing Fields.</p> <p>How are we, the local community, to trust HE assertions elsewhere in their documentation, much of it highly technical, when they refuse to correct this one?</p>	<p>The presence of local amenities in Acle is acknowledged and understood.</p> <p>As part of the Environmental Impact Assessment, the Applicant has undertaken an assessment of the effects of the proposed Scheme on land-use and accessibility, which includes the effects on walkers, cyclists and horse-riders (WCH), in accordance with DMRB standard LA112 Population and human health. LA112 recommends that the study area for the assessment of the effects on land use and accessibility shall comprise the construction footprint/project boundary plus a 500 metre area surrounding the project boundary. It goes on to state that where likely effects are identified outside of the 500 metre area, the study area should be extended accordingly.</p>

3 CLIMATE EMERGENCY PLANNING AND POLICY (REP5-019 TO REP5-022 AND AS-030)

Reference	Deadline 5 submission	Applicant's Response
	<p>The submissions can be found at:</p> <p>Deadline 5</p> <p>REP5-019 Comments on documents submitted at D4 and D4a [REDACTED]</p> <p>REP5-020 Comments on documents submitted at D4 and D4a - Appendix E: Chatham House, Climate Change Risk Assessment 2021 [REDACTED]</p> <p>REP5-021 Comments on documents submitted at D4 and D4a - Appendix F: Norfolk County Council Local Transport Plan 4 Delay: Press Article [REDACTED]</p> <p>REP5-022 Comments on documents submitted at D4 and D4a - Appendix G: Norfolk County Council Lobby For Further A47 Road Projects [REDACTED]</p>	<p>The response is provided in Appendix A to this document.</p>

Reference	Deadline 5 submission	Applicant's Response
	<div></div> <p>Additional Submission AS-030 Additional Submission accepted at the discretion of the Examining Authority Request for cumulative carbon emissions to be considered together for the A47BNB, A47NTE and A47THI examinations</p> <div></div>	

4 ENVIRONMENT AGENCY (REP5-023 AND REP5-024)

Reference	Deadline 5 submission	Applicant's Response
REP5-023 Req 4	Requirement 4 Environmental Management Plan has been amended in the dDCO (Rev 3) [REP4-008]. We note the addition of the Environment Agency as a named consultee for the EMP (Third Iteration) in respect of completion of works. While this was not something that we specifically requested, we can confirm that we would be happy to be consulted on relevant matters at that stage.	The Applicant acknowledges the response from the Environment Agency.
REP5-023 Req 8	The dDCO submitted at Deadline 4 [REP4-008] also includes amendments to Requirement 8 Surface and foul water drainage. We welcome the addition of the Environment Agency as a named consultee in respect of part (2). We also note that references to 'foul water' have been removed as there will be no foul water drainage required across the scheme. The Applicant has confirmed through discussions that foul drainage requirements during the construction phase will be managed through the Environmental Management Plan.	The Applicant acknowledges the response from the Environment Agency, and this is now agreed in the Statement of Common Ground (REP5-009).
REP5-023 EMP	We note that Action W12 has been added to Table 3-1 (Record of Environmental Actions and Commitments) in the Environmental Management Plan (Rev 4) [REP4-041]. We welcome the inclusion of the action, which concerns the long-term management and maintenance of the drainage system during operation.	The Applicant acknowledges the response from the Environment Agency.
REP5-024 ExQ2 02.15.2	<p>These two issues have been further discussed with the Applicant. In respect of issue a), we have reviewed the proposed text for a footnote to be added to Appendix A -Table of consents and agreements as part of a further revision (revision 5) to document 3.3 Consents and Licences Position Statement. In our view, the proposed footnote serves to provide an adequate definition of when an abstraction licence will be required for dewatering operations that take longer than 6 months. We understand that Revision 5 of document 3.3 will be submitted at Deadline 5. The inclusion of the proposed footnote, as discussed, will mean that we are satisfied that the issue is resolved.</p> <p>In respect of issue b), the Applicant has consulted with us on proposed</p>	<p>Revision 5 of the Consents and Licences Position Statement was submitted at Deadline 5. The EA have confirmed to the Applicant that they are satisfied with the document and this is now agreed in the Statement of Common Ground (REP5-009).</p> <p>Requirement 6 to the dDCO has been amended to the satisfaction of the EA (see REP5-002) and this is now agreed in the Statement of Common Ground (REP5-009).</p>

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	amendments to Requirement 6 Contaminated land and groundwater, part (2). The updated text addresses our concerns in respect of determining whether remediation is required, and ensuring that controlled waters are protected. We have confirmed to the Applicant that the proposed changes, if included in an updated dDCO, would be sufficient to resolve our previously raised concerns with R6.	

5 LINGWOOD AND BURLINGHAM PARISH COUNCIL (REP5-025)

Reference	Deadline 5 submission	Applicant's Response
Re: Highway England's documents REP4 023 and REP4 024. TR010040. Vol 6, 6.1 : Environmental Statement Chapter 12 – Population and Human Health. Sept 2021	<p>The people most affected by the proposed dualling of the A47 at North Burlingham are those who live within the parish of Lingwood and Burlingham. Our parish is divided by the A47 and the proposed dualling will increase the severance affect further.</p> <p>We, the people of Lingwood and Burlingham, welcome the dualling of our stretch of the A47, but we have consistently requested the scheme includes an underpass, or suitable bridge, for walkers, cyclists and horse riders who wish to access essential amenities or roam within our parish. We have also requested a footpath/cycleway between Lingwood, Burlingham and Acle so our children are able to cycle to school. We are supported by Norfolk County Council, Broadland District Council, other local parish councils and interested parties. However, Highways England consistently deny the need for either an underpass at the point of FP3 or a footpath to Acle. It would appear Highways England has not bothered to consider the evidence provided in our previous submissions but has continued to repeat misleading statements.</p> <p>I am not able to produce a glossy spreadsheet so, for the sake of clarity and speed, I have copied Highways England's remarks in italics followed by my observations. I have quoted mainly from REP 023, although my remarks also apply to the same statements carried over to REP24 and other error-strewn documents which have been submitted by Highways England.</p>	<p>The Applicant has considered the submissions made by Lingwood and Burlingham Parish Council including those made at Deadline 3 and Deadline 4 (see also Applicant's Response to Deadline 4 Submissions (REP5-015)).</p>
1)	<p>There appears to be confusion over the definition of the 'Study Area' and this may have led Highways England to repeat incorrect, statements. It is not known whether these statements are the result of a naive desk-top exercise, or whether they are made deliberately with the intention of confusing and misleading.</p> <p>The 'Study Area' for the Proposed Scheme was defined in HE's submission, 'Walking, Cycling and Horse riding Review', (REP2-012):-</p>	<p>The study areas have been determined in accordance with the Design Manual for Roads and Bridges, LA112 Population and Human Health. In respect of land-use and accessibility the study area is as defined in LA112, paragraph 3.6, and for human health is as defined in LA112, paragraph 3.23.</p> <p>As set-out in the Applicant's Response to the Examiner's First Written Questions (ExQ1) (REP1-061), Q1.13.9 on page 87, regarding the</p>

Reference	Deadline 5 submission	Applicant's Response
	<p><u>1.3.1: As indicated, the scheme fits the definition of a large scheme, which requires the adoption of a study area which extends to 5km around the scheme, as shown in Figure 1-1 below. The study area includes the A47, the villages of Blofield, North Burlingham, Lingwood and the small market town of Acle. The study area also includes the countryside to the north and south of the A47.</u></p> <p>However, REP4-024, 'Population and Human Health', which purports to include the concerns of walkers, cyclists and horse riders, states:</p> <p><i>"12.5.1: The study area for the assessment of impacts on land use and accessibility extends 500m from the red line boundary (including the construction footprint), in line with DMRB LA 112, paragraph 3.6. This has been selected as significant effects are unlikely to occur outside of the 500m study area as a result of the Proposed Scheme. The study area is shown in Figure 12.1 (TR010040/APP/6.3)."</i></p> <p>Figure 12.1 is referenced as APP-069. Please note, the map in question conveniently excludes the villages of Lingwood and Acle.</p> <p>In total contrast, the next sentence extends the study area to over 5 miles!!!</p> <p><i>"12.5.2: The study area for human health includes the following communities which are located within the Broadland district, adjacent to the Proposed Scheme: Blofield with South Walsham, North Burlingham and Acle. This study area is based on the extent and characteristics of the Proposed Scheme, and the degree to which these communities are likely to be affected by the Proposed Scheme, in line with paragraph 3.23 of DMRB LA 112. The study area extends beyond these communities where relevant, for example for the noise and air quality assessments."</i></p> <p>Also, <i>"12.6.33: All three communities (Blofield with South Walsham, Burlingham and Acle) are considered to have a high sensitivity to change."</i></p> <p>Blofield with South Walsham, Burlingham and Acle are not communities</p>	<p>assessment of the effects of the proposed Scheme on land use and accessibility, which includes the effects on walkers, cyclists and horse-riders (WCH):</p> <p>LA112, of the Design Manual for Roads and Bridges (<i>paragraph 3.6</i>) recommends that the study area for the assessment of the effects on land use and accessibility shall comprise the construction footprint/project boundary plus a 500 metre area surrounding the project boundary. It goes on to state that where likely effects are identified outside of the 500 metre area, the study area should be extended accordingly.</p> <p>The section of the A47 to the east of South Walsham Road is already a dual carriageway road and its layout would remain as existing post implementation of the proposed Scheme. As such, the proposed Scheme, would not result in significant effects for walkers, cyclists and equestrians using facilities located to the east of South Walsham Road. In view of this, the study area for the assessment is that shown in Figure 12.1 Population and Human Health (REP4-034), which includes the majority of Blofield, North Burlingham and the area to the north of Lingwood. The study area does not include the town of Acle or the village of Lingwood.</p> <p>The Applicant has also undertaken an assessment of the effects of the proposed scheme on human health. The study area in this case is as defined by LA112, paragraph 3.23, with an extended study area where relevant, for example for the noise and air quality assessments.</p> <p>Para 12.6.33, of ES Chapter 12 (REP4-023), is in relation to human health and uses the study area defined in para 12.5.2, LA112 paragraph 3.2.3 (REP4-023)</p>

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	<p>'adjacent to the proposed scheme', but are electoral wards of Broadland District Council. Indeed, Blofield with South Walsham is a vast area which extends around five miles north of the A47 and includes five separate parishes! Only part of one of these parishes, Blofield, lies within the study area defined by Fig.12.1 TR010040/APP/6.3.</p> <p>It would appear this study has published data appertaining to Broadland District Council's electoral wards which is broadly irrelevant to communities within any defined study area. Therefore the results of the study are meaningless.</p>	
2	<p><i>"12.6.11: As indicated above, the village of Lingwood located to the south of the A47 has assets located within the village. Residents of Lingwood are likely to use the local highway network to the south of the existing A47. These routes are not anticipated to be significantly impacted by the Proposed Scheme and therefore, this village has not been assessed any further."</i></p> <p>It is presumed this document, 'Populations and Human Health', is not about the benefit of traffic routes south of the A47, but about the health of the people affected by the proposed scheme. Lingwood is under one mile from the A47 and is part of the same parish as North Burlingham. The people of Lingwood are affected by the proposed scheme more than any other community, apart from North Burlingham, inasmuch as we are separated from our parish woodland walks, and our cyclists will never be able to cross the A47 safely. Highways England includes South Walsham in it's study area (by default) although this village is over two miles from the A47, so why was it decided not to include Lingwood?</p> <p>(In fact, Lingwood is part of Burlingham ward, so it appears Lingwood may have been 'assessed' after all!)</p>	<p>As set-out in the Applicant's Response to Deadline 4 Submissions (REP5-015):</p> <p>As part of the Environmental Impact Assessment, the Applicant has undertaken an assessment of the effects of the proposed Scheme on land-use and accessibility, which includes the effects on walkers, cyclists and horse-riders (WCH), in accordance with DMRB standard LA112 Population and human health. LA112 (section 3.6) recommends that the study area for the assessment of the effects on land use and accessibility shall comprise the construction footprint/project boundary plus a 500 metre area surrounding the project boundary. It goes on to state that where likely effects are identified outside of the 500 metre area, the study area should be extended accordingly.</p> <p>The provision of cycle tracks at the Blofield Overbridge and the B1140 junction will facilitate the safe north to south crossing of the new A47 for pedestrians and cyclists.</p>
3	<p><i>"12.6.9: Blofield is the main source of community assets within the study area, providing assets such as supermarkets, places of worship, schools and GP surgeries, as shown on Figure 12.1(TR010040/APP/6.3). There are also some community assets in Acle (such as a train station, schools, shops and GP surgeries) and some assets in Lingwood (such as a train station, schools, shops and places of worship). The sensitivity of</i></p>	<p>As set-out in the Applicant's response to Deadline 4 Submissions (REP5-015):</p> <p>Numerous local amenities are available in Blofield in close proximity to the Scheme extents and these can be accessed in the future using the new shared footway / cycleway to be</p>

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	<p><i>community assets in Blofield is classified as high."</i></p> <p>If the study area is defined in Fig.12.1 TR010040/APP/6.3, then Blofield is, indeed, the '<i>main source of community assets within the study area</i>', since this study area covers only half the village of Blofield and part of the tiny community at North Burlingham!!!</p> <p>Obviously, Highways England has not read our previous submissions, so I wish to emphasise again that Blofield is NOT '<i>the main source of community assets</i>' within the originally defined study area. Nor is it the main source of community assets within the study area defined by district electoral wards. Acle is!</p> <p>Contrary to Highways England's assertions, there are NO 'supermarkets' in Blofield, just a convenience store and a small farm shop. In contrast, Acle has a supermarket and an M&S food supermarket.</p> <p>There is only one '<i>places of worship</i>' in Blofield – an Anglican church. Lingwood has Anglican and Methodist churches. Acle has Anglican, Methodist and Roman Catholic congregations.</p> <p>There is only one '<i>schools</i>' in Blofield, a primary school which serves the village. The designated primary school for North Burlingham is Lingwood Primary Academy. The designated secondary school for both Lingwood and North Burlingham is Acle Academy.</p>	<p>provided along the former A47. Although numerous other local amenities are located in Acle, Acle itself is not impacted by the Scheme.</p> <p>The Design Manual for Roads and Bridges (DMRB) standard GG142 Walking, cycling and horse-riding assessment and review states at paragraph 4.7.1, page 16, (in relation to Table 4.7 Information requirements for large and small schemes) that "<i>The Lead Assessor should determine the appropriate quality of the information to be captured. Such that only information which can be used to help inform the highway scheme design is collated</i>".</p> <p>To comply with the requirements of the National Networks National Policy Statement (2014) (<i>see paragraph 4.31</i>), the Applicant has sought to both mitigate the environmental and social impacts of the Scheme and provide improved facilities for users (<i>in accordance with paragraph 5.174 of the NNNPS</i>) by incorporating a reasonable and proportionate package of improvements for walkers and cyclists (<i>which is supported by paragraph 5.184 of the NNNPS</i>).</p> <p>As part of the Environmental Impact Assessment, the Applicant has undertaken an assessment of the effects of the proposed Scheme on land-use and accessibility, which includes the effects on walkers, cyclists and horse-riders (WCH), in accordance with DMRB standard LA112 Population and human health. LA112 (<i>section 3.6</i>) recommends that the study area for the assessment of the effects on land use and accessibility shall comprise the construction footprint/project boundary plus a 500 metre area surrounding the project boundary. It goes on to state that where likely effects are identified outside of the 500 metre area, the study area should be extended accordingly.</p> <p>In identifying the package of walking and cycling improvements to be provided as part of the Scheme, the Applicant has been</p>

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		cognisant of the extent of the likely effects.
4	<p>"12.6.15: The majority of businesses within the study area are located in Blofield, however there are a number located along this section of the existing A47, including (refer to Figure 12.1 (TR010040/APP/6.3)):"</p> <p>Again, this study area covers only half of Blofield and part of North Burlingham. The majority of businesses within the properly defined study area are NOT situated in Blofield but in Acle and elsewhere!</p> <p>There is little point in my repeating everything that has been said in our previous submissions since it would appear Highways England are intent upon misleading everyone about the truth of the area.</p> <p>Please see our previous submissions, RR-005, RR-061, REP2-016, REP3-026 and REP4-059.</p>	See the Applicant's response in 3 above.
5	<p>"12.9.53:..... In the future, users making a trip between Lingwood and North Burlingham via Burlingham FP3 would be required to divert to the proposed WCH route running west to east parallel to the proposed agricultural access track to connect to the proposed Blofield Overbridge and then continue their journey via the overbridge and the proposed new combined footway/cycleway to be provided on the northern side of the former A47, which would be detrunked. Alternatively, users could follow the proposed WCH route to the east as far as the B1140 junction and access North Burlingham via the new footway/cycle track links. Although both the Blofield Overbridge and the B1140 junction would facilitate the safe crossing of the new A47 alignment for users, the resulting increases in journey length would be in excess of 500m. The sensitivity of Burlingham FP3 has been classified as medium due to observed usage being very low and the trips being for recreational purposes only. The magnitude of the impact is major as severing the route would result in a permanent increase in journey length in excess of 500m for users. Effects are therefore assessed as permanent Moderate adverse given the very low usage of this unsurfaced, recreational route which does not provide direct access to community assets."</p> <p>The increase in journey length over the proposed B1140 overbridge from</p>	<p>As set out in the Applicant's Response to the Examiner's First Written Questions (ExQ1) (REP1-061), Q1.13.8 page 81, the additional walking distances from footpath FP3 (to the south of the proposed A47) are as follows:</p> <ul style="list-style-type: none"> Burlingham FP3 to centre of North Burlingham = 2km Burlingham FP3 to Start of Burlingham Woodlands Walk/Burlingham FP1 = 2.2km. <p>The route of the detour using the proposed cycle track is shown in the context of the proposed Scheme and the surrounding landscape on sheets 4 and 5 of the Masterplan Rev 3 (REP5-006). The cycle track would be provided either in cutting or at grade with the new A47. Users of the cycle track would have open views of the countryside over the majority of its length, consistent with existing views associated with the area.</p> <p>The cycle track would run parallel to and to the south of a maintenance track as far as the proposed soakaway at North Burlingham. Infrequent use of this track by maintenance vehicles is</p>

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	<p>the point where FP3 meets the A47 is approximately 2.2 miles, or 4.4 miles for a round trip. This detour will take the walker along a path adjacent to a busy dual carriageway, then across an overbridge used by up to 700 heavy goods vehicles per day in peak season on their way to Cantley Sugar Factory (each of which has to make a return journey over the overbridge), then back along the other side of the A47. The return journey will be the same in reverse. (Re. the HGVs, please see confirmation from British sugar at REP2-016.) Highways England seems to assume this 4.4 mile detour will be acceptable for someone who has set out on a 6 mile ramble through Burlingham Woods! (The distance using the Blofield overbridge would be about the same, assuming paths alongside the A47.)</p> <p>As explained in previous submissions, the 'very low usage' recorded on FP3 is because walkers can no longer cross the A47 safely and, therefore, most choose to drive to North Burlingham woods, which has a high usage.</p> <p><i>It is incorrect to say FP3 'does not provide direct access to community assets'.</i> It is the shortest route from North Burlingham to the school, station, bus stops, village hall, etc. which are well within walking distance if parishioners were able to cross the A47 safely. An underpass would provide access to FP3 and to Lingwood Road, which is only about 250m from the point where FP3 meets the A47 and provides an alternative walkable route into Lingwood.</p> <p>Highways England has chosen to ignore the petition signed by well over 1,000 people who said they would use an underpass. It has also chosen to ignore the Parish Council's submissions (RR005, RR-061, REP2-016, REP3-026, REP4-059) and the 59 people who sent in their comment (RR016 to RR-075).</p>	<p>unlikely to impact on the amenity of users of the cycle track.</p> <p>The cycle track would follow a southeast and then northbound route around the soakaway before following the route of the existing permissive bridleway, which connects to Lingwood Lane. Beyond Lingwood Lane, the cycle track would follow an eastbound route parallel to the new A47 and the B1440 on-slip road before connecting to the cycle track on the B1140. At its closest point, the cycle track would be no closer than around 8 metres to the southern edge of the A47 westbound carriageway.</p> <p>A new fence and hedgerow would be provided between the cycle track and the A47 over the majority of its length and groups of trees would be planted at locations over the length of the route to break up views of the road.</p> <p>Species rich grassland would be established along the majority of the length of the cycle track which would add seasonal variation, attract wildlife and enhance the sense of the cycle track passing through its own setting, separate for the adjacent agricultural land or highway.</p> <p>The layout of the cycle track and the complimentary landscape improvements shown on the Masterplan Rev 3 (REP5-006) will ensure that the cycle track is an attractive and safe environment for users.</p> <p>The cycle track incorporated into the proposed overbridge at the B1140 junction will facilitate safe, grade separated, north to south (and vice versa) crossing movements of the new A47 for pedestrians and cyclists.</p> <p>The Applicant has been cognisant of the strength of feeling expressed by the local community and visitors to the area regarding the requirement for an overbridge or underpass across the new A47 to carry Burlingham FP3. This information has been considered alongside the results of the WCH surveys conducted for Burlingham</p>

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		<p>FP1 and FP3 and the Applicant's investigations into the reasons for the very low usage of Burlingham FP3. There is no evidence of commuter, utility walking trips using Burlingham FP3.</p>
6	<p><i>"12.8.12: A new combined footway/cycleway would be incorporated into the A47/B1140 grade separated interchange allowing the safe crossing of the new A47 for pedestrians and cyclists between South Walsham Road and the B1140."</i></p> <p>(The South Walsham Road IS the B1140!) The route for cyclists travelling between North Burlingham and Lingwood, using the proposed B1140 overbridge, will NOT be safe! Cyclists are expected to negotiate the overbridge next to a convoy of HGVs.. Arriving on the Lingwood side of the bridge, they may have to negotiate the HGVs turning left across their path. They will then have a choice. They could travel down Acle Road which is a winding country lane with hairpin bends and no footpath. This road is already dangerous for cyclists, given the speed and volume of traffic, and, when Lingwood Road and Lingwood Lane are blocked off, the volume of traffic will increase. Alternatively, the cyclists will be able to turn right along a cycle path and access Lingwood Lane, a quiet country road. However, Lingwood Lane joins Acle Road right on the most dangerous bend, and cyclists will still have to negotiate further sharp bends in a busy road with no footpath. The alternative, using the proposed Blofield overbridge, would deposit cyclists on Blofield Road, another narrow country lane with hairpin bends, no footpath and no speed limit. Cyclists have been killed here.</p> <p>Local cyclists will confirm no-one ever cycles along Blofield Road, Acle Road or the B1140 unless forced to do so because of the obvious dangers. If they need to cross the A47, they usually cycle down Lingwood Road and cross at FP3. An underpass would provide access to Lingwood Road for cyclists, horse riders and pedestrians.</p>	<p>The proposed cycle tracks incorporated into the B1140 junction and on Acle Road will be separated from the running carriageways of the roads. The separation distances from the carriageways will be provided in accordance with paragraph E/3.5.1 of DMRB standard CD143 Designing for walking, cycling and horse-riding and will reflect the proposed 30mph speed limit covering the overbridge and this section of Acle Road. Cyclists and pedestrians will not be required to mix with HGVs.</p> <p>Details of the crossings to be provided at the B1140 junction will be confirmed in Detailed Design and provided in accordance with the appropriate design standards.</p> <p>Acle Road and Lingwood Lane are established routes for cyclists as evidenced in Annex B of Appendix A to the Applicant's Response to Relevant Representations (REP1-060).</p> <p>Cyclists choosing to travel between North Burlingham and Lingwood via the Blofield Overbridge would follow the cycle track across the overbridge and then cross the new local road, (which provides access to/from Blofield), to join the proposed cycle track running east to west and to the south of the new A47. Cyclists would then follow this latter cycle track before connecting to Lingwood Road, which would become a cul-de-sac, to access Lingwood. The new local road would be subject to a 40mph speed limit where cyclists are required to cross. The proposed cycle tracks will provide a safe route for cyclists between North Burlingham and Lingwood, via the Blofield Overbridge.</p>
7	<p>May I be permitted to comment on Highways England's response to Broadland District Council and Norfolk County Council?</p>	<p>As set-out in the Applicant's Response to Relevant Representations (REP1-060):</p>

Reference	Deadline 5 submission	Applicant's Response
	<p>REP3-022. "35. <i>The walking distance between the centre of North Burlingham and the centre of Acle is approximately 3.8km. The Institution of Highways and Transportation (IHT) document, 'Providing for Journeys on Foot (2000)', indicates that the preferred maximum walking distance to common facilities is 1.2km and up to 2km for commuting, or walking to school.</i>"</p> <p>And: "<i>The walking distance between the centre of North Burlingham and both the primary school and village hall at Lingwood, via Burlingham FP3 and the footways provided as part of the local highways, is approximately 2.5km. The walking distance to the railway station is 2.3km via the same route. The Institution of Highways and Transportation (IHT) document, 'Providing for Journeys on Foot (2000)', indicates that the preferred maximum walking distance to common facilities is 1.2km and up to 2km for commuting, or walking to school. The walking distances to the facilities at Lingwood exceed the preferred maximum walking distances.</i>"</p> <p>As previously advised, the IHT document quoted by Highways England appears to be either out of date or incorrect. The Government's document "<i>Home to School Travel and Transport Guidance, July, 2014</i>" explains Parliamentary legislation concerning maximum walking distances to school.</p> <p>"1.3.16 - Statutory walking distances eligibility • provide free transport for all pupils of compulsory school age (5-16) if their nearest suitable school is: • beyond 2 miles (if below the age of 8); or • beyond 3 miles (if aged between 8 and 16)"</p> <p>This indicates the official maximum walking distances to school are 3.2 km – 4.8 km and not the 1.2 km – 2 km quoted by Highways England.</p> <p>Also, most residents of North Burlingham live in Main Road adjacent to the A47 and not the centre of the area. The distance between Main Road and Lingwood Station using footpaths is approximately 1.7 km as opposed to the 2.5 km quoted. Thus most residents of North Burlingham are well within the maximum walking distance to their amenities in Lingwood, but</p>	<p>The recommended walking distances provided in the Institution of Highways and Transportation (IHT) document, 'Providing for Journeys on Foot (2000)' are based on research and have been widely accepted in the transport planning field since the publication of the guidelines. The walking distances quoted from the document Home to School Travel and Transport Guidance, Statutory Guidance for Local Authorities, July 2014 refers to eligibility for free school transport rather than actual walking distances.</p> <p>The 2.3km walking distance quoted between the centre of North Burlingham and the railway station at Lingwood is measured from a point on Main Road between the residential properties numbered 7 and 17. The 1.7km walking distance quoted by Lingwood and Burlingham Parish Council would appear to be a 'crow-fly' distance as opposed to a walking distance via the available walking routes.</p> <p>As set-out in Appendix A to the Applicant's Response to Relevant Representations (REP1-060) (pg.199), the walking distance between the centre of North Burlingham and the centre of Acle is approximately 3.8km which greatly exceeds the preferred maximum walking distances, as recommended in the IHT guidelines.</p>

Reference	Deadline 5 submission	Applicant's Response
	<p>only if an underpass is provided. Using an underpass to Lingwood Road, and continuing along established roads to the school rather than unmade footpaths, the distance would increase to around 3 km. If this journey followed footpaths to the school which are already used by school children every day, the journey would be shorter and would fall within 'maximum walking distance'.</p> <p>Local residents are within statutory walking distance of Acle Academy high school, but only if a path is provided along the A47, at least as far as the Windle.</p>	
8	<p>There are many more comments I wish to make but, perhaps, 6 pages is enough. Our thoughts about the proposed scheme are well documented in previous submissions.</p> <p>In the end:- The document states, "<i>Table 12-15: Physical inactivity is a primary contributor to a wide range of chronic diseases including, but not limited, to coronary heart disease, stroke and diabetes. Physical activity is important for the mental health of the population and helps to prevent obesity, therefore any temporary stopping up of paths during construction would potentially have negative impacts to human health.</i>"</p> <p>This refers to 'temporary stopping up of paths'. But Highways England wants to stop up our paths permanently. We are expected to continue driving in order to access woodland which is within our own parish. Or we can take a walk which includes a 4.4 mile detour along a major trunk road, sharing a bridge with HGVs pumping out fumes. Or we can continue to cycle along dangerous country lanes and fight for space with HGVs..</p> <p>Highways England can have the last word: "<i>Stress and Anxiety The implementation of the Proposed Scheme is not anticipated to have an impact on the stress and anxiety of local residents. Neutral.</i>" (?????)</p>	<p>The Applicant re-iterates that as previously set-out in the Applicant's Response to Relevant Representations (REP1-060) and in the Applicant's Response to the Written Representations (REP3-025, page 25),</p> <p>the Applicant considers that the overall package of Walking, Cycling and Horse-Riding improvements is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users.</p>

6 NORFOLK COUNTY COUNCIL (REP5-026)

Reference	ExQ2	Response to ExQ2	Applicant's Response
2.14.1	Please provide an update on agreements relating to the transfer of assets.	<p>We 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>	Meetings with Norfolk County Council are continuing
2.14.2	The ExA notes differing advice within DMRB CD 143 'Designing for walking, cycling and horse-riding' and Local Transport Note (LTN) 1/20 'Cycle infrastructure design', relating to recommended widths of shared cycle tracks (2 metres and 3 metres respectively). Can the parties please: a) explain the status of LTN 1/20 and DMRB CD 143; and b) provide a view as to whether the standards of LTN 1/20 can be applied flexibly, given the rural context and likely low usage levels of shared cycle tracks associated with the Proposed Development?	<p>LTN 1/20 is national guidance for highway authorities and designers for cycle infrastructure it is expected that local authorities and their supply chain embed this guidance in local highways design standards. The DMRB CD 143 'Designing for walking, cycling and horse-riding' document provides requirements and advice for the design of walking, cycling and horse-riding facilities on and/or adjacent to the motorway and all-purpose trunk road network.</p> <p>As a local authority the standards shown in LTN 1/20 apply in both a rural and urban context although NCC recognises that there will be instances where there might be good reasons for standards different from those in the guidance and this would be considered on a case-by-case basis.</p>	The Applicant acknowledges the comment and is continuing to work with NCC.

APPENDIX A

RESPONSE TO CLIMATE EMERGENCY PLANNING AND POLICY (REP5-019 TO REP5-022 AND AS-030)

The CEPP response (**REP5-019**) to the Applicant's Written Summary of Oral Submissions at Hearing (**REP4-015**) is lengthy. It includes submissions that are not material in the determination of the DCO application, including criticisms of Government policy and advice. CEPP also erroneously assert that the likely significance of GHG emissions should be undertaken against local and regional carbon budgets and devote much effort to criticism of the Applicant's assessment on that basis. Since the approach advocated by CEPP is not the correct approach in law or policy the Applicant has focused its response on matters that are material to the determination of the DCO Application by the Secretary of State in accordance with section 104 of the Planning Act 2008. The Applicant has set out below the approach that is required to be followed in determining whether the Scheme will give rise to likely significant climate effects in respect of GHG emissions and demonstrates both that the Applicant has complied with this approach in ES Chapter 14 Climate (**REP2-002**) and that the CEPP approach is not one on which the Secretary of State could rely for the purposes of the Planning Act 2008, section 104 in preference to the approach set out in the NNNPS:

1. The approach to be taken to the consideration of carbon emissions and impacts in the determination of applications for development consent for national networks infrastructure is set out in paragraphs 5.16 – 5.19 of the NNNPS, which was approved by Parliament. As confirmed in the Ministerial Statement of 22 July 2021, pending the outcome of the announced review of the NNNPS

"...the NPS remains relevant government policy and has effect for the purposes of the Planning Act 2008. The NPS will, therefore, continue to provide a proper basis on which the Planning Inspectorate can examine, and the Secretary of State can make decisions on, applications for development consent." The statutory basis for the designation and review of a national policy statement is set out in sections 5 and 6 of the Planning Act 2008.

2. In respect of the assessment of carbon emissions, the Introduction at NNNPS paragraph 5.16 states that "The Government has a legally binding framework to cut greenhouse gas emissions by at least 80% [now 100%] by 2050. As stated above, the impact of road development on aggregate levels of emissions is likely to be very small. Emission reductions will be delivered through a system of five year carbon budgets that set a trajectory to 2050. Carbon budgets and plans will include policies to reduce transport emissions, taking into account the impact of the Government's overall programme of new infrastructure as part of that." As legislated for in the Climate Act 2008 (as amended), delivery of the emissions reductions necessary to achieve net zero by 2050 is measured through the pathway provided by interim targets of the carbon budgets. The Net Zero Strategy: Build Back Greener (published October 2021):

[REDACTED] was presented to Parliament pursuant to Section 14 of the Climate Change Act 2008. It sets out the next steps to be taken to cut carbon emissions in order to meet the Sixth Carbon Budget (2033 – 2037) and also the UK's 2030 Nationally Determined Contribution for the purposes of the Paris Agreement on Climate Change (described in the Technical Appendix to the Net Zero Strategy publication at pp 309 – 310). The Net Zero Strategy builds on the findings in the latest report by the Intergovernmental Panel on Climate Change (IPCC (2021), 'Sixth Assessment [REDACTED]' and postdates the publication by Chatham House of its "Climate change risk assessment 2021". Although CEPP assert (para 36) that the net zero policies previously referenced by the Applicant amount to "no more than [sic] distant promises" that opinion is not shared by the Climate Change Committee, in its independent analysis of the UK's Net Zero Strategy and other of the net zero documents previously referenced by the Applicant.

The Climate Change Committee's Independent Analysis: The UK's Net Zero Strategy

[REDACTED] (October 2021) states "Our overall assessment is that it is an ambitious and comprehensive strategy that marks a significant step forward for UK climate policy, setting a globally leading benchmark to take to COP26. Further steps will need to follow quickly to implement the policies and proposals mapped out in the Net Zero Strategy if it is to be a success." The Climate Change Committee notes that "A zero emission vehicle mandate will be the key delivery tool for electric vehicles, as recommended by the Committee" and "The Transport Decarbonisation Plan is a reasonably comprehensive

strategy for transitioning to a system in which almost all journeys are zero-carbon." Since the majority of operational GHG emissions from the Scheme will be from tail pipes rather than the infrastructure for which development consent is sought, it is material that there are up-to-date Government policies and strategies that seek to provide the pathway to delivering net zero by 2050. The Climate Change Committee's green/yellow/orange/red analysis of UK Climate Policy – State of Play (Table 2 at page 28 of the independent Analysis – link above) identifies that in respect of domestic transport, including domestic aviation and shipping, green (signalling "good plans") applies to publishing of the plans to achieve net zero, sufficient ambition and proper funding and/or incentives. It has allocated yellow ("generally good plans with some risks") to credible delivery policies, balanced mix of options and timelines for implementation. There are no orange ("more risks") or red ("significant risks") classifications identified in respect of domestic transport.

The Climate Change Committee describes the key actions in the coming years in respect of implementing the Transport Decarbonisation Plan as follows "This [Transport Decarbonisation Plan] included a clear roadmap for delivering the transition to electric vehicles, based on a zero-emission vehicle mandate. Phase-out dates for other types of non-zero-emission road vehicles have also been proposed, sending clear signals to the market. Alongside this, there is recognition of the need to reduce road traffic growth, supported by spending commitments on active travel and public transport. These now need to be turned into measurable targets and clear delivery policies to achieve this ambition." Neither a reduction in road traffic growth or achieving net zero are incompatible with the need for the proposed Scheme. The Applicant does not consider that CEPP's critiques of Government policy or the science that underpins it are consistent with the findings of the Climate Change Committee in its independent analysis of the Government's Net Zero Strategy, delivery of which would also mean that the GHG emissions predicted for the Scheme would be lower than those presented in Chapter 14.

In accordance with section 104 of the Planning Act 2008 the Secretary of State is required to determine the application in accordance with the NNNPS unless one or more of subsections (4) to (8) apply. Subsection (4) "applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations". It is relevant in this respect to note that:

The UK confirmed its Nationally Determined Contribution (NDC) under the Paris Agreement to the United Nations Framework Convention on Climate Change (UNFCCC) in December 2020. The NDC commits the UK to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels.

The NDC aligns with the legislated UK carbon reduction target in the 6th Carbon Budget, which, by setting a carbon budget for the period 2033 to 2037 of 965 MtCO₂e, will achieve an emissions reduction of 78% by 2035 compared to 1990 levels.

As presented in ES Chapter 14 (**REP2-002**) the climate assessment will not impact the UK achieving its carbon reduction targets. In turn it can therefore be concluded that there are no implications of the development in relation to the Paris Agreement and the UK's Nationally Determined Contribution under the Paris Agreement.

This conclusion is consistent with the Climate Change Committee's independent analysis, which states that the Net Zero Strategy "sets out sectoral ambitions that add up to a quantified pathway to meet the UK's Nationally Determined Contribution (NDC) for 2030 and the Sixth Carbon Budget covering the mid-2030s." Accordingly, the Applicant does not consider that there is a reasonable basis on which it could be concluded that the climate effects of the Scheme would invoke section 104(4).

3. The approach that the Applicant is required to take to the assessment of carbon impacts and climate factors is set out at NNNPS paragraph 5.17: "Carbon impacts will be considered as part of the appraisal of scheme options (in the business case), prior to the submission of an application for DCO. Where the development is subject to EIA, any Environmental Statement will need to describe an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets." For the purposes of the assessment, DMRB LA 114 – Climate sets out the requirements for assessing and reporting the effects of climate on highways (climate

change resilience and adaptation), and the effect on climate of greenhouse gas from construction, operation and maintenance projects. The methodology followed in ES Chapter 14 (**REP2-002**) for assessing the impact of the Scheme on climate is that set out in DMRB LA 114 section 3. In particular:

- Study areas: ES Chapter 14 (**REP2-002**) uses the study areas identified in DMRB LA 114 :

3.8 For construction and operational maintenance, the study area shall comprise GHG emissions associated with project construction related activities/materials and their associated transport.

3.9 For operational road user GHG emissions, the study area shall be consistent with the affected road network defined in a project's traffic model.

Accordingly, there is no justification for the CEPP criticisms of the study areas used in ES Chapter 14 Climate (**REP2-002**).

- Baseline scenario: ES Chapter 14 (**REP2-002**) complies with the requirements in DMRB LA 114 paragraph 3.10 that GHG emissions without the project shall be identified for current and future GHG emissions, that the boundary of the baseline GHG emissions should include current operational maintenance GHG emissions and operational user GHG emissions, and that the baseline GHG emissions should be consistent with the study area outlined for the project.
 - Data collection: ES Chapter 14 (**REP2-002**) presents the information identified in DMRB LA 114 paragraph 3 Table 3.11.1 on sources and lifecycle stages for project GHG emissions that should be obtained to inform the assessment. Construction of the Scheme has been calculated using the Highways England Carbon Tool (v2.3), whilst maintenance and operational emissions have been calculated over a 60-year appraisal period. To calculate end-user emissions, the traffic model and affected road network utilised for PCF stage 3 has been developed in line with the Department for Transport (DfT) Transport Appraisal Guidance (TAG). In following this approach, the Scheme has taken account of other planned developments within this area.
 - As discussed in Section 6 of the Transport Assessment (TA) (**REP1-045**), the strategic Norwich Area Transport Strategy Model (referred to as the NATS Model) is used as the basis to derive forecasted traffic impacts of the Scheme's performance across the wider area. The traffic model and affected road network utilised for PCF stage 3 has been developed in line with the Department for Transport (DfT) Transport Appraisal Guidance (TAG). In accordance with TAG guidance, developments and transport schemes identified in the uncertainty log with the likelihood of at least 'near certain' or 'more than likely' were included in the core scenario forecasts (please see TA section 6.3 for further details (**REP1-045**)). Accordingly, the Applicant rejects CEPP claims that the assessment presented in ES Chapter 14 (**REP2-002**) is not compatible with DMRB LA 114 and disagrees with criticism of the definitions used. The CEPP response seeks to apply to the Scheme an approach that is not in accordance with the NNNPS or DMRB LA 114 and to then criticise the Applicant for not following that incompatible approach. However, it is the CEPP approach that, if followed, would be contrary to the Planning Act 2008, section 104.
 - Significance criteria: DMRB LA 114 paragraph 3.18 requires that an assessment of project GHG emissions against UK government or overseeing organisation carbon budgets shall be undertaken and presented. In accordance with NNNPS paragraph 5.17 and DMRB LA 114 paragraphs 3.18 – 3.20 and Table 3.18 "Project GHG emissions against relevant carbon budgets", the assessment provided in Chapter 14 is against the relevant Government carbon budgets. CEPP erroneously asserts that the level at which likely significant GHG emissions should be assessed is against local or regional carbon budgets. Such an approach would not comply with advice in the NNNPS and, were it to be followed, would thus be contrary to the Planning Act 2008, section 104(3) obligation placed on the Secretary of State to determine the application in accordance with the NNNPS.
4. The NNNPS sets out the approach that the Secretary of State should take when considering carbon emissions in decision-making at paragraph 5.18: "The Government has an overarching national carbon reduction strategy (as set out in the Carbon Plan 2011) which is a credible plan for meeting carbon budgets. It includes a range of non-planning policies which will, subject to the occurrence of the very unlikely event described above, ensure that any carbon increases from road development do not compromise its overall carbon reduction commitments. The Government is legally required to meet this plan. Therefore, any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the

ability of Government to meet its carbon reduction targets."

A number of policy documents have been published by Government since the Carbon Plan 2011, most recently the transport decarbonisation plan "Decarbonising transport: a better, greener Britain" (14 July 2021) and the Net Zero Strategy: Building Back Greener (October 2021). All follow the approach legislated for in the Climate Change Act 2008 (as amended) and described at paragraph 2 above. Reducing emissions in the transport sector is the subject of Chapter 3v of the Net Zero Strategy (at pages 152 – 166), which includes the indicative domestic transport emissions pathway to 2037 at Figure 21 and the key commitments to achieve this: "The policies and proposals for transport in the Net Zero Strategy will... remove all road emissions at the tailpipe..." (page 24). Highways England recognises that they have a key role in the development and maintenance of a strategic road network that will facilitate the journey to net zero emissions. The Highways England Roadmap to net zero by 2050 sets out commitments to develop a blueprint for EV charging and energy storage by 2023 and to report to government on global HGV technology trials and set out proposals for trials in the UK in 2022.

Accordingly, not only are Government policy and strategies on the delivery of net zero in the domestic transport sector up-to-date, they have also been independently analysed by the Climate Change Committee in its independent analysis (published 26 October 2021) and found to provide a credible path to achievement of net zero by 2050 and to compliance with the UK's international obligations under the Paris Agreement. Accordingly, it is not considered that the CEPP criticisms of Government policy or the Applicant's approach in ES Chapter 14 Climate (**REP2-002**) constitute grounds under section 104(4) – (8) on which the Secretary of State could rely in deciding not to follow the approach set out in the NNNPS to assessing the significance of climate effects.

5. The NNNPS requires that the assessment of significance of effects on climate for DCO applications should be undertaken at the national level, which is the basis of the UK Government carbon budgets. The methodology set out in DMRB LA 114 (Climate) follows this approach. It should be noted that paragraph 2.6 of DMRB 114 advises that the assessment and reporting of the effects of climate shall be undertaken in accordance with the requirements in four over-arching environmental assessment documents. The ES for the proposed Scheme complies with the requirements set out in these documents, which themselves align with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). In particular, one of the four over-arching environmental assessment documents is DMRB LA 104 Environmental assessment and monitoring. DMRB LA 104 includes a series of definitions and requirements relating to cumulative assessment that have direct application to each of the individual environmental factors, including climate.

The LA104 standard provides a definition of cumulative assessment as:

Impacts that result from incremental changes caused by other present or reasonably foreseeable actions together with the project. NOTE: For the purposes of this guidance, a cumulative impact can arise as the result of: a) the combined impact of a number of different environmental factors - specific impacts from a single project on a single receptor/resource; and/or b) the combined impact of a number of different projects within the vicinity (in combination with the environmental impact assessment project) on a single receptor/resource.

It sets out the expectation that "Environmental assessments shall assess cumulative effects which include those from: 1) a single project (e.g. numerous different effects impacting a single receptor); and 2) different projects (together with the project being assessed)."

The assessment of the Scheme recognises that, in contrast to all other cumulative impact assessments presented in the ES, the spatial boundary of the climate receptor is global. The UK Government has no jurisdiction in other countries. Parliament has determined that, for the purpose of national network infrastructure projects, climate assessments should be considered at the national level, which is the basis of UK Government carbon budgets. By definition, NSIPs are of national importance and determination of their acceptability is by the Secretary of State rather than at a local level; likewise, assessment of the significance of their climate effects is undertaken at national level rather than at any other level.

The assessment of climate effects in ES Chapter 14 Climate (**REP2-002**) is in accordance with the overarching advice in DMRB LA 104. This is because the DMRB LA 114 methodology provides for 'single project' cumulative assessment through consideration of embedded construction and maintenance, and user tailpipe emissions. The cumulative assessment of 'different projects (together with the project being

assessed)' is inherently within the climate methodology through the inclusion of the project and other locally committed developments within the traffic model, and consideration of the project against the UK carbon budgets which are inherently cumulative as they consider and report on the carbon contributions across economic sectors.

It is not the case, as CEPP seeks to assert, that there is any breach of the EIA Regulations or a failure of the ES to comply with DMRB LA 114 or the overarching environmental assessment DMRB. The Applicant explained at the Applicant's Written Summary of Oral Submissions at Hearings (**REP4-051**) why the CEPP reliance on guidance of the European Commission was not adequate to support claims that the Applicant had failed to comply with the EIA Regulations or a correct understanding of the application of the EIA Regulations in this case. The various extracts quoted by CEPP from European Commission Guidance do not impose any obligation on member states of the European Union (which the UK was when the NNNPS was approved by Parliament) to determine the likely significance of any particular environmental effect at any particular level: that is a matter for the governments of the respective member states. The UK Parliament was not in breach of any legal obligation in approving the NNNPS that requires assessment of the significance of climate effects of proposed national networks infrastructure at a national level rather than a local or regional level. The EIA Regulations provide for the provision of information required to assess "likely significant effects". Through ensuring compliance with DMRB LA 114 (which itself is consistent with the requirements of the four over-arching environmental assessment DMRBs), the NNNPS and the EIA Regulations, the Applicant has provided all of the information that is required by the Secretary of State in order to determine the likely significance of climate effects in respect of the Scheme in accordance with the EIA Regulations and the NNNPS.