

A47 Blofield to North Burlingham

Scheme Number: TR010040

Volume 8 **8.2 Statement of Common Ground** **with National Highways** **and Broadland District Council**

Rule 8(1)(e)

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

December 2021

Deadline 9

Infrastructure Planning

Planning Act 2008

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

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


Statement of Common Ground – Broadland District Council

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STATEMENT OF COMMON GROUND

This statement of Common Ground has been prepared and agreed by (1) National Highways Limited and (2) Broadland District Council.

Signed 

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Position: Programme Lead

On behalf of National Highways

Date: 15 December 2021

Signed 

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On behalf of Broadland District Council

Date: 15 December 2021

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1 INTRODUCTION

1.1 Purpose of this Document

1.1.1 This Statement of Common Ground (SOCG) relates to an application made by National Highways (“the Applicant”) to the Planning Inspectorate (“PINS”) under Section 37 of the Planning Act 2008 (“PA 2008”) for a Development Consent Order (a “DCO”). If made the DCO would grant consent for the Applicant to undertake the A47 Blofield to North Burlingham Scheme (“the Scheme”). A detailed description of the Scheme can be found in the ES Chapter 2 The Proposed Scheme (**REP4-018**).

1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate website.



1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared by (1) National Highways as the Applicant and (2) Broadland District Council (BDC).

1.2.2 National Highways (then called Highways England Company Limited) became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing National Highways made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by National Highways.

1.2.3 BDC are the Planning Authority for the area within which the Scheme is located.

1.3 Terminology

1.3.1 In the tables in Section 3 ‘Issues’ of this SoCG the following terminology is used:

- “Agreed” indicates where the issue has been resolved
- “Not Agreed” indicates a final position
- “Under discussion” where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

1.3.2 Matters referred to in this SoCG reflect only issues which have been raised by BDC in their previous representations on the scheme.

2 RECORD OF ENGAGEMENT

2.1.1 A summary of the meetings and correspondence that has taken place between National Highways and Broadland District Council in relation to the Application is outlined in Table 2-1.

Table 2-1 : Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
03/11/20	Meeting	Scheme update
12/11/20	Meeting	To discuss the A47 Blofield DCO with Broadland District Council Planning Officer
01/12/20	Meeting	Scheme update
05/01/21	Meeting	Scheme update
02/02/21	Meeting	Scheme update
03/03/21	Meeting	Scheme update
04/08/21	Meeting	Discuss SoCG.
07/09/21	Meeting	Discuss SoCG and actions to resolve.
28/09/21	Meeting	Discuss outstanding matters relating to Air Quality & Noise
04/10/21	Meeting	Discuss outstanding matters relating to Cultural Heritage
05/10/21	Meeting	Discuss outstanding matters relating to Policy and the dDCO.
07/11/21	Meeting	Discuss outstanding matters relating to Noise, Policy & WCH.
08/12/21	Meeting	Discuss outstanding matters relating to Noise & Policy.
13/12/21	Meeting	Discuss outstanding matters relating to Hedgerows.

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) National Highways and (2) Broadland District Council in relation to the issues addressed in this SoCG.

3 ISSUES

Table 3-1 : Issues

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
Landscape and visual impact	RR-001	<p>Landscape and visual impact</p> <p>The proposed scheme is located in a predominantly rural landscape characterised by agricultural land uses with dispersed settlements. The agricultural fields are enclosed by hedgerows with mature trees and small areas of woodland. The ES notes that the scheme has the potential for adverse impacts on landscape features and landscape character and mitigation is therefore proposed in response. Chapter 7 and 8 of the ES identify that hedges were not subject to a full assessment under the Hedgerow Regulations 1997, but an estimate of species richness was made in order to screen hedgerows for likely importance. Broadland District Council would expect to see a full assessment of hedgerows against the full 'importance' criteria of the Hedgerow Regulations. Although no objection is raised in principle, Broadland District Council would wish the above issue to be addressed and may wish to make representations on the landscape and visual effects of the project and the suitability of proposed mitigation through the examination process.</p>	<p>A full assessment against the criteria of the Hedgerows Regulations of the hedgerows has now been undertaken. A total of 8 hedgerows (references: H4, H7 and H8 to H13 on the Hedgerow Plan (REP7-006)) with a combined length of approximately 655m have been identified as qualifying as 'important' will be potentially removed as part of the proposals. Broadland District Council does not object to this in the context of the delivery of the scheme.</p>	Agreed	14-12-21
Noise, air quality, vibration	RR-001	<p>Impacts arising from noise, air quality and vibration</p> <p>Whilst the project is in a predominantly rural area, the scheme has the potential to impact on the amenity of local residents during the construction and operational phases as a result of noise, air quality and vibration. Although Broadland District Council raises no specific issues on these matters at this stage, we may wish to</p>	<p>The Environmental Statement reports on the potential impacts during construction and operation as well as the proposed mitigation and design decisions to minimise adverse effects and maximise beneficial opportunities of the Scheme where possible.</p> <p>Noise, air quality and vibration assessments are</p>	Agreed	28-09-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
		make representations on these issues through the examination process and ensure that these issues are adequately addressed in the Development Consent Order.	presented in the following: <ul style="list-style-type: none"> • ES Chapter 5: Air Quality (APP-043) • ES Chapter 11: Noise and Vibration (REP1-028) • ES Chapter 15: Cumulative Effects Assessment (APP-053) 		
Noise, air quality, vibration		BDC suggest that s61 of the Control of Pollution Act 1974 be used (Prior consent for work on construction sites). This was the method used satisfactorily on the Broadland Northway (Northern Distributer Road).	The Applicant agrees to the use of Section 61 approach as raised by BDC within ExQ1 (1.12.2). This is secured in G1 of the REAC within EMP. See also the Applicant's Response to the Examiner's First Written Questions (REP1-061)	Agreed	28-09-21
Noise, air quality, vibration		Provide response to ExA following oral discussion on WHO guideline thresholds.	Response detailed in Applicant's Written Summary of Oral Submissions at Hearings (REP4-051). Document provided in meeting with BDC (28/09/2021). It is noted that the road traffic noise levels outside the closest facades to the B1140 and Yarmouth Road are above the recommendations within 2018 WHO Environmental Guidelines of 53 dB L _{den} and 45 dB L _{Aeq,8hour (night-time)} . This is not unusual in context of research carried out by the European Environment Agency that estimates that more than 100 million people in Europe are exposed to L _{den} levels above 55 dB; for night-time road traffic noise, over 72 million Europeans are exposed to L _{night} levels above 50 dB (Blanes et al., 2017).	Agreed	28-09-21
Noise, air quality, vibration		Applicant's Written Summary of Oral Submissions at Hearings 4.1 ISH 3 requested to be added to SoCG: Hearing Action Point 8 - Provide information on the difference of effectiveness between a 2m high noise barrier No 4 and a 3m high noise barrier No 4, and if	When assessing this alternative barrier proposal in accordance with DMRB LA111, the impact magnitude in the short-term with the Proposed Scheme is altered from Minor Adverse to Moderate Beneficial, and the impact magnitude over the short-term with the Proposed Scheme is altered from Negligible Adverse to Minor Beneficial. In this circumstance, no significant effects due to the change in operational road traffic	Agreed	08-11-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
		material, potential to provide a higher noise barrier at this location.	noise would occur. This is the same conclusion as presented in Table 11-14 within ES Chapter 11 (REP1-028). However, this would align with NNNPS aim 2 to mitigate and minimise other adverse impacts where project noise levels are above the LOAEL.		
Noise, air quality, vibration		Notwithstanding the above, would HE be prepared to increase the barrier height?	<p>As set-out in the Applicant's Response to Relevant Representations (REP1-060), RR-019-3:</p> <p>ES Chapter 11: Noise and Vibration (REP1-028) states that, with embedded mitigation in the form of a noise reducing road surface and 2 m high acoustic barrier, the effects due to the change in road traffic noise are not significant at Hall Cottages. Mitigation measures are provided to avoid significant effects at this location, in line with the current UK government policy on environmental noise.</p> <p>The location, height and acoustic performance requirements of each proposed noise barrier were developed to be sufficient to avoid significant effects due to the change in road traffic noise. For this location, a 2m noise barrier was sufficient to achieve this aim and is detailed within ES Chapter 11: Noise and Vibration (REP1-028).</p> <p>Therefore, the Applicant can confirm it is not prepared to increase the height of the barrier as it is not required as part of the scheme.</p>	Agreed, it is not required to make the development acceptable.	08-12-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date																
Noise, air quality, vibration		<p>Applicant's Written Summary of Oral Submissions at Hearings 4.4 ISH 3 requested to be added to SoCG:</p> <p>Hearing Action Point 11 - Address whether any additional noise mitigation measures would be feasible for those receptors along the B1140 (High Road) and Yarmouth Road where significant effects are reported</p>	<p>Yarmouth Road 18 hour Annual Average Traffic Flows:</p> <table border="1" data-bbox="1144 424 1525 501"> <thead> <tr> <th>DMOY</th> <th>DMFY</th> <th>DSOY</th> <th>DSFY</th> </tr> </thead> <tbody> <tr> <td>696</td> <td>823</td> <td>1992</td> <td>2720</td> </tr> </tbody> </table> <p>B1140 nr. South Burlingham Annual Average Traffic Flows:</p> <table border="1" data-bbox="1144 588 1525 665"> <thead> <tr> <th>DMOY</th> <th>DMFY</th> <th>DSOY</th> <th>DSFY</th> </tr> </thead> <tbody> <tr> <td>655</td> <td>426</td> <td>1802</td> <td>2120</td> </tr> </tbody> </table> <p>The changes in road traffic noise identified within ES Chapter 11 (REP1-028) for these two roads occur due to the above changes in traffic volume that are expected to occur due to the Proposed Scheme.</p> <p>Road traffic noise levels with the Proposed Scheme are expected to be:</p> <ul style="list-style-type: none"> - No more than 62 dB $L_{A10,18hour}$ at the closest residential façade to the Yarmouth Road section subject to moderate or greater changes in road traffic noise. This can be converted to 61 dB L_{den} and 52 dB $L_{Aeq,8hour (night-time)}$ using the TRL Conversion Method referenced in ES Chapter 11 (REP1-028). - No more than 59 dB $L_{A10,18hour}$ at the closest residential façade to the B1140 in South Burlingham subject to moderate or greater changes in road traffic noise. This can be converted to 59 dB L_{den} and 50 dB $L_{Aeq,8hour (night-time)}$ using the TRL Conversion Method referenced in ES Chapter 11 (REP1-028). <p>The above road traffic noise levels are less the road traffic noise levels expected at residential façades at a similar distance to the B1140 at Panxworth in the Do</p>	DMOY	DMFY	DSOY	DSFY	696	823	1992	2720	DMOY	DMFY	DSOY	DSFY	655	426	1802	2120	Agreed	08-11-21
DMOY	DMFY	DSOY	DSFY																		
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			<p>Minimum Opening Year scenario (without the Proposed Scheme). It is noted that the road traffic noise levels outside the closest facades to the B1140 and Yarmouth Road are above the recommendations within 2018 WHO Environmental Guidelines of 53 dB L_{den} and 45 dB $L_{Aeq,8hour}$ (night-time). This is not unusual in context of research carried out by the European Environment Agency that estimates that more than 100 million people in Europe are exposed to L_{den} levels above 55 dB; for night-time road traffic noise, over 72 million Europeans are exposed to L_{night} levels above 50 dB (Blanes et al., 2017). Good indoor conditions (defined within the WHO Guidelines for Community Noise and British Standard 8233:2014) within the closest properties to the B1140 South Burlington and the Yarmouth Road would be achieved with a building envelope that provides a level difference of 24 to 26 dB. This would be achieved where the external walls to habitable rooms incorporate an open trickle vent and 6 mm single glazed windows that are closed.</p> <p>For this reason, no significant adverse health effects are expected due to this level of road traffic noise and the provision of secondary glazing is not considered necessary.</p>		
Noise, air quality, vibration		Is it possible for HE and NCC to discuss the possibility of a low noise road surface for this stretch of road and/or for HE to make a financial contribution to NCC for the works in they are in agreement?	<p>Further discussion regarding the expected changes in road traffic noise along the B1140 and Yarmouth Road due to the Proposed Scheme and the expected effects took place between the Applicant and BDC on 8 November 2021. This included further explanation of the above response.</p> <p>The noise benefits of providing a low noise surface are greatest on high-speed (>75kmph) trunk roads with a high proportion of light vehicles. This is because the surface is effective at reducing road/tyre noise and</p>	Agreed	08-11-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
			<p>road/tyre noise is dominant on roads of this type. This is acknowledged within DMRB LA111.</p> <p>The traffic speeds expected on the B1140 and Yarmouth Road with the Proposed Scheme are 58 to 64 kmph (36 to 40 mph) at which there will be a greater contribution of engine noise vs tyre/road. It is also understood that heavy vehicle movements on the B1140 are relatively frequent due to the British Sugar Plc facility at Cantley. Under these circumstances, the noise benefits of providing a low noise surface will be limited.</p> <p>Due to this limited effectiveness, the Applicant does not propose to fund a low noise road surface on these County roads.</p>		
WCH	RR-001	<p>Routes for walking, Cycling and Horse Riding</p> <p>The A47 acts as a barrier to north-south movement by non-motorised users particularly between Lingwood and North Burlingham. Within the locality are the Burlingham Woods Walks - a series of Public Rights of Way and permissive paths, well used by pedestrians and dog walkers, which provide opportunities for informal recreation to the north and south of the A47. The proposed scheme would sever Burlingham FP3 and redirect users east-west across the proposed B1140 crossing. Whilst the inclusion of walking and cycling facilities at this junction is welcomed, the severance of Burlingham FP3 results in a significant detour which could be avoided through the inclusion of a footbridge across the proposed A47 thereby connecting Burlingham FP3 with FP1. Broadland District Council are supportive of the County Council's position on this issue.</p>	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Appendix A to the Applicant's Response to Relevant Representations (REP1-060)</p>	Not agreed	08-11-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
WCH	RR-001	<p>Broadland District Council has also previously made comments about the potential for the inclusion of cycling and pedestrian routes between North Burlingham and Acle. Whilst it is noted that Highways England have identified that these are outside of the scope of the scheme, Broadland District Council would wish to reiterate that their inclusion would be welcomed on the basis that it would create sustainable access for those in North Burlingham to a greater range of shops and services in Acle, and mitigate pressure on the Broads by providing enhanced access for residents in the locality to access Burlingham Woods Walks.</p>	<p>The Applicant has investigated the potential for a footway connection between North Burlingham and Acle in the vicinity of The Windle.</p> <p>Unfortunately, at the pinch point adjacent to the Hall Cottages, there is insufficient width to provide a footway / cycletrack of the required standard. This takes into consideration the alignment of the existing A47, the proposed noise barrier, vehicle restraint system and provision of adequate visibility from The Windle junction.</p> <p>The walking distance between the centre of North Burlingham and the centre of Acle is approximately 3.8km. The walking distances to the facilities at Acle exceed the preferred maximum walking distances as recommended by the IHT document. The IHT document identifies 1.4m/s as an average walking speed on an asphalt surface, giving a walking time of 46 minutes. Walking trips between North Burlingham and Acle are therefore more likely to comprise recreational walking trips than utility trips.</p> <p>An attractive walking route for recreational walking trips between North Burlingham and Acle is already provided by way of the Burlingham Woodland Walks network, utilising sections of Burlingham FP1 and FP2, South Walsham FP12, the permissive footpath between South Walsham Road and The Windle and the Byway between The Windle and Mill Lane in Acle. Therefore, given the existing walking route, there is no requirement for an additional walking route along the A47 between South Walsham Road and The Windle.</p> <p>The WCH surveys conducted at the A47 / South Walsham Road / B1140 junction recorded a negligible number of cyclists traveling east to west (and vice</p>	Not agreed	08-11-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
			<p>versa) on the A47. A small volume of cyclists were however, recorded crossing between the B1140 and South Walsham Road. These results confirm that the existing A47 is not an attractive route for cyclists</p> <p>With the Scheme in place, cyclists wishing to travel between North Burlingham and Acle will have a choice of routes. On leaving North Burlingham, they can travel north along South Walsham Road to Green Lane, northeast along Green Lane to Acle Road and then follow Acle Road/South Walsham Road into Acle. Alternatively, cyclists can leave Acle Road at The Windle and travel south before following the Byway which provides access to Mill Lane in the centre of Acle. Both routes are attractive and conducive to cycling. For cyclists not using road bikes, use can also be made of bridleway South Walsham BR11, which would result in a shorter journey than using Green Lane. Therefore, given the choice of existing cycling routes, there is no requirement for an additional cycling route along the A47 between South Walsham Road and The Windle.</p>		
Policy	REP1-066	<p><u>Policy Framework</u> The Development Plan comprises the following documents:</p> <ul style="list-style-type: none"> • Joint Core Strategy for Broadland, Norwich and South Norfolk 2011 (amendments adopted 2014) (JCS) • Broadland Development Management DPD 2015 (DM DPD) • Broadland District Council Growth Triangle Area Action Plan 2016 (GT AAP) • Site Allocations DPD 2016 (SA DPD) 	<p>With the exception of the Acle Neighbourhood Plan these Development Plan policy documents are referred to in the Case for the Scheme (REP1-042).</p> <p>With regards to Acle Neighbourhood Plan, the only policy relevant to the Scheme is Policy 5 – Improving links to the countryside and surrounding villages. This states that provision of new and improved footpaths, footways, cycleways and bridleways connecting Acle with surrounding villages and the countryside will be encouraged. Neither of the priority schemes identified in the Plan are of relevance to the A47 Blofield to North Burlingham Scheme, however, it is agreed that</p>	Agreed	18-10-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
		<ul style="list-style-type: none"> • Acle Neighbourhood Plan (2015) • Blofield Neighbourhood Plan (2016) <p>Also relevant is the Broadland Landscape Character Assessment SPD 2013</p>	<p>the list is not exhaustive, and that Broadland District Council supports the general principle of improved links to the countryside and surrounding villages.</p> <p>As set out in ES Chapter 12 Population and Human Health (REP4-023), the Scheme includes facilities for cyclists and pedestrians, including a footpath / cycleway crossing at the Blofield and B1140 Overbridges. The Burlingham Trails Network currently links from Lingwood Road, eastwards to connect with a proposed footway from Lingwood Lane to the Acle junction where it connects into a shared footway/cycleway crossing of the A47, This is illustrated in the Rights of Way and Access Plans (REP4-004).</p> <p>The Broadland Landscape Character Assessment SPD 2013 is referred to in ES Chapter 7 Landscape and Visual (APP-045).</p>		
Policy	REP1-066	<p>The following policies are considered to be particularly relevant to the proposals:</p> <p><u>JCS</u></p> <ul style="list-style-type: none"> • Policy 1 – Addressing climate change and protecting environmental assets • Policy 2 – Promoting good design • Policy 5 – The economy • Policy 6 – Access and transportation • Policy 7 – Supporting communities <p><u>DM DPD</u></p> <ul style="list-style-type: none"> • Policy GC1 – Presumption in favour of sustainable development • Policy GC2 – Location of new development 	<p>Appendix D of the Applicant's Response to The Examiner's First Written Questions (ExQ1) (REP1-061) provides a list of relevant development plan policies and the reasons for conformity or otherwise with these, with the exception of DM DPD Policy GC2, outlined below.</p> <p>The Scheme is an improvement to the existing in this location. An appraisal of options for the improvement to the A47 between Blofield and North Burlingham took place in 2017. The Preferred Route Alignment was chosen following extensive consultation and environmental studies.</p>	Agreed	18-10-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
		<ul style="list-style-type: none"> • Policy GC4 – Design • Policy EN1 – Biodiversity and habitats • Policy EN2 – Landscape • Policy EN4 – Pollution • Policy TS2 – Travel plans and transport assessments • Policy TS3 – Highway safety • Policy CSU5 – Surface water drainage <p><u>GT AAP</u></p> <ul style="list-style-type: none"> • No directly relevant policies <p><u>SA DPD</u></p> <ul style="list-style-type: none"> • No directly relevant policies <p><u>Acle Neighbourhood Plan</u></p> <ul style="list-style-type: none"> • Policy 5 – Improving links to the countryside and surrounding villages <p><u>Blofield Neighbourhood Plan</u></p> <ul style="list-style-type: none"> • No directly relevant policies 	<p>Policy GC2 states that “new development will be accommodated within the settlement limits defined on the policies map, outside of these limits development which does not result in any significant adverse impact will be permitted where it accords with the specific allocation and/or policy of the development plan”. As the Scheme is a Nationally Significant Infrastructure Project and is a road scheme, it does not fit within the allocated development types shown on the policies map and is outside of the settlement limits.</p> <p>However, the Scheme is compliant with a policy of the development plan, JCS 6, which states: <i>“The transportation system will be enhanced to develop the role of Norwich as a Regional Transport Node, particularly through the implementation of the Norwich Area Transportation Strategy, and will improve access to rural areas”</i> including “promoting improvements to the A11 and A47.”</p> <p>The impacts of the Scheme have been mitigated as detailed in the Environmental Statement. One of the Scheme’s objectives is to protect the environment by minimising adverse impacts and where possible, improve the environmental effects of transport on those living along the route of the new and existing road. Overall, the benefits of the Scheme (including economic and safety benefits) are considered to outweigh any unavoidable adverse effects following appropriate mitigation measures.</p> <p>As the Scheme is compliant with Policy JCS 6 the requirements of policy GC2 have therefore also been met.</p>		

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
			<p>With regards to Acle Neighbourhood Plan, Policy 5 – Improving links to the countryside and surrounding villages, the Scheme's accordance with this policy is summarised in point above.</p> <p>In the BDC LIR it identified that there were no policies in the Blofield Neighbourhood Plan which were of relevance however the applicant has identified a list of relevant policies in Appendix D of REP1-061 which Broadland District Council is in agreement with</p> <p>The Applicant is in agreement with the list of relevant development management policies provided by BDC.</p>		
Policy	REP1-066	Other material considerations include the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).	<p>The compliance of the Scheme with national policy is summarised in the Case for the Scheme (REP1-042).</p> <p>National Policy Statements (NPS) set out government policy on different types of national infrastructure development. NPS documents provide the framework within which Examining Authorities make their recommendations to the Secretary of State.</p> <p>As the Scheme is a Nationally Significant Infrastructure Project (NSIP), the Secretary of State must decide the application in accordance with any relevant national policy statement, in this case the National Policy Statement for National Networks is most relevant (NNPS). As the Scheme meets the criteria for a NSIP and is subject to the DCO process, the application will be judged primarily against the NNNPS, according to the decision-making framework set out in the Planning Act 2008.</p> <p>Other policy documents such as the NPPF and PPG</p>	Agreed	08-11-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
			<p>still have weight have been considered as part of the DCO application.</p> <p>The NPPF also states in paragraph 5: <i>'The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.'</i></p> <p>Accordance with the NNNPS is set out in the National Networks National Policy Statement Accordance Tables (APP-121).</p>		
Policy	REP1-066	<p>Also of relevance is the emerging Greater Norwich Local Plan (GNLP) The Plan which covers BDC, Norwich City and South Norfolk Councils is being prepared. The Regulation 19 consultation closed on 22nd March 2021 and is due to be submitted to the Secretary of State for Examination anticipated to be undertaken between November and December 2021. It is expected that the GNLP would be adopted in Autumn 2022. However, given the stage of preparation it carries only very limited weight in decision making.</p>	<p>The Greater Norwich Local Plan is summarised in the Case for the Scheme (REP1-042) (paragraphs 6.4.21 – 6.4.24).</p> <p>It is recognised that the Greater Norwich Local Plan was submitted to the Secretary of State for Examination at the end of July 2021.</p> <p>It is agreed that this policy document currently carries limited weight due to its stage in preparation.</p>	Agreed	18-10-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
Policy	REP1-066	A statement of compliance or otherwise with the above development plan policies is provided as appendix 1 to the LIR.	See Appendix A for response.	Agreed, except for JCS Policy 7 and ANP Policy 5 in relation to WCH.	08-12-21
Policy	REP1-066	The importance of this scheme is reflected in the existing development plan. Policy 6 of the JCS seeks to enhance the transport system in order to develop the role of Norwich as a Regional Transport Node. This is to be achieved by, amongst other things, "promoting improvements to the A47". The need to deliver improvements to the strategic highway network is echoed in the emerging GNLP, which supports strategic infrastructure improvements that support the growth needs of the area. The emerging GNLP, in Policy 4 (Strategic Infrastructure), specifically refers to improvements to the A47 between Blofield to North Burlingham as one of the schemes that will help the plan achieve its aims.	<p>The JCS policies are also outlined in the Case for the Scheme (REP1-042) and the Scheme's compliance with the JCS is summarised in Appendix D of the Applicant's Response to The Examiner's First Written Questions (ExQ1) (REP1-061).</p> <p>As noted above the Case for the Scheme (REP1-042) (Section 11) acknowledges the emerging Greater Norwich Local Plan.</p> <p>The Applicant acknowledges that within the emerging GNLP Policy 4 is supportive of the Scheme.</p>	Agreed	03-09-21
Heritage	REP1-066	<p><u>Heritage</u></p> <p>In accordance with paragraph 193 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. In accordance with paragraph 197 of the NPPF the effect of an application on the significance of non-designated heritage assets also needs to be taken into account in</p>	<p>Effects on the significance on both designated and non-designated heritage assets have been assessed as set out in the methodology presented in ES Chapter 6, Cultural Heritage, Section 6.4 (REP3-013).</p> <p>See below.</p>	Agreed, see below point	01-09-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
		determining the application.			
Heritage impact on Church of St Andrew		Confirmation that the overall residual effect on the Church of St Andrew (listed building number 1051522) is beneficial, the setting of the church remains preserved and consequently there is no harm as per the NPPF and NPS NN guidance.	Further to this point, the Applicant confirms that the effect on the church is quite small in real terms and the classification of the "moderate" effect is an artefact of the assessment matrix in DMRB LA104. The Applicant has not and will not use the effect on the church to promote the road or regard it as a significant "public benefit" to add to wider balancing arguments.	Agreed	01-09-21
Heritage	REP1-066	Broadland District Council is satisfied that through the assessment of the Zone of Visual Influence (ZVI) and Zone of Theoretical Visibility (ZTV), as well as assessment of potential noise impact, potential heritage assets affected have been covered, and this includes identification of non-designated heritage assets. Generally the Council would have more concerns with regard to long term and operational impacts rather than temporary impacts from construction, as (apart from road sign and milestone) assets will not be directly physically impacted upon and construction impact is temporary. It is however good to see that Poplars Farm buildings will be monitored for vibration damage etc from construction however the Council is surprised that this is not also the case with nearby Oaklands.	<p>The Applicant notes that BDC is satisfied with these assessments.</p> <p>The assessment of operational impact has been included for all chapters in the ES as per the Scoping Opinion (APP-116).</p> <p>Vibration risk assessments undertaken to date for the construction phase (see ES Chapter 11: Noise and vibration (REP1-028)) have not indicated a risk to either of the buildings identified by BDC.</p> <p>The precautionary approach to Poplar Farm was taken in respect of the location, condition and multiple building phases/repairs of the northern-most barn. Only the barn is proposed for monitoring. This reasoning is provided in ES Chapter 6, Cultural Heritage Table 6.2 (REP3-013).</p> <p>Oaklands is further away from sources of potential vibration and the building is in much better condition. Given that there is no established vibration risk and the conditions that gave rise to the precautionary approach at the Poplars Farm barn are absent, the building is are not proposed for monitoring on a precautionary</p>	Agreed	04-10-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
Heritage	REP1-066	Due to the urbanising affect, there is also negligible to potentially slight adverse impact on the two historic churches, Owl Barn and house next to Owl Barn – although this is mainly due to their higher significance and the relatively very low impact in terms of setting the analysis comes out as higher impact in the matrix than for example non-designated heritage assets which are considered to be of lower heritage value and significance.	<p>basis.</p> <p>It has been assumed that the two churches referred to are the Church of St Andrew (1051522, MNF8523) and the Church of St Peter (1304547, MNF8524).</p> <p>Effects before mitigation on the Churches are presented in ES Appendix 6.1, Cultural Heritage Information, Table 5 (APP-074). This acknowledges possible new structures being visible in some circumstances before mitigation and assesses the effects as neutral given the current urbanising effect from the existing A47, balanced with the increased distance of the proposed carriageway. In ES Chapter 6, Cultural Heritage, Table 6.2 (REP3-013), with mitigation, the effect is assessed as beneficial overall.</p> <p>The urbanising effect on Owls Barn and House at Owls Barn (1304603, MNF51094 and 1372653, MNF51115) before mitigation is also given in ES Appendix 6.1, Table 5 (APP-074). This assesses a negligible adverse effect, deriving from potential visibility of vehicles and their headlights, as well as road noise.</p>	Agreed	04-10-21
Heritage	REP1-066	In terms of permanent impact on the setting of heritage assets the most affected assets in terms of setting will be the non-designated heritage assets of Poplar Farm and Oaklands (former Rectory to St Andrew) which will be in very close proximity to the new road. In the categorising used in the Cultural Heritage chapter (APP-044) (para 6.4.14) non-designated heritage assets have relatively low value in terms of significance, and therefore overall significance of effect usually comes out quite low even if there does appear to be quite a significant degree of adverse harm to the setting when assessing the setting. This is the case	<p>The Applicant agrees and acknowledges that it is a known limitation of the matrix assessment approach. The methodology presented in ES Chapter 6, Cultural Heritage, Section 6.4 (REP3-013) to apply that matrix approach to cultural heritage assets allows for adjustment by professional judgement in consideration of the nuanced narrative of value/sensitivity and effects.</p> <p>The error in the table has been corrected and ES Chapter 6 Cultural Heritage (REP3-013).</p>	Agreed	04-10-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
		<p>with Poplars Farm where major adverse impact (reduced to moderate with mitigation) is identified and Oaklands where there is moderate harm, and where the bypass is directly to the north. It is worth noting that moderate is only second to major in the possible degrees of impact in the report i.e. no change, negligible, minor, moderate or major (para 6.4.15). There is an error on the table on p28 (Row 2) of APP-044 where presumably it is meant to have The Old Post Office to the left column and low in value/sensitivity column to the right. For Beighton House the impact is identified as being negligible to possibly at worse slight adverse, whereas the Old Post Office it is considered slight beneficial as the dual carriageway will be further away.</p>			
Heritage	REP1-066	<p>The former parkland to Burlingham Hall is identified as non-designated heritage asset, and a small part of the former parkland to the south east will be developed upon altering the boundary definition of the former extent of the park. It is noted that this has already been altered in terms of character with loss of the corner plantation and the subdivision of the land with new field divisions. The map in the appendix does not however show the full extent of historic park as it was at the turn of the century, although it is described in para 6.7.26-28 of APP-044 as being to that extent in manner – which is a bit confusing – map should show full extent of historic park or it could indicate the former area of park now which has now lost its character.</p>	<p>The historic map does clip the northern boundary of the park (MNF61984). However, the full extent of the park was transcribed into GIS by the Norfolk historic environment record and is shown on ES Figure 6.2, Sheet 2 (APP-056).</p> <p>The Applicant acknowledges that the figure is crowded. ES Figure 6.6 (REP4-033) has been provided at Deadline 4 to make the information clearer.</p>	Agreed	04-10-21
WCH	REP1-066	<p>Burlingham Woodland Walks have been developed on land owned by Norfolk County Council since the 1990s and pass through a landscape of old and new woodland and orchards and farmland interspersed by hedgerows within and around North and South</p>	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey</p>	Not agreed	08-11-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
		<p>Burlingham, Lingwood, Strumpshaw, Beighton and Acle. These walks can be accessed by residents of Lingwood (south of the A47) by crossing the A47 using Burlingham FP3. The proposed scheme would sever Burlingham FP3 and instead redirect users east towards the proposed B1140 crossing.</p>	<p>and an analysis of the results, which supports the Applicant's conclusion, is set out in Appendix A to the Applicants Response to the Relevant Representations (REP1-060).</p> <p>The Scheme includes the provision of the B1140 Junction, which incorporates pedestrian and cyclist facilities to facilitate safe north south movements across the A47 thereby reducing the severance effect. The Applicant considers that the B1140 Junction is located in the right place to both provide for connectivity and remove a difficult existing junction.</p> <p>Burlingham FP1 is a promoted circular walk and is one of the recommended starting points for the Burlingham Woodland Walks (as indicated in the map and guide), which commence at its southern end in the St Andrew and St Peter Church car park. The mobility access paths forming part of the network also commence at this location. The car park can only accommodate a small number of vehicles but on street parking for users is available on Main Road in North Burlingham. Mobility access and ample car parking therefore make this an attractive starting point. The other recommended starting points are the health centre / library car park in Acle and the Fairhaven Garden Trust car park in South Walsham, both of which lie to the north of the A47. Most of the Burlingham Woodland Walks network and the majority of the key features are located to the north of the A47 in an area comprising North Burlingham, Burlingham Green, Town Green, South Walsham and Acle. By contrast, very few key features are located to the south of the A47 in the area between North Burlingham and Lingwood. The fact that very few users of Burlingham</p>		

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			<p>FP1 chose to continue south across the A47 is therefore not entirely down to the severance effect of the A47. It may simply be that Burlingham FP3 and permissive routes to the south of the A47 are not seen as attractive enough for most visitors to the area. This is reflected in the survey results.</p> <p>Although Burlingham FP3 will be diverted, a new cycle track running east west and to the south of the new A47 alignment will provide onward connections to pedestrian and cyclist facilities provided at both the Blofield Overbridge and the North Burlingham Junction. These facilities will provide for the safe north south crossing movements across the A47 thereby reducing the severance effect. The Applicant's assessment indicates that Burlingham FP3 is used primarily for recreational walking trips and is not a practical route for utility walking trips due to the quality of the footpath and the walking distances between North Burlingham and local facilities and amenities in Lingwood. The additional walking distances required to access the crossing facilities at the North Burlingham Junction from Burlingham FP3 are unlikely to deter recreational trip makers.</p>		
WCH	REP1-066	To support the delivery of green infrastructure in the District in the short, medium and long term, Broadland District Council has had prepared, on its behalf, the East Broadland Green Infrastructure Project Plan (See appendix 2 of the LIR). The plan is intended to support the future growth of the region by proposing green infrastructure projects with the capacity to accommodate future developments. Project 5 of the plan "A47 Safe Foot and Cycling Crossing" seeks to deliver a safe foot and cycle crossing over the A47	<p>The East Broadland Green Infrastructure Project Plan supports the delivery of potential green infrastructure projects, however it is not a Development Plan Document or adopted SPD.</p> <p>The reasons why Project 5 of the Plan (a footbridge crossing over the A47) is not included within the Scheme are summarised below and in Appendix A to the Applicants Response to Relevant Representations (REP1-060).</p>	<p>Agreed – re Policy</p> <p>Not agreed – re WCH</p>	<p>18-10-21</p> <p>08-11-21</p>

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
		<p>between Lingwood and North Burlingham. This will provide a vital link between the settlements and the Burlingham Trails to the north and south of the A47. The project plan identifies that the A47 dualling plans would increase the severance of the A47 and that a new crossing would provide a way to integrate communities on both sides of the road</p>	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Appendix A to the Applicants Response to Relevant Representations (REP1-060).</p> <p>The WCH survey results suggest that the cycle track over the proposed B1140 Overbridge would remove the existing severance effect of the existing A47 for the majority of non-motorised users.</p> <p>The B1140 Overbridge also provides a reasonable alternative route for cyclists and the single pedestrian crossing at Lingwood Lane. Importantly, Lingwood Lane is equidistant between the overbridge (identified as Project 5 in the East Broadland Green Infrastructure Project Plan) and the B1140 Overbridge, and is therefore likely to provide an equally convenient diversion.</p> <p>At Lingwood Road/Dell Corner Lane the survey did not reveal any pedestrians crossing of the A47. The cyclists using Lingwood Road would be expected to divert across the Blofield Overbridge.</p> <p>Burlingham FP3 is only a right of way for those on foot and it does not therefore provide a legitimate crossing point for cycles. Given the sizeable walking distances</p>		

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			<p>and walking times involved and the fact that part of the route is via an un-surfaced, part field edge/part field footpath, it is concluded that Burlingham FP3 is not a practical route for everyday utility trips on foot between North Burlingham and Lingwood. This would continue to be the case if an overbridge of the A47 at North Burlingham were to be provided. Therefore, it is unlikely that provision of such an overbridge would lead to a significant increase in utility walking trips between Lingwood and North Burlingham-</p> <p>With the Scheme implemented as proposed in the application, users undertaking recreational walking trips would experience increases in walking time and walking distance when accessing the Burlingham Woodlands Walks network from Lingwood. However, the increased walking distances are unlikely to be a deterrent to recreational users and the creation of additional lengths of footpath can be seen to provide additional walking opportunities for them.</p> <p>It is therefore not possible to justify an additional overbridge at North Burlingham for pedestrians and cyclists.</p>		
WCH	REP1-066	<p>As identified by the Council previously, the proposed scheme severs Burlingham FP3 and redirects users to the proposed B1140 crossing. Whilst the inclusion of walking and cycling facilities at this junction is welcomed, the severance of Burlingham FP3 results in a significant detour which could be avoided through the inclusion of a footbridge across the proposed A47. If delivered as a green bridge there would be additional ecological connectivity, also supported by Project 5 of the East Broadland Green Infrastructure</p>	See response above.	Not agreed	08-11-21

Issue	Document Reference (if relevant)	Broadland District Council Comment	Applicant's Response	Status	Date
		Project Plan			
dDCO	REP1-066	<p><u>Consideration of the draft order</u></p> <p>With regards to the Draft Development Consent Order, the Council in general terms does not wish to raise any concerns, however the Council wishes to reserve its position at this stage pending further progress of the examination and discussions with the Applicant.</p>	The Applicant acknowledges this comment and will continue to liaise with Broadland District Council with respect to the draft DCO.	Noted	

APPENDIX A – RESPONSE TO LOCAL IMPACT REPORT APPENDIX 1

Document	Policy	Local Impact Report	Applicant's Response
Joint Core Strategy for Broadland, Norwich and South Norfolk (2011), Amendments adopted 2014.	Policy 1 – Addressing climate change and protecting environmental assets	Policy 1 covers a broad spectrum of issues relating to climate change and environmental assets. Overall compliance with this policy will need to be undertaken through the examination process but the Council raise no in principle issues in respect of compliance with it.	The Applicant acknowledges this comment.
	Policy 2 – Promoting good design	The design, siting and use materials of the Scheme is intrinsically related to its function and design opportunities are considered limited. However it is noted that landscaping is used as mitigation to soften some of the impacts of the development (for example on landscape or the setting of heritage assets) and the route of the scheme has had regard to local constraints to try and minimise these impacts. Consequently it is considered that there is no conflict with Policy 2. In response to ExA Questions 1.10.8 Broadland District Council would welcome a requirement within the dDCO for the detailed design of the proposed bridges to be undertaken in consultation with BDC and / or subject to design review by Highway England's Strategic Design Panel.	<p>The Applicant made the following response to the ExA FWQ 1.10.8 (REP1-061)</p> <p><i>Requirement 3 in the draft DCO (REP3-004 'Detailed design' sets out that the authorised development must be designed in detail and carried out so that it is compatible with the preliminary scheme design shown on the works plans and engineering drawings and sections unless otherwise agreed in writing by the Secretary of State, following consultation with the relevant planning authority on matters related to its functions.</i></p> <p><i>Should the design of the structures change from that shown the Applicant would have to consult with Broadland District Council.</i></p> <p><i>Highways England's Strategic Design Panel was set up in 2017 and is intended to focus on strategic input rather than scheme specific details targeting where its expertise, insight and guidance will have most positive impact and wider benefit, such as standards, procurement and evaluation. As such, the Strategic Design Panel is not of direct applicability to the Scheme.</i></p>

Document	Policy	Local Impact Report	Applicant's Response
	Policy 5 – The economy	The Scheme, for reasons set out in the Local Impact Report, is considered to result in economic benefits. It is considered that the scheme complies with policy 5.	The Applicant acknowledges this comment.
	Policy 6 – Access and transportation	Policy 6 includes reference to the promotion of improvements to the A47. The supporting text identifies that these improvements relate more specifically to improvements to reduce the significant stretches that remain single carriageway. The scheme is considered to comply with this policy 6 in principle.	The Applicant acknowledges this comment
	Policy 7 – Supporting communities	Policy 7 seeks to enhance quality of life and well being of communities. Included within this is the promotion of healthier lifestyles by maximising access by walking and cycling and providing opportunities for social interaction and greater access to green space and the countryside. As detailed within the LIR, the scheme severs Burlingham FP3 and the proposed solution results in a significant detour. This could be mitigated through the provision of a footbridge at FP3 over the proposed route of the A47. Whilst the scheme therefore provides access to local green infrastructure networks, this could be better maximised (in accordance with policy 7) through the inclusion of a footbridge.	<p>The Applicant acknowledges this comment.</p> <p>The Applicant made the following response to the ExA FWQ 1.13.8 (REP1-061).</p> <p><i>(c) Firstly, Burlingham FP3 is a public footpath so cannot be used legally by cyclists, i.e. all existing cycle trips are required to make use of the local highways connecting to the A47 and cross the A47 at the existing at-grade junctions. For cyclists to use Burlingham FP3, its status would need to be legally changed to that of either a bridleway or cycle track, its width would need to be increased and its surfacing improved in agreement with the relevant landowner(s). Upgrading the status and form of this PRow would extend the impacts on landowners and could not be justified in terms of being sufficiently compelling when considering whether or not to compulsory acquisition powers should be sought.</i></p> <p><i>As indicated, all existing cycle trips between Lingwood and North Burlingham and between other destinations north and south of the A47 are required to make use of the local highways connecting to the A47 and cross the A47 at the existing at-grade junctions. The Proposed</i></p>

Document	Policy	Local Impact Report	Applicant's Response
			<p><i>Scheme would not lead to a marked increase in journey distance for cycling trips across the A47 and the cycle track to be incorporated into the proposed North Burlingham Junction would facilitate the safe crossing of the new A47. The proposed Scheme would therefore improve the cycling experience and remove the severance effect of the A47 for cyclists. With the provision of the two new bridges as part of the Scheme it was considered appropriate to utilise these crossings for pedestrians and cyclists in addition, with the two crossing being sufficiently proximate to the currently location of Burlingham FP3 so as not to justify in highway and economic terms the provision of an additional crossing solely for pedestrians.</i></p> <p><i>The WCH surveys recorded very low usage of Burlingham FP3 and very few crossing movements of the A47 in the vicinity of North Burlingham, reference to ES Chapter 12: Population and Human Health [APP-050] Table 12.5. It may be that Burlingham FP3 is not an attractive route for walking trips between North Burlingham and Lingwood, for utility trips, given that it is an unsurfaced, part field edge/part field footpath and given the distance between the two settlements.</i></p> <p><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 Highway 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. Moreover, to put the required walking times</i></p>

Document	Policy	Local Impact Report	Applicant's Response
			<p><i>into perspective, the IHT document identifies 1.4m/s as an average walking speed. The application of this walking speed indicates a walking time of around 30 minutes to reach the primary school and villages hall and 28 minutes to reach the railway station, irrespective of any delay associated with crossing the A47. These sizeable walking distances and walking times suggest that despite the apparent severance effect of the A47, use of Burlingham FP3 is not an attractive route for everyday utility trips between North Burlingham and Lingwood. This is likely to remain the case if an overbridge were to be provided.</i></p> <p><i>It can be concluded from the above that Burlingham FP3 is therefore more of a leisure route for recreational walking trips where surface quality and walking distance are less important. Many of the RRs highlight the importance of this route for leisure purposes.</i></p> <p><i>Looking now at the issue of access to the Burlingham Woodland Walks network at North Burlingham, namely where Burlingham FP1 connects with Main Road, having commenced such a recreational walking trip at Lingwood railway station. The walking distance via Burlingham FP3 and the footways provided as part of the local highways is around 2.1km, which suggests a walking time of around 25 minutes plus any delay associated with crossing the A47. With the Scheme implemented as proposed, three alternative routes for walkers are available between Lingwood Station and Burlingham FP1. These are shown in Applicant's Response to Relevant Representations, Appendix A, Figure C (REP1-060) and described below:</i></p> <ul style="list-style-type: none"> <i>Option 1 - via use of the local highways (School Road/Church Road), Burlingham FP3, the proposed new PRow footpath to the south of</i>

Document	Policy	Local Impact Report	Applicant's Response
			<p><i>the A47, the shared footway/cycleway at the North Burlingham junction to cross the A47 and then the footways along Main Road to access Burlingham FP1. This results in an increased walking distance of around 2.2km and an increased walking time of around 26 minutes.</i></p> <ul style="list-style-type: none"> • <i>Option 2 - via use of the local highways (School Road/Church Road), Burlingham FP3, the permissive bridleway to Lingwood Lane, Lingwood Lane, the proposed new PRow footpath to the south of the A47 and then via the same route to Option 1 to access Burlingham FP1. This results in an increased walking distance of around 2.1km and an increased walking time of around 25 minutes.</i> • <i>Option 3 - via use of the local highways (School Road/Lodge Road), Lingwood Lane, the proposed new PRow footpath to the south of the A47 and then via the same route as Options 1 and 2 to access Burlingham FP1. This results in an increased walking distance of around 1.5km and an increased walking time of around 18 minutes.</i> <p><i>The above indicates that users undertaking a recreational walking trip would experience around an 18 to 26 minute increase in walking time when accessing Burlingham FP1 from Lingwood railway station, although, minimal delays would be experienced when crossing the new A47 via the proposed North Burlingham Junction. Given that this grade separated junction would remove the severance effect of the A47, it is contended that the increased walking distances are unlikely to be a deterrent to those users wishing to undertake a purely recreational trip. In summary, given the sizeable walking distances and walking times involved and the fact that part of the route is via an</i></p>

Document	Policy	Local Impact Report	Applicant's Response
			<p><i>unsurfaced, part field edge/part field footpath, it is concluded that Burlingham FP3 is not an attractive route for everyday utility trips between North Burlingham and Lingwood. This would continue to be the case if an overbridge of the A47 at North Burlingham were to be provided. Therefore, it is unlikely that provision of an overbridge would lead to a significant increase in utility walking trips between Lingwood and North Burlingham, as is claimed by the RRs.</i></p> <p><i>It is acknowledged that, with the Scheme implemented as proposed, users undertaking recreational walking trips would experience increases in walking time and walking distance when accessing the Burlingham Woodlands Walks network from Lingwood railway station. However, given that the proposed North Burlingham junction would remove the severance effect of the A47, it is contended that the increased walking distances are unlikely to be a deterrent to recreational users. If anything, recreational walking trips could increase given that the A47 would no longer be a barrier.</i></p> <p><i>An additional overbridge at North Burlingham for pedestrians and cyclist is therefore not included in the Scheme as it could not be justified in terms of compelling case of land acquisition and the costs of constructing and maintaining the bridge for very limited use, when two bridges providing the facility to cross the A47 are being provided.</i></p>
Broadland Development Management DPD 2015	Policy GC1 – Presumption in favour of sustainable development	This policy reflects the presumption in favour of sustainable development of the NPPF. The precise application of this policy is to be undertaken when consideration of compliance or otherwise with the development plan and material considerations have been assessed through the examination process.	The Applicant acknowledges this comment.

Document	Policy	Local Impact Report	Applicant's Response
	Policy GC2 – Location of new development	The scheme is outside of the settlement limit defined on the policies map. Policy GC2 states that outside of settlement limits development which does not result in any significant adverse impact will be permitted where it accords with a specific allocation and/or policy of the development plan. In this respect, policy 6 of the JCS, which seeks to promote improvements to the A47 to reduce the significant stretches that remain single carriageway, is of particular relevance. The Council therefore considers that the scheme complies with policy GC2 subject to the examination process finding no significant adverse impact	The Applicant acknowledges this comment.
	Policy GC4 – Design	<p>Policy GC4 covers a broad range of issues that proposals should pay adequate regard to. The Council has the following observations using the numbering of policy GC4:</p> <ul style="list-style-type: none"> i) Whilst the scheme will impact on the environment, character and appearance of the area, the route of the scheme has been designed to reduce these and where adverse impacts would result mitigation in the form of landscaping is proposed to avoid significant impacts. ii) Given the nature of the scheme it is difficult to reinforce local distinctiveness, however the comments made under (i) are considered relevant here. iii) N/A iv) The application has considered the impact of development on amenity of existing residents and mitigation will be secured to avoid significant adverse impacts. v) The Council consider that the scheme utilises the site area effectively. vi) The Council note that provision is made for 	<p>The Applicant acknowledges this comment.</p> <p>With respect to point viii the Applicant has provided a response in Appendix A to Applicant's Response to Relevant Representations (REP1-060).</p> <p>With respect to point x the Applicant has submitted a revised version of ES Chapter 14 Climate (REP2-002) and a response to the Examining Authority's Rule 17 Request (REP2-009)</p>

Document	Policy	Local Impact Report	Applicant's Response
		<p>a range of transport modes including enhanced pedestrian and cycle routes.</p> <p>vii) The Council raise no issue in respect of the safety of the environment and crime prevention.</p> <p>viii) The Project provides links into existing infrastructure, however the severance of Burlingham FP3 could be mitigated through the provision of a footbridge rather than the proposed detour to the eastern end of the scheme.</p> <p>ix) N/A</p> <p>x) The Council note that the ExA has requested further work on climate change is undertaken as part of the ES.</p>	
	Policy EN1 – Biodiversity and habitats	<p>Whilst the scheme will have impacts on biodiversity and habitats, the route of the scheme has had regard to constraints and mitigation for adverse impacts can be secured. In addition, the Council consider that there are clear benefits of the scheme which weigh in favour of the scheme in the application of this policy.</p>	The Applicant acknowledges this comment.
	Policy EN2 – Landscape	<p>Whilst the project will have adverse impact on the character and appearance of the area through the urbanisation of existing countryside, these impacts can be reduced through mitigation in the form of new landscaping. Subject to a suitable mitigation scheme (and no objections are raised in principle to what is being proposed in this respect) and its long term management and maintenance, the Council consider that the scheme would comply with EN2 in the context of this as a nationally significant infrastructure project.</p>	The Applicant acknowledges this comment.

Document	Policy	Local Impact Report	Applicant's Response
	Policy EN4 – Pollution	The Council raise no issues in principle in respect of this policy subject to suitable mitigation being secured in the DCO to ensure that there is no significant impact upon amenity, human health or the natural environment	<p>The Applicant acknowledges this comment.</p> <p>Mitigation measures are set out within the Register of Environmental Actions and Commitments which forms part of the Environmental Management Plan (REP3-014).</p> <p>The EMP and the measures within it are secured by Requirement 4 to the Draft DCO (REP3-004).</p>
	Policy TS2 – Travel plans and transport assessments	The Council raise no issues in respect of this policy subject to Norfolk County Council (as local highway authority) being satisfied through the examination process.	The Applicant acknowledges this comment and will continue to liaise with Norfolk County Council.
	Policy TS3 – Highway safety	The Council raise no issues in respect of this policy subject to Norfolk County Council (as local highway authority) being satisfied through the examination process	The Applicant acknowledges this comment and will continue to liaise with Norfolk County Council.
	Policy CSU5 – Surface water drainage	The Council raise no issues in respect of this policy subject to the lead local flood authority being satisfied through the examination process.	The Applicant acknowledges this comment and will continue to liaise with Norfolk County Council.
Broadland District Council Site Allocations DPD 2016	No relevant policies	N/A	
Broadland District Council Growth Triangle Area Action Plan 2016	No relevant policies	N/A	

Document	Policy	Local Impact Report	Applicant's Response
Acle Neighbourhood Plan	Policy 5 – Improving links to the countryside and surrounding villages	The policy seeks to improve pedestrian links to the countryside and surrounding villages. Broadland District Council has also previously made comments about the potential for the inclusion of cycling and pedestrian routes between North Burlingham and Acle. Whilst it is noted that Highways England have identified that these are outside of the scope of the scheme, Broadland District Council would wish to reiterate that their inclusion would be welcomed on the basis that it would create sustainable access for those in North Burlingham to a greater range of shops and services in Acle and provide enhanced access for residents in the locality to access Burlingham Woods Walks in accordance with policy 5 of the Neighbourhood Plan	<p>The Applicant acknowledges this comment.</p> <p>The Applicant has previously provided a response in Appendix A to Applicant's Response to Relevant Representations (REP1-060).</p>
Blofield Neighbourhood Plan	No relevant policies	N/A	

APPENDIX B – POLICY DOCUMENTS

Joint Core Strategy for Broadland, Norwich and South Norfolk (2011), Amendments adopted 2014.

[REDACTED]

Broadland Development Management DPD 2015

[REDACTED]

Broadland District Council Site Allocations DPD 2016

[REDACTED]

Broadland District Council Growth Triangle Area Action Plan 2016

[REDACTED]

Acle Neighbourhood Plan

[REDACTED]

Blofield Neighbourhood Plan

[REDACTED]