

A47/A11 Thickthorn Junction

Scheme Number: TR010037

Volume 9

9.36 Applicant's Response to the Secretary of State's Request for Comments

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

Planning Act 2008

August 2022

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning
(Examination Procedure) Rules 2010**

A47/A11 Thickthorn Junction
Development Consent Order 202[x]

**9.36 APPLICANT'S RESPONSE TO THE SECRETARY OF STATE'S
REQUEST FOR COMMENTS**

Rule Number:	8(1)(c)
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1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47/A11 Thickthorn scheme was submitted on 31 March 2021 and accepted for examination on 28 April 2021.
- 1.1.2 The examination closed on 23 March 2022 and the Examining Authority submitted their recommendations to the Secretary of State on 20 June 2022.
- 1.1.3 This document sets out Highways England's (the Applicant's) response to the Secretary of State's Request for Comments issued on 22 July 2022.

2 KEY ABBREVIATIONS

- 2.1.1 The following abbreviations may be used in the Applicant's responses:

- dDCO = draft Development Consent Order
- DMRB = Design Manual for Roads and Bridges
- EIA = Environmental Impact Assessment
- ES = Environmental Statement
- ExA = Examining Authority
- NPSNN = National Policy Statement for National Networks 2014
- the Scheme = the A47/A11 Thickthorn Junction

3 APPLICANT'S RESPONSES TO THE SECRETARY OF STATE'S REQUEST FOR COMMENTS

No.	Question To	SoS Question	Response
1	The Applicant, Norfolk County Council	<p>1. Climate Change</p> <p>The Secretary of State notes the Norfolk Local Transport Plan 4 ("the Plan") is due to be adopted in July 2022. In anticipation that it is adopted, the Secretary of State invites the Applicant to provide an assessment against the carbon targets contained within the Plan.</p> <p>The Secretary of State also requests that Norfolk County Council confirm if the Plan has been adopted, and if not when it is expected to be adopted.</p>	<p>The Norfolk Local Transport Plan 4 (LTP4) sets out Norfolk County Council's plans, policies and programmes on transport and transport infrastructure for the period to 2036. The LTP4 Strategy was adopted at a full County Council meeting on 29 November 2021. It identifies the projects and programmes that are important within LTP4, including the A47/A11 Thickthorn Junction which is highlighted as one of the ongoing achievements with the priority action area for enhancing connectivity. The plan sets out how the County Council will decarbonise the transport network. It records that the County Council's Environmental Policy has been adopted and that this sets out a move towards carbon neutrality by 2030. The LTP4 Implementation Plan was subsequently the subject of consultation. Norfolk County Council (NCC) Cabinet has approved and recommended to Full Council that the Implementation Plan is adopted. Together, the LTP4 Strategy and the Implementation Plan replace the current LTP3. Within the Implementation Plan, a local carbon trajectory is given based on road transport ('tailpipe emissions') published by the Department for Business, Energy and Industrial Strategy. The trajectory within the LTP4 is in line with the upper end of range under the Department for Transport's (DfT) Transport Decarbonisation Plan (TDP).</p> <p>The LTP4's targets follow the same trajectory for tailpipe (end-user) emissions and are thus aligned to the national targets within the TDP. This is also aligned to the Applicant's own Net Zero targets to have net zero carbon travel on their roads by 2050.</p> <p>As described in the Applicant's Response to the Examining Authority's First Written Questions (REP2-006 – GC4.7), the assessment of end-user emissions is conservative and likely overestimated. This is because the uptake of new electric vehicles, aligned to the TPD and LTP4 trajectories, in future years is expected to be higher than the proportions used in the Scheme assessment. This is due to the Government's commitments to remove all emissions from road transport to achieve net zero by 2050, which include:</p> <ul style="list-style-type: none"> • An end to the sale of new petrol and diesel cars and vans by 2030 • All new cars and vans to zero emissions at the tailpipe by 2035 • All new L-category vehicles to be fully zero emissions at the tailpipe by 2035 • The end of the sale of all non-zero emissions HGVs by 2040

No.	Question To	SoS Question	Response
			<p>Section 5 in the Climate Change Position Statement (REP8-013) sets out how the assessment presented within ES Chapter 14 (REP3-006) demonstrates that the scheme will not have a material impact on the Government's ability to meet its carbon reduction targets. To summarise, the NPSNN requires assessment against the Government's statutory carbon reduction target, which is to be delivered through the pathway provided by the statutory carbon budgets. The carbon budgets are set at a national geographical scale. The NPSNN does not require assessment against any local or regional targets.</p> <p>Norfolk County Council and the Applicant have agreement on climate objectives in respect of the Scheme at reference number 50 of the Statement of Common Ground (REP10-005). Although LTP4 sets out a non-statutory transport carbon budget, it has not presented a methodology to determine how this would be relevant in decision-making and there are many considerations that will need to be addressed in order for that to be the case, including how transport carbon effects would be taken into account alongside carbon effects in other sectors, the circumstances in which emission increases could be offset by reductions in other sectors and whether the transport carbon budget figures would be relevant in determining what may or may not be a significant impact for either EIA or planning purposes. The LTP4 Implementation Plan states at Policy 6, under Objective 2, that carbon mitigation and budgets will be embedded into future guidance reviews, setting out objectives and targets. At this time, therefore, there is no statutory carbon budget or carbon reduction targets at less than a national level and the only relevant policy guidance is that set out in the NPSNN.</p> <p>In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations), an ES is required to assess the likely significant impacts of a development on the environment (Regulation 14). The ES includes an assessment of the likely significant effects of the scheme on climate at Chapter 14 (REP3-006).</p> <p>The ES is also required to include "a description of the likely significant effects of the development on the environment resulting from, inter alia— (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental</p>

No.	Question To	SoS Question	Response
			<p>problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;" (emphasis added) see paragraph 5 of Schedule 4 to the 2017 Regulations.</p> <p>The baseline adopted for the purpose of the traffic modelling, from which the predicted carbon emissions during the operational period have been predicted, includes locally committed development (including the A47 Blofield to North Burlington NSIP scheme, the A47 North Tuddenham to Easton NSIP scheme and the Norwich Western Link) within the traffic model along with other committed developments in the Affected Road Network. Sections 4.3 and 4.4 of the case for the scheme (APP-125) provide an overview of the strategic modelling, the uncertainly log and traffic forecasting methodology, and states the other schemes within the traffic models.</p> <p>Chapter 14 of the ES (REP3-006) sets out at Table 14-10 the baseline which includes the carbon emitted by the locally committed development and other development within the ARN. The Total (DS) row sets out the forecast emissions of this development in cumulation with the proposed development. Thus, the ES identified the total carbon emissions of the Scheme and the other developments described above on a cumulative basis. The Secretary of State has before him the total amount of carbon emissions that would be produced on a cumulative basis in order to inform his planning judgment. In accordance with the EIA Regulations, the schemes included in the assessment comprise existing and approved schemes and, in addition, also schemes that are in the planning/consenting process and those that are committed through the LTP. The Applicant has therefore gone further than the EIA Regulations require in providing information on the cumulation of effects.</p>
2	The Applicant, Natural England, Historic England and	<p>2. Statements of Common Ground ("SoCGs")</p> <p>The Secretary of State notes that at the end of the examination SoCGs had not yet been signed</p>	<p>Historic England – Statement of Common Ground has now been signed by both parties and is submitted together with this document.</p> <p>Natural England – No signed Statement of Common Ground yet, although all points are agreed as per previous version of Statement of Common Ground submitted at Deadline 10</p>

No.	Question To	SoS Question	Response
	Hornsea Project Tree Offshore Wind Farm	between the Applicant and Historic England, Natural England and Hornsea Project Three Offshore Wind Farm. Please could the parties confirm the status of these SoCGs and if these have been signed.	<p>(REP10-003). The Applicant continues to liaise with Natural England in order to obtain a signed version of the document for submission.</p> <p>Hornsea Project Three Offshore Wind Farm – No signed Statement of Common Ground, although the parties continue to liaise, and a meeting was recently held to ensure the respective construction Traffic Management Plans are properly coordinated between the parties. The Applicant will provide a further to update the Secretary of State by 2 September.</p>

A47/A11 Thickthorn Junction

Scheme Number: TR010037

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8.4 Statement of Common Ground with Highways England and Historic England

The Infrastructure Planning (Examination Procedure) Rules 2010
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**The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009**

A47/A11 Thickthorn Junction
Development Consent Order 202[x]

STATEMENT OF COMMON GROUND – HISTORIC ENGLAND

Regulation Number:	8(1)(c)
Planning Inspectorate Scheme Reference	TR010037
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Author:	A47/A11 Thickthorn Junction Project Team, Highways England

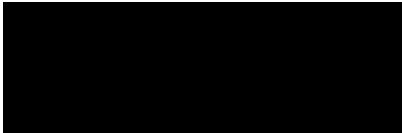
Version	Date	Status of Version
Rev. 0	November 2021	Deadline 3
Rev. 1	December 2021	Deadline 5
Rev. 2	August 2022	SoS Consultation

STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Historic England.



Signed
Chris griffin
Programme Director
on behalf of Highways England
Date: 04/08/2022



Signed
Dr James Albone
Inspector of Ancient Monuments
on behalf of Historic England
Date: 02/08/2022

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1. INTRODUCTION

1.1. Purpose of this document

- 1.1.1. This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A47/A11 Thickethorn Junction ("the Application") made by Highways England Company Limited ("Highways England") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2. This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or 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) Highways England as the Applicant and (2) Historic England.
- 1.2.2. Highways England 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 Highways England 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 Highways England.
- 1.2.3. Historic England is the public body that advises central and local government on England's historic environment: The Historic Buildings and Monuments Commission for England is generally known as Historic England. However due to the potential for confusion in relation to "HE" (Highways England and Historic England), we have used "HBMCE" in our formal submissions to the examination to avoid confusion. HBMCE was established with effect from 1 April 1984 under Section 32 of the National Heritage Act 1983. The general duties of HBMCE under Section 33 are as follows:

"...so far as is practicable:

 - to secure the preservation of ancient monuments and historic buildings situated in England;
 - to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
 - to promote the public's enjoyment of, and advance their knowledge of, ancient monuments and historic buildings situated in England and their preservation".

HBMCE is a statutory consultee providing advice to local planning authorities on certain categories of applications for planning permission and listed building consent, and is also a statutory consultee on all Nationally Significant Infrastructure Projects. Similarly HBMCE advises the Secretary of State on those applications, subsequent appeals and on other matters generally affecting the historic environment. It is the lead body for the heritage sector and is the Government's principal adviser on the historic environment.

1.2.4. In the context of this Application, Historic England's statutory responsibilities relate primarily to applications for development which affects:

- Undesignated assets considered to be of national importance
- Assets that can contribute significantly to acknowledged national research objectives
- Conservation Areas and their settings
- Relevant works in respect of designated heritage assets
- Grade II listed buildings.

1.2.5. Historic England advised Highways England during a telephone meeting held on the 15 October 2020 and in their relevant representation to the Planning Inspectorate in June 2021, that in the context of this Application, they will comment on the assessment of and impact on the grade I and II* listed buildings where there is potential for impact on their setting. Historic England will defer advice on grade II listed buildings and undesignated heritage assets to the local planning authorities.

1.3. Terminology

1.3.1. In the tables in the Issues chapter of this SoCG, "Not Agreed" indicates a final position, and "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. "Agreed" indicates where the issue has been resolved.

1.3.2. It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to Historic England, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Historic England.

2. RECORD OF ENGAGEMENT

- 2.1.1. A summary of the meetings and correspondence that has taken place between Highways England and the Historic England 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
26-Feb-2018	Meeting	<p><u>Topic:</u></p> <p>Concern due to proximity of the Proposed Scheme to the Scheduled Monument and impact on the setting.</p> <p><u>Outcome:</u></p> <p>Proposed Scheme to be designed as far as possible, site meeting held between Highways England and Norfolk County Council ES to discuss setting.</p>
26-Jun-18	On- site consultation Purpose of the site visit was to supplement consultation with Historic England on the setting on the scheduled monument	<p><u>Topic:</u></p> <p>Setting of Scheduled Monument</p> <p><u>Outcome:</u></p> <p>Historic England acknowledged that there is less concern regarding setting having visited the site. Lidar and aerial photograph analysis to be undertaken to be supplemented with detailed archaeological topographic survey if necessary.</p> <p>Trench plan to include trenching to the north-west of the westernmost barrow of the Scheduled Monument.</p> <p><u>Topic:</u></p> <p>Archaeological trial trenching in area specifically surrounding the scheduled monument. Concerns raised regarding timeframe in relation to carrying out archaeological assessment in time to feed into scheme design.</p> <p><u>Outcome:</u></p> <p>Acknowledgement that timeframe is tight but results of surveys will be considered in relation to scheme.</p>
2019	Statutory consultation responses Conference calls	<p><u>Topic:</u></p> <p>Concerns regarding the likely harm to significance of the prehistoric barrows through a development within their setting. The prehistoric barrows survive with a high degree of integrity.</p> <p>The concerns should be accurately reflected in the ES. In particular, the significance and the effects of the junction improvements on these assets would need to be clearly articulated, and a clear and convincing justification needs to be set out to specifically justify the heritage impacts.</p> <p><u>Topic:</u></p> <p>Mitigation for effects on heritage assets</p> <p><u>Statutory consultation response:</u></p> <p>Mitigation needs to be provided for these effects.</p> <p>A clearly expressed programme of mitigation for the designated heritage assets, not just embedded mitigation. This could include on and offsite mitigation, but the ES clearly needs to demonstrate how the mitigation will add public value to offset this harm.</p>

Date	Form of correspondence	Key topics discussed and key outcomes
		<p><u>Outcome:</u></p> <p>Offsite mitigation was further discussed during July 2020 conference call, in which a heritage interpretation board situated on the Cantley Lane Link overbridge, should a line of sight to the barrows be possible from a publicly accessible place, was received favourably. Historic England requested that any such board include an interpretation of the wider landscape setting in order to deliver public benefit.</p> <p><u>Topic:</u></p> <p><u>Statutory consultation response:</u></p> <p>The ES will need to address cumulative impacts:</p> <ul style="list-style-type: none"> Noise visual impacts (including lighting and night time views) full ES to deliver heritage specific viewpoints, clearly illustrated with summer and winter photomontages. A non-technical summary of the noise impacts on the designated heritage assets to be provided in the heritage chapter. This would need to be aimed at helping us to interpret the technical data and assess the impact.
11/06/2020	Email and telephone correspondence	<p><u>Topics:</u></p> <p>HER data was updated in 2019 however the redline boundary changed. Whilst changes were substantial, they were nearly all within the previous data search area (exception of north west of the scheme for new speed limit signage). No potential for impacts to heritage assets through installation of the signage.</p> <p>Visual impact viewpoints. (Scoping Opinion states need to agree a study area for the assessment of likely setting effects). Requested confirmation that proposed ZTV is sufficient for identification and assessment of designated and non- designated heritage assets as a result of rearranging the junction).</p> <p>The Scoping Opinion required heritage-specific viewpoints are agreed. No significant setting effects are anticipated, can the visual impact assessment in the ES be carried out without heritage specific viewpoints/ visualisations/ drawn sections. Each asset would instead be assessed in the ZTV/ ZVI through a tabulated sensitivity screening exercise and detailed assessment.</p>
12/6/2020	Email	Email to forward email from 11/06/2020 to another colleague within Historic England.
06/072020	Email and telephone correspondence	<p>Outcome of above issues:</p> <ul style="list-style-type: none"> Agreement with Historic England that the approach for assessing visual impact using the ZTV with additional sensitive heritage assets beyond it, is appropriate. Discussed that the assessment of heritage assets can effectively be demonstrated to the planning inspectorate through use of VPs 1 and 2, rather than additional heritage-specific viewpoints. There is no requirement for a viewpoint at the barrows themselves. Long-sections will be appropriate to demonstrate the landscape context. Agreement with Historic England that no other designated assets than the barrows require visualisations to demonstrate potential significant effects. HER data to be updated to reflect the extended redline boundary along the B1172 and need to include Up-to-date Norfolk HER data was obtained July 2020 and used in the preparation of this baseline chapter and for the impact assessment. Requested that the visualisations include both existing and mitigation planting.
09/07/2020	Email	Email to arrange phone call regarding 'scope of the heritage assets settings assessment'. Agenda for meeting suggested:

Date	Form of correspondence	Key topics discussed and key outcomes
		<p><u>Visualisations</u></p> <ul style="list-style-type: none"> - Documents attached to email presenting summer and winter views for the ES. Asked for comment on position of V1 and V2 for use in the assessment of the barrows. - Comment on the suitability of a long-section visualisation for each barrow. - Not proposing any other viewpoints for screening and designated heritage assets in the ZTV as the Grade 2* church and registered parkland are outside the ZTV and visualisations wouldn't show changes as a result of the Proposed Scheme. <p><u>Mitigation</u></p> <ul style="list-style-type: none"> - Add screening along wooded barrows or whether to open the setting up? The setting of the barrows have already been entirely eroded through quarrying in the immediate vicinity and the presence of the existing road network on all sides in the wider area. However further planting would minimise noise expected at the barrows.
10/07/2020	Email	Response from Historic England to schedule meeting for 23/07/2020 or 24/07/2020.
10/07/2020	Email	Email to ask if there are any immediate concerns for meeting due to proximity of meeting to submitting draft ES chapter.
10 July 2020	Email and telephone correspondence	<p>Response from Historic England to say based on a quick assessment from email content, the information looks to be reasonable. A wooded context for the barrows is likely to be the preferred option.</p> <p>Any assessment should bear in mind that the wooded context may be removed in the future.</p>
23 July 2020	Meeting/ call Email and telephone correspondence	<p>Wooded context for barrows agreed.</p> <p>The Historic England Regional Science Advisor requests investigation into the potential for gravels of geoarchaeological interest in the area of the proposed stream diversion to be evaluated.</p> <p>Relevant specialists will be on hand during the GI WB.</p>

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

3. ISSUES

3.1. Issues related to the Environmental Statement (ES)

Issue	Document reference	Historic England Comment	Highways England Response	Status
Agreement regarding visualisations for designated assets	Environmental Statement (Chapter 6 Cultural heritage) (APP-077)	Agreement required with Historic England that no other designated assets than the barrows require visualisations to demonstrate potential significant effects.	Visualisations depicting the scheduled monument have been produced to aid the assessment (Figure 6.4, Volume 2 (TR010037/APP/6.2).	Agreed
Inclusion of Scheduled Monument within the trench plans	Environmental Statement (Chapter 6 Cultural heritage) (APP-077)	Trench plan to include trenching to the north-west of the westernmost barrow of the Scheduled Monument. Additional trial trenching took place in Spring 2021. Fifteen hand dug trial pits were excavated in place of trenching.	Proposed trial trenching within the Proposed Scheme DCO boundary in close proximity to the scheduled monument to provide data on any associated archaeological activity, requested by Historic England to accompany the ES submission, was completed in 2020, with the supplementary trenching completed December 2021. The final report from the December 2021 trenching is awaited however initial results indicate no archaeological remains. This corresponds with the trenching completed around the scheduled monument in 2020.	Agreed
HER data to be used in Environmental Statement Chapter 6- Cultural Heritage	Environmental Statement (Chapter 6 Cultural heritage) (APP-077)	HER data to be updated to reflect the extended redline boundary along the B1172 and need to include this area to ensure that the most complete and up-to-date dataset is being used in the EIA submission.	The archaeological potential of the Proposed Scheme DCO boundary has been determined through consideration of the available HER data, documentary evidence geophysical survey and	Agreed

Issue	Document reference	Historic England Comment	Highways England Response	Status
			intrusive evaluation through trial trenching.	
Gravels of geoarchaeological interest	Environmental Statement (Chapter 6 Cultural heritage) (APP-077)	Historic England Regional Science Advisor requests investigation into the potential for gravels of geoarchaeological interest in the area of the proposed stream diversion to be evaluated.	A geoarchaeological watching brief was maintained over proposed geotechnical ground investigation completed Summer 2021. No archaeological remains were identified. The monitoring report was submitted to the Examining Authority at Deadline 2 (REP2-010) .	Agreed
Scheduled Monument	Environmental Statement (Chapter 6 Cultural heritage) (APP-077)	Concern due to proximity of the Proposed Scheme to the Scheduled Monument.	The location of drainage and road infrastructure has been placed as far as possible (19.75m) from the scheduled monument 'Two Tumuli in Big Wood' (NHLE1003977) which is located alongside the Proposed Scheme DCO boundary in order to minimise direct impacts on any associated remains that may be preserved.	Agreed
Design interventions	Environmental Statement (Chapter 6 Cultural heritage) (APP-077)	Concern as to whether there would be enough time after consultation to input into the Proposed Scheme design.	'Design measures' section details the embedded mitigation and design input for cultural heritage.	Agreed
Designated heritage asset mitigation	Environmental Statement (Chapter 6 Cultural	Mitigation needs to be provided for these effects. A clearly expressed programme of mitigation for the designated heritage	Clearly expressed programme of mitigation provided in design, mitigation and enhancement measures section of	Agreed

Issue	Document reference	Historic England Comment	Highways England Response	Status
	heritage) (APP-077)	assets, not just embedded mitigation. This could include on and offsite mitigation, but the ES clearly needs to demonstrate how the mitigation will add public value to offset this harm.	ES chapter and the EMP (TR010037/APP/7.4)	
Mitigation- public information board	Environmental Statement (Chapter 6 Cultural heritage) (APP-077)	A public information board suggested if a line of sight is possible from Cantley Lane Link Road to the prehistoric barrows.	<p>This has been provided in the mitigation and enhancement section of the ES:</p> <p>An opportunity for enhancement or public benefit through the provision of an information board has been identified on the proposed all user pathway on the Cantley Lane link road, particularly should a line of sight be possible to the barrows (Two Tumuli in Big Wood, NHLE1003977). This is recognised as an enhancement as the barrows are not currently publicly accessible.</p> <p>A heritage information board would provide an explanation of the history and significance of the barrows, set in the context of the wider contemporary prehistoric landscape from this vantage point, to bring public value back to a historic landscape that has been almost entirely permanently altered in character by the road network and modern developments.</p>	Agreed
Viewpoints of cultural heritage assets to be used in Environmental	Environmental Statement (Chapter 6 Cultural	Discussed that the assessment of heritage assets can effectively be demonstrated to the planning inspectorate through use of VPs 1	Table 6-7 details to refer to VPs 1 and 2 from landscape and visual effects assessment.	Agreed

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Statement of Common Ground – Historic England

Issue	Document reference	Historic England Comment	Highways England Response	Status
Statement Chapter 6- Cultural Heritage	heritage) (APP-077)	and 2, rather than additional heritage-specific viewpoints. There is no requirement for a viewpoint at the barrows themselves. Long-sections will be appropriate to demonstrate the landscape context. Requested that the visualisations include both existing and mitigation planting.		
Potential harm to significance of prehistoric barrows	Environmental Statement (Chapter 6 Cultural heritage) (APP-077)	Concerns regarding the likely harm to significance of the prehistoric barrows through a development within their setting. The prehistoric barrows survive with a high degree of integrity. The concerns should be accurately reflected in the ES. In particular, the significance and the effects of the junction improvements on these assets would need to be clearly articulated, and a clear and convincing justification needs to be set out to specifically justify the heritage impacts.	Due to the permanent alteration of the setting from the construction of the Cantley Lane Link Road, a moderate adverse (significant) permanent operational effect is noted in the ES on the barrows.	Agreed
Archaeological topographic survey- Lidar and aerial photography	Statutory Consultation	Lidar and aerial photography analysis to be undertaken to be supplemented with detailed archaeological topographic survey if necessary.	LiDAR and aerial photography undertaken and considered to be sufficient, subsequent topographical survey not considered necessary.	Agreed

Issue	Document reference	Historic England Comment	Highways England Response	Status
Scheduled Monument	Statutory Consultation	Concern due to proximity of the Proposed Scheme to the Scheduled Monument.	Proposed Scheme to be designed as far as possible from the Scheduled Monument.	Agreed
Zone of Theoretical Visibility to be used in Environmental Statement Chapter 6- Cultural Heritage	Statutory Consultation	Agreement required with Historic England (detailed in Scoping Opinion) regarding the Zone of Theoretical Visibility used.	Agreed that the approach for assessing visual impact using the ZTV with additional sensitive heritage assets beyond it is appropriate.	Agreed
Viewpoints to be used in Environmental Statement Chapter 6- Cultural Heritage	Statutory Consultation	Agreement required with Historic England (detailed in Scoping Opinion) regarding viewpoints to be used.	Agreement that the assessment of heritage assets can effectively be demonstrated to the planning inspectorate through use of VPs 1 and 2, rather than additional heritage-specific viewpoints. Long- sections will be used to demonstrate the landscape context.	Agreed
HER data to be used in Environmental Statement Chapter 6- Cultural Heritage	Statutory Consultation	HER data to be updated to reflect the extended redline boundary along the B1172 and need to include this area to ensure that the most complete and up-to-date dataset is being used in the EIA submission.	Up-to-date Norfolk HER data was obtained July 2020 and used in the preparation of this baseline chapter and for the impact assessment.	Agreed
Context to be retained for barrows	Statutory Consultation	Agreement required regarding the context to be provided for the barrows.	Wooded context should be retained for the barrows.	Agreed

A47/A11 Thickthorn Junction
Statement of Common Ground – Historic England

Issue	Document reference	Historic England Comment	Highways England Response	Status
Gravels of geoarchaeological interest	Statutory Consultation	Historic England Regional Science Advisor requests investigation into the potential for gravels of geoarchaeological interest in the area of the proposed stream diversion to be evaluated.	GI archaeological watching brief was completed in Summer 2021.	Agreed
Visualisations to be used in Environmental Statement Chapter 6- Cultural Heritage	Environmental Statement (Chapter 6 Cultural heritage) (APP-077)	Visualisations created should include both existing and mitigation planting.	Visualisations of the Scheme were submitted to the Examining Authority as part of the DCO submission (APP- 059 – APP-067) along with cross sections of the scheme with the scheduled monument shown on Figure 6.4 (APP-058)	Agreed

3.2. Issues related to the Relevant Representations

Reference	Relevant Representation	Highways England Response	Status
RR-005.1	<p>The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Digital Culture, Media and Sport. We summarise our representation regarding this proposed project as follows. Please note we do not intend to attend the preliminary hearing. However, we will be submitting full written representation at a later date.</p> <p>Representation: 1. Introduction Historic England's written representation will comment more fully on the key historic environment issues in due course, however for the purposes of this representation they are summarised below.</p> <p>2. Designated Heritage Assets Historic England's advice on designated heritage assets will be limited to the scheduled monument of 'Two tumuli in Big Wood' (1003977) which lies immediately adjacent to the DCO boundary. Advice on grade II listed structures will be provided by South Norfolk District Council's Conservation Team. We note from Section 6.7.16 of the Chapter 6.1 of the ES that the trial trenching proposed adjacent to the scheduled monument was not carried out. Historic England would welcome the opportunity to hold further discussions about the proposed trial trenching</p>	<p>Trial trenching initially planned adjacent to the scheduled monument could not be undertaken in 2020 due to the presence of dense vegetation. Supplementary trial trenching was completed December 2021 which included a series of hand dug trial pits in the area adjacent to the scheduled monument. The final report is awaited (to be submitted to the Examining Authority at Deadline 7) however initial results showed no archaeological remains.</p> <p>The applicant acknowledges the significant adverse residual effect on the scheduled monument. The Case for the Scheme (APP-125) presents the basis for considering the wider benefits of the scheme against this residual effect. The final assessment of harm and the weighting of public benefits against that harm is the prerogative of the decision-maker."</p>	Agreed

Reference	Relevant Representation	Highways England Response	Status
	adjacent to the scheduled monument with the applicant's heritage consultant and Norfolk County Council. Section 6.10.7 of the ES identifies that the proposed scheme would have a 'significant residual adverse effect' on the scheduled monument. This would arise through a permanent change to the setting of the monument and the severance of the barrows from their landscape context overlooking a small valley to their south. We consider that the change to the setting of the 'Two tumuli in Big Wood' scheduled monument would result in harm to the significance of this designated heritage asset. The level of harm will need to be weighed against the public benefit of the proposed scheme.		
RR-005.2	3. Non-Designated Heritage Assets Chapter 6 of the ES identifies a wide range of non-designated heritage assets within the DCO application boundary and wider study area. The archaeological surveys already undertaken have identified previously unrecorded buried archaeological remains and a high potential for further such heritage assets to be present within the application site boundary. We note that further field survey would be necessary to fully establish the archaeological potential of the proposed development area. A 'Compound/Material Storage Area' is shown southeast of the existing A11 on Figure 2.1. This area was not included in the archaeological surveys and we are concerned that it could impact on as yet unidentified heritage assets. We request clarification regarding the potential impact in this area, and whether archaeological surveys are proposed for this.	<p>Supplementary trial trenching was completed December 2021 which included a series of hand dug trial pits in the area adjacent to the scheduled monument. The supplementary survey covers areas that were not surveyed during the 2020 trial trenching. The final report is awaited (to be submitted to the Examining Authority at Deadline 7) however initial results showed no archaeological remains.</p> <p>In consultation with the county archaeologist, trial trenching only is proposed at the location of the Compound/Material Storage Area shown southeast of the existing A11 on Figure 2.1 (APP-054)</p>	Agreed
RR-005.3	4. Summary We intend to expand on these matters more fully in our written representation. We are broadly satisfied with the baseline data and overall assessment methodology used in the Cultural	All proposed mitigation to ensure the historic environment is protected is set out in the REAC table of the Environmental Management Plan (APP-128). Compliance	Agreed

Reference	Relevant Representation	Highways England Response	Status
	Heritage chapter of the submitted Environmental Statement. In the event that the development is consented, we would be concerned to ensure that the historic environment is adequately and appropriately considered, and that the DCO is appropriately worded to ensure appropriate mitigation would be delivered.	with these commitments is secured in the dDCO (APP-017) by requirement 4 and requirement 9 ensures a written scheme of investigation is submitted, approved and complied with.	

3.3. Issues related to the Written Representations

Reference	Relevant Representation	Highways England Response	Status
	In the event that that the development is consented, we would be concerned to ensure that the historic environment is adequately and appropriately considered, and that the DCO is appropriately worded to ensure appropriate mitigation would be delivered.	<p>Cultural heritage mitigation measures are detailed in items CH1 to CH8 in Table 3-1 (REAC) of the EMP (APP-128). These are secured via Requirement 4 of the dDCO.</p> <p>A Written Scheme of Investigation will be completed during detailed design of the scheme, secured via Requirement 9 of the dDCO.</p>	Agreed

3.4. Issues related to the Environmental Management Plan

Issue	Historic England Comment	Highways England Response	Status
Mitigation for designated heritage assets to add public value. Table 3.1 of EMP- Action	<p>Mitigation needs to be provided for these effects.</p> <p>A clearly expressed programme of mitigation for the designated heritage assets, not just embedded mitigation. This could include on and offsite mitigation, but the ES clearly needs to demonstrate how the mitigation will add public value to offset this harm.</p>	<p>The site has been subject to archaeological excavation and recording by various methods.</p> <p>A Written Scheme of Investigation (WSI) will be prepared by an archaeological specialist and will include the methodology for all heritage mitigation.</p>	Agreed

Issue	Historic England Comment	Highways England Response	Status
Cultural Heritage		<p>All recording and conservation measures will be secured through DCO requirements and captured within the WSI which will be agreed with Historic England, NCCES and the Broadland District Council Conservation Officer as appropriate.</p> <p>During construction, a protocol for unexpected archaeological discoveries will be developed as part of the WSI. This protocol will be agreed with Historic England and NCCES in advance which may include:</p> <ul style="list-style-type: none"> • Hoarding around construction compounds where possible in sensitive areas to reduce visual impacts • Toolbox talks or other instruction methods to allow operatives to identify potential archaeological remains • Protocols for protection, recording, and archiving of relevant finds • Protocols and communications plans for temporarily halting works and consulting with the relevant stakeholders in the event of unexpected remains of high or very high value / sensitivity <p>Monitoring of any protection measures would be undertaken during construction to ensure that they remain effective including regular inspections of temporary fencing.</p>	