

The Examining Authority presented a series of questions which were outlined in its letter of 14 January 2025 to the Applicant and other Interested Parties, in order to receive further information about matters it considered relevant to the application. Newark and Sherwood District Council has responded to these questions in the following report and has provided the following schedule which provides an easy reference guide for the Examining Authority to see the comment to each of the questions posed to us.

1. General overarching matters including Policy, Need and Alternatives		
EXQ2 Question Number	Question	NSDC Response
Q1.0.1	<p>National Planning Policy Framework</p> <p>A revised National Planning Policy Framework (the Framework) was published on 12 December 2024. All Parties confirm whether there are any changes to your case resultant from changes to the Framework and if so, set out the amended policy and how this changes your case. Furthermore whether you consider this changes the scope of any of the Applicant's Assessments or the basis for the Secretary of State's conclusions.</p>	<p>The revised NPPF has resulted in an increase to the housing requirement for Newark and Sherwood District. The annual housing requirement was 454 prior to the NPPF being published, this has now increased to 707 dwellings per annum. Consequently, the Council now needs to review the Local Development Framework to identify more land for housing. This will also include a review of employment needs. Whilst the Council is not able to pre-empt the outcome of the plan review, given that Newark is defined as a Sub Regional Centre and the largest settlement in the district, it is anticipated that there may be a need to allocate more land in Newark. NB. This change has also resulted in NSDC not being able to demonstrate a five year housing land supply (the land supply is currently 3.43 years). As such, the tilted balance currently applies to planning decisions on housing.</p> <p>The Council's Amended Core Strategy (2019) and Allocations and Development Management DPD (adopted and emerging) have both made the assumption that the</p>

		<p>Proposed Development of the A46 carries some weight in the delivery of new development including allocated sites. This is demonstrated in Appendix D ‘Public Transport and Highway Infrastructure Required for Delivery of the Newark and Sherwood Core Strategy’ (Amended Core Strategy 2019) which includes the Proposed Development. Without the Proposed Development going ahead those sites already allocated and proposed to be allocated would be reliant on other means of transport/junction improvements to successfully mitigate the highways impact of those new developments in the Newark Urban Area. In particular, it should be noted that Allocations at NUA/E2, NUA/E4, NUA/MU1 and NUA/MU3 (proposed opportunity site 2), because of their close proximity to the Proposed Development could specifically be negatively impacted by the failure of the Proposed Development to occur.</p> <p>Given that there is now a need to review these plans and produce a new Local Plan, any further land allocated for development would undoubtedly put an even greater strain on the A46. This could potentially constrain the delivery of development in the district.</p>
1.4 Mitigation		
Air Quality		
EXQ2	Question	NSDC Response
Question Number		

<p>Q1.4.1</p>	<p>Mitigation – Pre-commencement Plan</p> <p>a) Do you have any unresolved comments on the Pre-commencement Plan (PCP) [REP4- 012]?</p> <p>b) Are there any matters which you consider should be included in the PCP which have not yet been included?</p>	<p>Air quality and dust mitigation are somewhat limited in scope and should reflect measures in the IAQM guidance and comments of AECOM (and EMP2).</p> <p>Air Quality – AQ1 the list of mitigation provided is not exhaustive, NSDC was under the impression that additional measures (such as dust monitoring at high-risk receptor locations) would be carried out as per AECOM's recommendations and discussions during the hearing.</p> <p>With regard to the Air Quality and Dust Management Plan, NSDC had a SoCG meeting on Thursday 23rd January with National Highways whereby they committed to addressing the following points:</p> <ul style="list-style-type: none"> • Section 1.3.1 b – 'Data will be recorded, reviewed and provided to the EHO when requested', NSDC would like this changed to 'Data will be recorded, reviewed and provided to the EHO'. • Monitoring – NSDC would expect that visual inspections are undertaken in low-risk areas and actual monitoring undertaken in high-risk areas. This is not clearly stated in Tables 1-1, 1-3 of the AQDMP and Table 3-2 (page 20) of the main FI EMP. • NSDC would also expect that details regarding the type of monitoring and location of the monitoring
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	<p>c) Where relevant, does the PCP satisfactorily reflect the provisions on the First Iteration EMP so that there would be a consistent approach to mitigation across all stages of development?</p>	<p>sites to be provided in the AQDMP as well as information regarding baseline monitoring. We would also expect the applicant to be proposing a threshold and actions which would be undertaken if the levels were within 10% of the threshold and actions if they were exceeded.</p> <ul style="list-style-type: none"> • Reporting – we would expect confirmation in the AQDMP that the council would be informed if a dust complaint was received and the approach taken to investigate the complaint and actions taken e.g. additional mitigation measures adopted. NSDC would also expect confirmation that a report would be submitted to the council e.g. baseline report and then a report every 6 months - outlining the results of the monitoring data, details of complaints and actions taken to resolve them. • Table 1-2 – a figure would be useful to indicate where these dust generating activities are and the locations of receptors. The location of monitoring sites could also be added. <p>c) The Pre-commencement Plan and the Air Quality and Dust Management Plan align with each other, but the First Iteration EMP seems to contradict both these plans.</p>
Land Contamination		

EXQ2 Question Number	Question	NSDC Response
Q1.4.1	b) Are there any matters which you consider should be included in the PCP which have not yet been included?	The PCP needs to ensure site workers are aware of hotspots as per recommendations for fencing off and signing.
Noise and Vibration		
EXQ2 Question Number	Question	NSDC Response
Q1.4.1	<p>Mitigation – Pre-commencement Plan</p> <p>a) Do you have any unresolved comments on the Pre-commencement Plan (PCP) [REP4- 012]?</p> <p>b) Are there any matters which you consider should be included in the PCP which have not yet been included?</p> <p>c) Where relevant, does the PCP satisfactorily reflect the provisions on the First Iteration EMP so that there would be a consistent approach to mitigation across all stages of development?</p>	<p>These works were considered as part of the noise assessment, and controls proposed as for other noise-generating activities. For general development, this mitigation would be addressed through the DCO and in the 2nd Iteration Environmental Management Plan. NSDC understand this causes an issue as these reports will not be produced until after pre-commencement works are complete.</p> <p>Controls on hours of work are proposed in the Pre-commencement plan (07:00- 18:00 weekdays and 08:00-14:00 Saturdays). These should be brought in line with those for general construction works elsewhere in the application, and the controls on the nature of works at the start of the day also included within the PC plan.</p>

		Specific mitigation measures are detailed within the Pre-commencement Plan for each activity, along with general mitigation measures. These are generally acceptable, however there are a number of areas where precise details of works are not yet known, and as such exact details of activities and mitigation has not been provided. The general mitigation measures are also fairly generic, and potentially unenforceable due to caveats ('where/ if required', 'as far as reasonably practicable', 'may include', etc).
2. Air Quality and Emissions		
EXQ2 Question Number	Question	NSDC Response
Q2.0.2	<p>Statement of Common Ground with NSDC</p> <p>Are there any outstanding points which are preventing point 32 from being agreed?</p>	No.
3. Biodiversity, Ecology and Natural Environment		
EXQ2 Question Number	Question	NSDC Response
Q3.0.5	<p>Water Vole Habitat</p> <p>Through the creation of water vole habitat following potential displacement as described in ES Chapter 8 paragraph 8.11.36 [APP-052], is there a possibility of</p>	Any displacement would be via a displacement licence which would restrict this to 50 consecutive metres along both banks. As American Mink have a territorial range of 1-6 km this extent of displacement is, in our opinion, unlikely

	increasing/ encouraging American Mink into the area? If so, what controls should be undertaken to protect Water Vole, if any, from this non-native species?	to bring displaced water vole into an increased risk of predation by American Mink.
Q3.0.6	<p>FIEMP - Ancient Trees</p> <p>The First Iteration Environmental Management Plan (FIEMP) [REP4-010] details under B17 of table 3-2 Register of environmental actions and commitments (REAC), protection measures for existing trees and vegetation and that this will be monitored on-site by an arboriculturist.</p> <p>Should any works that impact on veteran trees such as those referenced T038, T136 or T139 be required should this not be assessed independently given that the NPPF 2024 considers them to be irreplaceable habitat? If so, should NSDC be a consultee and B17 amended appropriately? If not, why not?</p>	It is our understanding that B17 (and B18) is an independent assessment specifically for veteran trees, with protection measures for existing trees and vegetation more generally covered under L2, L4 and L6 of Table 3-2. Therefore, we do not consider that B17 requires amendment.
Q3.0.7	<p>Local Nature Recovery Strategy</p> <p>Are the Host Authorities content that the Proposed Development supports the aims of the Local Nature Recovery Strategy?</p>	The Nottingham and Nottinghamshire Local Nature Recovery Strategy development timeline is that public consultation is anticipated to be May/June 2025 with the strategy published in July 2025. Therefore, considering that development of the LNRS has not yet reached the public consultation stage it is not possible to provide a meaningful response to this question.

4. Climate and Carbon Emissions

EXQ2 Question Number	Question	NSDC Response
Q4.0.2	<p>Carbon Management Plan</p> <p>Has there been any progress on agreeing the outline / contents of the Carbon Management Plan which the Applicant agreed [REP4-035] to provide to NSDC for comment? When is a final, agreed version expected to be provided to the Examination?</p>	<p>There is a requirement for DCO projects to identify measures to reduce carbon emissions during the project's lifecycle.</p> <p>The OCMP refers to the DMRB LA 114 requirement for projects to seek to minimise carbon emissions in all cases to contribute to the UK's target for net reduction in carbon emissions. DMRB LA114 is the appropriate guidance document and sets out the requirements for assessing and reporting the effect on climate of emissions from construction, operation and maintenance projects.</p> <p>The OCMP proposes that reductions in carbon emissions will be achieved by adhering to the principles of PAS 2080 to reduce carbon emissions during the scheme design, construction and operation stages. PAS 2080 is the appropriate specification to adopt as it provides a framework for managing carbon in infrastructure projects and was created to help organisations in the infrastructure sectors understand, measure and reduce carbon emissions throughout the project lifecycle. PAS 2080 reduces carbon emissions through application of the carbon reduction hierarchy (avoid, switch, improve).</p> <p>Adhering to the principles of PAS 2080 will also make sure that carbon is consistently and transparently quantified at</p>

		<p>the key stages of the design process. The OCMP states that, in accordance with PAS2080, design development has been undertaken during the preliminary design phase, with the carbon associated with construction considered. Several carbon reduction measures have subsequently already been embedded into the current design, including;</p> <ul style="list-style-type: none"> • Updates to earthwork balance to reduce cut and fill • Reuse of existing infrastructure including existing carriageway where possible • Use of warm mix asphalt • Design for inclusion of prefabricated and precast where possible <p>The OCMP states that a carbon workshop was held in January 2023 that involved an overview of the Scheme along with a discussion relating to carbon hotspots and reduction opportunities that could be applicable to the Scheme. Opportunities for carbon reduction identified and progressed have been recorded and updated within a Carbon Opportunities Log which will be appended to the final Carbon Management Plan..</p> <p>The OCMP also states that further workshops will be held throughout the detailed design and construction periods to identify additional opportunities to reduce carbon. These workshops will be run by the integrated project team of the</p>
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		<p>Principal Designer and Contractor. These workshops will focus on implementation of the PAS2080 carbon hierarchy (avoid, switch and improve), specific actions and ideas to develop further, reduction measures identified to date, key hotspots per asset/material type and structural solution and review of carbon assessments to date. Carbon reduction measures identified and implemented will be reported in the Carbon Opportunities Log and shared to the relevant teams throughout the project stages to support monitoring and implementation of carbon reduction measures.</p> <p>The OCMP lists potential innovative carbon reduction measures which have been identified to date. These opportunities are very much aligned with current industry best practice for reducing carbon emissions within construction/infrastructure projects and should be given serious consideration as the project lifecycle progress. They include:</p> <ul style="list-style-type: none"> • Powering construction plant with Hydrogenated Vegetable Oil (HVO) / electricity • Use of recycled aggregate including collaboration with other local projects • Provision of renewable energy for the construction compound
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		<ul style="list-style-type: none"> • Deployment of best practice construction processes for greatest durability • Retention/creation of woodland/habitats to maximise potential for carbon sequestration <p>The OCMP is a live document that will be updated to a Carbon Management Plan (CMP) upon consent of the DCO to set out how carbon will be managed during the construction of the scheme in detail. The CMP will include further detail on; procurement, materials and resource management on site, change process for low/zero carbon solutions and construction techniques. The Carbon Opportunities Log will be appended to the final CMP. To date NSDC is satisfied with the level of detail already produced but accepts that it is a live document so is subject to changes. However the level of detail already seen is acceptable.</p> <p><i>Additional information on the OCMP is appended to these EXQs for the EXAs information.</i></p>
Q4.0.3	<p>Additional Information in Response to Finch Judgement</p> <p>a) Does [REP4-036] affect any of the comments that you have made in relation to Climate and Carbon Emissions. If yes, how?</p>	<p>a) Having reviewed the Applicant's representation, although there are likely to be some effects during construction phase these are not likely to be direct effects.</p> <p>b) No.</p>

	b) Following your review of [REP4-036], do you have any additional observations to make in relation to Climate and Carbon Emissions?	
6. Draft Development Consent Order		
6.1 Requirements – Schedule 2		
EXQ2 Question Number	Question	NSDC Response
6.1.1	<p>Requirement 5 – Construction Hours</p> <p>NSDC’s deadline 4 submission [REP4-045], in response to working hours, notes that this matter has been added to the Statement of Common Ground between the Applicant and NSDC and identifies certain amendments to the working hours. At Deadline 4, the Applicant submitted an updated Development Consent Order [REP4-003] which included amendments to the requirement of working hours. Confirm whether these amendments and the latest drafting of Requirement 5 addresses your concerns.</p>	Construction hours are agreed as 7am to 18:00 weekdays, and 8am until 14:00 on Saturdays (reflected in the dDCO at submission 4 (REP4-003). However, the applicant states that they will only be working 8am until 13:00 hours on Saturdays and the draft DCO will be amended at Deadline 5. As part of the SoCG discussions, excluded and permitted activities between 07:00 and 07:30am Monday to Friday are stated, and this is an acceptable approach to NSDC. But these activities should be included in the draft DCO to remain enforceable.
7. Geology and Soils		
EXQ2 Question Number	Question	NSDC Response
Q7.0.1	<p>NSDC’s Contaminated Land Strategy</p> <p>Does the adoption of a revised Contaminated Land Strategy in December 2024 affect the Applicant’s assessment or</p>	The updated strategy does not affect the applicant’s assessment or conclusions. It is updated to reflect current LCRM guidance and 2012 statutory guidance, but these have both been used by the industry and regulators for

	conclusions? Does it include any new considerations that should be reflected in the ExA's consideration of the Application?	several years now anyway. This has just now been updated in NSDC's strategy. No new considerations need to be considered, the basic principles of dealing with land contamination remain.
8. Cultural Heritage		
EXQ2 Question Number	Question	NSDC Response
Q8.0.1	Civil War Landscape Considering the contents of [REP4-041] and cross referencing this with the most up to date Works Plans [REP3-002], does either of the councils have any concerns over the potential impacts on the civil war landscape, including both designated and non-designated assets, with respect to the understanding and legibility of the landscape and its wider importance to the history and identity of Newark on Trent and the surrounding area. When responding, please consider the desirability of preserving the asset(s) and any efforts by the Applicant to enhance their setting.	Nottinghamshire County Council's Senior Archaeology Officer is covering all aspects of archaeology relating to the A46 dDCO. NSDC would refer the Examiners to Nottinghamshire County Council's response in this respect.
10. Landscape and Visual Effects		
EXQ2 Question Number	Question	NSDC Response
Q10.0.1	Cattle Market Junction	The study area lies within National Character Area 48 Trent and Belvoir Vale (Natural England 2014). Features highlighted within this National Character Area that are

	<p>Please expand on your submission [REP4-048] with respect to the Applicant's landscaping around the Cattle Market junction and its consistency, or otherwise, with the features highlighted in National Character Area (NCA) 46.</p>	<p>relevant to the Cattle Market Junction are shown in bold text and include:</p> <ul style="list-style-type: none"> ▣ A gently undulating and low-lying landform in the main, with low ridges dividing shallow, broad river valleys, vales and flood plains. The mature, powerful River Trent flows north through the full length of the area, meandering across its broad flood plain and continuing to influence the physical and human geography of the area as it has done for thousands of years. ▣ Agriculture is the dominant land use, with most farmland being used for growing cereals, oilseeds and other arable crops. While much pasture has been converted to arable use over the years, grazing is still significant in places, such as along the Trent and around settlements. ▣ A regular pattern of medium to large fields enclosed by hawthorn hedgerows, and ditches in low-lying areas, dominates the landscape. ▣ Very little semi-natural habitat remains across the area; however, areas of flood plain grazing marsh are still found in places along the Trent. Notably the Headline Statement of Environmental Opportunity (SEO) have four specific actions for this National Character two of which relate to vegetation cover and the character of the Trent Vale. These are:
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		<p>SEO 2</p> <p>☐ Enhance the woodland and hedgerow network through the planting of small woodlands, tree belts, hedgerow trees and new hedgerows to benefit landscape character, habitat connectivity and a range of ecosystem services, including the regulation of soil erosion, water quality and flow.</p> <p>SEO 4</p> <p>☐ Maintain and enhance the character of this gently undulating, rural landscape. Promote and carefully manage the many distinctive elements that contribute to the overarching sense of place and history of the Trent and Belvoir Vales.</p> <p>These are relevant to the approach from the north to the Cattle Market junction and the proximity to the river with its flood plain pasture, linear tree belts and hedgerows and approach to the historic core of Newark.</p> <p>In answer to the question, ‘is the Applicant’s landscaping around the Cattle Market junction consistent with the features highlighted in National Character Area’, we would have to conclude it is not, when taking into consideration the recommendations of SEO2.</p> <p>The applicants' visualisations for viewpoint 25 at year 15 show a vast expanse of open grassland either side of the great north road approach to the junction. This area could</p>
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		include some of the recommendations of SEO2 that would both enhance this approach and substantially improve the screening, reduce the overall impact of this structure.
Q10.0.3	<p>Impact on Residential Properties at Sandhills</p> <p>Following receipt of [REP4-039], please provide an updated comment in relation to the effects on those residents at Sandhills and please provide any suggested mitigation measures that may reasonably be capable of being implemented.</p>	<p>The impact on residential properties at Sandhills is illustrated by Viewpoint 24 (7.57 Additional Visual Effects Information) with an additional wireframe having been produced by the applicant that depicts the view without any existing intervening built form or vegetation.</p> <p>Existing built form comprises a flood bund that sits to the rear of property boundaries in Sandhills and is outside the site boundary. Existing vegetation (occasional small trees, and scrub) is within the field to the north of Sandhills southwest of the A46 roundabout junction as well as on the roundabout itself.</p> <p>The proposed linear belts of tree planting to the southwest of the Proposed A46 Cattle Market junction (shown on Figure 2.3 Environmental Master plan sheet 3 of 7) will partially break up the mass of the elevated retaining wall by Year 15. Closer to the Cattle Market junction structure where there are existing drainage constraints and proposed waterbodies, tree planting is very limited with intermittent tree planting on the roundabout and lines of individual trees on the edge of northern bank of the proposed waterbody and on the perimeter of the temporary construction compound only.</p>

		<p>Suggested mitigation to reduce the impact to Sandhills (Viewpoint 24) are:</p> <p>1) Reconfiguring the shape of the proposed water body directly north of Sandhills (pulling it further south to allow a line of trees to be planted to the western toe of the existing flood bund at the closest point to the receptors of Sandhill.</p> <p>2) The applicant should explore all opportunities to increase tree cover within the open grassed area southeast of the roundabout junction and closest to VP 24. While it is understood there are existing drainage constraints within this area, we feel there is opportunity for further tree planting here as screening of the considerable visual impact created by the structure. Planting should be considered as near to the culvert as can be permitted to close down the angle of view. While this will not screen all the view it should reduce the extent of the impact considerably. The applicant should evidence all constraints that prevent the increase in tree planting here.</p>
Q10.0.4	<p>Setting of Protected Landscapes</p> <p>Do you consider the recently published ‘Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes’ (16 December 2024) by Defra to have any relevance to this proposal and, if so, please</p>	<p>This development does not have relevance to this Guidance document. Protected landscapes as defined by DEFRA are National Parks, Norfolk and Suffolk Broads and National Landscapes in England. National Landscapes is the rebranded name for Areas of Outstanding Natural Beauty</p>

	provide a statement detailing the relevant effects. If not, please detail why.	(AONBs). There are no protected landscapes designated within the study area of the development proposals.
12. Noise and Vibration		
EXQ2 Question Number	Question	NSDC Response
Q12.0.1	<p>Bridge House Farm and Old Stable Yard</p> <p>ES Chapter 11 Noise and Vibration [APP-055] and [REP4-046] details that there is no exceedance of LOAEL at either Bridge House Farm or Old Stable Yard. However, Old Stable Yard was removed from NSDC's emerging Local Plan as a potential allocation by virtue of adverse impacts of noise due to the existing proximity of the A1 and A46. It has since been granted planning permission by NSDC for use as a GRT site for six residential pitches. The Applicant's evidence shows no exceedance of LOAEL at either location despite the Works Plans [REP3-002] showing the A46 moving closer to both locations.</p> <p>a) Does NSDC have any concerns regarding the Applicant's results that LAOEL will not be exceeded at either location despite concerns that the GRT site was not acceptable as an allocation due to noise.</p>	<p>a) NSDC does not have any significant concerns. The reason the site was removed was due to noise and the impact of the measures necessary to mitigate the noise on the Open Break, plus the deliverability of the measures. The conclusion from a Noise Assessment evidence commissioned by NSDC: NIA-10951-23-11131-v1 Winthorpe Road, Newark and NIA-10951-23-11131-v1 Winthorpe Road, Newark Addendum) was that daytime and night-time ambient noise levels across the site are due to road traffic noise on the A1 and (to a lesser extent) the A46. Highest discrete event maxima at the site are due to noise from the adjacent dog kennels, however, this had no bearing on the assessment as it is the control of night-time ambient noise levels from road traffic which governs the sound insulation requirements at night.</p> <p>The work took account of the A46 modelling available at the time and concluded that ambient noise levels were not expected to increase significantly as a result of the proposed A46 Newark Bypass.</p>

	c) Can both NSDC and the Applicant update their SoCG to include reference to the noise impacts at both Bridge House Farm and Old Stable Yard.	c) Yes.
14. Transportation and Traffic		
EXQ2 Question Number	Question	NSDC Response
Q14.0.3	<p>Mitigation – Outline Traffic Management Plan</p> <p>a) Do NCC and NSDC have any unresolved comments on the OTMP, including in relation to construction-phase diversions? If yes, please explain whether and how these could be resolved and whether OTMP Appendix A [REP3-026] needs to be amended.</p>	<p>a) Paragraph 1.3.6 states that the Southern Link Road will be open spring 2025. This has now changed to late Summer 2026.</p> <p><u>Appendix A</u> Paragraph A. 1.4. on page 44: The proposed diversion from Farndon through the village of Hawton is not supported by NSDC due to road safety concerns. The road is narrow and winding, with poor visibility in some places. The diversion route relies on Hawton Bridge remaining open for the duration, however this is subject to change with the construction of the SLR. The applicant is advised to contact Nottinghamshire County Council for further information of impending closures to this bridge until potentially September 2026. The Southern Link Road (SLR) is due to be opened by late summer 2026 and this route is preferable rather than the road through Hawton which is a small settlement. The Applicant has stated in discussions that they would not rely on routes through small settlements and would only use strategic routes (where practical),</p>

	<p>b) Should parish councils be specifically mentioned as consultees / stakeholders?</p> <p>c) Should parish councils be invited to monthly traffic management meetings as suggested by Farndon Parish Council [RR-022]?</p> <p>d) Have the comments from Coddington Parish Council [REP2-041] in respect of diversions been satisfactorily addressed?</p> <p>e) Bearing in mind what Applicant says in 3.3.3 of [REP4-032], does NCC have any remaining concerns about diversions and, if yes, how could these be resolved?</p>	<p>therefore this appears to be contrary to their principles. However, the use of Hawton Bridge, through our discussions with NCC and the construction of the SLR, is not an appropriate route for traffic diversions. The Highways Network Management Team at Nottinghamshire County Council may wish to be notified of this arrangement and provide more comments to the Applicant.</p> <p>Paragraph A. 1.6. A1133 on page 46: The proposed diversion via Winthorpe does not show all the routes that are needed for the diversion. Going north on the A46, the route should continue along the A46 as it's not possible to go north through Brough (it's on the other side of the dual carriageway).</p> <p>Paragraph A.1.2.2 on page 42: Text states 'The diversion route for this closure would be via the A52 (between the A46 Saxondale junction and the A1 at Grantham) and along the A1, to re-join the A46 at the Brownhills and Friendly Farmer roundabouts.'</p> <p>The text highlighted seems to be an error as the plan accompanying paragraph A.1.2.2 doesn't show the A52.</p> <p>b) Yes, it would be helpful as part of the Communication Strategy.</p>
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		<p>c) It would be helpful, as part of the Communication Strategy, to invite parish councils to traffic management meetings.</p> <p>d) Please seek advice from Nottinghamshire County Council.</p> <p>e) Question for Nottinghamshire County Council.</p>
15. Flooding and Drainage		
EXQ2 Question Number	Question	NSDC Response
Q15.0.1	<p>Averham and Kelham FCA In [REP4-033], it was confirmed that Peridot Solar had submitted an amended plan relative to their application for a solar panel installation on part of the Averham and Kelham FCA to remove the panels from the FCA.</p> <p>Does this resolve the fundamental concern over how the FCA and the panels would operate and their relative development timescales?</p>	<p>Application number 23/01837/FULM – Kelham and Averham solar Farm - The Amended plan was formally submitted to the District Council and consulted on with the Environment Agency. The application was heard at Planning Committee on 16th January 2025 where Members overturned Officers recommendation of approval. A decision notice has now been issued on 31 January 2025 for refusal. Drawing number HC1002/05/03 Rev 4 was submitted to remove the solar panels from within the FCA and the EA removed their holding objection on the basis of the amended plan. The applicant has 6 months in which to submit an appeal which will take it to after the examination has closed but given the panels are now out of the FCA this it not considered to cause any conflict.</p>

Q15.0.2	EA Flood Map Update Does the recent update to the EA flood mapping data, published on 17 December 2024, result in any alterations to the findings of Chapter 13 Road Drainage and Water Environment [APP057] or Appendix 13.2 Flood Risk Assessment [APP-177]. Equally, does this update alter the comments made by the Host Authorities or the EA?	No. The proposal will increase flood risk elsewhere and does not comply with the exceptions test (as defined by the NPPF). Whilst we are aware of the tolerance to the model which has been agreed this is still an area of concern for the District Council where there are properties involved.
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Appendix 1 – Additional information relating to Q.4.0.2

Carbon Reduction Targets Alignment

UK National Targets

The UK national targets were established by the 2008 Climate Change Act which committed the UK to reducing its emissions by 80% by 2050 against 1990 levels. This target was made more ambitious in 2019 when the UK committed to a net zero target. The new target requires the UK to bring all greenhouse emissions to **net zero by 2050**, effectively revising the target to a **100% reduction by 2050, against 1990 levels**.

In 2020 the UK set another target to reduce UK emissions by **68% by 2030, compared to 1990 levels**. This target was based on the UK's nationally determined contribution towards the Paris agreement.

The Climate Change Act also provides a system of carbon budgeting to help the UK address the changes in its emissions reduction trajectory required by the above targets. These five-year carbon budgets set interim targets which are also measured against 1990 levels:

Carbon Budgets set when the UK 2050 reduction target was 80% include:

- 4th carbon budget (for period 2023-2027) equates to a **52% reduction by 2027**
- 5th carbon budget (for period 2028-2032) equates to a **57% reduction by 2032**

Carbon Budget set in 2020 after the UK set new reduction targets of 68% by 2030 and 100% by 2050:

- 6th carbon budget (for period 2033-2037) implies a **78% reduction by 2035**

National Highways (NH) Targets

NH's Outline Carbon Management Plan (OCMP) is referenced on page 246 of 6.5 Environmental Statement – First Iteration Environmental Management Plan [APP-184]. The targets section of the OCMP is aligned with NH's previously published document "Net Zero Highways our 2030/2040/2050 Plan". The latter sets net zero targets for NH's corporate emissions, maintenance and construction emissions and road users to be achieved by 2030, 2040 and 2050 respectively. The timescales for achieving all these net zero targets are therefore more ambitious than the UK Government's 2050 target for net zero.

NH's emissions reduction trajectory specified for maintenance and construction states the following interim targets against a 2020 baseline:

- 0-10% reduction by 2025
- 40-50% reduction by 2030
- 70-80% reduction by 2035
- 100% reduction (net zero) by 2040

A 2020 baseline is not aligned with the UK Government's 1990 baseline. However, NH set these targets in 2021 following the UK government's net zero announcement in 2019 – the concept of net zero had not been adopted across industries until this point. Many organisations publishing net zero strategies set a baseline around the same time period because; net zero did not really exist as a concept before 2019 and obtaining more historical data can prove problematic. Also, emissions baselines can vary significantly as they are heavily dependent on factors such as growth, productivity and change so generally speaking a more recent baseline is a more accurate baseline.

Whole Life Carbon

DCO Submissions require a whole life carbon footprint assessment which evaluates the emissions associated with the construction, operation and decommissioning of the project.

The OCMP sets out how whole life carbon emissions have been assessed to date and how they will be assessed during the detailed design to further reduce carbon emissions during the construction and operation of the scheme.

The OCMP refers to the Design Manual for Roads and Bridges (DMRB) LA 114 – which sets out the project lifecycle stages to be considered as construction and operation and lists sub-stages for each of these stages. The OCMP is designed to explained the requirement to support implementation of DMRB LA 114 during the design, construction and operation of the scheme.

The OCMP refers to a preliminary design carbon assessment which has been completed based on estimated construction data from the available design information. This is reported in Chapter 14 (Climate) of the Environmental Statement (ES) [APP-058]. Chapter 14 shows the breakdown of the whole life cycle carbon (for construction and operation stages) which is correctly aligned with the lifecycle stages and sub-stages detailed within DMRB LA 114 and PAS 2080 (the appropriate carbon management specification and framework relating to infrastructure projects).