Norwich Western Link Planning Statement

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Contents

Tables

Figures

Glossary

Term	Definition
The Applicant	Norfolk County Council as the promoter of the Proposed Scheme.
A47 DCO	Refers to the National Highways A47 North Tuddenham to Easton DCO.
Area for temporary use during construction	These are areas within the Redline Boundary that are intended for use during the construction period but reinstated on completion of the construction stage. These include construction compounds.
The Conservation of Habitats and Species Regulations 2017	The Conservation of Habitats and Species Regulations 2017 is UK legislation that consolidated the previous 2010 regulations. It includes provisions making it an offence to deliberately capture, kill, or disturb certain wild animals or to trade in them, with some exceptions. It also requires the establishment of a network of conservation sites to conserve important habitats and species as identified in the European Council Directive 92/43/EEC, also known as the Habitats Directive.
Environmental Impact Assessment	The term 'Environmental Impact Assessment' describes a procedure that must be followed for certain types of projects before they can be given 'development consent'. The procedure is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects.

Term	Definition
The Hedgerows Regulations 97	The Hedgerows Regulations 1997 are a set of UK Statutory Instruments that came into effect on June 1, 1997. These regulations are created to protect hedgerows, particularly those in the countryside that are 30 years or older.
Local Highway Authority	Means the highway authority for the local highway network as set out in the Highways Act 1980. For the purposes of the Proposed Scheme, the local highway authority is Norfolk County Council.
National Planning Policy Framework	The National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied.
NERC Act 2006	Means the Natural Environment and Rural Communities Act 2006
NMU (non-motorised users)	A specific group of road users including walkers, cyclists or horse riders but excluding drivers of motorised vehicles.
Norfolk County Council as the County Planning Authority	Norfolk County Council is the County Planning Authority who will consider the Planning Application and decide whether or not to grant planning permission.
Principal Contractor	The contractor who will deliver the Proposed Scheme.
Proposed Scheme	The proposed Norwich Western Link scheme summarised in section 2 of this Statement and set out in more detail in Chapter 3 of the Environmental Statement.

Term	Definition
Ramsar	Ramsar Sites are wetlands of international importance designated under the Ramsar Convention.
Red Line Boundary	All areas of land required temporarily or permanently for the construction and operational activities of the Proposed Scheme would be contained within the Red Line Boundary.
River Wensum Viaduct	Viaduct crossing the River Wensum Special Area of Conservation and Site of Special Scientific Interest and floodplain (approximately 490m long). The ten-span bridge design includes piled piers within the floodplain.
Rochdale Envelope	The Rochdale Envelope assessment approach is an acknowledged way of assessing a Proposed Development comprising EIA development where uncertainty exists, and necessary flexibility is sought.
Site Boundary	The areas within the main engineering works (structures, carriageway, drainage, earthworks, etc.) will be undertaken, including areas for temporary use during construction such as works compounds, storage sites, and welfare facilities.
Statutory Duty	Statutory Duties are those which Norfolk County Council are required by law to carry out and/or comply with.
Temporary Works Platform	The term to refers to the temporary platform across the floodplain used to construct the viaduct. It will cross the River Wensum by means of a temporary bailey bridge.

Acronyms

Acronym	Acronym in full
AONB	Area of Outstanding Natural Beauty (now known as a National Landscape)
AQMA	Air Quality Management Area
BEP	Broadland Enterprise Park
BNG	Biodiversity Net Gain
CEMP	Construction Environmental Management Plan
CIEEM	Chartered Institute for Ecology and Environmental Management
CL:AIRE	Contaminated Land: Applications in Real Environments
CPA	County Planning Authority
CPO	Compulsory Purchase Order
CRoW	Countryside and Rights of Way Act 2000
CTMP	Construction Traffic Management Plan
CZ	Consultation Zone
DAS	Design and Access Statement
DCO	Development Consent Order
DMRB	Design Manual for Road and Bridges
DPD	Development Planning Document
EHO	Environmental Health Officer
EIA	Environmental Impact Assessment
ELC	European Landscape Convention

Acronym	Acronym in full
ES	Environmental Statement
FEZ	Food Enterprise Zone
FRA	Flood Risk Assessment
GHG	Greenhouse Gas
GNLP	Greater Norwich Local Plan
HDV	Heavy Duty Vehicle
HE	Highways England (now National Highways)
HEDBA	Historic Environment Desk Based Assessment
HGV	Heavy Goods Vehicles
HPI	Habitat of Principal Importance
HRA	Habitats Regulation Assessment
IEMA	Institute of Environmental Management and Assessment
IMD	Indices of Multiple Deprivation
JCS	Joint Core Strategy
LCA	Landscape Character Area
LHA	Local Highway Authority - NCC
LNR	Local Nature Reserve
LTN	Low Traffic Neighbourhood
LTP	Local Transport Plan
LTP - IP	Local Transport Plan - Implementation Plan
NATS	Norwich Area Transportation Strategy

Acronym	Acronym in full
NCA	National Character Area
NCC	Norfolk County Council
NH	National Highways
NHLE	National Heritage List for England
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
NN NPS	National Networks National Policy Statement
NPSE	Noise Policy Statement for England
NVC	National Vegetation Classification
NWL	Norwich Western Link
OCEMP	Outline Construction Environmental Management Plan
PHE	Public Health England
PROW	Public Right of Way
RFC	Ratio of Flow Capacity
SAC	Special Area of Conservation
SOCI	Statement of Community Involvement
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
STS	Sustainable Transport Strategy
TA	Transport Assessment
TfN	Transport For Norwich (Policy document)

Acronym	Acronym in full
TRL	Transport Research Laboratory
WebTAG	Department for Transports Transport Analysis Guidance
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
ZTV	Zone of Theoretical Visibility

Executive Summary

This Planning Statement has been prepared by Norfolk County Council ('the Applicant') in support of an application for full planning permission for the development of the Norwich Western Link highways scheme. The application is being made via Regulation 3 of The Town and Country Planning General Regulations 1992, as the Applicant will act as both the determining planning authority and the intended developer.

The major objectives of the Proposed Scheme are to:

- Improve strategic connectivity with the national road network.
- Support sustainable economic growth;
- Improve the quality of life for local communities; and
- Promote an improved environment.

This Statement presents the case for the Proposed Scheme and establishes the applicable national and local planning policy context along with relevant material considerations for the Proposed Scheme, drawing on the overall assessments and supporting documents that accompany the application.

Full planning permission is sought for the Proposed Scheme that will link the A1270 Broadland Northway from its junction with the A1067 Fakenham Road to the A47 trunk road near Honingham. It comprises the dualling of the A1067 Fakenham Road from its existing junction with the A1270 to a new roundabout located approximately 400m to the north-west, in addition to a new dual carriageway link from the new roundabout to a new junction with the A47 near Honingham and other ancillary works. The proposals also include provision for Non-Motorised Users, providing a full package of sustainable interventions to support the sustainable travel objectives of the Proposed Scheme.

The Proposed Scheme covers an area of land, which is approximately 287 hectares (ha) and is located approximately 10.5 kilometres to the north-west of the city of Norwich. In total the Proposed Scheme will comprise approximately 6km of new road and will be supported by a series of new structures, including a new bridge at Ringland Lane, a new viaduct over the River Wensum, green bridges and wildlife crossings and other ancillary works.

The Proposed Scheme is supported by all necessary engineering works to ensure normal operation of the highway, including surface water drainage system, flood compensation and bunds to ensure climate resilience. The proposals also include a substantial suite of environmental mitigation measures to offset impacts arising from the construction and operation of the Proposed Scheme along with significant environmental enhancements notably in relation to Biodiversity Net Gain.

Local communities in this area suffer from extensive problems such as rat-running and traffic congestion on the local road network that were not designed to take the volumes or size of vehicles now using them. Without intervention these problems are expected to worsen with the anticipated growth in population and jobs as proposed as part of the latest Development Plan for the area (the Greater Norwich Local Plan). The Proposed Scheme has been designed to address these issues and provide substantial transport benefits for the area and wider region.

Public consultation undertaken as part of the scheme development highlight considerable public support for the Proposed Scheme from the villages and settlements to the west of Norwich that are affected by these transport issues.

Further to the transport benefits to be created by the Proposed Scheme, there are also wider economic, social and environmental benefits that it will create (*covered under section 3 of this Planning Statement (Needs and benefits of the Proposed Scheme*)) including improving access to major employment and residential sites helping to deliver new jobs and economic growth for the region. The Proposed Scheme is considered on balance to have positive environmental and social benefit, increasing opportunities for walking, cycling and public transport use in the area to the west of Norwich. Additional benefits in terms of the resulting air quality as result of removing traffic from the local road network and road safety improvements will also be created.

The Proposed Scheme is the result of an extensive optioneering exercise that has been carried out over a number of years to ensure that the optimal route to address the transport issues has been chosen, achieving value for money and minimising environmental impacts. A summary of this is set out in this Statement under section 4 (*Scheme Development and Options Considered*). It is considered that this process demonstrates that creating a new strategic connectivity link between the western end of Broadland Northway and the A47, is the most effective way of tackling the above noted transport issues, whilst also ensuring a more resilient transport network to enable quicker and more reliable journeys to the west of Norwich for all modes of transport and reduced traffic congestion and queuing in local communities.

The Proposed Scheme crosses the River Wensum Special Area of Conservation, that is also designated as a Site of Special Scientific Interest. The Proposed Scheme includes a number of engineering, architectural, landscape and ecological design features designed to integrate the development into this landscape and includes environmental enhancements such as connectivity to existing woodland/planting, habitat creation and visual screening.

Complementing the landscaping design are additional areas of habitat creation to meet the scheme requirements and objectives in relation to Biodiversity Net Gain (*predicted to achieve a quantifiable 10.97% increase in BNG outcome for the non-excluded habitats using Metric 3.1 and a provisional 11.58% based on copying the 3.1 data into the Statutory Metric*) protected species mitigation, tree loss compensation and Water Framework Directive mitigation.

The Proposed Scheme is subject to a full Environmental Impact Assessment. Accordingly, the application is supported by a full Environmental Statement (ES) that has been supported by detailed surveys and consultations with statutory bodies. In addition to the submitted Environmental Statement, the application is supported by a comprehensive suite of technical documentation. This Statement also assesses the Proposed Scheme's compliance with the Applicant's duties and responsibilities under other relevant legislation, including the Transport Act 2000, Natural Environment and Rural Communities Act 2006, the Conservation of Habitats and Species Regulations 2017 and Norfolk County Councils own policies.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise. This Statement assesses the Proposed Scheme against national and local planning policy and assesses whether it accords with the policies and meets relevant planning tests. It is concluded that, taken as a whole, the Proposed Scheme is in accordance with national and local planning policy.

Chapter 7 of the Planning Statement (*Planning Balance and Conclusions*) assesses the Proposed Scheme in relation to policies contained within the adopted Development Plan, and whether the Proposed Scheme should benefit from the presumption in favour of sustainable devolvement in the National Planning Policy Framework (NPPF). The Planning Statement concludes that the Proposed Scheme is in accordance with the Development Plan.

In relation to the overarching objectives of sustainable development as set out in the NPPF, this Statement concludes that the Proposed Scheme overall will, on balance, have economic, social and environmental benefits and will support delivery of these objectives to the wider region. The Proposed Scheme is considered to accord with the Development Plan taken as a whole, although there are adverse effects that will result in relation certain environmental factors. However, on balance it is considered that the need for and public benefits that the Proposed Scheme justify and outweigh those adverse effects, in line with the relevant policy tests, and are considered strong material considerations in favour of approving the application.

Even were the application of paragraph 11 of the NPPF (the presumption in favour of sustainable development) to be discounted owing to some aspect of the Proposed Development being considered to be not in accordance with the policies within the Development Plan (noting that the Development Plan needs to be applied as a whole) then on balance this Planning Statement identifies that paragraph 12 of the NPPF can be applied as the material considerations in favour and the significant wider benefits of the Proposed Scheme, would more than outweigh any issues of non-compliance with policies which might be thought to arise from the residual adverse environmental impacts.

The Planning Statement concludes that the Proposed Scheme is considered to be in accordance with the policies of the Development Plan as a whole, will on balance provide economic, social and environmental benefits and will support delivery of these objectives to the wider region and has strong material considerations in favour of approving the Proposed Scheme.

1 Introduction

1.1 Overview

1.1.1 This Planning Statement ('the Statement') has been prepared by Norfolk County Council (herein referred to as 'the Applicant'), in support of an application to Norfolk County (acting in its capacity as the County Planning Authority ('CPA')) for full planning permission for the development of the Norwich Western Link (NWL) (referred to in this Statement as 'the Proposed Scheme').

1.1.2 The application is being made via Regulation 3 of The Town and Country Planning General Regulations 1992, as the Norfolk County Council will act as both the CPA in determining the application and the Applicant. The Town and Country Planning General Regulations 1992 require NCC in developing and determining such applications in manner that ensures there is a functional separation between those persons engaged in promoting the application from those responsible for determining it.

1.2 The Proposed Scheme

1.2.1 In summary the Proposed Scheme is a highway scheme linking the A1270 Broadland Northway from its junction with the A1067 Fakenham Road to the A47 trunk road near Honingham. It comprises:

- The dualling of the A1067 Fakenham Road from its existing junction with the A1270 to a new roundabout located approximately 400m to the north-west;
- Constructing a new dual carriageway link from the new roundabout to a new junction with the A47 near Honingham, with a short section carried over the River Wensum and its floodplain on a viaduct;
- Works to side roads to integrate the Proposed Scheme within the existing highway network; and

- Environmental mitigation.

1.2.2 A description of the Proposed Scheme is set out in Chapter 2 of this Statement.

1.2.3 The high-level objectives of the Proposed Scheme are to:

- Support sustainable economic growth;
- Improve the quality of life for local communities;
- Promote an improved environment; and
- Improve strategic connectivity with the national road network.

1.2.4 The vision and objectives of the Greater Norwich Local Plan (GLNP) identifies the Proposed Scheme as part of a wider programme of transport schemes in the region that together will provide greater travel choices and allow people to make the best use of evolving sustainable transport networks, supporting the GNLP aim of promoting regional connectivity. The Local Transport Plan 4 Strategy which covers the period 2021-2037 and its Implementation Plan was adopted by NCC in 2022. The Local Transport Plan identifies the Proposed Scheme as being one of the priorities for enhancing strategic connections. The Norfolk Strategic Infrastructure Delivery Plan also identifies it as a priority road infrastructure scheme.

1.2.5 The need for the Proposed Scheme and the transport, economic, social and environmental benefits to be created by the Proposed Scheme are set out in Chapter 3 of this Statement utilising the findings and conclusions provided by the accompanying documentation submitted in support of the application as noted below.

1.3 Application Documentation

1.3.1 The application has been prepared in line with the County Planning Authority's (CPA) updated 'National and Local Validation Requirements for County Council (Regulation 3) Planning Application' checklist (see Appendix

A of this Statement), as well as the national validation requirements for planning applications.

1.3.2 The following accompanying documents are provided as part of the planning application submission:

- Application Covering Letter;
- Completed Planning Application and Listed Building Consent Forms, Certificates and Notices;
- CIL Exemption Form;
- Planning Statement;
- Design and Access Statement (DAS);
- Transport Assessment;
- Sustainable Transport Strategy;
- Pre-Application Consultation Report;
- Statement of Community Involvement;
- Environmental Statement (ES);
- Flood Risk Assessment;
- Habitat Regulation Assessment; and
- Drainage Strategy Report.

1.3.3 The ES is supported by a range of key chapters relating specifically to the assessment of the Proposed Scheme and
includes a suite of technical appendices that help provide additional information relating to the Proposed Scheme including:

- Outline Construction Environmental Management Plan;
- Design Site Waste Management Plan;

- Arboricultural Impact Assessment;
- Biodiversity Net Gain Technical Report;
- Complementary Traffic Mitigation Schemes Assessment;
- Ecological Mitigation Strategy; and
- Various Habitat + Species Surveys / Hedgerow Reports to complement the ES.

1.3.4 A full set of planning drawings in line with the National and Local Validation Requirements for County Council (Regulation 3) Planning Applications have also been submitted with the application (see Appendix B for a full schedule of these drawings).

1.4 The Purpose of the Planning Statement

1.4.1 The purpose of this Statement is to support the application for full planning permission, clearly setting out the case and planning policy context along with relevant material considerations for the Proposed Scheme, drawing on the assessments and supporting documents that accompany the application as set out in sections 1.3.2 to 1.3.4 above. The assessments that inform the case for the Proposed Scheme and are referred to throughout this Statement with the most pertinent set out below.

Accompanying Assessments

1.4.2 A detailed Transport Assessment (Document reference: 4.01.00) has been prepared to consider the effects of the Proposed Scheme on all users of the local transport network within the scope of assessment as well as relevant A47 junctions on the Strategic Road Network (SRN). This document should be read in conjunction with the Sustainable Transport Strategy (Document Reference 4.02.00), which describes in more detail the Proposed Scheme's Non-Motorised User Provision and explains a package of local transport improvements, which are proposed to support sustainable travel patterns

within the study area west of Norwich once the Proposed Scheme is in place. This Statement summarises the assessment and conclusions particularly in relation to the need for and benefits of the Proposed Scheme. A summary of this assessment is set out in Chapter 3 of this Statement.

1.4.3 The Proposed Scheme is considered to be development subject to Environmental Impact Assessment (EIA) as it falls within a description of development (10 (f) – Construction of roads) as set out in Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations 2017). In accordance with the EIA Regulations 2017 a full ES (Document reference: 3.01.00) has been submitted to accompany the application. The reported findings of the ES have been referred to as part of this Statement to allow for consideration of the impacts and effects of the Proposed Scheme in terms of accordance with relevant national and local planning policy. Of particular note is the requirement to include a description of the reasonable alternatives studied by the developer as part of the EIA process (Regulation 18(3)(d) of the EIA Regulations 2017) and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. A summary of this assessment is set out in Chapter 4 of this Statement.

1.4.4 The Proposed Scheme crosses one Special Area of Conservation (SAC) (the River Wensum), with further SACs in the wider area. Such sites are statutory designated sites of importance to nature conservation that are protected by the Conservation of Habitats and Species Regulations 2017 (as amended). Under this legislation 'Competent Authorities' such as the CPA must assess Plans and Projects (both alone and in-combination with other plans and projects) for their potential to cause 'Likely Significant Effects' on or 'adverse effects on integrity' to such sites in accordance with those Regulations and the NPPF. The assessment process is commonly referred to as Habitats Regulations Assessment (HRA). The Applicant has provided 'Information to Inform a Habitats Regulations Assessment' (Document reference: 4.03.00) to accompany this application. This report covers an initial screening

assessment (Stage 1) followed by Appropriate Assessment (Stage 2), and also determines whether further HRA stages (Stage 3 and 4) need to be applied to achieve compliance with legislation, concluding that they do not.

Policy Context

1.4.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, if regard is to be had to the Development Plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the Development Plan unless material considerations indicate otherwise. The relevant Development Plan that will form the basis for the determination of the application is set out in Chapter 5 of this Statement.

1.4.6 This Statement also seeks to identify relevant material considerations and assesses whether the Proposed Scheme is consistent with the presumption in favour of sustainable development contained in paragraph 11 of the NPPF, having regard to its guidance on the operation of that presumption, together with the objectives for sustainable development in paragraph 8 of the NPPF, noting that those objectives are not necessarily to be achieved with every individual planning decision (as explained in paragraph 9 of the NPPF).

1.4.7 In addition to this Statement assessing the Proposed Scheme's compliance with national planning policies, the adopted Development Plan and other relevant material considerations, this Statement will seek to consider the relevant statutory duties and responsibilities under other relevant legislation, including the Transport Act 2000, and NCC's own policies, including those covering environmental aspects.

1.5 Other processes and consents

Compulsory Purchase Order

1.5.1 Alongside the application for full planning permission, the Applicant as the promoter of the Proposed Scheme has been in negotiation with relevant landowners to be able to acquire the land required to deliver the Proposed

Scheme. To ensure the timely delivery of the Proposed Scheme should those negotiations prove to be unsuccessful, the Applicant has resolved to acquire the necessary interests in land via a Compulsory Purchase Order (CPO), with Cabinet resolving to make the requisite CPO in its 4th December 2023 meeting. Link to Cabinet Minutes of the meeting held on 04th December 2023.

Side Roads Order

1.5.2 A series of alterations to the local highway network will be required if planning permission is granted for the Proposed Scheme. This will be dealt with by way of a Side Roads Order made under the Highways Act 1980 to give NCC the statutory authority to divert and alter the local highway network and private means of access.

1.5.3 A summary of the proposed measures that are to the subject of the Side Roads Order are set out in Sustainable Transport Strategy (Document reference: 4.02.00). As with the CPO, the Cabinet resolved to authorise the making, publication and submission, for confirmation by the Secretary of State, of the necessary Side Roads Order in its 4th December 2023 meeting. Link to Cabinet Minutes of the meeting held on 04th December 2023.

1.6 Structure of the Statement

1.6.1 The remainder of this Statement is structured as follows:

- Chapter 2: sets out a detailed description of the Proposed Scheme;
- Chapter 3: comprises the Case and Need for the Scheme. This chapter sets out the background to the planning application, the Scheme Objectives, the need for the Proposed Scheme, and the benefits that it will bring. It also identifies how the selected route option will fulfil the objectives of the Government's Major Road Network programme;
- Chapter 4: provides background on the Scheme's development and the reasonable alternatives that have been considered;

- Chapter 5: provides detail on the Development Plan and other materially relevant considerations, including national planning policies;
- Chapter 6: provides and assessment of the Proposed Scheme against the policy framework, both locally and nationally. This includes an assessment of the Proposed Scheme against the Development Plan as a whole, consideration of relevant material considerations, and an assessment of whether the Proposed Scheme benefits from the presumption in favour of sustainable development contained in the NPPF, and applicability of NPPF paragraph 12 in the event that the Proposed Scheme were to be found to deviate from the adopted Development Plan;
- Chapter 7 considers the planning balance for the Proposed Scheme; and
- Chapter 8 provides a conclusion and summary as to the overall acceptability of the Proposed Scheme.

1.7 The Proposed Scheme

1.7.1 This chapter provides a summary description of the development for which full planning permission is being sought.

1.7.2 A description of the existing site is set out in greater detail of Chapter 2 of the ES (The Existing Site).

1.7.3 The description of the Proposed Scheme draws on the fuller description contained in Chapter 3 of the ES (Description of the Proposed Scheme), with further details of the access and design evolution of the Proposed Scheme provided in the accompanying Design and Access Statement (DAS) (Document reference: 1.02.00).

1.8 Location and Context

1.8.1 The location and route of the Proposed Scheme are shown on the planning drawings -Route Plan (Document reference 2.01.00) and Red Line Boundary Plans (Document reference 2.02.00).

1.8.2 The Proposed Scheme will connect the A1270 Broadland Northway from its junction with the A1067 Fakenham Road to the A47 trunk road near Honingham.

1.8.3 The Proposed Scheme covers an area of land approximately 287 hectares (ha) and is located approximately 10.5 kilometres to the north-west of the city of Norwich. The Applicant does not own and control all the land that is required for the Proposed Scheme (nor can the Applicant confirm the identity of all landowners/tenants) and therefore the appropriate Certificate C under Article 13 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 has been completed and notice has been served on those groups with an interest in the land, in conjunction with the issue of a newspaper advertisement.

1.8.4 The nearest settlements to the Proposed Scheme include:

- Weston Longville (approximately 0.2 kilometres to the west);
- Weston Green (approximately 0.27 kilometres to the north west);
- Honingham (approximately 0.1 kilometres to the south);
- Ringland (approximately 0.2 kilometres to the south);
- Attlebridge (approximately 0.3km to the north); and
- Easton (approximately 3.5 kilometres to the south).

1.8.5 The majority of the existing land use within the Red Line Boundary is agricultural / arable land and areas of existing woodlands. The agricultural land uses include a mix of both arable and livestock farming.

1.8.6 An Agricultural Land Classification (ALC) survey has been undertaken to ascertain the ALC grading within the Red Line Boundary for the application and is reported on further in section 6.10 of this Statement.

1.8.7 There are two residential properties located within the Red Line Boundary and eleven residential properties whose direct access lie within the Red Line Boundary. There are no business premises (excluding agricultural) or recreational facilities within the Red Line Boundary.

1.8.8 There are nine Public Highways within the Red Line Boundary with a number of Public Rights of Way and private means of access located within and adjacent to the Red Line Boundary.

1.8.9 Three Habitats Sites were identified in the study area for the EIA, including the area of air quality change of the Affected Road Network. The River Wensum SAC Paston Great Barn SAC, and the Norfolk Valley Fens SAC are of International Value.

1.8.10 The Proposed Scheme crosses the River Wensum, which is a Main River regulated by the Environment Agency. The river is both a SAC and a Site of Special Scientific Interest (SSSI). The Proposed Scheme will also cross over a Tributary of the Tud (Foxburrow Stream).

1.8.11 The Norfolk Valley Fens SAC in East Dereham is 11.2 kilometres from the Proposed Scheme and covers two sites immediately adjacent to each other, with Scarning Fen to the west of Potter Fen. They cover an area of 6.2ha and together are a SSSI, but also make up part of the Norfolk Valley Fens SAC.

1.8.12 Areas of woodland are partially within the Red Line Boundary of the application including an area of woodland between Primrose Grove and Rose Carr, Spring Hills, Long Plantation, Gravel Pit Plantation and Foxburrow Plantation.

1.8.13 An Arboricultural Impact Assessment (Document reference 3.10.35) has been prepared, which identifies that The study area for the Proposed Scheme

features 51 ancient and veteran arboricultural features and seven such features are affected by it.

1.8.14 Two parcels of ancient woodland, listed on the national Ancient Woodland Inventory, are present within 200m of the Red Line Boundary;

- Primrose Grove is adjacent to the Red Line Boundary (15m from the Proposed Scheme at it closest point); and
- Mouse Wood is more than 15m from the Proposed Scheme and located approximately 10m to the west of the Red Line Boundary, separated by Wood Lane (B1535) which provides an access route to the Site Boundary.

1.8.15 Hedgerow surveys undertaken as part of the EIA process identified a total of 22 hedgerows totalling 8.27 kilometres within or partially within the Red Line Boundary (Document reference: 3.10.10). All of the hedgerows qualify as Habitats of Principal Importance under the Natural Environment and Rural Communities Act 2006 ('NERC')

1.8.16 A total of eighteen hedgerows totalling 7.33 kilometres that are within or partially within the Red Line Boundary for the Proposed Scheme qualify as Important (as defined under the Hedgerows Regulations 1997), however none of the hedgerows were found to contain ancient or veteran features.

1.8.17 The Environment Agency's Flood Map for Planning shows that the River Wensum has a wide floodplain throughout the Study Area for the Proposed Scheme, where land currently lies in Flood Zones 2 and 3, (Flood Zone 2 is classed as having a Medium Probability of flooding and is assessed as land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding. Flood Zone 3 is classed as having a High Probability of flooding and is assessed as land having a 1 in 100 or greater annual probability of river flooding). The majority of the Proposed Scheme is located in the low-risk Flood Zone 1 although some sections are located in the medium risk Flood Zone 2, and areas to the north and south of the River Wensum and the

viaduct crossing are in the high-risk Flood Zone 3. The submitted FRA addresses the sequential and exceptions test as required by the NPPF, see section 6.8 of this Statement for further details.

1.8.18 In terms of designated heritage assets, a study area of 1 kilometre (km) around the Red Line Boundary identified nineteen Listed Buildings, including two Grade I, sixteen Grade II and 1 Grade II* Listed Buildings.

1.8.19 There are no conservation areas within close proximity to the application site. Norfolk County Council does not have Archaeological Priority Areas.

Related Transport Developments

1.8.20 Norwich Airport - The design of the Proposed Scheme is approximately 6.0 kilometres in length, running in a northeast to south westerly direction. The safeguarding area for Norwich Airport extends out to 15km, therefore the majority of the Proposed Scheme sits within Norwich Airport safeguarding area.

1.8.21 A47 between North Tuddenham and Easton - As part of a separate planned scheme, National Highways proposes to realign and dual the A47 between North Tuddenham and Easton. This scheme's Development Consent Order (DCO) was made by the Secretary of State in August 2022. National Highways will construct the Honingham grade-separated junction, and the Norwich Western Link will connect to the north-eastern side of that junction.

1.9 The Development

Description of Development

1.9.1 The proposed description of 'development' as per Section 55 of the Town and Country Planning Act 1990 for which full planning permission is sought is as follows:

> *'Development of approximately 6km of the Norwich Western Link Road connecting the A1067 (Fakenham Road) with the new A47 North Tuddenham to Easton scheme (being developed by National Highways), including the construction of a new roundabout junction*

with the A1067 Fakenham Road, improvements to the A1067 Fakenham Road and the roundabout junction with the A1270 Broadland Northway. Structures include a new viaduct carrying the Norwich Western Link over the River Wensum, a new underpass at Ringland Lane, the provision of a green bridge carrying the Broadway over the Norwich Western Link, three further green bridges, wildlife crossings, and culverting of a tributary to the River Tud. Related works include the stopping up, diversion, improvement and provision of side roads, new walking cycling and horse-riding provision, the stopping up, replacement and provision of new private means of access, and ancillary landscaping, ecological mitigation, surface water drainage system, flood compensation, bunds, other environmental mitigation, diversion and protection of apparatus and temporary works to facilitate construction, and the change of use of the premises known as Low Farm as offices (class E), and other ancillary works.

Proposed Highway Infrastructure

1.9.2 The Proposed Scheme consists of the construction, operation and maintenance of an approximately 6 km long dual-carriageway road connecting the A1067 Fakenham Road and the A47, with a dualled section of the A1067 to the existing A1270 roundabout.

1.9.3 The following structures are also proposed as part of the Proposed Scheme:

- Viaduct crossing the River Wensum Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) and floodplain (approximately 490m long). The ten-span bridge design includes piled piers within the floodplain;
- A culvert crossing of a minor watercourse in the floodplain for maintenance access;
- Wildlife crossings, including underpasses and overbridges;
- Retaining wall in area of Ancient Woodland;

- Overbridges where required to maintain routes across the scheme for vehicles, non-motorised users (pedestrians, cyclists and horse riders) and/or wildlife; and,
- Culvert structure for a tributary of the River Tud.

1.9.4 The Proposed Scheme design includes sloped earth embankments and cuttings to manage the topography, earth bunds, landscape planting, drainage basins, and maintenance access tracks.

Non-Motorised Users Provision

1.9.5 A Sustainable Transport Strategy (Document reference: 4.02.00) has been developed alongside the Proposed Scheme's highway design and is submitted as a separate document (Document reference: 4.02.00).

1.9.6 The Sustainable Transport Strategy (Document reference: 4.02.00) presents a range of sustainable transport measures within the Red Line Boundary for which planning permission is sought, that will be of benefit to Non-Motorised Users (NMU), and for the betterment of existing local highways.

1.9.7 The NMU proposals included within the Proposed Scheme aim to connect existing routes and make them more usable whilst also mitigating potential severance issues caused by the provision of the new classified road which crosses several existing side roads including PROWs.

1.9.8 The details of the NMU proposals are shown on the 'Non-Motorised User & Side Road Provision General Arrangement' plan (Document reference: 4.02.01). In summary the NMU proposals consist of the following development for which planning permission is sought as part of this application:

- Route 1a: Honingham Restricted Byway 1 - Diversion of the existing Honingham Restricted Byway 1 to run parallel with the proposed carriageway;

- Route 1b: Honingham Restricted Byway 1 - the creation of a new diversionary route linking Route 1a and the old A47 to the south, with The Broadway to the north;
- Route 2: The Broadway is to be stopped up and replaced with a bridleway and restricted byway on the same alignment, to create a tranquil green lane for NMU access and ecology;
- Route 3: Breck Road will be stopped up and, to the west of the proposed carriageway, will be replaced with a restricted byway on the same alignment until it reaches the proposed carriageway;
- Route 4: Church Hill Lane is to be stopped up and, to the west of the proposed carriageway, will be replaced with a bridleway on the same alignment until it reaches the Classified Road, at which point it is diverted northwards to run parallel and adjacent to the Classified Road (Route 9 below);
- Route 5: Blackbreck Lane will be stopped up from its junction with Church Hill Lane/Weston Road and replaced with restricted byway on the same alignment. Where it meets the proposed carriageway, it will be diverted to re-join Ringland Lane to the east of the proposed carriageway;
- Route 6: Improvements to the existing Ringland Lane will remain open to all traffic with Ringland Lane crossing under the proposed carriageway via a new underpass. A cycle-friendly on-road link is proposed on Ringland Lane from the underpass of the Proposed Scheme to the junction with Marl Hill Road;
- Route 7: Ringland FP1 (Public Footpath). The existing public footpath is to be retained to preserve access over this pedestrian route;
- Route 8: Weston Longville Footpath 9. It is proposed to upgrade Weston Longville Footpath No.9, to the east of the proposed alignment to a restricted byway (i.e. stop up the footpath and replace it on the

same alignment with a restricted byway), with links to The Broadway and the Honingham RB1 diversionary route;

- Route 9: Dedication of a new bridleway from Church Hill Lane to Blackbreck Lane via a Green Bridge over the proposed carriageway;
- Routes 10, 10a and 10b: New Public Footpaths over the Proposed Scheme's maintenance tracks;
- Route 11: New Pedestrian / Cycle Link – A1067 to A1270. A new pedestrian / cycle link is proposed to the north of the A1067 Fakenham Road, linking the existing Attlebridge Restricted Byway 4 (RB4) and Bridleway 6 (BR6). The route will create a safe link for users to access existing Public Rights of Way to the north of the improved A1067 and the existing non-motorised user infrastructure provision along the Broadland Northway. The existing uncontrolled pedestrian crossing at Fakenham Road/NDR Roundabout will be removed. The alternative route would be along Route 11, then to cross at the uncontrolled crossing point on the A1067 to Attlebridge FP5;
- Route 12: New Pedestrian / Cycle Link – Improved Marl Hill Road to A1067. A new pedestrian / cycle link is proposed along the eastern side of the improved Marl Hill Road, linking Weston Longville with Morton on the Hill and Attlebridge. The route will create a safe link for users which is segregated from traffic, on a parallel alignment with the Proposed Scheme's viaduct. Where the new route connects with A1067, a new crossing will be installed to assist users accessing onward routes including the Marriott's Way. A new central island will be installed within the central reserve with localised widening of A1067 immediately east of the junction with Marl Hill Road.

1.9.9 The NMU provision for which planning permission is sought as part of this application provide a full package of sustainable interventions to support the sustainable travel objectives of the Proposed Scheme. The NMU provisions also complement the Transport for Norwich (TfN) strategy which seeks a

mode shift away from private cars and improvement in air quality within a study area that interfaces with the Proposed Scheme's area.

1.9.10 Within the accompanying Transport Assessment (Document reference: 4.01.00), the Proposed Scheme is shown to re-route existing strategic traffic from local roads to the Classified Road, thereby creating the conditions to allow for further improvements to enhance sustainable transport options.

1.9.11 Section 7 of the Sustainable Transport Strategy (Document reference: 4.02.00) proposes a range of wider Complementary Sustainable Transport Measures (CSTM) that the Applicant would seek to pursue in the vicinity of the Proposed Scheme at a more strategic level, having been made possible by the forecasted reduction in traffic on local roads brought about by the operation of the Proposed Scheme.

1.9.12 The wider Complementary Sustainable Transport Measures include measures for improved active travel and public transport, which will be brought forward by NCC outside of the Proposed Scheme for which planning permission is sought. These works would be implemented separately from the Proposed Scheme via NCC's powers as the Highway Authority.

Landscape and Ecological Design

1.9.13 The Proposed Scheme includes a number of landscape and ecological design features.

1.9.14 The preferred alignment of the Proposed Scheme has been developed to avoid important ecological features where possible, most notably the River Wensum SAC / SSSI and ancient woodland, with this iterative optioneering process summarised in Chapter 4 of this Statement.

1.9.15 Where habitat loss has been unavoidable, mitigation in line with local and national planning policy has been provided.

1.9.16 A Landscaping Design (as shown on the supporting Landscaping Layout Sheets (Document Reference: 2.07.00) has been developed to integrate the Proposed Scheme into the landscape and includes environmental objectives

such as connectivity to existing woodland/planting, habitat creation and visual screening.

1.9.17 Complementing the Landscaping Design along the Proposed Scheme are additional areas of habitat creation to meet the scheme requirements and objectives in relation to Biodiversity Net Gain (BNG), protected species mitigation, compensation for tree and habitat loss and Water Framework Directive (WFD) mitigation. These areas are identified on the Essential Environmental Mitigation Plan (Document Reference 2.11.00).

1.9.18 The Proposed Scheme also includes a number of ecological design features including wildlife crossings structures, underpasses and green bridges which are as follows:

- Construction of the Nursery Woodland green bridge over the new dual carriageway road to maintain habitat connectivity with the surrounding woodland. The Nursery Woodland green bridge is to be used only for maintenance access on foot and will not be opened to the public.
- Construction of the Morton green bridge over the new dual carriageway road to provide habitat connectivity and to provide access across the new road for people on foot, bicycle or horseback.
- Construction of the Broadway green bridge to carry the Broadway over the new dual carriageway road and to provide habitat connectivity. The Broadway would be closed to public motor vehicle traffic (save for access) but would provide access over the new road for people on foot, bicycle, horse and horse drawn vehicles.
- Construction of the Foxburrow Plantation green bridge to provide habitat connectivity, private means of access and maintenance access over the new road.

1.9.19 A BNG Technical Report (as set out in ES Chapter 10: Biodiversity - Appendix 33: Biodiversity Net Gain Technical Report (Appendix 10.33) - Document reference: 3.10.33) has been undertaken in accordance with best practice

guidance and been prepared using the Biodiversity Metric 3.1 published by Natural England. The landscape design of the Proposed Scheme has been based, in part, on BNG Metric 3.1, as this was the most up to date Metric at the time of completion of the Habitat surveys. An updated iteration of the metric has recently come into force on the 14/02/24 (the Statutory Metric). Following discussion with planning officers at NCC, it has been agreed that the application shall be submitted based on Metric 3.1, however an additional appendix has been added to Environment Statement Chapter 10: Biodiversity, in which the existing habitat data has been inputted into the new Statutory Metric (Nov23 version) and results given utilising that metric, notwithstanding that the baseline surveys were not completed in the manner fully expected by that metric.

1.9.20 The report concludes that the Proposed Scheme is predicted to achieve a quantifiable 10.97% BNG outcome for non-excluded habitats based on Metric 3.1 and 11.58% based on the Statutory Metric, although it cannot avoid the loss of ancient and veteran trees, which is deemed an irreplaceable habitat.

Flood Mitigation Design

1.9.21 The majority of the Proposed Scheme is located in the low-risk Flood Zone 1 although some sections are located in the medium risk Flood Zone 2, and areas to the north and south of the River Wensum and the viaduct crossing are in the high-risk Flood Zone 3. A Flood Risk Assessment (Document reference: 3.12.02) is submitted as an appendix to the ES with this addressing both the Sequential and Exception tests as set out in the NPPF.

1.9.22 The Proposed Scheme's drainage systems have been designed to intercept and divert run-off away from watercourses and floodplains, most notably the River Wensum. A Drainage Strategy and Drainage Design Plans (Document reference: 2.08.00) have been developed as part of the Proposed Scheme to collect surface water from the carriageway. The road will be built so water flows into grassed swales, catchpits and roadside drainage ditches with attenuation to intercept silt and sediment at the edge of the carriageway. This ensures water is suitably treated before it enters a final drainage basin where

the treated water either infiltrates into the ground, discharges into the Foxburrow Stream or to the A47 surface water drainage system. Sediment forebays will have suitably wetted areas for planting. A pollution control valve will be incorporated into the design of each basin for spillage control.

Change of Use (Low Farm House)

1.9.23 The Proposed Scheme also seeks the change of use of Low Farm House, to allow the property to be used as site offices during the construction phase. This will require the change is use from the exiting Class C (residential) use to Class E (Commercial, Business and Service).

1.9.24 Following the change of use, Low Farm House will be used as site offices for the duration of the construction phase (anticipated to run between the years 2025 – 2029). Usage of the property for this purpose will be on a small scale with a maximum of 5 permanent individuals at the location at any one time.

1.9.25 There is no reconfiguration or other material changes proposed to be made to the property itself, either externally or internally. Office furniture will be located within the property, including several desks, office chairs, document storage (filing cabinets / tambour units / cupboards), all to facilitate the use of the property as a small-scale office. Given the low number of individuals who will us this property during the construction phase, the anticipated low levels of office waste shall be managed by the individuals within the office, and as such no large-scale waste management requirement will put in place requiring access to the property.

1.9.26 In terms of usage, the office will be used for the duration of the construction project, with operating hours of 07:00 – 19:00 Monday to Friday, with the potential for 07:00 – 13:00 on Saturdays if critical construction activity on the Proposed Scheme is required at this time.

1.9.27 The property will be accessed via its existing ‘access right’ (Back Lane and The Street). The property will be accessed only by individual (standard) cars and small commercial vehicles (transit size vehicles). No modifications are proposed to the existing parking or access arrangements.

1.9.28 Use of the property will be wholly aligned to the relevant details within the OCEMP, and will be aligned to the CEMP, Construction Lighting Management Plan, Noise Management Plan etc. when developed.

2 Need and Benefits of the Proposed Scheme

2.1 Introduction

2.1.1 The need for this major infrastructure scheme is driven by identified transport issues located to the west of Norwich. Local communities in this area are suffering from rat-running and traffic congestion on the local road network that were not designed to take the volumes or size of vehicles now using them.

2.1.2 Without intervention, these problems are expected to get worse with anticipated population and job growth in and around Norwich. Assessment work has demonstrated that creating a new strategic connectivity link between the western end of Broadland Northway and the A47, is the most effective way of tackling these transport issues.

2.1.3 There are also wider transport benefits that the Proposed Scheme will create including the development of a more resilient transport network, enabling quicker and more reliable journeys to the west of Norwich for all modes and reduced traffic congestion and queuing in local communities.

2.1.4 There are also wider economic, social and environmental benefits that the Proposed Scheme will create including improving access to major employment and residential sites helping to deliver new jobs and economic growth for the region. The Proposed Scheme will also increase opportunities for walking, cycling and public transport use in the area to the west of Norwich by removing traffic from the local road network. Additional benefits in terms of road safety improvements will also be created.

2.1.5 The need for the Proposed Scheme and the resulting transport, economic, social and environmental benefits are set out in greater detail below.

2.2 The Major Road Network (MRN) Programme

2.2.1 On 23 December 2017, the Government launched a consultation setting out proposals for the creation of a Major Road Network (MRN). The MRN forms a middle tier of the country's busiest and most economically important local

authority 'A' roads, sitting between the national Strategic Road Network (SRN) and the rest of the local road network. The SRN is made up of the nation's motorways and major A roads and is '*arguably the largest and single most important piece of infrastructure in the country*. link to the Strategic Road Network Initial Report, published by Highways England, quote from page 6. A specific new funding stream has been dedicated to improvements on MRN roads.

2.2.2 The A1270 Broadland Northway is part of the Major Road Network (MRN) which connects into the SRN, including the A47. There is gap in the MRN between the A47 and the western end of the A1270 Broadland Northway.

2.2.3 The Government has set out five objectives for the Major Road Network Programme, link to the Governments Major Road Network and Large Local Majors Programmes: programme investment planning, as follows:

- Reduce congestion;
- Support economic growth and rebalancing;
- Support housing delivery;
- Support all road users; and
- Support the Strategic Road Network.

2.3 The Proposed Scheme Objectives

2.3.1 The high-level objectives of the Proposed Scheme are stated to be:

- Improve strategic connectivity with the national road network.
- Support sustainable economic growth;
- Improve the quality of life for local communities; and
- Promote an improved environment.

2.3.2 The need for the Proposed Scheme in terms of the problems with the existing highways network in the area to the west of Norwich, how this impacts the local and wider communities and how the Proposed Scheme will address these is set out below with the resulting transport benefits provided, based on the findings of the Transport Assessment (Document reference: 4.01.00).

2.3.3 In addition to the transport benefits, the wider economic, social and environmental benefits in line with the above high-level objectives are also set out below.

2.4 The Need for the Proposed Scheme

2.4.1 The need for the Proposed Scheme is set out in greater detail in Chapter 4 of the Transport Assessment (Document reference: 4.01.00). A summary of this is provided below.

Strategic Connectivity Gap

2.4.2 Following the completion in April 2018 of the A1270 Broadland Northway (formerly known as the Norwich Northern Distributor Road or NDR), there is now an evident strategic connectivity gap between the A47 and A1067, crucial radial routes leading into central Norwich from the west.

2.4.3 This is because the major road network configuration in this area does not currently connect with the strategic road network to the west of Norwich (i.e. the A47), which leaves users unable to pass seamlessly between the two networks.

2.4.4 No Primary A Road Standard routes are currently in place to address north-south movement west of the Outer Ring Road (A140 Sweet Briar Road), with the closest available A Road route (A1065 from Swaffham to Fakenham) located approximately 35km west of the A140, and therefore not a preferable alternative.

2.4.5 In addition to the above issues, the River Wensum and, to a lesser degree, the River Tud, pose considerable physical obstacles to north-south travel between the A47 and A1067.

2.4.6 This contrasts with the position to the east of Norwich, where the major road network and the strategic road network meet at the Postwick junction of the A1270 Broadland Northway and the A47.

2.4.7 While this strategic connectivity gap exists, strategic traffic will seek to use local roads that are inappropriate due to existing highway geometrical constraints as well as constraints at existing highway bridges as set out below.

Local Roads – Existing Highway Geometrical Constraints

2.4.8 The Transport Assessment (Document reference: 4.01.00) identifies that there are over 30,000 journeys per day crossing through the area to the west of Norwich, via the A47 seeking to access the A1067 and/or A1270. Many of these trips are on longer distance desire lines cutting through the area to the west of Norwich where there is no Primary A Road standard route available between A47 and A1270 – only unclassified local roads and the B1535 exist currently.

2.4.9 The Transport Assessment (Document reference: 4.01.00) notes that these local roads are not fit to accommodate the high volumes of strategic traffic and larger vehicles that are currently using them. The roads are generally narrow with tight bends and mature trees alongside the roads and limited verge space on various sections of road outside of the villages.

2.4.10 The existing roads also take traffic through villages with residential frontages. Commercial vehicles are often seen to use these roads which impacts on residential amenity and creates conflicts, as these types of vehicles occupy a wider space and often need to cross the centre of the carriageway due to highway width constraints. Area specific examples of these constraints are provided below.

2.4.11 Within Weston Longville the local roads generally have a width of 5m, except for Church Street, which is narrower with tight bends and traffic calming features. Although HGVs are not suitable for this route due to restrictions, larger vans, caravans, and minibuses often use it, leading to traffic issues that

may worsen with projected growth. Similarly, Marl Hill Road to the north of Weston Longville, connecting to A1067, is also about 5m wide but is frequently used by LGVs and commercial vehicles, providing an alternative to the longer B1535 route.

2.4.12 The B1535 route in the west of Norwich, designated for HGVs, is generally 6m wide but lacks a marked centreline in some sections. It features tight bends and connects to A1067 west of Marl Hill Road. Despite its geometrical constraints and existing traffic calming, the route via Weston Longville is currently expected to carry at least 30% more traffic than B1535 Weston Hall Road.

2.4.13 In Ringland village, roads are narrow (4.8m), with property frontages close to the carriageway. Taverham Lane in Costessey, despite traffic calming measures, is predicted to have higher usage than the B1535. The alternative route through Costessey Lane is narrow, constrained by residential areas, and features traffic calming measures that slow and constrain traffic flows. Additionally, Weston Road, Breck Road, and The Broadway, crossing the Proposed Scheme, are narrow (3m or less) with limited passing bays.

2.4.14 All of the road capacity / constraints issues identified above present a situation that is currently unsustainable, and a lack of intervention will only continue to make the existing conditions even worse.

Constraints at Existing Highway Bridges

2.4.15 In addition to the width and capacity issues for the local roads themselves, many of the existing bridges in the area to the west of Norwich are similarly not suited to accommodate the volumes and types of traffic that are currently trying to use them.

2.4.16 Beyond the A140 Outer Ring Road (Sweet Briar Road), the number of existing bridges spanning the River Wensum is extremely limited, with narrow structures constrained by weight restrictions, which limits certain vehicles such as HGV’s from utilising them.

2.4.17 The Taverham Mill bridge spans the River Wensum at Taverham Lane, connecting Taverham and Costessey. It features a 6m width between parapets, but the carriageway has been narrowed to approximately 5m. The road approaching the bridge has tight bends within 50m from both the north and south sides, both slowing and constraining traffic flow. It is subject to a 40mph speed limit. The area is surrounded by lakes with the area prone to flooding, further exacerbating traffic impacts during inclement weather events.

2.4.18 The existing bridge at Costessey Lane in Drayton, crossing the River Wensum, is positioned on a skewed angle and faces a tight bend. Due to a constrained highway alignment and an aging structure, it is subject to a 20mph speed limit and a 7.5T weight limit. The road leading to the bridge has multiple tight bends with limited forward visibility and a typical width of 5m, further constraining traffic flows.

2.4.19 Ringland Road bridge, situated at the eastern edge of Ringland village, has a narrow carriageway of about 4.8m. It is subject to a 30mph speed limit and a 7.5T weight limit. Positioned on a bend with poor forward visibility approaching the junction, it intersects with The Street and Costessey Lane near a public house.

2.4.20 Hellesdon bridge, located approximately 800m west of Sweet Briar Road, crosses the River Wensum. This narrow bridge has a carriageway width of about 4m and is subject to a 3T weight restriction. Surveys identify that this bridge is popular among local cyclists, who will be negatively impacted when cars and vans opt to use this crossing as a short cut.

2.4.21 When assessed in combination, these historic bridges lack the physical capacity to accommodate significant volumes of strategic traffic seeking to use the area.

2.4.22 Noting the weight restrictions intended to prevent heavy vehicles using them, it is considered that improving and structurally strengthening the bridge structures would also adversely impact the already constrained highway

geometry in the vicinity of bridges and, potentially jeopardise highway safety and increase the risk of collisions.

2.4.23 In addition, the existing bridges over the River Wensum in the west of Norwich located at Ringland, Costessey Lane, Taverham Lane (Taverham Mill Bridge) and Hellesdon Bridge are all relatively low lying. With all of the bridges crossing the same river, it is possible that more than one of the existing routes may become unavailable at the same time during extreme flood events, affecting the resiliency of the existing network.

Road Safey

2.4.24 Given the constrained nature of the roads in this area, improving road safety and reducing Personal Injury Accidents (PIA) has been a key driver in the development of the Proposed Scheme.

2.4.25 PIA data has been obtained from NCC covering the period from 1st April 2017 to 26th March 2022 at key locations within a 5km radius of the Proposed Scheme route. The data showed that PIAs that occurred at these locations included 277 collisions. Of the 277 collisions three were fatal, 62 were serious and 212 were slight.

2.4.26 For analysis of the data, six ‘accident clusters’ have been identified. NCC as Local Highway Authority define an ‘accident cluster’ ~~is~~ as where five or more PIAs have occurred in a 3-year period within a 50m radius (urban) and 100m radius (rural).

2.4.27 Signage in place on A1067 between Attlebridge and Lenwade also notes a high casualty route.

Impacts resulting from the above problems

2.4.28 Chapter 4 of the Transport Assessment (Document reference: 4.01.00) identifies that there are over 30,000 journeys per day approaching from the west of Norwich via A47 at Wood Lane junction seeking to access the A1270.

2.4.29 Many of these trips have desire lines cutting through the area to the west of Norwich and tend to take short cuts through the local and rural road network on the west side of the city.

2.4.30 As set out above, significant challenges have been identified in the area to the west of Norwich pertaining to the limited and constricted nature of the existing local road connections and highway bridges, originally not intended for strategic traffic use.

2.4.31 The existing local roads guide trips through villages with residential frontages, and it is not uncommon to observe commercial vehicles navigating these routes, adversely affecting the residential environment.

2.4.32 This high volume of traffic brings with it the associated issues of noise, safety, and emissions for the local communities, also hindering the opportunity for non-motorised travel modes such as walking and cycling, (NWL Strategic Outline Business Case).

2.4.33 During the development of the Proposed Scheme, residents in the impacted villages to the west of Norwich were consulted about the lack of a viable strategic route and asked how this was impacting their daily lives.

2.4.34 As described within the supporting Transport Assessment (Document reference: 4.01.00) and Statement of Community Involvement (Document reference: 1.03.00) residents identified the following issues:

- Those living in communities to the west of Norwich in particular raised concerns about traffic problems they were seeing and experiencing on a daily basis;
- Concern over the volume of traffic ‘rat-running’ through local villages;
- A lack of connectivity between the A47 and the (then proposed) NNDR (now A1270 / Broadland Northway);

- The number of HGVs using routes through villages, even where this is signed as inappropriate or forbidden (e.g., weight limits and width restrictions);
- The combination of the above having resulted in an unsafe environment for pedestrians due to lack of footways / pedestrian routes within the area;
- The need to accommodate extra traffic associated with new major residential developments (there are several of these developments which are currently going through the planning or site allocation process as part of the GLNP – see Appendix C of for a summary of relevant allocations) along with employment developments including the proposed Food Enterprise Zone near Easton and developments at Norwich Airport; and
- A lack of connectivity by public transport especially around, rather than into, Norwich (e.g. to University and Hospital areas), link to the NWL Technical Report published in June 2016.

2.4.35 In respect of the emerging Greater Norwich Local Plan (GNLP), the GNLP was adopted by Broadland District Council at a Council meeting on 28 March 2024. Please see section 5 of this statement for a full breakdown of the adopted and emerging Development Plan.

2.5 Transport Benefits of the Proposed Scheme

2.5.1 Owing to the amount of traffic wishing to traverse the area between the A47 and the A1067/A1270 and the lack of an alternate and viable strategic route to the west of Norwich, we see evidence of how ‘rat-running’ through villages such as Weston Longville and Ringland impacts on residential amenity, quality of life, safety and limits active travel opportunities for local residents.

2.5.2 In consideration of the issues around strategic connectivity in Norfolk LTP4 states:

"Strategic connections are important to Norfolk particularly for its continued economic success. This includes connections to London and Cambridge, and to major gateways like the London airports. These major connections, however, tend to be lengthy due in part to the location of Norfolk, but also because many are not of the same high standard as elsewhere in the UK."

"The county has two major trunk road routes: the A11 and A47. The A47 is a mixture of poor standard single carriageway road and dual carriageways. This leads to inconsistency of standard, creating safety issues, as well as slow and unreliable journeys. Compared to other parts of the country, journey times from other major places to Norfolk are lengthy. The availability of rail is poor, with many places in Norfolk some distance from a rail station. There is also a limited number of destinations available by train from the county. As a result, Norfolk has substantially lower numbers of residents commuting by rail compared to the rest of the UK."

2.5.3 Chapter 4 of the submitted Transport Assessment (Document reference: 4.01.00) states that:

> *"The new road is needed to intercept traffic entering the city on the western edge of Norwich and alleviate pressure from strategic movements through rural communities. 'Reducing the Dominance of Traffic' is part of the Vision set out within the Transport for Norwich Strategy, 2021. The new route would offer improved journey times for residents, businesses, emergency services, and visitors, and deliver economic benefits for local communities."*

2.5.4 The Transport Assessment (Document reference: 4.01.00) states that the Proposed Scheme has been developed to address the problems with the existing transport network as summarised in section 3 above as follows:

- The Proposed Scheme offers a direct link between A47 and A1270 on the west side of Norwich which is suitable for strategic traffic and HGVs;

- Through-traffic in rural communities such as Weston Longville and Ringland is forecast to reduce by 88-95% with the Proposed Scheme in place;
- Journey distances are reduced by about 4.6km per journey for those using B1535 route from A47 to A1270 with the Proposed Scheme in place;
- Journey times are quicker and more reliable for those using B1535 route from A47 to A1270 (a saving of about 6 minutes per vehicle);
- The Proposed Scheme alleviates future junction capacity and safety issues on A1067 at junctions with Marl Hill Road and B1535;
- With through-traffic removed from local villages in the west of Norwich, there are less barriers to walking and cycling and the local network is more conducive to active travel;
- Personal injury collisions are expected to reduce with the Proposed Scheme in place;
- There is forecast traffic reduction on A47 southern bypass east of A11 and south western radial routes into central Norwich (A1174 and B1108) as traffic switches to use available capacity on the A1270 with the Proposed Scheme in place;
- The Proposed Scheme and the proposed viaduct will provide a more resilient transport network versus the existing local road network in the area, which is limited by a small number of crossings or the Rivers Wensum and Tud;
- With the Proposed Scheme in place there would be a more resilient and future proofed highway network available, with contingency in the event future emergency works as a result of flooding such as at the A140 crossing of the River Wensum with the Proposed Scheme providing an alternative route; and

- Traffic flows at A47 junctions on the southern bypass east of A11 are predicted to reduce.

2.5.5 The Transport Assessment (Document reference: 4.01.00) concludes the Proposed Scheme offers a vital new dual carriageway strategic highway route which is designed to be suitable for all vehicles including HGVs and LGVs and is capable of carrying the predicted volumes of traffic that would otherwise continue to use minor rural roads in the west of Norwich to access the A1270 Broadland Northway from the A47.

2.5.6 The implementation of the Proposed Scheme will help to create a more sustainable and resilient transport network for the future which will adequately support forecast traffic levels to 2039 and beyond.

2.5.7 NMU provision would also be enhanced and joined up providing a more extensive network of off-road routes.

2.5.8 A new segregated cycle route and NMU crossing facility would be provided on A1067 connecting to Attlebridge and onward routes to the NCN1 Marriott's Way. A reduction in traffic on minor roads would also assist NMUs with safer active travel opportunities and existing routes will become more attractive and less intimidating for users.

2.5.9 Additionally, a 'monitor and manage' regime is proposed that will be secured via planning condition, so that appropriate traffic mitigation is delivered when shown to be needed to seek to avoid as far as reasonably possible negative impacts to the highway network. Overall, the Transport Assessment (Document reference: 4.01.00) finds that the Proposed Scheme is likely to provide operational and capacity benefits to the wider highway network and responds to the five objectives for the Major Road Network Programme as set out in Table 1 below.

Table 1: How the Proposed Scheme fulfils the objectives of the major road network programme

Objective	How the Proposed Scheme Fulfils the Objective of the MRN Programme
O1 – Reducing congestion	Part 1.2 of the submitted Transport Assessment confirms that the existing highway network to the west of Norwich becomes congested, particularly at peak times. The Proposed Scheme will help to reduce this congestion, particularly at existing junctions with the A47. Strategic traffic modelling undertaken with the Transport Assessment and (Document reference: 4.01.00) that several of the junctions on the A47 southern bypass around Norwich will have improved capacity performance with the Proposed Scheme in place, as traffic is more easily able to divert via A1270 Broadland Northway, with improved access from the west via the Proposed Scheme. Junctions 2A/B (A47 / Taverham Road / Blind Lane, Junction 3 (A1067 Fakenham Road / B1535 Weston Hall Road / Porter's Lane), Junction 4 (Marl Hill Road / The Street / Fakenham Road), and Junction 5 (Church Street / Marl Hill Road / Morton Street) are all seen to benefit from the development of the Proposed Scheme. Based on the results shown within the supporting Transport Assessment and (Document reference: 4.01.00) and with the Proposed Scheme in place, capacity and queueing issues are predicted to be lower suggesting that the Proposed Scheme offers a significant benefit to the operation of these Junctions. Please refer to section 8.2 (Junction Capacity Assessment) of the Transport Assessment and (Document reference: 4.01.00) for full details.

Objective	How the Proposed Scheme Fulfils the Objective of the MRN Programme
O2 – Support economic growth and rebalancing	Part 4.5 of the Transport Assessment confirms that a new link crossing the River Wensum allowing traffic to avoid congestion would substantially enhance the accessibility of a number of existing employment sites, including Norfolk and Norwich University Hospital, the University of East Anglia and Longwater Retail Park and help in improving capacity to support the development of proposed employment sites in the GNLP.
O3 – Support housing delivery	There are several major residential developments identified on the western edge of Norwich which are currently going through the planning process or proposed for site allocation as part of the GNLP. The GNLP was adopted by Broadland District Council at a Council meeting on 28 March 2024. Although not required to facilitate any individual residential development site, Part 4.6 of the Transport Assessment and (Document reference: 4.01.00) confirms that investing in new infrastructure such as the Proposed Scheme will help to unlock capacity in the highway network that will be used by vehicles travelling to and from the new housing sites.

Objective	How the Proposed Scheme Fulfils the Objective of the MRN Programme
O4 – Supporting all road users	As well as reducing congestion and providing greater certainty over journey times for motorists, the Proposed Scheme also supports Non-Motorised Users, including pedestrians, cyclists and horse riders, by incorporating a range of suitable NMU facilities alongside the highway link design. The Proposed Scheme includes new Public Rights of Way and improvements to existing routes, as well as joining up the existing fragmented PROW routes to create a logical and coherent network around the scheme in accordance with the principles of LTN 1/20 and Gear Change policies. A NMU Provision plan is included as Appendix 1 of the Transport Assessment.
O5 – Supporting the SRN.	The Proposed Scheme will provide a direct connection between the SRN (i.e. the A47) and the A1270 through the west of Norwich. It will facilitate orbital movement around Norwich and support the connectivity between the SRN and MRN networks.

2.6 Wider Economic, Social and Environmental Benefits of the Proposed Scheme

2.6.1 Paragraph 7 of the NPPF states that that the 'purpose of the planning system is to contribute to the achievement of sustainable development'.

2.6.2 Paragraph 8 of the NPPF goes onto state that 'Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives: The three overarching objectives are as follows:

- *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.*
- *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- *an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

2.6.3 The three overarching objectives of the planning system as it pertains to achieving sustainable development are not criteria to be used to judge the merits of a proposal. They are however considered to provide a helpful framework to capture the three dimensions of sustainable development and so are adopted below as a useful structure when looking across the wide range of benefits that the Proposed Scheme creates. The benefits of the Proposed Scheme in line with the three overarching objectives of sustainable development are set out at a high level below.

Economic Benefits

2.6.4 Paragraph 85 of the NPPF states that '*Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*'.

2.6.5 In reference to enhancing connectivity and the economic benefits road schemes can render, Norfolk County Council's Local Transport Plan 4 (LTP4) states:

"Good connectivity is vital because when people choose to travel it allows them to easily get to where they need to, whether to work, education or visiting friends and families. Connectivity is especially important for businesses because delays in delivering goods, or unpredictable journey times, cost money. Without good connections to other parts of the country many businesses might not choose to stay in, or move to, Norfolk."

2.6.6 LTP4 goes on to state:

"The British Chambers of Commerce (The Congestions Question: Business Transport Survey, London) found that almost 60% of UK firms consider transport infrastructure as a major influence on their business location, suggesting that physical transport connectivity remains important for businesses….. Evidence reports, such as the A47 Economic Impact Study, completed by WSP Consultants for the A47 Alliance in 2019, show the value of good strategic connections on the major road network. This found that the Alliance's three priority dualling schemes would create an uplift in gross value added from new employment of over £330m, generate over £200m in benefits from enhanced productivity and bring about benefits of £40m in regional markets by reducing delay and congestion and increasing efficiency.".

2.6.7 The implementation of the Proposed Scheme has the potential to catalyse substantial regional economic benefits, acting as a crucial driver for economic development. The impact of the Proposed Scheme will go beyond the infrastructure improvements themselves and will fosters a range of economic advantages for the region. The Proposed Scheme will significantly enhance connectivity, reducing travel time and cut congestion. This improved accessibility will facilitate the movement of goods and services, creating more efficient supply chains within the region, which businesses can seek to capitalise on, and use this added efficiency to reach wider markets, attracting

investments, and expanding their operations. Additionally, the streamlined transportation of goods could lead to cost savings for businesses, ultimately contributing to increased competitiveness and profitability for the Greater Norfolk region.

2.6.8 The enhanced connectivity brought about by the Proposed Scheme will also have a direct impact on employment opportunities. As the Greater Norwich region becomes more accessible, businesses are more likely to establish or expand their operations in these areas, generating a demand for local labour. This, in turn, leads to job creation and reduced unemployment rates. Moreover, improved connectivity attracts skilled professionals who may have been deterred by the lack of efficient transportation options, contributing to a more diverse and skilled workforce in the region.

2.6.9 The economic benefits of the Proposed Scheme are discussed in particular relation to the enhanced access to existing and proposed employment and residential developments as well as to the tourist economy, a key sector for the Norfolk region.

2.6.10 **Enhanced Access to existing and proposed employment sites** – The GNLP includes an allocation of 284 hectares of employment land, with a target of providing accommodation for 33,000 extra jobs for the same period for the Greater Norwich Area as a whole.

2.6.11 The following existing or proposed major employment sites are located to the western side of Norwich city:

- The **Norfolk and Norwich University Hospital** is a key employment site and trip attractor from across Norfolk and the wider region employing around 10,000 staff;
- The **University of East Anglia** is also at the western fringe of the city and plays an important role for employment and education, with about 17,000 students and 3,700 staff based at the campus. The site is co-located with Norfolk and Norwich University Hospital and **Norwich**

Research Park. In addition to the University of East Anglia, the Norwich Research Park has over 115 companies based at the site, with around 30,000 jobs provided in this area;

- **Longwater Retail Park** is also a key trip attractor in the west of Norwich at the junction of the A47 and A1074 – this site offers a wide variety of employment opportunities and caters for food retail with a major supermarket (Sainsburys) located here; and
- A new **Food Enterprise Zone** at Easton was granted via a Local Development Order where up to 50,000sqm development is permitted on a site totalling 19 Hectares adjacent to Blind Lane within 300m of the A47. When complete the Food Enterprise Zone is expected to provide up to 2,000 jobs by 2050 and a host of multiple businesses with a range of complementary uses connected to the agri-food sector;
- **Norwich Airport** is a key asset for the region and focus for economic development that is seeking to increase its passenger numbers from 500,000 in 2017 to 1,400,000 by 2045. Policy 6 ('The Economy') of the emerging GNLP specifically allocates an additional 46.5 hectares of employment land on the northern edge of Norwich Airport that will be focused on aviation related activities. The Airport has growth plans will increase their value to the local economy from £70m to £170m by 2045. This will increase demand from the south and the west for high quality transport infrastructure to assist this growth and improve timely and reliable access to the Airport.

2.6.12 Due to the regional nature of the above sites' catchments, encompassing the North Norfolk coast and key settlements north of Norwich city such as Aylsham, Fakenham, and North Walsham, it is a requirement to cross the River Wensum to access these sites. As noted above there are very limited opportunities for doing this currently. A new link crossing the River Wensum would allow for future traffic congestion to be avoided and would substantially enhance the accessibility of these vital employment sites.

2.6.13 The Proposed Scheme will enhance access from the wider region to these sites specifically as follows:

- The nearest alternative A&E hospital sites to Norfolk and Norwich University Hospital are much further away in Kings Lynn (approximately 54 miles), Bury St Edmunds (approximately 53 miles) and Lowestoft (approximately 35 miles). Emergency service vehicles also need good and uncongested access to the Norfolk and Norwich University Hospital site to achieve suitable emergency response times. As congestion to the west of Norwich city increases, emergency access becomes more challenging and constrained. Hence the additional highway capacity provided by the Proposed Scheme on the western edge of Norwich would facilitate greater emergency access to the hospital site;
- As a major trip attractor, the University of East Anglia and Norwich Research Park would substantially benefit from improved accessibility as a result of the Proposed Scheme both in terms of the highways capacity provided and enhanced journey times along with the proposed connections that the NMU provisions will provide;
- All of the retailers at the Longwater Retail Park have HGV distribution requirements and are located adjacent to the A47 for ease of access to the SRN but deliveries often form part of a longer journey with multiple drop off sites enroute, so orbital connectivity around Norwich, enhanced by the Proposed Scheme would be of benefit. For example, Sainsburys also has a large store in North Walsham, so HGVs could use the Proposed Scheme for access between the two stores instead of using the Outer ring Road or less suitable local roads;
- The Proposed Scheme will be accessible within a 2-minute drive from the Food Enterprise Zone. The Cycle Friendly Routes proposed as part of the wider complimentary sustainable transport measures connect to Easton, passing the Food Enterprise Zone site, enabling enhanced

sustainable access for future workers at the site who live locally. As well as improving access to the Food Enterprise Zone, the Proposed Scheme will provide additional capacity on the local road network to help reduce congestion; and

- The Proposed Scheme will improve strategic access to Norwich Airport.

2.6.14 The Proposed Scheme will provide improve journey times around the west of the city will create stronger and more effective links to the Midlands and the North of England making the region more attractive for investors, commuters and customers with easier access to the above employment sites.

2.6.15 **Supporting Residential Developments** – New residential development helps meet local housing need and stimulates the economy, with new employment and commercial development becoming more viable with increased population. However, the need to tolerate additional development trip generation without mitigation can be detrimental and hinders progress towards attracting economic investment. To counteract this effect investment in new infrastructure such as the Proposed Scheme will therefore unlock capacity and make Norwich more attractive for growth.

2.6.16 The GLNP indicates that central Government targets for housing are likely to result in a requirement for around 49,500 new homes in the Greater Norwich region for the period 2018 to 2038.

2.6.17 There are several major residential developments identified on the western edge of Norwich which are currently going through the planning process or have been allocated as part of the GNLP– see Appendix C of for a summary of relevant allocations.

2.6.18 These allocations offer a total of approximately 4,000 dwellings in the west of Norwich to be developed within 10 years of opening the Proposed Scheme (if permitted). Whilst these sites are not considered to be dependent development, without the Proposed Scheme in place, there would be increased pressure on the highway network in Costessey, Taverham, Easton and Drayton.

2.6.19 The Proposed Scheme will also support the development of employment and residential sites in the area by facilitating access to the Park and Ride sites on the western edge of Norwich at Costessey and the Airport by linking the two radial corridors into Norwich; the A1067 and A47 on the western side of the city and allowing Park and Ride traffic to avoid the outer ring road. Both Park and Ride sites serve different destinations. The Costessey Park and Ride site serves the Norfolk and Norwich University Hospital, University of East Anglia and Norwich Research Park sites whereas the Airport Park and Ride site operates to Norwich city centre. The Proposed Scheme will enable some of the traffic accessing these Park and Ride sites to avoid the Outer Ring Road on the western side of Norwich (also known as Sweet Briar Road A140). For example, those living north of the city wishing to access the Norwich University Hospital, University of East Anglia and Norwich Research Park sites could in future drive to Costessey Park and Ride site via the Proposed Scheme. These major employment sites already have significant pressures on car parking, so offering more efficient access to Costessey Park and Ride would help to intercept more vehicle trips at the edge of Norwich city.

2.6.20 **Supporting the Cambridge Norwich Tech Corridor** - By addressing the strategic connectivity gap in the road network between the A1067 and the A47 to the west of Norwich, the Proposed Scheme will substantially enhance the accessibility of key sites including the Food Enterprise Zone, University of East Anglia, Norwich Research Park and Norwich Airport, all identified as forming part of the Cambridge Norwich Tech Corridor. The Proposed Scheme will also complete the orbital route around Norwich further enhancing the highway network in the region. This will support the strategic growth of the Cambridge Norwich Tech Corridor.

2.6.21 **Supporting the Coastal Visitor Economy** – According to 'Written evidence submitted by North Norfolk District Council to the DCMS Select Committee – Call for Evidence Impact of COVID-19 on Tourism Sector' North Norfolk is heavily dependent on the visitor economy, which in 2018 comprised 29% of the district's employment, generating £511m from 9.6m trips. The visitor

economy is critical to the sustainability of retail and hospitality businesses in and around the district's seven market and resort towns.

2.6.22 The North Norfolk coast is a popular UK tourist destination, attracting trips from the East of England, the wider southeast, the Midlands and London. Many of these trips have origins to the south and west of Norwich and destinations north of Norwich which would be well served by the Proposed Scheme connecting the A47 and A1270 Broadland Northway to more efficiently connect to the A140 which takes traffic north of the city to the coast.

2.6.23 In summary, the Proposed Scheme has the potential to deliver a range of economic benefits, in both the short and long term. From increased business competitiveness and job creation to stimulating local economic activity and attracting investments, the positive impacts reverberate throughout the region, supporting growth and prosperity in the Greater Norwich region.

2.6.24 It is therefore considered that the Proposed Scheme is consistent with the overarching economic objective of sustainable development as set out in the NPPF 2023 in terms of supporting employment and housing growth as set out in the GNLP.

2.6.25 Furthermore, the construction and maintenance of the Proposed Scheme will generate an increase in economic activity in the area, albeit modest. Local businesses, including construction firms, material suppliers, and service providers, experience increased demand for their products and services. This injection of capital into the local economy has the potential to stimulate growth as the Proposed Scheme will create a number of jobs both directly and indirectly, which is strongly supported in planning terms and is a strong material consideration in favour of the Proposed Scheme.

Social Benefits

2.6.26 In terms of social benefits, the Proposed Scheme will help support the promotion of healthy communities by providing significantly improved amenity for the communities affected by existing patterns of traffic.

2.6.27 As the Proposed Scheme will lead to the reassignment of trips away from areas of congestion and low capacity and move this traffic onto a more appropriate and faster route, traffic reduction through these villages will help make the network more suitable and attractive for walking and cycling and would help to promote active travel, which is consistent with improving quality of life.

2.6.28 The Proposed Scheme will also reduce rat running through the rural villages to the west of Norwich, by reducing and removing congestion and relocating those larger vehicles that are passing through the area and which are not suited to the smaller roads currently being used. This will have the knock-on effect of further increasing safety in the local communities currently impacted, whilst also improving ambient noise and air pollution levels.

2.6.29 The Sustainable Transport Strategy (Document reference: 4.02.00) has been developed through public and key stakeholder consultation, seeking to maximise opportunities for transferring shorter distance band trips to non-motorised modes of travel such as walking and cycling where possible. The Sustainable Transport Strategy is three-fold – it includes a NMU provision, wider interventions for creating cycle friendly routes and a bus strategy.

2.6.30 The NMU provision predominantly consists of ProW diversions and extension of the ProW network in the immediate vicinity of the alignment of the Proposed Scheme, which also helps to mitigate severance issues caused by the alignment, where existing routes are to be closed. The proposed NMU provision also assists with joining up what was found to be an existing but fragmented local ProW network with limited coverage and in some cases poor connectivity to existing settlements.

2.6.31 Section 4.13 of the Transport Assessment (Document reference: 4.01.00) sets out how an assessment of the Proposed Scheme in terms of providing a more suitable environment for cycling has been undertaken in line with LTN1/20 (Cycle Infrastructure Design) Guidance, link to the Department for Transport Cycle Infrastructure Design. Annual Average Daily Traffic (AADT)

flow plots were derived from the strategic modelling undertaken as part of the traffic modelling for the Proposed Scheme for the following three scenarios in the 2029 opening year:

- Do Minimum (without Proposed Scheme);
- Do Something (with the Proposed Scheme); and
- Do Something + Mitigation (with the Proposed Scheme and additional traffic mitigation measures).

2.6.32 The LTN 1/20 (Cycle Infrastructure Design) threshold analysis indicates that in the 2029 opening year there will be changes in AADT flows which are predicted to become more attractive for cycling in the Do Something or Do Something + Mitigation scenarios. These include routes through Taverham and Costessey, Ringland and Wood Lane. When the proposed mitigation is added, there are further reductions in Felthorpe and the north of Wymondham (amongst other routes).

2.6.33 This will support a modal shift and more people cycling and walking as a result of the Proposed Scheme.

2.6.34 There are also social benefits related to a reduction in accident impacts to the potential for the reduction of traffic along the route of the Proposed Scheme. As set out in sections 3.2.23 to 3.2.27, accident cluster sites within the study area of the Proposed Scheme have been reviewed and considered in the Transport Assessment (Document reference: 4.01.00). The Proposed Scheme has been designed to improve safety for all users by offering a new high standard road which has a straighter and more suitable alignment geometry than existing minor roads in the west of Norwich.

2.6.35 By ensuring that enhanced access to the employment developments noted in section 3.4.8 and the development of the major residential developments in the area is supported by enhanced highways capacity and NMU provisions as set out in Sections 3.4.9 to 3.4.11, the Proposed Scheme will support the

health, social and cultural well-being of existing and proposed communities in line with paragraph 8 of the NPPF.

2.6.36 The social benefits are therefore considered to be strongly supported in planning terms and represent a strong material planning consideration in favour of the Proposed Scheme.

Environmental Benefits

2.6.37 The support for sustainable transport set out in the Section 9 of NPPF, needs to be weighed against other policy factors within the NPPF including the environmental impact of the Proposed Scheme.

2.6.38 The selected route option (see Chapter 4 of this Statement) has been chosen to ensure that the works do not affect the integrity of the River Wensum SAC.

2.6.39 Environmental mitigation that is proposed as part of the development of the Proposed Scheme, seeks to minimise adverse environmental impacts arising from construction whilst also aiming to minimise impact of the Proposed Scheme.

2.6.40 At a high level the Proposed Scheme is likely to result in enhanced amenity within the local villages and rural areas that are currently experiencing the transport issues as set out in section 3.4 of this Statement and so contribute to improved quality of life for local residents.

2.6.41 A net increase in biodiversity has been assessed to occur following development of the Proposed Scheme. The Proposed Scheme has followed the mitigation hierarchy to avoid losses in biodiversity and achieve a positive outcome where possible for BNG and adopts the applicable hierarchy of avoiding adverse effects where possible, mitigating those impacts that are unavoidable, and compensating those impacts that cannot be mitigated.

2.6.42 The Proposed Scheme is predicted to achieve a quantifiable 10.97% increase in BNG outcome for the non-excluded habitats using Metric 3.1 and a provisional 11.58% based on copying the 3.1 data into the Statutory Metric.

2.6.43 The full environmental impact of the Proposed Scheme has been assessed as part of the EIA process and reported in the ES (Document reference: 3.01.00) that accompanies the application. The environmental impacts including both the reported adverse and beneficial effects are considered further in Chapter 6 of this Statement and the planning balance and conclusions in Chapters 7 and 8 of this Statement.

2.7 Summary need for Proposed Scheme

2.7.1 The lack of a strategic link road to the west of Norwich results in an inappropriate level of traffic on the local road network, seeking to make the connection between the A47 and the A1067/A1270. This has an adverse impact on the amenity of those living in the area, as evidenced by the Transport Assessment (Document reference: 4.01.00) and baseline reporting in the ES (Document reference: 3.01.00), with this understanding of impacts being supported and demonstrated by the public consultation events that have been carried out in the area over a number of years.

2.7.2 As well as tackling the issues that local residents are currently experiencing, the Proposed Scheme will also address the strategic connectivity gap to the west of Norwich and will provide additional capacity and resilience in the local road network that is modelled to improve journey times and reliability.

2.7.3 The Proposed Scheme will both address the existing issues in the road network as well as provide capacity to help support the delivery of the proposed economic development that is contained in the GNLP. The planned growth will logically increase existing pressure on the road network to the west of Norwich.

2.7.4 The evidence from the various public consultations that have been undertaken is that there is public support in the local area for tackling issues on the local road network to the west of Norwich.

2.8 Summary Benefits of the Proposed Scheme

2.8.1 The Proposed Scheme benefits are summarised as follows:

Transport Benefits

2.8.2 It is considered that the Proposed Scheme will:

- Address the strategic connectivity gap in the road network between the A1067 and the A47 to the west of Norwich;
- Reduce congestion and provide greater certainty over journey times for motorists;
- Enhance the local transport network for pedestrians, cyclists and horse riders, by incorporating a range of NMU provisions alongside the highway link design;
- Improve the resilience of the highway network in the area to the west of Norwich. The transport network in the area is currently constrained by limited bridge crossings and areas of the network are prone to flooding resulting in significant rerouting during flood events;
- Reduce forecast traffic on the existing local road network allowing for a range of wider 'Complementary Sustainable Transport Measures' that the Applicant would seek to pursue at a more strategic level. These include measures for improved walking, cycling and public transport, which will be brought forward by the Applicant and in partnership with bus operators outside of the Proposed Scheme for which planning permission is sought.

2.8.3 The supporting Sustainable Transport Strategy (Document reference: 4.02.00) also includes Cycle Friendly Routes and a Bus Strategy, with further details provided in chapter 9 of the supporting Transport Assessment (Document reference: 4.01.00). The Cycle Friendly Routes and the Bus Strategy are collectively known as the Complementary Sustainable Transport Measures (CSTM). NCC as Local Highway Authority will bring forward these elements once the Proposed Scheme is in place and there is reduced traffic on the surrounding highway network. The opening of the Classified Road is

expected to facilitate improved conditions for active travel and bus movement in preparation for the CSTM items to be implemented.

Economic Benefits

2.8.4 Although not required to facilitate any individual developments, investing in new infrastructure such as the Proposed Scheme will help to unlock capacity in the highway network that will be used by vehicles travelling to and from existing and proposed housing and employment sites.

2.8.5 This will support economic activity in Norfolk by reducing transport journey times and so costs, opening up new markets and increasing productivity through quicker and more reliable journeys.

2.8.6 A number of the employment sites identified in section 3.6.9 include keys sites that form part of Cambridge Norwich Tech Corridor. Enhanced access to these sites will attract further labour and skills along with investment to the area supporting the wider growth of the Norwich region and enhancing Norwich's position as the regional capital.

2.8.7 In summary, the Proposed Scheme has the potential to deliver a range of regional economic benefits, in both the short and long term, including the increased potential for job creation and stimulation of the local economy.

Social Benefits

2.8.8 As the Proposed Scheme will lead to the reassignment of trips away from areas of congestion on the local road networks, moving this traffic onto a more appropriate and faster route, traffic reduction through local villages and rural areas will help make the network more suitable and attractive for walking and cycling and would help to promote active travel, which is consistent with improving quality of life.

Environmental Benefits

2.8.9 At a high level the Proposed Scheme is likely to result in enhanced environmental amenity within the local villages and rural areas that are

currently experiencing the transport issues as set out in section 3.4 of this Statement and so contribute to improved quality of life for local residents.

2.8.10 A net gain in biodiversity has been assessed to occur following development of the Proposed Scheme.

3 Scheme Development and Options Considered

3.1 The Need for a New Strategic link Road

3.1.1 The possibility of creating a strategic link road to connect the west of Norwich to address capacity issues and foster the role of Norwich as a regional capital has been considered over a number of years.

3.1.2 The Norwich Area Transportation Strategy, link to the Transport for Norwich Strategy website. (NATS) published in October 2004 included a Norwich Northern Distributor Road ('NNDR') which '*could comprise a dual carriageway road around the north of Norwich from the A47 at Costessey in the west to the A47 at Postwick in the east*', that would include the route of the Proposed Scheme, as a '*key element*' of the Strategy. The NNDR that connects the A47 to the east of Norwich to the A1067 to the west was fully open to traffic in April 2018 and is now known as the A1270 'Broadland Northway'.

3.1.3 Since 2004 a number of studies have been undertaken as part of the iterative design process for the Proposed Scheme. As part of the development of the Proposed Scheme and the selection of the preferred option that forms the basis of this application for full planning permission, a number of alternative options were considered as part of these studies. As part of this iterative design process, engagement and consultation was undertaken with both statutory bodies such as the Environment Agency and Natural England along with consultation with the wider public to inform option selection.

3.1.4 A more detailed description of the reasonable alternatives (the options) that have been considered by the Applicant, together with the principal reasons for proceeding with the preferred option is set out in Chapter 4 of the ES (Document reference: 3.04.00). A summary of this is set out below.

3.2 A47-A1067 Western Link Road Scoping Study 2014

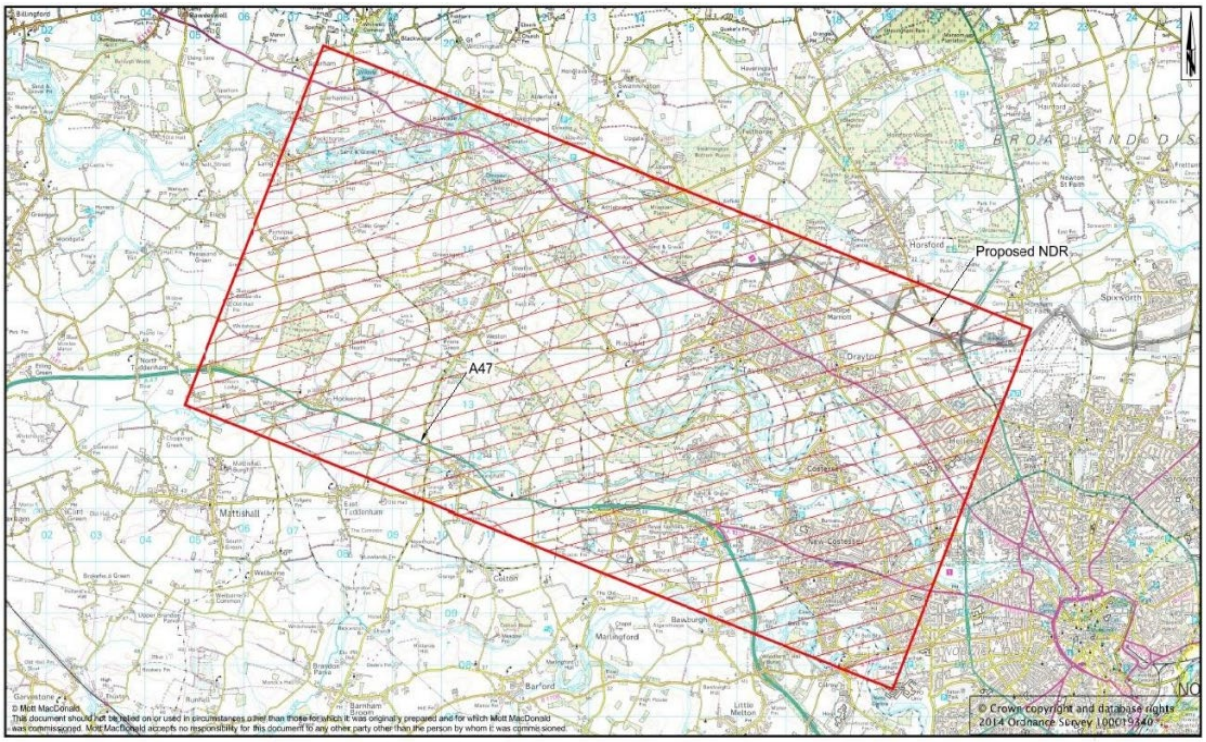
3.2.1 A study undertaken by Mott MacDonald, the '*A47-A1067 Western Link Road Scoping Study,* link to the A47-A1067 Western Link Road Scoping Study, was

published in October 2014. Part 1.1 of the study identifies that delivery of the Proposed Scheme:

> *'Could have additional benefits for the Norwich sub-region through further enhancing strategic connections and addressing specific concerns expressed by Members of NCC in respect of:*
>
> - *The desire to provide relief to existing traffic problems in the Taverham/Costessey Ringland and Weston Longville/Hockering areas. These problems relate principally to the long-standing adverse impacts of through traffic on the local road network; and*
> - *The desire to improve access to the Queens Hills residential development, currently served from a single access through the Longwater Employment Area, to the A47/A1074 Longwater Interchange. This junction suffers from congestion at peak times affecting both residential and business users.'*

3.2.2 A Scoping Study was subsequently undertaken to investigate potential route options for the Proposed Scheme within the study area identified in Figure 1 below.

Figure 1: Study Area - A47-A1067 Western Link Road Scoping Study 2014



Source: Mott MacDonald

3.2.3 The options considered included Public Transport Only and a number of different routes that considered different direct and indirect connection routes.

3.2.4 To inform the sifting process, a desk-based study was carried out to map environmental constraints. The impact of alternative routes on traffic patterns, and in particular existing local roads between the A47 and A1067, was examined using the Norwich Area Transport Strategy (NATS) transport model, against a baseline of growth assumptions and measures contained in the Joint Core Strategy for Broadland, Norwich and South Norfolk (2011).

3.2.5 Appendix E of the Scoping Study 2014 relating to a set of Scheme Specific Objectives rated the options using a RAG (Red/Amber/Green) rating. The Public Transport Option scored Red or Amber for all of the objectives. In particular, it would not have offered connections to the strategic road network, would have little impact on strategic traffic on local routes and would not facilitate delivery of housing.

3.3 Norwich Western Link Technical Report 2016

3.3.1 NCC subsequently set up a Members' Working Group in late 2014 to further consider the possibility of a new link road over the Wensum Valley, link to the Member Working Group meeting document.

3.3.2 In June 2016 the Norwich Western Link Technical Report that had been undertaken by Mouchel was published, link to the Norwich Western Link Technical Report, released in June 2016. The report considered the strategic background to the NWL project link, the strength of the evidence supporting it, the gaps in the appraisal to date, and the possible difficulties in delivering a scheme.

3.3.3 The report reviewed the routes from the A47-A1067 Western Link Road Scoping Study 2014. The route options were considered to fall within three broad corridors defined as within western, central and eastern corridors, and concluded that a central option was likely to offer the preferred corridor because:

- It would provide the most direct link between the NDR and A47 and therefore deliver the greatest transport benefit for strategic traffic;
- The eastern options had become limited by the (subsequently constructed) Queen's Hills developments; and
- The western options did not appear to achieve the stated objectives.

3.3.4 Using the A47-A1067 Western Link Road Scoping Study 2014 as a basis for discussion, meetings were held with both the Environment Agency and Natural England during summer 2016. The impact of the crossing of the River Wensum was the primary concern for both the Environment Agency and Natural England.

3.3.5 The report concluded at paragraph 11.2 that: '*There are good reasons for believing that a NWL would help to address the traffic problems identified by local people and stakeholders, and improve connectivity for all modes. There*

are a number of possible alternative routes, and enough work has been done to suggest which of these might be most effective.'

3.3.6 The presence of '*very significant environmental challenges in finding an acceptable engineering solution*' were noted, although it was concluded that they '*did not appear to be a complete "showstopper", based on recent consultations*'.

3.4 Norwich Western Link Technical Report 2017

3.4.1 A further Technical Scoping Report (Norwich Western Link Technical Report 2017) was published by WSP in October 2017 which identified the case for, and viability of, a new road connection between the A47 and A1067, link to the Norwich Western Link Technical Report, released in October 2017.

3.4.2 The report primarily considered the provision of a new link road from the A1067 to the A47 west of Norwich within a preferred 'central corridor' as suggested in the Norwich Western Link Technical Report 2016.

3.4.3 The report identified 13 preliminary engineering solutions to carry the alignment across the River Wensum Valley including a tunnel. The four potential options that could deliver the most appropriate solution for crossing the River Wensum and floodplain were presented to Natural England and the Environment Agency in July 2017. Both the Environment Agency and Natural England were supportive of the progress that had been made with the potential options since consultation in 2016, and continued liaison during the adoption of a preferred alignment was recommended.

3.4.4 The report confirmed that proposed development aspirations for the area were likely to increase demand on the road network and that, without intervention, this increased demand would have a negative impact on network performance resulting in greater increases in queueing and travel times.

3.4.5 It also concluded that an increase in through-traffic and HGVs travelling on local roads unsuited to such movements may impact on quality of life for

those living and working adjacent to these local corridors, link to the Norwich Western Link Technical Report, released in October 2017, paragraph 3.8.

3.5 Norwich Western Link Option Assessment Report March 2019

3.5.1 The Norwich Western Link Option Assessment Report published in October 2018 and updated in March 2019 built on the above and considered a range of possible interventions on the highway network to the west of Norwich, including highway and traffic management measures, walking and cycling improvements, public transport enhancement, and development of green infrastructure / open spaces.

3.5.2 The report considered both individual interventions and a combined package of public transport improvements so that the full range of potential benefits could be assessed.

3.5.3 Initially the report considered a wide range of interventions across all transport modes throughout the study area which comprised the land between the A47 and A1067 to the west of Norwich. A range of 82 options were generated which included a range of travel modes, approaches, and scales of option as a potential means of addressing the issues in the study area. This list included both infrastructure and non-infrastructure interventions and improvements and the Do-Nothing scenario.

3.5.4 The 82 options identified were then assessed using the Department for Transport's (DfT) Early Assessment and Sifting Tool (EAST) which has been designed to assess and compare all types of transport-related options, packages, strategies, and plans. EAST is designed to be used across a range of transport modes and geographies and is the primary mechanism for evaluating options against a number of assessment areas relevant to the decision-making process. The sift was arranged to be consistent with the DfT's Transport Business Case principles, based around the best practice five-case model approach (e.g. Strategic, Economic, Managerial, Financial and Commercial). Due to the sensitive nature of the study area (notably the presence of the SAC/SSSI), in terms of environmental considerations, an

additional sixth assessment topic covering 'environmental' was added to support the EAST assessment. The options appraisal was expanded to consider a total of seven environmental factors which was consistent with later stages of the business case process.

3.5.5 The 82 options were scored against the six assessment topics (strategic, economic, managerial, financial, commercial, and environmental assessment topics) and a two-stage sifting process was undertaken. The first stage involved the removal of options which failed to perform at least as well as the "Do Nothing" option when compared against all assessment topics. The Do Nothing option included no new infrastructure.

3.5.6 The 82 options were sifted and assessed against the Scheme Objectives and a series of environmental criteria. Any option assessed as performing worse than the 'do nothing' scenario was then discounted, leaving 34 options remaining.

3.5.7 These remaining options comprised 22 new link highway options, five network improvement schemes, three active travel options, three public transport options and a freight option.

3.5.8 The option assessment considered three tunnel options (cut and cover, bored and mined) in relation to the River Wensum area. The report concluded that a tunnel solution should be discounted at this stage due to potential severance of the groundwater table, high cost, high maintenance, and lack of space between the River Wensum and the A1067 resulting in a longer distance and reduced transport benefits.

3.5.9 The option assessment resulted in a viaduct option being chosen for all new link road options that would cross the River Wensum.

3.5.10 Single carriageway options were also considered and discounted due to the lack of additional capacity that they would provide. Discounting the single carriageway options removed a further eight options, resulting in a total of 26 options. The remaining options were subsequently re-categorised into "Non-

Highway Options", "New Link Highway Options" and "Existing Link Upgrade Options".

3.5.11 Non-highways options generally scored lower than the highways options in Stage 1 which indicated that individually, non-highway options were less likely to achieve the Specific Objectives than highway options. For this reason, it was decided that the ten remaining non-highway link options could be part of a wider package that could be considered as supplementary measures to accompany the shortlisted highways options.

3.5.12 The new highway link options were taken forward because they performed significantly better against the specific objectives. However, a further sifting exercise was required to further refine the remaining 16 options. The report assessed that a dual carriageway bridge option to connect the A47 to the A1067 would deliver '*high*' value for money, link to the Norwich Western Link Technical Report, released in October 2017, paragraph 5.3.3. At the same time that the report was published, the EDT Committee resolved to further develop the Proposed Scheme based on the conclusions of the Options Assessment Report.

3.5.13 Following the sifting process, a shortlist of options consisting of three new highway link options, one existing link upgrade and 10 non-highway options were shortlisted.

3.5.14 The sifting process concluded that whilst initiatives to encourage greater use of more sustainable modes of travel are an integral part of the overall approach, such initiatives on their own could not realistically be expected to address the transport issues arising to the west of Norwich and that only a road-based intervention had the ability to cater for the full range of vehicular journeys passing through the area.

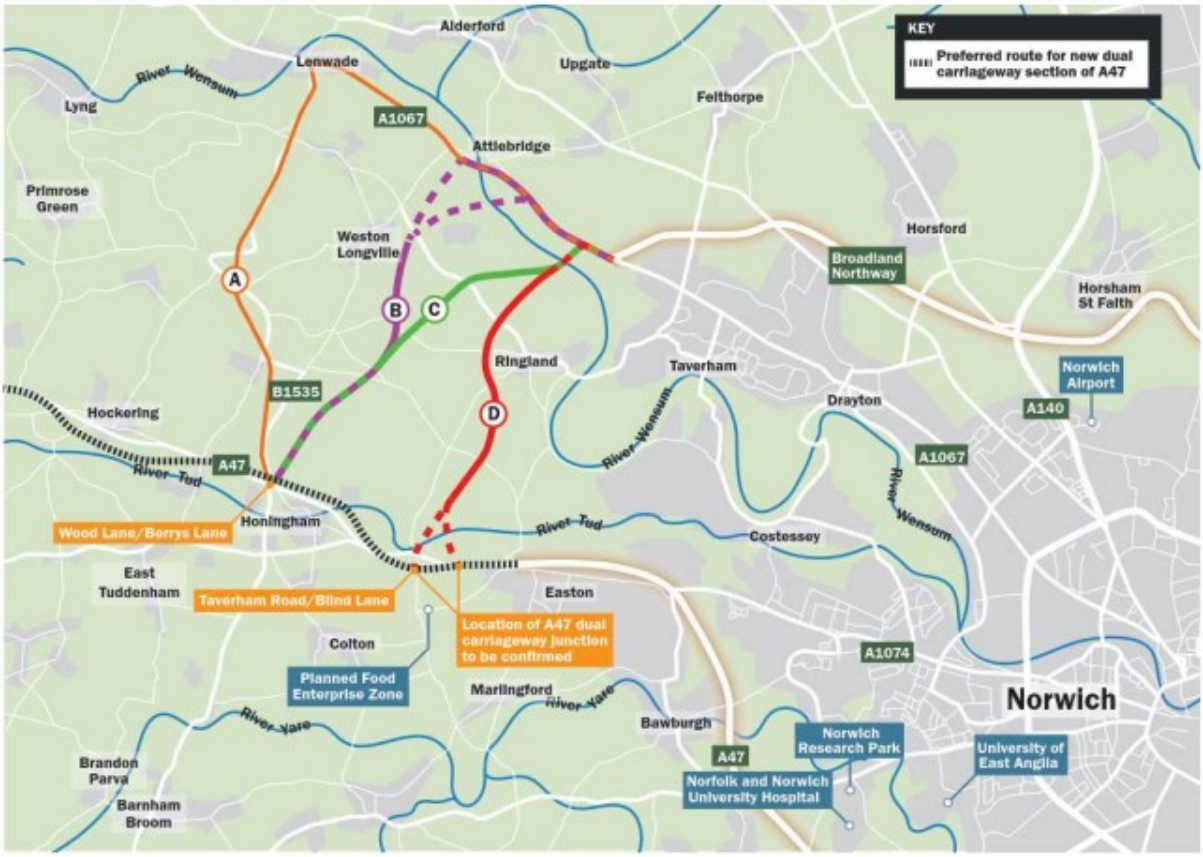
3.6 Norwich Western Link Road Option Selection Report (2019)

3.6.1 Subsequently an extensive study examining possible interventions on the highway network to the west of Norwich was undertaken, which is recorded in

the Norwich Western Link Road Option Selection Report (OSR) was published in February 2019, link to Norwich Western Link Options Selection report.

3.6.2 Four road-based options were identified based on the analysis of the three shortlisted highways corridors as identified in the OSR and Figure 2 below.

Figure 2: Short Listed Route Options



3.6.3 Within the OSR each option was assessed against the strategic and local objectives in addition to using the following criteria:

Engineering

3.6.4 An assessment of each shortlisted option in respect of land constraints, utilities interface, topography, tie in with the A47, departures from Design Manual for Roads and Bridges (DMRB) standards, drainage design and structural requirements.

Cost

3.6.5 A total project cost was estimated for each option combining an estimate for base construction cost and a quantitative risk value for each option.

Traffic and Economic Assessment

3.6.6 Traffic modelling was undertaken using the 2015 NATS model to assess the impact of proposed infrastructure associated with each of the shortlisted options. At the time of preparing the OSR, the modelling was considered to be suitable for relative comparison of options, to inform the selection of a preferred option.

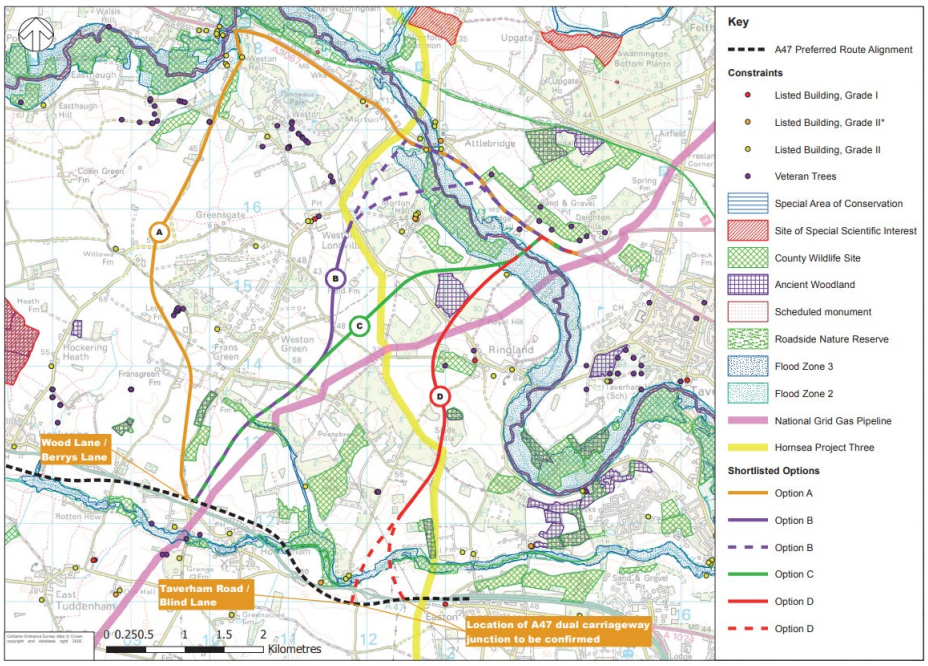
3.6.7 DfT WebTAG methodology was used to inform an economic appraisal with an adjusted benefit cost ratio (BCR) calculated for each shortlisted option to determine the respective value for money. The traffic modelling was also used to inform the environmental appraisal for noise, air quality and greenhouse gases.

Environment (including Biodiversity)

3.6.8 An assessment of the noise, greenhouse gas, historic environment, water environment, geology & soils, landscape, air quality and biodiversity impacts of each option. The OSR assessment was carried out in accordance with the DfT's TAG Unit A3 (Environmental Impact Appraisal – December 2015) guidance and was a desk-based appraisal supported by site surveys. Known statutory designated environmental constraints at the time of the OSR were also taken into account as part of the option selection process.

3.6.9 The environmental constraints identified in Figure 3 below, were also considered.

Figure 3: Proposed Scheme Environmental Constraints



Feedback from public consultation on shortlisted options

3.6.10 Two rounds of public consultation were undertaken presenting the shortlisted options to members of the public, affected landowners and key stakeholders. An analysis of questionnaire responses and more detailed narrative on responses from stakeholders was completed to determine the level of support for each of the shortlisted options.

3.6.11 Following the consultation, the options were presented to NCC Cabinet with a recommendation for a preferred route, and a preferred route (Option C) for the Proposed Scheme was announced in July 2019, link to the 15th July 2019 Cabinet Meeting, document website, as illustrated in Figure 4, below.

Figure 4: Norwich Western Link Preferred Route

3.7 Alignment Refinement Appraisal Report 2022

3.7.1 Following the identification of a preferred route, a refinement exercise was carried out to consider multiple refinement alignments of Option C at its northern end. This was necessary in order to seek to avoid impacts on a barbastelle bat roost at Rose Carr (located at the northern end of the Proposed Scheme), which was identified following surveys carried out as part of scheme development post the OSR stage.

3.7.2 Bats and their roosts are afforded legal protection, pursuant to the Habitats Directive and the Conservation of Habitats and Species Regulations 2017 and so in this context, refinements to the route were considered to avoid impacts to this maternity roost.

3.7.3 An alignment refinement exercise (reported in the Alignment Refinement Appraisal Report 2022 (Document reference 3.04.03) was undertaken where seven alignment refinement options were created and subject to an appraisal in line with the criteria applied in the OSR 2019. The seven refinement options were considered against a number of environmental criteria comprising:

- The requirement to avoid the barbastelle bat roost at Rose Carr;

- Impacts on The River Wensum SAC and the River Wensum as a Water Framework Directive Waterbody;
- The location of ancient woodland (identified through the Ancient Woodland Inventory);
- Further biodiversity constraints;
- The historic environment, in particular the Barn 50m north of Low Farmhouse (Grade II Listed structure), and
- Residential property locations.

3.7.4 On balance of all these factors, refinement Option 4 was selected as the most suitable alignment refinement of the Preferred Route.

3.8 Review of OSR Conclusions in Light of 2022 Alignment Refinement

3.8.1 Following this refinement, an exercise was undertaken to consider the performance of that refined option against the options previously considered at the OSR stage, to ensure that the conclusions of that earlier process still held true following the refinement to the chosen Option C route corridor (Document reference: 3.04.03 Appendix 4.3).

3.8.2 This exercise considered the same factors that were explored at the OSR stage, utilising the OSR methodology, including fit with scheme objectives, and the key relevant environmental factors such as biodiversity, bats, heritage, carbon and impacts to arboriculture.

3.8.3 The conclusions of this exercise (Document Reference: 3.04.03) were that the Refined version Option C remains the best option in overall terms.

3.9 Design Evolution

3.9.1 Careful consideration of environmental constraints has also informed the development of the engineering and environmental design within the chosen route. This is explained further in the Design Evolution Report (Document Reference 3.04.05) which explains how key features within the design, such

as the viaduct, green bridges, underpasses and how the Proposed Scheme passes through woodland, have sought to ensure that biodiversity (including bats) and woodland are protected as much as is possible, whilst also ensuring that the objectives of the scheme are able to be met.

3.9.2 Furthermore, the Ancient and Veteran Trees Avoidance Alignment Optioneering Report (Document reference 3.04.04) sets out how the Proposed Scheme has sought to minimise its direct impacts to Ancient and Veteran Trees and why seven such features are unable to be avoided. This is explained further in section 6.5 of this Statement.

3.10 Public Consultation as part of the optioneering process

3.10.1 The need for the Proposed Scheme and potential options for addressing the traffic issues to the west of Norwich have been the subject of a number of public consultations that have taken place over a number of years. A full Statement of Community Involvement (Document reference: 1.03.00), setting out details of these consultations, has been submitted with the Planning Application in addition to a Pre-application Planning Consultation Report (Document reference: 5.01.00).

3.10.2 The initial public consultation for the revised NATS that took place in 2003 showed there to be strong support (78% of people who responded) for transport improvements to the north and west area of Norwich, including for the principle of connecting the A47 in the west of Norwich to re-join the A47 at Postwick, in the east, which would involve the Proposed Scheme's route.

3.10.3 In March 2016 public consultation events were undertaken in Costessey and Weston Longville which established that local residents were experiencing a range of issues with the volume of traffic using local rural roads to the west of Norwich.

3.10.4 NCC subsequently undertook another public consultation which ran from May 2018 to July 2018. This consultation was intended to establish people's

experience of living in, and travelling through, the area to the west of Norwich and to gauge residents' views on possible solutions to these issues.

3.10.5 A total of 4,426 website visitors were recorded with 2,327 comments received. The results demonstrated that respondents perceive the roads in the area to be unsuitable for the current levels and type of traffic (1,395 respondents), with rat-running (1,103 respondents) and slow journey times (1,001 respondents) identified as significant issues.

3.10.6 When asked which options they wanted the council to consider tackling transport issues in the area, 86% of respondents selected the option of a new road link to connect the A47 with the A1270 Broadland Northway.

3.10.7 Of the available options, there was a clear preference for developing a new road between the A1270 and A47 in order to tackle the transport issues highlighted in the area (1,492 respondents), which was selected by more than three times as many people as the next most popular option of improving the existing roads (which was supported by 473 respondents).

3.10.8 A further round of public consultations commenced on 26 November 2018 following the shortlisting of different options for the Proposed Scheme's route in winter 2018/19. A series of public events were also held in late 2018, prior to the Christmas break and after the holidays in January 2019. During this consultation, 77% of respondents either agreed or mostly agreed there was a need for the Proposed Scheme.

3.10.9 A Local Access Consultation ran for eight weeks between 27 July 2020 and 20 September 2020. This consultation asked for people's views on how NCC could best support people to walk, cycle and use public transport in the area to the west of Norwich, and for opinions on proposals for local roads that cross the planned NWL, as well as for Public Rights of Way in the vicinity of the new road. The views expressed in this consultation has informed the development of the STS.

3.10.10 As part of a stakeholder engagement programme that took place in December 2020 as part of the submission of the Outline Business Case, the following

individuals and organisations wrote in support the principle of the Proposed Scheme:

- Broadland District Council;
- South Norfolk Council;
- Breckland Council;
- North Norfolk District Council;
- New Anglia Local Enterprise Partnership;
- Norfolk Chambers of Commerce;
- First Eastern Counties Buses;
- Norfolk Constabulary;
- Norfolk and Norwich University Hospital;
- The Road Haulage Association;
- Norwich Research Park;
- Norwich Airport;
- Chantry Place (formerly Chapelfield shopping centre); and
- Food Enterprise Park at Easton.

3.10.11 The Norwich Western Link Pre-Planning Application Public Consultation took place in August 2022 for eight weeks including more details on the design of the route, including the viaduct over the River Wensum, as well as complementary measures being proposed as part of the project.

3.10.12 Please refer to the supporting Statement of Community Involvement (Document reference: 1.03.00) and Pre-Application Consultations Report (Document reference: 5.01.00) for further detail as to the findings.

4 The Development Plan and Material Considerations

4.1 Introduction

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Its states that:

> *'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.'*

4.1.2 This chapter of the Statement therefore sets out the Development Plan policies that are relevant to the determination of this application for full planning permission.

4.1.3 It also identifies the material considerations that may be considered relevant to the determination of this application in light of the benefits and impacts of the Proposed Scheme.

4.1.4 This chapter of the Planning Statement categorises and groups the applicable policies in under the following headings:

- The Development Plan;
- Other Relevant Policy;
- National Policy; and
- Statutory Requirements

4.2 The Development Plan

4.2.1 The Proposed Scheme is wholly located within the administrative area of Broadland District Council (BDC).

4.2.2 Local planning authorities must review and produce an up-to-date Development Plan to guide growth in their area. In the Greater Norwich area,

Broadland District Council, Norwich City Council and South Norfolk Council have worked together to produce a new joint strategic plan, the GNLP. This also includes working closely with Norfolk County Council and the Broads Authority.

4.2.3 It is noted that GLNP was submitted to the Secretary of Stage for independent examination in July 2021, has gone through examination 2021 to 2024, with main the modifications consulted on in late 2023.

4.2.4 An independent inspector's report was prepared to assess the soundness and legal compliance of the GNLP, with the report concluding that the plan is sound and can be adopted as part of the local plans for Broadland, Norwich, and South Norfolk, subject to the inclusion of the recommended main modifications, link to the Report on the Examination of the Greater Norwich Local Plan.

4.2.5 The adoption of the GNLP has been considered by the relevant local planning authorities on the following dates:

- The GNLP was adopted by Broadland District Council at a Council meeting on 28 March 2024.
- The GNLP was adopted by South Norfolk Council at a Council meeting on 25 March 2024.
- The GNLP was adopted by Norwich City Council at a Council meeting on 12 March 2024.

4.2.6 The newly adopted GNLP-supersedes the previously adopted Joint Core Strategy DPD 2011 and the Site Allocations DPD for the BDC area. The majority of the undeveloped sites in the Site Allocations DPD are re-allocated through the GNLP.

4.2.7 The GNLP does not replace existing adopted Area Action Plans (AAPs) for Long Stratton, Wymondham and the Growth Triangle, though in some cases additional allocations have been made through the GNLP in these areas. The GNLP will be used in conjunction with the adopted AAPs, Development

Management Plans for the local planning authorities, to assess development proposals.

4.2.8 Therefore, the relevant Development Plan for this application is considered to consist of the following documents:

- The Greater Norwich Local Plan (2024);
- The Development Management DPD (2015); and
- The Norfolk Minerals and Waste Development Framework.

Greater Norwich Local Plan (2024)

4.2.9 The GNLP seeks to build on the long-established joint working arrangements for Greater Norwich which have delivered the previous Joint Core Strategy (JCS) for the area. The GNLP includes strategic planning policies and will also allocate individual sites for development. It aims to ensure that new homes and jobs are delivered, and the environment is protected and enhanced, promoting sustainability and the effective functioning of the area.

4.2.10 The GNLP identifies the strategy for growth in this first part of the plan, the 'GNLP Strategy'. The sites to deliver the strategy are in the second part of the plan, the 'GNLP Sites Plan'. This is supported by amendments to the adopted Policies Map covering site allocations. The third part of the plan is its 'monitoring framework'. The plan will be used to help to assess planning applications.

4.2.11 The GNLP aims to provide up-to-date policies to guide development and meets Government requirements set out in the NPPF. The GNLP has been prepared ahead of the likely implementation of the new system for plan-making Government has committed to introducing through the Levelling Up and Regeneration Act (LURA) and changes to the NPPF. Therefore, the GNLP will play a key role in guiding the transition to the new planning system, helping to ensure sustainable infrastructure, housing and jobs growth in Greater Norwich.

4.2.12 The six primary objectives of the GNLP cover the following key areas:

- **Economy:** “To support and promote clean growth and progress towards a post-carbon economy through the expansion of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor as part of a wider entrepreneurial, enterprising, creative and broad-based economy with high productivity and a skilled workforce.”
- **Communities:** “To grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities, helping to close the gap between life chances in disadvantaged and other communities.”
- **Homes:** “To enable delivery of high-quality homes of the right density, size, mix and tenure to meet people’s needs throughout their lives and to make efficient use of land”.
- **Infrastructure:** “To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity to allow access to economic and social opportunities.”
- **Delivery:** “To promote the delivery of housing, jobs and infrastructure to meet identified needs, supported by intervention mechanisms where the market is unable to deliver.”
- **Environment:** “To protect and enhance the built, natural and historic environments, make best use of natural resources, and to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emissions by 2050.”

4.2.13 The Proposed Scheme is recognised as an identified transport scheme of the Applicant in the GNLP with relevant references made to it throughout the document. Whilst the Proposed Scheme is not a proposal of the GNLP and it is not required to deliver any allocation in the Plan, the Examining Inspectors

considered that it is appropriate for the Proposed Scheme to be referenced in the GNLP as a strategic infrastructure project being progressed by the highway authority.

4.2.14 The GNLP defines the Norwich Western Link in the Appendix 2 'Glossary' to the plan as follows:

> *"**Norwich Western Link:** The proposed development of a road to connect the A1270 Broadland Northway or Northern Distributor Road (NDR) from the A1067 to the A47 west of Norwich."*

4.2.15 At paragraph 83 of the GNLP Document 1 – The Strategy, under Infrastructure 'Road Hierarchy' the Proposed Scheme is referred to as follows:

> *"A preferred route for a dual carriageway "**Norwich Western Link**" between the A1270 and the A47 was confirmed in July 2019. The Department for Transport (DfT) approved the Strategic Outline Business Case in May 2020 giving the project conditional entry into its 'Large Local Majors' funding programme and awarding more than £1 million of development funding for the project in the 2020/21 financial year. An Outline Business Case (OBC) was submitted to the DfT in July 2021 and following development of the scheme, including refinement of the alignment, an addendum to the OBC was submitted to DfT in September 2022. Work is currently ongoing to develop a planning application for the scheme and a decision from DfT on the OBC is anticipated."*

4.2.16 In Section 3 of Document 1 – The Strategy ('The Vision and Objectives for Greater Norwich), the GNLP states under the Infrastructure heading:

> *"By 2038 our transport system will be enhanced by a combination of infrastructure improvements and new technologies. Connectivity will improve both within Greater Norwich and to other parts of the country and beyond. This will include better rail services to London, Cambridge, Stansted, Milton Keynes, Oxford and the West, growth at*

Norwich Airport and road improvements to the A11, A47, ***the Norwich Western Link*** *and the A140.*

Together these will provide greater travel choices and allow people to make the best use of evolving sustainable transport networks, particularly in the urban area. They will also continue to support Norwich's role as the regional capital and improve access to our rural areas."

4.2.17 The policy considered of most relevance to the Proposed Scheme from the GNLP is set out in table 2 below.

Table 2: Relevant policy from the GNLP

Policy	Title
Policy 1	The Sustainable Growth Strategy
Policy 2	Sustainable Communities
Policy 3	Environmental Protection and Enhancement
Policy 4	Strategic Infrastructure
Policy 6	The Economy

The Development Management Development Plan Document (DPD) (2015)

4.2.18 The Development Management DPD, adopted August 2015, aims to further the objectives set out in the NPPF and the previously adopted Joint Core Strategy.

4.2.19 Table 3 sets out the policy considered of most relevance to the Proposed Scheme from the Development Management DPD. Chapter 6 of this Planning Statement provides relevant wording for each applicable policy.

Table 3: Relevant Policy from the Development Management DPD

Policy	Title
Policy GC1	Presumption in Favour of Sustainable Development
Policy GC4	Design
Policy EN1	Biodiversity and Habitats
Policy EN2	Landscape
Policy EN3	Green Infrastructure
Policy EN4	Pollution
Policy H4	Change of Use of a Dwelling
Policy TS2	Travel Plans and Transport Assessments
Policy TS3	Highway Safety
Policy CSU5	Surface Water Drainage

Norfolk Minerals and Waste Development Framework

4.2.20 The Development Plan also includes the documents that make up the Norfolk Minerals and Waste Development Framework. This framework contains the following three minerals and waste planning Policy documents, and a policies map as follows:

- Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026 (adopted September 2011);
- Minerals Site Specific Allocations Development Plan Document (DPD) (adopted October 2013, amendments adopted December 2017);
- Waste Site Specific Allocations Development Plan Document (DPD) (adopted October 2013); and

- Revised policies map which includes the Site-Specific Allocations and an interactive map of Mineral Safeguarding Areas.

4.2.21 The policies in the framework relate primarily to applications for Minerals and Waste developments and are of less direct relevance to the Proposed Scheme. The Proposed Scheme bisects an area of land that is identified as a Mineral Safeguarding Area for Sand and Gravel Extraction in the both the current and emerging Norfolk Minerals and Waste Local Plan (*the emerging Minerals and Waste Local plan is covered in further detail below*).

The Emerging Norfolk Minerals and Waste Local Plan

4.2.22 The above framework is also being currently reviewed and updated with the Norfolk Minerals and Waste Local Plan submitted to the Planning Inspectorate for independent examination on 20 December 2023.

4.2.23 Because the emerging policy document is still at an early stage and could be subject to change, this Statement captures the relevant policies~~,~~ as still 'emerging' and relays them in their current form at time of writing (April 2024). Therefore, the policy wording shown below represents the latest emerging position, but it is acknowledged that the wording could be revised during the course of the examination.

4.2.24 Policy MP11: Mineral Safeguarding Areas and Mineral Consultation Areas states the following:

> '*The County Council will safeguard existing, permitted and allocated mineral extraction sites from inappropriate development proposals. Mineral Consultation Areas are delineated on the Policies Map and extend to 250 metres from each safeguarded site. Development proposals within 250 metres of a safeguarded site should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction and the 'agent of change' principle will be applied in all such cases. The County Council will object to development proposals which would prevent or prejudice the use of safeguarded sites for mineral extraction.*

The County Council will safeguard Norfolk's silica sand, carstone, and sand and gravel mineral resources, within the Mineral Safeguarding Areas identified on the Policies Map, from inappropriate development proposals. For mineral resources the Mineral Consultation Area is the same defined area as the Mineral Safeguarding Area.

The Mineral Planning Authority should be consulted on all development proposals within Mineral Consultation Areas, except for the excluded development types set out in Appendix 4.

For relevant development proposals located within a Mineral Safeguarding Area the Mineral Planning Authority will expect to see appropriate investigations carried out to assess whether any mineral resource there is of economic value, and if so, whether the mineral could be economically extracted prior to the development taking place. This information should be provided through the submission of a Mineral Resource Assessment, as set out in Appendix 10.

The conservation benefits of carstone will be a consideration in safeguarding resources.

In line with the NPPF, the Mineral Planning Authority will object to development which would lead to the sterilisation of the mineral resource, and it would be for the relevant Local Planning Authority to decide whether there are compelling planning reasons for over-riding this safeguarding objection'.

4.3 Other Relevant Policy Not Forming Part of the Development Plan

4.3.1 In addition to the policies of the Development Plan there are a number of Policy documents that may be relevant in determining the planning application. As well as the fulfilment of the Scheme Objectives and the Government's Objectives to the Major Road Network Programme, which are set out in Chapter 3 of this Statement, the objectives of the NCC's Local Transport Plan may also be relevant.

Norfolk Local Transport Plan 4 Strategy 2021-2036 and Implementation Plan

4.3.2 NCC's fourth Local Transport Plan (LTP) 4 Strategy was adopted in July 2022 and covers the period 2021-2036. This document sets out NCC's plans, policies and programmes on transport and transport infrastructure for the region.

4.3.3 The accompanying Local Transport Implementation Plan 4 (published July 2022) explains how the LTP objectives and policies will be implemented and confirms that:

> '*Our approach to implementation will therefore be to…*
>
> *Take forward schemes that are included in the current government large local major and major road network funding streams. These are Long Stratton Bypass, Norwich Western Link, West Winch Housing Access Road, A47/ A17 Pullover Junction, King's Lynn… These schemes are expected to realise a range of benefits. They all have detailed business cases at various stages of development, setting out scheme objectives, benefits and impacts… Each will need to prove its case in order to draw down funding and receive any statutory consents or approvals prior to delivery on the ground. A key part will be consideration of carbon credentials for each scheme.'*

4.3.4 In Chapter 5 of the LTP it is stated that:

> *'Public highways and transport networks have a significant influence in shaping the place in which we live. Transport infrastructure connects communities and services together and plays a vital role in the way people move around and access the wider world. It also plays an essential part in the economic vibrancy of Norfolk connecting us to each other and the rest of the country'.*

4.3.5 Page 84 of the LTP confirms that: '*Completion of the Norwich Western Link will connect the Broadland Northway to the A47 in the west and will be complemented by sustainable transport measures. The Norwich Western Link*

would provide a higher standard route between the western end of Broadland Northway and the A47 and significantly improve travel between these two major roads. Traffic congestion, rat-running and delays to journeys are all significant issues on minor roads to the west of Norwich.'

4.3.6 Explicitly, the supporting text for Policy 8 (Enhancing Connectivity, and what it means in practice (p48)) identifies the dualling of the NWL as a priority in ensuring quick, reliable journey times for longer-distance journeys. Policy 8 of LTP also states:

'*Our priority will be to improve major road and rail connections between larger places in the county, and to major ports, airports and cities in the rest of the UK*.'

4.3.7 Policy 10 of LTP states:

'We will seek to improve connectivity between rural areas and services in urban centres.'

4.3.8 Policy 11 of LTP states:

"When making changes and improvements to our transport network, and in working with users on how they choose to use the transport network, we will seek to understand the consequences of the decisions on meeting the collective challenge of protecting and improving our global environment to meet the environmental Policy target of working towards carbon neutrality".

4.3.9 Policy 15 of the LTP states that:

'We will identify routes important for sustainable and active transport and give priority – especially in urban areas – to sustainable and active modes of transport'.

4.3.10 Policy 17 of the LTP states that:

'Using the safe systems approach, the county council and road safety partners will work together to contribute to a reduction in the number of people killed and seriously injured on the road network'.

4.3.11 Policy 21 of the LTP states that:

'The likely impacts of climate change on the highway network should be addressed to ensure assets are resilient. Where assets can't be made resilient to impacts of climate change, such as coastal erosion, we should have planned alternatives so we can respond faster and avoid disruption. We will use a risk-based approach to determine the priority for action'.

4.3.12 The strategic objectives of LTP are set out in Table 4 below:

Table 4: Objectives of Norfolk Local Transport Plan 4

Objective	Title
Objective 1	Embrace the Future
Objective 2	Delivering a Sustainable Norfolk
Objective 3	Enhancing Connectivity
Objective 4	Enhancing Norfolk's Quality of Life
Objective 5	Increasing Accessibility
Objective 6	Improving Transport Safety
Objective 7	A Well Managed and Maintained Transport Network

Norfolk Strategic Infrastructure Delivery Plan 2021

4.3.13 The Norfolk strategic infrastructure delivery plan (NSIDP) was published in December 2021, and pulls together information on the *'key infrastructure needed to deliver economic growth in Norfolk'*, link to NSIDP. Page 34 of the

NSIDP identifies the Proposed Scheme as: '*one of the County Council's priority road infrastructure schemes*'.

Transport For Norwich 2021

4.3.14 The Transport for Norwich (TfN) strategy was adopted in December 2021. It replaces the existing Norwich Area Transportation Strategy adopted in 2004, which set out a transportation strategy for the Norwich area until the year 2021.The TfN strategy forms part of a suite of documents setting out transport Policy in Norfolk. The Norfolk Local Transport Plan (LTP) as described above, covers transport Policy across the whole of the county, whereas the TfN strategy aligns with, and nests within this and provide the detail for the Norwich area.

4.3.15 The core strategic aims of the TfN strategy, are to support a growing economy, strengthen communities and to put carbon reduction and better air quality at the heart of the aim to and to reduce impact on the environment. The Vision of the TfN states that *"Norwich and the strategic growth areas around it will become a place to thrive because affordable, shared, clean, active and accessible travel are the first choice for journeys, and people within at least the urban area can access a range of services without a car."*

4.3.16 The Vision of the TfN will be delivered through nine themes, with the most relevant to the Proposed Scheme including:

- **Norwich and Norfolk:** *"Norwich and the strategic growth area around it is the centre for a large part of the county and the wider eastern region. Good, strategic connections by clean transport modes including rail, low carbon vehicles and sustainable modes within and to places outside of the area are vital for continued prosperity."*
- **Supporting growth areas:** *"The area has plans for significant growth. This needs to be in the right places, with transport networks provided, so that people can easily access facilities. Priority should be given to walking, cycling and public/shared transport links."*

- **Meeting local needs:** *"The transport system needs to support the needs of everyone, being designed to take account the different needs of different people."*
- **Reducing the dominance of traffic:** *"In local neighbourhoods, traffic impacts will be reduced. This will be achieved through a series of interventions including low traffic neighbourhoods, school streets and reductions in speed limits, based around the principle of Healthy Streets."*
- **Making the transport system work as one:** *"The transport system needs to ensure efficient movement of large numbers of people. We will identify roads where general traffic is prioritised; where public transport is prioritised; and where active travel is prioritised. This reflects that streets cannot accommodate every demand at the same time, and we must prioritise. Elsewhere, streets will primarily support communities who live there, businesses or for leisure uses like meeting friends or entertainment. Parking will be reviewed to consider current parking capacity, arrangements, cost, availability and type."*

4.3.17 Key policies contained within the TfN Strategy, which have influenced the Proposed Scheme, are set out in Table 5.

Table 5: Transport for Norwich Strategy (adopted December 2021)

Topic	Wording in TfN:
Strategic Connections	Strategic connections and hinterland access will be promoted to enhance the role of Norwich as the regional capital. **ACTIONS INCLUDE:** "Carry out strategic assessments of the traffic impacts as a consequence of completing the committed strategic schemes (including improvements to the A47, the committed transforming cities programme and the **Norwich Western Link**) to identify the opportunities to deliver enhanced sustainable transport measures to support public transport and active travel". We will ensure that new strategic connections are optimised to benefit the economy, this includes rail enhancements to Cambridge, Stansted, London and other destinations, main bus and coach links, the Norwich Western Link, A47 improvements, and Long Stratton Bypass. Sustainable transport measures will be promoted to capture the benefits of these connections within the Norwich urban area and the strategic growth area around it. Individual schemes will need to mitigate their environmental impacts through the detailed work on these projects. We will ensure that Norwich's role as a regional economic centre and transport hub is supported through excellent transport connectivity to the Norwich travel to work area and longer distance connections are improved to markets outside the county. Rail and the park and ride system play important roles in maintaining good access into Norwich for trips from outside the urban area.

Topic	Wording in TfN:
Net Zero Carbon	We will reduce carbon emissions from transport in Norwich to make the necessary contribution to the national target of reducing emissions from all sources by 78% by 2035 compared to 1990 and achieving net zero emissions by 2050. A carbon budget will be developed for the transport programme to demonstrate how it will ensure emissions are contained within the budget.
Supporting Growth Areas, Regeneration Areas & Strategic Employment Areas	We will proactively plan to meet the transport requirements of planned growth areas, regeneration areas and strategic employment areas and their associated transport commitments.
Road Traffic Harm Reduction	We will reduce the harms of road traffic associated with road casualties and tackle the fear of road traffic affecting vulnerable road users.
Places	New schemes, enforcement and maintenance activities on the transport network will seek to enhance the character and quality of places with historic, architectural or natural landscape character and ecological value.
Freight and Deliveries	We will develop a coordinated approach for managing freight and deliveries to support clean modes of deliveries and minimise the impact of the movement of freight within the urban area with regard to emissions and traffic intrusion.

Topic	Wording in TfN:
Neighbourhoods	We will work with local communities, elected members and stakeholders to reduce the impact of unnecessary traffic in neighbourhoods and provide connections that meet local needs and support active travel.
Road Network and Travel Mode Hierarchy	We will adopt a road network and travel mode hierarchy that will support mobility requirements of people and recognises the place function as well as movement function of different parts of the network.
Journey Time and Reliability	Journey times and reliability will be improved on the local highway network with particular emphasis to support fast and frequent bus services.

4.4 National Planning Policies

The Role of the NPPF in Determining the Planning Application

4.4.1 The NPPF was published in February 2012 and subsequently revised, the latest time in December 2023. The NPPF sets out the Government's economic, environmental, and social planning policies for England.

4.4.2 Paragraph 2 of the NPPF confirms that the Framework is a material planning consideration in determining planning applications, but that this does not change the statutory status of the Development Plan as the starting point for decision making:

> *'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.'*

4.4.3 Paragraph 5 of the NPPF states that '*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'*.

4.4.4 Paragraph 8 of the NPPF goes onto state that '*Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)'*.

4.4.5 Paragraph 8 of the NPPF states that the planning system has three overarching objectives as follows:

- *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*
- *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- *an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

4.4.6 Paragraph 9 of the NPPF goes on to state that:

'These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area'.

4.4.7 Paragraph 11 of the NPPF sets out how the presumption in favour of sustainable development should be applied in practice, confirming that:

'Plans and decisions should apply a presumption in favour of sustainable development…

*For **decision-taking** this means:*

"approving development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

4.4.8 Paragraph 12 of the NPPF states:

"The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans

that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed."

4.4.9 The following sections of the NPPF are of specific relevance to the determination of this application:

- Section 2 Achieving sustainable development;
- Section 4 Decision-making;
- Section 6 Building a strong, competitive economy;
- Section 8 Promoting healthy and safe communities;
- Section 9 Promoting sustainable transport;
- Section 14 Meeting the challenge of climate change, flooding and coastal change;
- Section 15 Conserving and enhancing the natural environment; and
- Section 16 Conserving and enhancing the historic environment.

National Planning Practice Guidance

4.4.10 The National Planning Practice Guidance (NPPG) supports the NPPF and provides further guidance in relation to policies considered relevant to the Proposed Scheme. The most pertinent of these are set out below:

- Air Quality - Paragraph: 001 Reference ID: 32-001-20191101
- Biodiversity Net Gain - Paragraph: 008 Reference ID: 74-008-20240214
- Climate Change - Paragraph: 001 Reference ID: 6-001-20140306
- Flood Risk and Coastal Change - Paragraph: 001 Reference ID: 7-001-20220825 to Paragraph: 080 Reference ID: 7-080-20220825

- Historic Environment - Paragraph: 018 Reference ID: 18a-018-20190723
- Natural environment - Paragraphs: 004 Reference ID: 8-004-20190721, 005 Reference ID: 8-005-20190721 and 006 Reference ID: 8-006-20190721
- Noise - Paragraph: 001 Reference ID: 30-001-20190722

Revised National Networks – National Policy Statement (March 2024)

4.4.11 Paragraph 5 of the NPPF states that '*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'*.

4.4.12 National Policy Statements are policy documents that are produced by the national government to provide a framework for the determination of applications for development consent under the Planning Act 2008 for nationally significant infrastructure projects.

4.4.13 The National Networks National Policy Statement (NNNPS), (March 2024), sets out the need for, and Government's policies to deliver, development of nationally significant infrastructure projects (NSIPs) on the national road and rail networks in England. It provides planning guidance for promoters of nationally significant infrastructure projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.

4.4.14 It must be recognised that the Proposed Scheme is not an NSIP, so the NNNPS does not apply in direct terms when considering determination. Nonetheless, aspects of the Government's policy on NSIPs may be considered relevant to new major road infrastructure such as the Proposed Scheme.

4.4.15 Of particular note to the Proposed Scheme in the revised NN NPS is Chapter 5 in relation to Greenhouse Gas emission. Paragraph 5.28 of revised NN-NPS states that:

> *'The construction and operation of national network infrastructure will in itself lead to greenhouse gas emissions'.*

4.4.16 It goes on to state at paragraphs 5.31 - 5.32 that:

> *"Emissions occur across the lifecycle of a project, and assessing the Whole Life Carbon emissions throughout a project will identify areas for efficiency and potential carbon reductions..."*
>
> *"Undertaking a Whole Life Carbon Assessment involves calculating the emissions from 'cradle to grave' of a project. This builds a comprehensive understanding of the emissions generated when building, operating, using, maintaining and discontinuing the infrastructure."*

4.4.17 In terms of mitigation paragraph 5.36 states that:

> *"Applicants should look for opportunities within the design of the proposed development to embed nature-based or technological solutions to mitigate, capture or offset the emissions of construction".*

4.4.18 In relation to decision taking paragraph 5.40 states that:

> *"However, given the important role national network infrastructure plays in supporting the process of economy wide decarbonisation, the Secretary of State accepts that there are likely to be some residual emissions from construction of national network infrastructure".*

4.4.19 Paragraph 5.41 goes on to state that:

> *"Operational carbon emissions from some types of national network infrastructure cannot be totally avoided. Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that a net increase in operational carbon*

emissions is not, of itself, reason to prohibit the consenting of national network projects or to impose more restrictions on them in the planning policy framework".

4.4.20 Paragraph 5.42 also confirms that:

"Any carbon assessment will include an assessment of operational carbon emissions, but the policies set out in chapter 2 of this NPS, apply to these emissions. Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. Therefore, approval of schemes with residual carbon emissions is allowable and can be consistent with meeting net zero".

4.4.21 It must be recognised that the Proposed Scheme is not an NSIP, so the revised NN-NPS will not apply in direct terms when considering determination. Nonetheless, aspects of the Government's policy may be considered relevant to new major road infrastructure such as the Proposed Scheme. The revised NN-NPS does recognise (at paragraph 2.8) that the strategic road network plays a complementary role with the major roads network (which includes the A1270 Broadland Northway) and with local roads, especially in ensuring that traffic uses the most suitable routes within the overall network which are appropriate for the purposes of different types of journeys and travel modes.

4.5 Statutory Requirements and Key Legislation

Transport Act 2000

4.5.1 The Transport Act 2000 is a significant piece of legislation that aimed to modernize and improve the transportation sector. The Act contains measures to create a more integrated transport system and aims to improve local passenger transport services, and reduce road congestion and pollution, and also to provide tools for local authorities to improve transportation planning and management. Parts II (local transport) and III (road user charging and workplace levies) of the Act are only applicable to England and Wales.

4.5.2 Key provisions of the Act that are of relevance to the Proposed Scheme include:

1) Integration of Transport Services: The Act sought to promote integration between different modes of transport, such as road, rail, and air, with the goal of creating a more efficient and seamless transportation system.

2) Quality Partnerships and Transport Plans: The Act encouraged the development of quality partnerships between local authorities and transport operators to improve services. It also introduced the concept of local transport plans to enhance the coordination of transportation at the regional level.

3) Transport Innovation Fund: The Act established the Transport Innovation Fund to support local authorities in implementing innovative transportation solutions and projects.

4) Traffic Management and Regulation: The Act provided provisions for improved traffic management and regulation, with the aim of reducing congestion and improving the overall efficiency of the road network.

4.5.3 In respect of Local Transport issues, the Act defines authorities which are to be local transport authorities and imposes a duty on those authorities to prepare and publish a local transport plan setting out their policies for the promotion of safe, integrated, efficient and economic transport to, from and within their area, and to carry out their functions so as to implement those policies. In the case of NCC, this has resulted in the creation of the LTP and its supporting Implementation Plan, and the Transport for Norwich Policy documents.

Planning (Listed Buildings and Conservation Areas) Act 1990

4.5.4 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 relates to the control of works affecting the character of a listed building or its setting. The section requires that local planning authorities should pay special attention to the desirability of preserving the building or its setting

when considering any application for planning permission. The goal is to ensure that any proposed development or alteration takes into account the historic and architectural significance of the listed building and its surroundings. Section 66 aims to strike a balance between development needs and the preservation of the country's cultural heritage by safeguarding listed buildings and their settings.

4.5.5 The Act requires that determining authorities:

> "*In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*;

The Natural Environment and Rural Communities Act 2006

4.5.6 The Natural Environment and Rural Communities Act 2006 is a comprehensive piece of legislation that aims to balance the protection of the natural environment with the needs of rural communities, promoting sustainable practices and public access to the countryside.

4.5.7 Section 40 of the Natural Environment and Rural Communities Act 2006, as amended most recently by the Environment Act 2021 pertains to the "general biodiversity objective" to conserve and enhance biodiversity in England through the exercise of its functions. This section imposes an obligation on public authorities in England to consider and take into account the conservation and enhancement of biodiversity when carrying out their functions.

4.5.8 Section 40 requires a public authority to have given 'consideration' to the General Biodiversity Objectives initially by 1st January 2024. and thereafter from time to time., in order to confirm what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective and thereafter determine such policies and

specific objectives it considers appropriate and to take appropriate action, in light of those policies and objectives, to further that objective. In meeting this duty, a public authority must have particular regard to any local nature recovery strategy and any relevant species conservation strategy or protected site strategy prepared by Natural England.

4.5.9 In responding to this requirement, NCC has been working with Suffolk Councils as part of the Norfolk and Suffolk Nature recovery Partnership to prepare a 'Local Nature Recovery Strategy', link to the Local Nature Recovery Strategy website, to instigate new approaches to restoring and protecting nature and will aim to identify opportunities and priorities for nature restoration across Norfolk and will consist of:

- A habitat map showing where valuable areas for nature are currently located;
- A statement of biodiversity priorities - a locally agreed list of priority areas where new and improved habitats would bring the most benefit; and
- A map of locations and actions showing where and how habitats can be created and connected, and how the wider environment and economy can benefit.

4.5.10 The strategy will be created through the following stages:

1) Stakeholder Engagement: Early in the process the Partnership with Suffolk Councils will engage with local stakeholders, including conservation groups, landowners, land managers, government bodies, local authorities, business and community organisations. This process is crucial for ensuring the strategy reflects local needs and has broad support.
2) Developing the Strategy: The drafting of the Local Nature Recovery Strategy (LNRS), including mapping, setting priorities for action, and outlining specific projects and initiatives. This phase will likely involve both

technical ecological assessments and broader consultation with stakeholders.

3) Collaboration and Consultation: Making sure the strategy represents the shared goals of the county is essential to its success. Stakeholder collaboration will therefore play a central role in shaping the strategy and will be ongoing throughout the process, culminating in a public consultation on the draft LNRS.

4) Implementation: Once the strategy is finalised and approved, projects and initiatives outlined in the strategy will begin, or continue, to be implemented. This will be ongoing over several years, with different projects having their own timelines. It is the ambition of the LNRS to inspire new nature recovery projects on the ground.

5) Monitoring and Review: After implementation begins, there will be ongoing monitoring of outcomes and periodic reviews of the strategy's effectiveness, leading to revisions and adaptations as necessary.

4.5.11 The Partnership anticipates completion of the development of the Local Nature Recovery Strategy by March 2025.

Environment Act 2021

4.5.12 The UK's Environment Act 2021 is a piece of legislation that has aimed at addressing environmental challenges and promoting sustainability. It outlines a framework for protecting and enhancing the natural environment, biodiversity, and ecosystems across the UK. Key provisions of the act include setting legally binding targets for air quality, water quality, waste reduction, and biodiversity restoration. It also establishes the Office for Environmental Protection (OEP) to oversee compliance with environmental laws and hold public authorities to account. The Environment Act 2021 represents the UK Government’s comprehensive approach to safeguarding the environment for current and future generations in the UK.

4.5.13 Pursuant to this Act since 12 February 2024, all planning permissions granted in England (including applications such as the Proposed Scheme), have to deliver at least 10% biodiversity net gain, secured for at least 30 years, as the result of the imposition of a mandatory form of planning condition to this effect.

Habitats Regulation Assessment

4.5.14 Regulation 63 of the Conservation of Habitats and Species Regulations 2017 sets out the requirements for a 'competent authority' to consider, prior to deciding to grant consent for a project, whether that project is likely to have a significant effect on a Habitats Site, (as a result of the implementation of Brexit, the legislative language used to describe sites protected by the Habitats Regulations has changed from their previous nomenclature of 'European Sites' to refer to a 'national site network' of sites. For the purposes of this Planning Statement we shall refer to them as 'Habitats Sites'), and if so, to make an appropriate assessment of the implications of the project to that site in view of that site's conservation objectives, to determine if an adverse effect on the integrity of that Habitat Site would be caused. Regulation 63(1) of the Habitat Regulations states:

"A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which:

(a) is likely to have significant effect on a European site or European offsite marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of that site,

- must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.

4.5.15 If, in light of the conclusions of the appropriate assessment, the competent authority cannot conclude that the that the plan or project will not adversely affect the integrity of the Habitat Site consent must not be granted unless the competent authority is satisfied that there are no alternative solutions, there

are imperative reasons of overriding public interest and compensation measures have been secured (Regulations 64). The CPA as the competent authority will therefore undertake this assessment in considering the application for the Proposed Scheme, and the Applicant has submitted information to inform that assessment [Document reference: 4.03.00).

4.5.16 Additionally, these Regulations also apply more general duties, under Regulation 9, which require that a competent authority (whose definition is 'Public Body') and so includes NCC as promoter and the CPA in a wider sense must: "*exercise their functions which are relevant to nature conservation, including marine conservation, so as to secure compliance with the requirements of the Directives"* and *"in exercising any of its functions, must have regard to the requirements of the Directives so far as they may be affected by the exercise of those functions"*.

4.5.17 This duty is particularly relevant in the context of Regulation 55 of the Regulations, which, reflecting the requirements of the Habitats Directive, only allow certain activities that impact on protected species, if a licence is granted by a licensing body (in this case Natural England) to do so on the basis that the licensable activity would (as the relevant test for the Proposed Scheme) be for the purposes of "*preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment"* and that they are satisfied that there is "*no satisfactory alternative"* and that *"the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range"*.

4.5.18 Whilst it is for Natural England to directly apply the Regulation 55 tests, the Regulation 9 duty means that NCC and CPA must be mindful of whether it is likely that such a licence will be able to be granted (as a follow-on from the 'requirements of the Directives') when undertaking its functions, including making decisions on planning applications. The CPA will seek advice from Natural England during the decision-making process.

4.5.19 Chapter 6 below, assesses the Proposed Scheme against the policies of the Development Plan and material planning considerations, as relevant, identified above.

4.6 Norfolk County Council Strategy and Policy

4.6.1 Also important to the CPA's decision on the Proposed Scheme are NCC's relevant strategies and policies., These documents set out considerations that NCC is expected to take into account when making decisions in general terms, and so may be relevant to the determination of the Proposed Scheme.

Norfolk County Council's Climate Strategy (2023)

4.6.2 The purpose of this strategy document is to provide a clear statement of NCC's strategic framework to help tackle climate change. It describes how the authority aims to meet their commitment to reach net zero across its estate by 2030, and how they will continue to work with their partners to work towards a carbon neutral Norfolk.

4.6.3 The document also highlights how NCC will address other interlinking issues that need to be dealt with in a holistic manner, particularly the decline in biodiversity, as Norfolk adapts to a changing climate. The priorities and targets are set out across seven key focus areas, outlining the current progress and next steps in their delivery. These key focus areas for NCC cover: 'Our Estate' / Dealing with 'Indirect Emissions' and 'County-Wide' Emissions / Promoting a Green Economy / Adapting to Climate Change / Space for Nature to Recover and Grow / Engagement.

4.6.4 Strategy Objectives of NCC's Climate Strategy include:

1. *Outline how we will deliver on our target to meet Net Zero across our estates.*

2. *Inform Norfolk's residents, our staff, partners and local businesses of the action NCC is taking to tackle climate change across Norfolk.*

3. *Help guide our action in the coming years on our journey to net zero and adapting services to address the impacts of climate change.*

Norfolk County Council's Environmental Policy (2019)

4.6.5 Norfolk County Council's Environmental Policy takes as its starting point the Government's own 25-year Plan published in 2018 and is structured to reflect the key environmental concerns embodied in that plan. In addition, it is framed to reflect the increasing importance that climate change has on all aspects of the environment, whether the landscape itself, the species within it, or the rich cultural heritage that occupies it. The policy reflects the areas that the Council sees as key to protecting and maintaining the health of Norfolk's distinctive environment and its occupants. The Policy itself signposts to overarching activity that spans a range of environmental interactions that the Council is involved with, including those where it already has its own statutory environmental responsibilities.

4.6.6 The key features of this policy relevant to the Proposed Scheme are as follows:

- embedding an 'environmental net gain' principle for development, including housing and infrastructure;
- focusing on woodland to maximise its many benefits for the environment and our communities;
- protecting and recovering nature (committing to a 25-year Environmental Strategy and Pollinator Action Plan);
- conserving and enhancing natural beauty including providing support for designated sites including Habitats Sites;
- promoting the opportunities to enhance health and wellbeing that are available through exposure to the natural environment;
- planting more trees to improve biodiversity and as a potential mitigation measure for climate change in appropriate locations;

- supporting the community to make sustainable travel choices including promoting sustainable public transport, encouraging sustainable travel on all new developments and supporting the creation of green infrastructure in key urban areas;
- maximising resource efficiency and minimising environmental impacts at end of life;
- reducing pollution; and
- protecting and improving the global environment including ensuring that each project NCC undertakes is assessed for the contribution it will make towards achieving its environmental targets and working, where possible, with partners to plan, resource and implement measures that together achieve the overall targets for Norfolk, underpinned by a robust approach to monitoring, measuring and reporting on the outcomes.

5 Assessment of The Proposed Scheme

5.1 Introduction

5.1.1 This chapter sets out the relevant Development Plan policies along with other material considerations and uses the findings of the ES (Document reference: 3.01.00), Transport Assessment, (Document reference: 4.01.00) along with other supporting documents as set out in sections 1.3.2 to 1.3.4 to assess the Proposed Scheme against the policies.

5.1.2 The assessment adopts a thematic approach, whereby key aspects of the Proposed Scheme and environmental factors are grouped together and assessed in terms of their accordance with the relevant polices under the following themes:

- Good Design;
- Transport Improvements;
- Air Quality and Noise & Vibration;
- Biodiversity;
- Greenhouse Gases and Climate Change;
- Landscape and Visual;
- Surface Water, Drainage and Flood Risk;
- Cultural Heritage;
- Soils and Agricultural Land;
- Mineral Safeguarding Areas;
- Supporting Communities; and
- Sustainable Growth

5.1.3 When assessing each 'theme', the full hierarchy of relevant policies, other relevant material considerations and all statutory requirements, as set out in Chapter 5 of this Statement will be referred to.

5.2 Good Design

Relevant Development Plan Policy

5.2.1 Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. The relevant parts of GNLP Policy 2 are set out below as they pertain to good design.

5.2.2 In relation to **Good Design GNLP Policy 2 – Sustainable Communities** states that**:**

To contribute to the achievement of sustainable communities, development proposals should, where relevant, address the following matters:

1. *Ensure safe and convenient access for all, including by non-car modes, to on-site and local services and facilities such as schools, health care, shops, recreation/ leisure/community/faith facilities and libraries; encourage walking, cycling and public transport through the layout of development; and integrate parking to avoid it dominating the streetscape or being a hazard.*
2. *reate and contribute to multi-functional green infrastructure links, whether provided on-site or off-site, including through landscaping, street trees and other tree planting, taking account of local green infrastructure strategies and delivery plans.*
3. *Create beautiful, well-designed places and buildings which respect the character of the local area and seek to enhance it through appropriate design, having regard to any local design guidance (including design codes).*

4. *Avoid risks of unacceptable levels of soil, air, water and noise pollution and/or land instability.*

5. *Avoid locating inappropriate development in areas at risk of flooding by applying the sequential and exceptions tests and ensuring that flood risk is not increased elsewhere. Sustainable drainage systems should be incorporated unless there is clear evidence that this would be inappropriate.*

6. *Protect water quality and ensure a low level of energy consumption.*

5.2.3 **Policy GC4 ('Design')** of the DM DPD states that:

'*Development will be expected to achieve a high standard of design and avoid any significant detrimental impact. Schemes which are of an innovative nature or which reduce reliance on centralised, non-renewable energy sources will be particularly encouraged. Proposals should pay adequate regard to:*

- *The environment, character and appearance of an area;*
- *Reinforcing local distinctiveness through careful consideration of the treatment of space through the development, the appearance of new development, the scale of new development and landscaping;*
- *Meeting the reasonable amenity needs of all potential future occupiers;*
- *Considering the impact on the amenity of existing properties;*
- *Making efficient use of land and resources;*
- *Being accessible to all via sustainable means, including public transport;*
- *Creating safe environments addressing crime prevention and community safety;*
- *Incorporating appropriate infrastructure linking to the surrounding area;*
- *The creation of sustainable, inclusive and mixed communities; and*

- *Minimising resource and energy consumption and how it is located and designed to withstand the longer-term impacts of climate change.'*

National policy and other material considerations

5.2.4 The relevant national policies are considered to be set out in Section 12 of the NPPF and particularly paragraph 135 of the NPPF which states as follows:

Planning policies and decisions should ensure that developments:

(a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

(b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

(c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

(d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

(e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

(f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Accordance with policy

5.2.5 As set out in section 4 of this Statement and within chapter 4 (Reasonable Alternatives) of the submitted ES (Document reference: 3.04.00), the

alignment of the Proposed Scheme has been subject to a full and comprehensive assessment in terms of overall performance against a wide range of strategic and project specific objectives.

5.2.6 The final alignment has been arrived at following this detailed assessment, sifting 82 identified potential options using standard assessment tools such as the DfT's EAST tool and assessment processes aligned with the DfT Business Case process. This has resulted in the chosen alignment for which planning permission is sought, which can deliver the most transport, economic, social and environmental benefits with the impacts and effects mitigated as far as reasonably practicable.

5.2.7 This conclusion is supported by the findings of the "Review of OSR Conclusions in light of the 2022 Alignment Refinement" report (Document reference: 3.04.03) which reviews the performance of the chosen alignment following its refinement to avoid a maternity bat roost. That report considers all key engineering and environmental factors and fit with scheme objectives and concludes that the refined alignment is still considered to present the best performing option overall.

5.2.8 Given the conclusions of the optioneering process and having refined and reviewed that decision in light of the on-going EIA process, including consideration of impacts to the setting of heritage assets and ecological impacts, it is considered that an alternate option or alignment would not meet the strategic or project specific objectives.

5.2.9 The factors that have influenced the design of the Proposed Scheme are set out in the Design and Access Statement (Document reference: 1.02.00). Paragraph 1.1.4 of the Design and Access Statement (Document reference: 1.02.00) confirms that the project has sought to deliver good design through collaborative working with environmental disciplines and the engineering team, led by landscape architects with the following project wide design principles developed collaboratively with the 'Local Planning Authority Design Group':

- Respond to the character and landscape in which the Proposed Scheme is situated, with engineered forms integrated with the landscape to minimise their physical and visual impact and provide wider benefits or features;
- Make a positive contribution to the landscape through conserving and enhancing the natural environment and biodiversity net gain;
- Strive to minimise adverse impacts on the landscape and seek sustainability in its use of materials, construction techniques, and maximising multi-functional features wherever possible;
- Maintain and enhance the local Rights of Way where possible, for community accessibility, amenity, and to encourage sustainable modes of travel – with consideration of this beyond the scheme's extent;
- Adhere to a design narrative which provides a commonality and theme to unify all components of the scheme; and
- Respond to the constraints of the scheme and consider its whole lifespan including capital and maintenance costs.

5.2.10 The above principles have resulted in good design being firstly embedded as part of the optioneering process as set out in Chapter 4 of this Statement, with the Proposed Scheme alignment having been designed to respond to the environmental constraints as set out in section 2.2 of this Statement.

5.2.11 Following on from this the Proposed Scheme alignment has been designed to:

- Maintain connectivity for walking and cycling, to the surrounding network and support public transport in the area;
- Minimise effects on ecology particularly on adjacent woodland/habitats and the Fakenham Road Roadside Nature Reserve along with providing a net gain in terms of BNG;
- Reduce landscape and visual effects;

- Minimise effects as far as reasonably practicable on soil, air quality, water and noise sensitive receptors;
- Minimise effects as far as reasonably practicable flood impacts notably in relation to the floodplain around the River Wensum;
- Reuse material won by the dualling earthworks in the local vicinity to avoid transportation of new material from further afield reducing construction materials and minimising the generation of waste;

5.2.12 In terms of the benefits of the design to the local communities and wider region, it is anticipated that the Proposed Scheme would have beneficial effects on severance, pedestrian and cyclist delay, pedestrian and cyclist amenity, accidents and safety, delay and fear and intimidation.

5.2.13 The NMU provision that forms part of the Proposed Scheme has been designed to enhance and join up an extensive network of off-road routes and provide a new network of cycle routes. Please refer to supporting document: 'NMU Provision Plan' (Document reference: 4.04.01) for full details.

5.2.14 As set out in the Traffic and Transportation Chapter of the ES (Document reference: 3.19.00), it is anticipated that the Proposed Scheme would assist with improving existing bus journey time reliability on existing routes by freeing up road space. The wider transport improvements that the Proposed Scheme will create are discussed further in section 3.4 (Transport Benefits of the Proposed Scheme) of this Statement.

5.2.15 It is therefore considered that the Proposed Scheme accords with part 1 of GNLP Policy 2 and Policy GC4 of the DM DPD as they pertain to the encouragement of walking, cycling and public transport as well as creating a safe environment and increasing community safety as a part of good design.

5.2.16 The optioneering process as summarised in Chapter 4 of this Statement followed the mitigation hierarchy notably in relation to impacts on ecological designated sites, including the River Wensum SAC and SSSIs in the study area. The residual effects of the Proposed Scheme on these sites are

assessed in Chapter 10 of the ES (Biodiversity – Document reference: 3.10.00), accompanied by information to inform a Habitats Regulations Assessment ('HRA' – Document reference: 4.03.00). This environmental factor is discussed further in section 6.5 of this Statement.

5.2.17 In terms of ecological design measures, the Proposed Scheme includes the development of green infrastructure with a number of green bridges, designed in accordance with the most recent scientific research, and principles of design, as well as specific areas of habitat creation and enhancement, as shown on the Landscape Design Plans (Document reference 2.07.00) and the Essential Environmental Mitigation Plan. A full Ecological Mitigation Strategy (Document reference: 3.10.32) and outline Bat Mitigation Strategy (Document reference: 3.11.06) accompanies the application with further details of the ecological mitigation forming part of the landscape design and shown on the Landscape Design Plans (Document reference 2.07.00).

5.2.18 The Proposed Scheme's landscape design has been designed to respond to the baseline landscape character and likely visual impacts of the Proposed Scheme (please refer to Landscape Design Plans (Document reference 2.07.00) with engineered forms integrated with the landscape to help integrate it into its receiving environment and minimise landscape and visual effects as far reasonably practicable.

5.2.19 The landscape design for the alignment is shown in the Landscape Design Plans (Document reference 2.07.00). The proposed earthworks, earth bunds, and extensive landscape planting have been used to help integrate the Proposed Scheme into its receiving environment as set out in section 4.8 of the submitted Design and Access Statement (Document reference: 1.02.00). Chapter 9 of the ES (Document reference: 3.09.00) assesses the Proposed Schemes effects in terms of landscape and visual effects, notably in relation to impacts on existing properties and other sensitive visual receptors. It includes the measures taken to avoid or mitigate significant adverse effects as far as reasonably practicable and is discussed further in this Statement under section 6.7.

5.2.20 Noting the ecological and landscape design and accompanying mitigation measures, it is therefore considered that the Proposed Scheme accords with part 3 of GNLP Policy 2 and Policy GC4 of the DM DPD as they pertain to the creation and contribution to multi-functional green infrastructure in the area to the west of Norwich with adequate regard paid to the environment, character and appearance of the area. The Proposed Scheme is also seen to accord with parts 3 and 5 of GNLP Policy 2 and Policy GC4 of DM DPD as they pertain to the creation and contribution to landscaping and well-designed places that considers the impacts upon the amenity of existing properties.

5.2.21 Part 7 of GNLP Policy 2 requires that development avoid unacceptable levels of soil, air, water and noise pollution. The Proposed Scheme's effects as they pertain to these environmental factors are summarised below:

- Air - Chapter 6 of the ES (Document reference: 3.06.00) assesses the Proposed Schemes effects in terms of air pollution and the measures taken to avoid or mitigate significant adverse effects as far as reasonably practicable – this is discussed further in this Statement under section 6.4;
- Noise - Chapter 7 of the ES (Document reference: 3.07.00) assesses the Proposed Schemes effects in terms of noise and vibration and the measures taken to avoid or mitigate significant adverse effects as far as reasonably practicable – this is discussed further in this Statement under section 6.4;
- Water - Chapter 12 of the ES (Document reference: 3.12.00) assesses the Proposed Schemes effects in terms of road drainage and the water environment and the measures taken to avoid or mitigate significant adverse effects as far as reasonably practicable – this is discussed further in this Statement under section 6.8; and
- Soil - Chapter 13 of the ES (Document reference: 3.13.00) assesses the Proposed Schemes effects on soils and the measures taken to avoid or mitigate significant adverse effects as far as reasonably

practicable – this is discussed further in this Statement under section 6.10.

5.2.22 The Proposed Scheme has been designed to minimise flood impacts notably in relation to the floodplain around the River Wensum with the Flood Risk Assessment (Document reference: 3.12.02) concluding that there would be no increased risk of flooding as a result of the Proposed Scheme (*save for a negligible impact at Ringland Lane – discussed at section 6.8 below*), taking into account its proposed drainage system, and the Proposed Scheme itself was not subject to an inappropriate level of flood risk. The Sequential / Exceptions tests have been applied to the Proposed Scheme and are set out in section 6 of the Flood Risk Assessment (Document reference: 3.12.02) concluding that flood risk would not be increased to an unacceptable level elsewhere. The design process and Flood Risk Assessment (Document reference: 3.12.02) are discussed in further detail in section 6.8 of this Statement. It is therefore considered that the Proposed Scheme accords with part 8 of GNLP Policy 2 as it pertains to avoiding the location of inappropriate development in areas at risk of flooding by applying the sequential and exceptions tests and ensuring that flood risk is not increased elsewhere.

5.2.23 The Proposed Scheme has been designed to minimise waste and use materials in a sustainable manner, as set out in Chapter 14 of the ES ('*Material Assets and Waste*') (Document reference: 3.14.00), this includes the reuse of excavated arisings in the design as fill for embankments and environmental bunds. Additionally, the Proposed Scheme incorporates the use of sustainable materials as set out in Chapter 14 of the ES ('*Material Assets and Waste*') (Document reference: 3.14.00), according with the policy aims of good design and sustainability as set out in GNLP Policy 1 (Sustainable Growth Strategy), Policy 2 (Sustainable Communities) and Policy 3 (Environmental Protection and Enhancement).

The Design of the Proposed River Wensum Viaduct

5.2.24 The proposed River Wensum Viaduct is a significant element of the design for the Proposed Scheme and so is discussed in further detail below.

5.2.25 It would carry the carriageway of the Proposed Scheme over the River Wensum and its floodplain and is illustrated in the planning drawings (Document reference: 2.06.01).

5.2.26 The viaduct has been designed to:

- Consider the visual impact of the structure in the landscape, and how it is perceived by people near (including drivers on the structure) and far from it;
- Not adversely impact the integrity of the environmental designations of the River Wensum (SAC/SSSI), or the wider floodplain;
- Enable continued movement of wildlife beneath the structure with planting placed appropriately to guide birds and bats;
- Minimise maintenance requirements with the materials and design details used; and
- Enable a construction methodology that responds to the environmental constraints and need to minimise impact on the floodplain.

5.2.27 In order to minimise the loss of active flood plain and minimise construction activity around the River Wensum the proposed viaduct comprises a ten-span weathering steel ladder deck structure, comprised of three longitudinal I-beam girders supporting a concrete deck. At each of the nine pier locations are three piled cylindrical concrete piled piers. The span lengths vary in length with the longest span of 59.4m over the River Wensum. Six of the ten spans are 53.46m long, the remaining three are shorter to provide the end spans at abutments.

5.2.28 The span arrangement and placement of piers is informed by the environmental constraints, providing an offset from the watercourses in the floodplain, and a suitable height above the river to minimise shading of the River Wensum SAC.

5.2.29 An environmental barrier has been incorporated into the design as part of the vehicle restraint system on the outer edges of the structure to reduce noise and to protect from salt spray arising from tyre splash. The barrier is transparent to offer uninterrupted views of the floodplain and landscape from the road. The viaduct will not be illuminated to reduce visual impacts.

5.2.30 The River Wensum Viaduct has been designed to a high standard be consistent with the principles of good design.

Summary

5.2.31 As a highways scheme, the design has been developed in line with the guidance as set out in the DMRB and the NCC highways standards with the resulting improvement to highway safety aligning with the aims of paragraph 135 of the NPPF.

5.2.32 In line with paragraph 135 of the NPPF, it is considered that the Proposed Scheme will improve the overall quality of the local communities served by the existing local road network as identified in Chapter 3 of this Statement by reducing through traffic with resulting benefits in terms of improved air quality, noise and residential amenity. The proposed NMU provisions and better access to the Park and Ride System along with improved public transport in the area due to better journey times will also result in benefits to these local communities, enhancing the overall quality of life.

5.2.33 As set out above the design of the Proposed Scheme is considered to respond to the local environmental constraints through:

- Primary mitigation embedded into the design mitigation with the alignment avoiding where possible impacts on significant environmental designations and the design seeking to reduce the physical and spatial mass of development;
- Secondary mitigation to prevent, reduce, or offset adverse effects that could not be avoided through the design process in the form of

landscape & visual, climate resilience, and noise mitigation along with both ecological mitigation and a net gain in biodiversity; and

- Tertiary mitigation that will be secured by way of planning conditions or through legislation that sits outside of the Town and Country Planning Act 1990 such as protected Species Licences.

5.2.34 The design of the Proposed Scheme is therefore considered to accord with the relevant parts of GNLP Policy 2 (Sustainable Communities) and of Policy GC4 ('Design') of the DM DPD with good design evident in the Proposed Scheme in line with the above mitigation hierarchy.

5.2.35 The design of the Proposed Scheme is also aligns with the aims of paragraph 135 of the NPPF with adequate regard being evident in design in relation to avoiding where possible impacts based on the environmental constraints, minimising adverse effects in terms of landscape, visual, soils, air quality, noise, water and flooding. The design of the Proposed Scheme is assessed as improving the amenity of existing local communities and enhancing safety on the highway. The Proposed Scheme will serve to link up towns and villages to the west of Norwich, providing a more resilient transport network, therefore supporting the creation of sustainable, inclusive and mixed communities in line with the principles of good design.

5.3 Transport Improvements

Relevant Development Plan Policy

5.3.1 **GNLP Policy 4 (Strategic Infrastructure)** states (with additional sub-divisions inserted by the Applicant in square brackets for ease of navigation and cross-referencing):

> **[First element]** *Strategic infrastructure improvements will be undertaken to support timely delivery of the Greater Norwich Local Plan and the wider growth needs of the area. Key elements will be:*
>
> **[Second element]** *Transport*

[First part] *Transport improvements will support and embrace new technologies and develop the role of Norwich as the regional capital, support strategic growth in the Cambridge Norwich Tech Corridor, improve access to market towns and rural areas and promote sustainable and active transport.*

[Second part] *Transport infrastructure will be brought forward to support the development aims of this plan. A considerable shift towards non-car modes will be promoted in the Norwich urban area over the plan period. High density growth will be focussed in locations with good access to improved sustainable transport networks and interchanges in Norwich, creating a virtuous cycle where clean transport is prioritised, less use is made of cars and space is used more efficiently and attractively.*

[Third part] *This will be achieved by:*

- *Having regard to the Transport for Norwich Strategy including consideration of its aims to:*
    - *Reduce carbon emissions and improve air quality,*
    - *Significantly improve the bus, cycling and walking networks to promote modal shift.*
    - *Develop the role of the park and ride system.*
    - *Change attitudes to travel.*
- *Continuing to improve public transport accessibility to and between main towns and key service centres, taking account of Norfolk County Council's market towns network improvement strategies.*
- *Promoting regional connectivity recognising the work already underway on:*

- *Enhancement of rail services, including improved journey times and reliability to London and Cambridge, supporting the East-West Rail link and innovative use of the local rail network.*
- *Improvements to the A47, including delivery of the Blofield to North Burlingham, Thickthorn and North Tuddenham to Easton improvements being progressed by National Highways.*
- *The Norwich Western Link being progressed by Norfolk County Council.*
- *Enhancement of the Major Road Network including provision of the A140 Long Stratton bypass being progressed by Norfolk County Council.*
- *Protection of the function of strategic transport routes (corridors of movement).*
- *Continued investigation of and support for rail freight opportunities.*
- *Supporting the growth and regional significance of Norwich Airport for both leisure and business travel to destinations across the UK and beyond.*

[Third element] *Other Strategic Infrastructure*

The Greater Norwich local authorities and partners including utility companies will work together in relation to the timely delivery of improvements to infrastructure, including that set out in appendix 1 and to:

- *The energy supply network including increased capacity at primary substations at Cringleford, Peachman Way, Sprowston*

and Earlham Grid Local and/or innovative smart solutions to offset the need for reinforcement.

- *Water supply and sewerage network improvements including the wastewater network at Whitlingham water recycling centre, the Yare Valley sewer and elsewhere to protect water quality and designated habitats.*
- *Health care infrastructure.*
- *Police infrastructure.*

School capacity will be increased to provide for growth by improvements to existing schools and the provision of new schools as required, including primary schools on strategic development sites and a new high school in the North-East growth area as identified in appendix 1.

In line with other policies in this plan, a multi-functional strategic green infrastructure network will be further developed as set out in maps 8A and B and in green infrastructure strategy updates.

[Fourth element] *On-site and local infrastructure, services and facilities*

Development proposals will provide on-site services and facilities and support local infrastructure capacity improvements through on-site provision, providing land and developer contributions.

5.3.2 **DM DPD Policy TS2 (Travel Plans and Transport Assessments)** states:

"In the case of major developments, or where a particular need is identified, a Transport Assessment and/or Travel Plan will be required. Developers will need to include proposals to deal with any consequences of their development in terms of maximising access by foot, cycle and public transport and means by which this will be secured in perpetuity."

5.3.3 **DM DPD Policy TS3 (Highways Safety)** of the DPD states that:

"*Development will not be permitted where it would result in any significant adverse impact upon the satisfactory functioning or safety of the highway network*."

National Policy and other material considerations

5.3.4 Paragraph 85 of the NPPF encourages planning decisions to create the conditions in which businesses can expand, and economic growth is supported.

5.3.5 Paragraph 108 (Promoting Sustainable Transport) of the NPPF states that transport issues should be considered from the *earliest stages of plan-making and development proposals* so that problems can be identified and assessed. It goes onto to state that '*opportunities to promote walking, cycling and public transport use are identified and pursued*'.

5.3.6 As set out in section 108(3) of Transport Act 2000 each local transport authority must prepare a local transport plan, with subsection (3B) requiring that in complying with the duty under subsection (1)(b), that it has regard to the proposals contained in its plan.

5.3.7 The LTP 4 Strategy sets out NCC's plans, policies and programmes on transport and transport infrastructure for the region. Policies 4, 8, 10, 11, 13, 15, 17 and 21 of the LTP are considered of most relevance to the Proposed Scheme and are addressed below.

Accordance with policy

5.3.8 Before addressing the question of how the proposal accords with policy on transport improvements, it is worth setting out some general comments on the main policy, Policy 4 of the GNLP, because it is a composite policy with several different strands, and it needs to be seen and applied in its proper context.

5.3.9 The first element of GNLP Policy 4 addresses all types of strategic infrastructure improvements. It covers both what is needed to support the timely delivery of the development promoted by the GNLP and also what may

be needed to support the wider growth needs of the area. This element of the policy does not set any specific development management tests but is generally supportive of all strategic infrastructure improvements serving the needs of the area.

5.3.10 The second element of Policy 4 is specific to transport infrastructure, and is in three parts. The first part is applicable to all 'transport improvements', whether proposals of the GNLP or not, and sets out objectives that any such transport improvements should seek to achieve. The second part is directed to the transport infrastructure that is to be brought forward to support the development aims of the GNLP. It sets out what such infrastructure is intended to achieve in conjunction with the growth promoted by the GNLP. The third part sets out how the other two parts will be achieved and includes reference to the TfN strategy and to the transport proposals planned or underway by other bodies, including by NCC as local highway authority, National Highways, and rail operators. As noted above, this part of GNLP Policy 4 recognises the NWL as a project being promoted by the Applicant.

5.3.11 The next element of GNLP Policy 4 addresses other (non-transport) strategic infrastructure and has no relevance to the Proposed Scheme. The final element of GNLP Policy 4 addresses non-strategic infrastructure and is also not relevant.

5.3.12 Returning to the second element of GNLP Policy 4, the Applicant acknowledges that the NWL is not a specific proposal of the GNLP, but it is, nonetheless, a transport improvement within the remit of GNLP Policy 4 in so far as the Policy sets out objectives to be achieved by such improvements or development management tests to be satisfied. It is therefore relevant to consider the extent to which the proposal will achieve (or help to achieve) the objectives in the first part of this element of Policy 4. The second part of this element is not directly relevant, because it is concerned with the specific transport infrastructure that is needed to support the development aims of the GNLP. However, consideration has been given to this aspect to the extent that it has any potential relevance.

5.3.13 With the above remarks in mind, GNLP Policy 4 is now addressed.

5.3.14 The first element of GNLP Policy 4 states that '*Strategic infrastructure improvements will be undertaken to support timely delivery of the Greater Norwich Local Plan and the wider growth needs of the area'* with a key element of this being '*Transport Improvements'*.

5.3.15 The supporting text (paragraph 241 of the GNLP) that accompanies GNLP Policy 4 recognises that '*Greater Norwich is a mixed urban and rural area in which travel and access issues vary, with the use of the private car being particularly important to the rural economy'*.

5.3.16 The Key Diagram in the GNLP identifies the 'Western link road' (the Proposed Scheme) as being located on the outer edge of the 'Strategic growth area'. GNLP Policy 1 (The Sustainable Growth Strategy) states that '*Most of the housing, employment and infrastructure growth is focussed in the Strategic Growth Area illustrated on the Key Diagram'*.

5.3.17 There are several housing and employment allocations, including the proposed Food Enterprise Zone near Easton and developments at Norwich Airport identified to the west of Norwich (GNLP – Part 2 - Strategic Sites - see Appendix C of this Statement), within the vicinity of the Proposed Scheme.

5.3.18 Although not required to facilitate any of these individual sites, Part 4.6 of the Transport Assessment (Document reference: 4.01.00) confirms that investing in new infrastructure such as the Proposed Scheme will help to unlock capacity in the highway network that will be used by vehicles travelling to and from the proposed housing allocations.

5.3.19 Part 4.5 of the Transport Assessment (Document reference: 4.01.00) confirms that a new link crossing the River Wensum allowing traffic to avoid congestion would substantially enhance the accessibility of a number of the existing employment sites, including Norfolk and Norwich University Hospital, the University of East Anglia and Longwater Retail Park and help in improving capacity to support the development of proposed employment allocations as set out in the GNLP, supporting the timely delivery of the aims of the GNLP

and the wider growth needs of the area in accordance with the first element of GNLP Policy 4 as identified above.

5.3.20 In relation to the objectives that transport improvements should seek to achieve, as set out in GNLP Policy 4, (first part of the second element) it is considered that the Proposed Scheme will support the development of Norwich as the regional capital. The Vision for the GNLP expects that most of the jobs growth will be '*delivered on key strategic sites in and around Norwich with good access to public transport, the major road network and a comprehensive cycling network. This will contribute to the growing national importance of the Cambridge Norwich Tech Corridor and strengthen Norwich's role as the regional capital'*.

5.3.21 As set out in paragraph 6.3.19 above, the Transport Assessment (Document reference: 4.01.00) confirms that the Proposed Scheme will enhance the accessibility of a number of existing and proposed employment and housing sites and will provide access to the major road network. It is noteworthy in relation to housing and employments sites, that GNLP Policy 1 (Sustainable Growth Strategy) states that '*The sustainable growth strategy will be supported by improvements to the transport system…'*.

5.3.22 By addressing the strategic connectivity gap in the road network between the A1067 and the A47 to the west of Norwich, the Proposed Scheme will substantially enhance the accessibility of key sites including the Food Enterprise Zone, University of East Anglia, Norwich Research Park and Norwich Airport, all identified as forming part of the Cambridge Norwich Tech Corridor. The Proposed Scheme will also complete the orbital route around Norwich further enhancing the highway network in the region. This will support the strategic growth of the Cambridge Norwich Tech Corridor.

5.3.23 By re-directing inappropriate traffic on the existing local road network and addressing the transport issues as set out in section 3.4 of this Statement, the Proposed Scheme will offer increased route options to the market towns and rural areas to the west of Norwich.

5.3.24 The NMU provision that forms part of the Proposed Scheme will enhance and join up an extensive network of off-road routes and provide a new network of cycle routes as set out in section 2.3 of this Statement in line with the GNLP Vision relating to developing the role of Norwich as the regional capital.

5.3.25 Furthermore, it is anticipated that the Proposed Scheme would support better bus journey time reliability on existing routes by freeing up road space on existing roads.

5.3.26 The NMU provision and the improved bus journey times are considered to promote a modal shift away from private cars for the local communities and improve public transport accessibility and will offer increased route options to and between the market towns, villages and rural areas to the west of Norwich.

5.3.27 Taken as whole, the Proposed Scheme is therefore considered to accord with the first part of the second element of GNLP Policy 4 as it will develop the role of Norwich as the regional capital, support strategic growth in the Cambridge Norwich Tech Corridor, improve access to market towns and rural areas and promote sustainable and active transport.

5.3.28 As noted, the second part of the second element of GNLP Policy 4 is not considered directly relevant because it is concerned with the specific transport infrastructure that is needed to support the development aims of the GNLP. However, in line with the development aims of the GNLP it is considered that the Proposed Scheme will improve access to employment and residential sites located outside of the Norwich urban area, with the noted NMU provision and the improved bus journey times improving transport networks.

5.3.29 The third part of the second element of GNLP Policy 4 sets out how the first and second parts will be achieved by:

> '*Having regard to the Transport for Norwich Strategy including consideration of its aims to:*
>
> - *Reduce carbon emissions and improve air quality,*

- *Significantly improve the bus, cycling and walking networks to promote modal shift.*
- *Develop the role of the park and ride system.*
- *Change attitudes to travel.*

5.3.30 In relation to the TfN, the supporting text that accompanies Policy GNLP 4 at paragraph 237 states:

> *"The Transport for Norwich Strategy (TfN) was adopted in 2021. It aligns with the LTP, providing further detail for the Norwich area (which roughly equates to the Strategic Growth Area in this plan). TfN focuses on carbon reduction and better air quality, including measures to improve walking, cycling and public transport facilities to support significant modal shift in the urban area during the plan period. This is required to assist in meeting national targets to achieve zero carbon development by 2050. The measures feature improvements to sustainable transport networks and interchanges, including Park and Ride enhancements. TfN also supports road improvements to enable the other measures, including the Long Stratton Bypass and the* ***Norwich Western Link*** *(see below).*

5.3.31 Paragraph 239 of the GNLP states:

> *"Norfolk County Council has identified the* ***Norwich Western Link*** *as one of its infrastructure priorities. A Preferred Route announcement was made in July 2019 and that route is shown on the Key Diagram. In May 2020 the DfT approved the Strategic Outline Business Case (SOBC) for the* ***Norwich Western Link*** *which gives the scheme conditional entry to the DfT's Large Local Majors project funding programme. Work continues to develop the scheme.*

5.3.32 Paragraph 242 of the GNLP goes on to state:

"Strategic transport improvements in Policy 4 include rail and airport improvements, along with road improvements including dualling of the A47, the Long Stratton bypass and the ***Norwich Western Link****."*

5.3.33 In summary it is considered that the Proposed Scheme has had regard to the aims of the TfN Strategy in terms of reducing carbon as follows.

5.3.34 It is noted that the Principal Contractor for the Proposed Scheme has committed to a number of measures to reduce carbon during the construction phase with additional recommendations to further reduce carbon emissions as part of the operational stage being explored by the Applicant.

5.3.35 The Proposed Scheme is also considered to be aligned with the environmental aims of the TfN Strategy that seeks to reduce carbon emissions by facilitating 'active travel', through the NMU provision and improvements to public transport journey times with the Proposed Scheme in place. With the Proposed Scheme in place, the Applicant will seek to pursue the wider Complementary Sustainable Transport Measures (see Chapter 2 of this Statement) at a more strategic level, aligning with the aims of the TfN Strategy in relation walking and cycling.

5.3.36 The Proposed Scheme would also improve public transport journey times by addressing the existing congestion on the local road network as set out in Chapter 3 of this Statement and would enhance access to existing Park and Ride sites (see paragraph 6.3.26 of this Statement). The enhancement of the public transport and Park and Ride network is considered to align with the aims of the TfN Strategy in terms of reducing carbon emission.

5.3.37 It is therefore considered that due regard to the aims of the TfN Strategy, as they relate to reducing carbon emission have been had and that the Proposed Scheme, when considered as a whole with the conclusions in terms of accordance with policy as set out in Section 6.6 (Greenhouse Gases and Climate Change), can be seen to accord with the third part of the second element of GNLP Policy 4.

5.3.38 Consideration of this aim from the TfN in terms of improvements to air quality is discussed in more detail in section 6.4 of this Statement (Air Quality and Noise & Vibration). Chapter 6 of the ES (Document reference: 3.06.00) reports that subject to the mitigation set out in the OCEMP (Document reference: 3.03.01), that the Proposed Scheme will have a negligible residual air quality effect (and so not significant in EIA terms) on human health receptors in both the construction and operational stages.

5.3.39 In relation to effects on sensitive habitats at ecological receptors, the significance of these is considered further in Section 6.5 of (Biodiversity) this Statement. In relation to air quality effects on ancient woodland and veteran trees, a total of 73 were scoped into the Air Quality Ecological Impact Assessment (Document reference: 3.10.34). All trees modelled were currently exceeding the critical level and load for Nitrogen (N) deposition and Ammonia (NH_3) and are predicted to continue exceeding the critical level and load for N deposition and NH_3 regardless of the Proposed Scheme being in place. An Air Quality Compensation Strategy is proposed to compensate for the predicted deterioration of these assets as a result of the Proposed Scheme. The Outline Air Quality Compensation Strategy (Document reference: 6.01.01) includes the measures to compensate for air quality impacts on veteran trees, ancient woodland and at other statutory and non-statutory designated sites as set out in section 6.4. of this Statement.

5.3.40 It is therefore considered that due regard to the aims of the TfN Strategy, as they relate to improving air quality have been had and that the Proposed Scheme, when considered as a whole with the conclusions in terms of accordance with policy as set out in Section 6.4 (Air Quality and Noise & Vibration), can be seen to accord with the third part of the second element of GNLP Policy 4.

5.3.41 GNLP Policy 4 states that the strategic infrastructure improvements will be achieved by having regard to aims of the TfN, notably in relation to the promotion of modal shift. In terms of promoting a modal shift in the area to the west of Norwich, the NMU provision that form part of the Proposed Scheme

will enhance and join up an extensive network of off-road routes. A new segregated cycle route and NMU crossing facility would be provided on A1067 connecting to Attlebridge and onward routes to the NCN1 Marriott's Way. A reduction in traffic on minor roads would also assist NMUs with safer travel opportunities and existing routes will become more attractive and less intimidating for users. The Proposed Scheme is assessed as part of the Transport Assessment (Document reference: 4.01.00) to result in beneficial effects on severance, pedestrian and cyclist delay, pedestrian and cyclist amenity, accidents and safety, delay and fear and intimidation. Furthermore, it is anticipated that the Proposed Scheme would assist with improving existing bus journey time reliability on existing routes by freeing up road space on existing roads.

5.3.42 The above elements of the Proposed Scheme are considered to promote a modal shift away from private cars for the local communities and improve public transport accessibility to and between the main towns and key service centres to the west of Norwich. In doing so it is considered that the Proposed Scheme has had regard to the aims of the TfN Strategy in relation to the 'Statement of Policy – Active Travel' and so can be seen to accord with the third part of the second element of GNLP Policy 4.

5.3.43 The Proposed Scheme is also considered to assist in developing the role of the Park and Ride system in the Norwich area by facilitating access to the Park and Ride sites on the western edge of Norwich at Costessey and Norwich Airport. The Proposed Scheme will link the two radial corridors into Norwich (the A1067 and A47) on the western side of the city, allowing Park and Ride traffic to avoid the outer ring road. In doing so it is considered that the Proposed Scheme has had regard to the aims of the TfN Strategy in relation to 'Statement of Policy - Norwich Park and Ride' and so can be seen to accord with the third part of the second element of GNLP Policy 4.

5.3.44 Overall, the above noted proposals for enhancing the NMU provision and improvements to the major road network that would support improved public transport, are considered to assist in providing and promoting more choice in

terms of sustainable and active transport modes, with wider transport benefits of the Proposed Scheme in terms of additional routes, capacity and supporting better journey times. The amalgamation of these factors is considered to influence attitudes to travel in a positive manner. In doing so it is considered that the Proposed Scheme has had regard to the aims of the TfN Strategy in relation to 'Changing Attitudes and Behaviours' and so can be seen to accord with the third part of the second element of GNLP Policy 4.

5.3.45 When assessing accordance with the DM DPD Policy TS2, it should be noted that this planning application is supported by a Transport Assessment (Document reference: 4.01.00), and a Travel Plan will be produced for the construction stage of the Proposed Scheme that will be secured by way of a suitable planning condition. The Proposed Scheme is in therefore full accordance with this element of the policy.

5.3.46 In terms of accordance with the secondary element of DM DPD Policy TS2, that being the requirement for: '*Developers to include proposals to deal with any consequences of their development in terms of maximising access by foot, cycle and public transport*' and the safety focussed objectives of DM DPD Policy TS3, being: "*Development will not be permitted where it would result in any significant adverse impact upon the satisfactory functioning or safety of the highway network*.", it should be recognised that as per the findings set out in Chapter 19 of the ES (Traffic and Transport) (Document reference: 3.19.00), the Proposed Scheme is reported to result in beneficial effects on severance, pedestrian and cyclist delay, pedestrian and cyclist amenity, accidents and safety, delay and fear and intimidation. Furthermore, it is anticipated that the Proposed Scheme would potentially assist with supporting better bus journey time reliability on existing routes by freeing up road space on existing roads.

5.3.47 The Sustainable Transport Strategy (Document reference: 4.02.00) submitted in support of the Proposed Scheme confirms that the Proposed Scheme will deliver a range of key benefits for sustainable travel in the area to the west of Norwich, as confirmed in Part 11.3 of the document:

'The Proposed Scheme will provide enhanced access to the Public Rights of Way network, with the standard of routes improved and the existing fragmented network would be joined up. Routes would connect to the Broadland Northway at the northern end, and to routes crossing the A47 at the south, connecting the villages of Honingham, Ringland and Weston Longville; the Marriott's Way; Costessey Park & Ride; Norwich Research Park; Taverham; and Drayton. The measures are forecasted to increase the number of walking and cycling trips across the study area by making the routes more attractive and safer for users, as well as logically placed to connect key amenities. The local roads across the wider area are also expected to receive levels of traffic reduction which would help to make walking and cycling on the carriageway more attractive (supported by additional speed management measures where appropriate)."

5.3.48 Section 6 of the Sustainable Transport Strategy (Document reference: 4.02.00) also sets out the NMU provision that forms part of this application and explains in Section 7 how a suite of wider complementary sustainable transport measures will be pursued in the vicinity of the Proposed Scheme at a more strategic level, and which would be made possible by the forecasted reduction in traffic on local roads brought about by the operation of the Proposed Scheme maximising access by foot, cycle and public transport in the area to the west of Norwich. These works would be implemented separately from the Proposed Scheme via NCC's powers as the Highway Authority.

5.3.49 As part of the Transport Assessment (Document reference: 4.01.00) a Personal Injury Accident (PIA) review has been conducted across the study area to determine whether there are any integral highway safety issues where increases in vehicular, pedestrian and cycle movements associated with the Proposed Scheme are anticipated. The Transport Assessment (Document reference: 4.01.00) concludes that the Proposed Scheme will reduce road accidents and improve access to the MRN and SRN to the west of Norwich.

As such the Proposed Scheme fully accords with Policy TS3 in this regard. In addition to highways safety aspects, DM DPD Policy TS3 is equally concerned with the proper functioning of the highway network. The submitted Transport Assessment (Document reference: 4.01.00) assessed all junctions impacted by the Proposed Scheme to understand the capacity and operational impacts caused. It concluded:

> *"The detailed junction assessments demonstrate that the vast majority of junctions within the TA scope are found to operate within capacity in the 2039 future year 10 years after opening of the NWL scheme. Many of the junctions are shown to receive traffic relief as a result of the NWL scheme. There are a small number of junctions where there are slight increases in traffic, queues and delays as a result of the scheme, but queue lengths remain acceptable, so no mitigation is proposed."*

5.3.50 Given that the application is accompanied by a full Transport Assessment (Document reference: 4.01.00), that the future preparation of a Travel Plan for the construction stage will be secured by way of a suitable planning condition, the measures relating to maximising access by foot, cycle and public transport as set out in the Sustainable Transport Strategy (Document reference: 4.02.00), along with the safety objectives as set out in the PIA that would be realised, the Proposed Scheme can be seen to fully accord with the DM DPD policies TS2 and TS3.

NCC Environmental Policy

5.3.51 In addition to compliance with adopted Development Plan policy, it is considered that the Proposed Scheme is consistent with the aims and objectives of NCC's Environmental Policy, as the Proposed Scheme has both been designed to take account and limit impacts caused by the route selection (as evidenced within chapter 4 of the ES (Reasonable Alternatives Considered – Document reference: 3.04.00) and where impacts are identified, appropriate mitigation will be implemented, as evidenced within the supporting Ecological Mitigation Strategy (Document reference: 3.10.32).

Summary

5.3.52 The Proposed Scheme will help to unlock capacity in the highway network that will be used by vehicles travelling to and from the proposed housing and employment allocations, supporting the timely delivery of the aims of the GNLP and the wider growth needs of the area in accordance with GNLP Policy 4 as set out in the first element of the policy.

5.3.53 The Proposed Scheme is considered to accord with the first part of the second element of GNLP Policy 4 as it will develop the role of Norwich as the regional capital, support strategic growth in the Cambridge Norwich Tech Corridor, offer increased route options to market towns and rural areas and promote sustainable and active transport.

5.3.54 The second part of the second element of GNLP Policy 4 is not considered directly relevant, because it is concerned with the specific transport infrastructure that is needed to support the development aims of the GNLP, but the Proposed Scheme is considered to align with this part's broad aims.

5.3.55 The Proposed Scheme is considered to accord with the third part of the second element of GNLP Policy 4 as due regard has been had to the aims of the TfN in relation to:

- the reduction in carbon emissions and improvements to air quality (sections 6.6 and 6.4 of this Statement respectively).
- The promotion of modal shift with the NMU provision and improvements to the major road network that would support improved public transport;
- development of the Park and Ride system by facilitating access sites on the western edge of Norwich at Costessey and at Norwich Airport; and
- the amalgamation of the above factors and their influence on positive attitudes to travel.

5.3.56 It is noted that GNLP Policy 4 states that '*Having regard to the Transport for Norwich Strategy including consideration of its aims to…Reduce carbon emissions and improve air quality'*.

5.3.57 Consideration of this aim from the TfN in terms of reducing carbon emissions is discussed in more detail in section 6.6 of this Statement (Green House Gases and Climate Change).

5.3.58 Taken as whole, the Proposed Scheme is considered to accord with GNLP Policy 4.

5.3.59 Given that the application is accompanied by a full Transport Assessment (Document reference: 4.01.00), that the future preparation of a Travel Plan for the construction stage will be secured by way of a relevant planning condition, the measures relating to maximising access by foot, cycle and public transport as set out in the Sustainable Transport Strategy (Document reference: 4.02.00) along with the safety objectives as set out in the PIA that would be realised, the Proposed Scheme can be seen to fully accord with the DM DPD policies TS2 and TS3.

5.3.60 It is therefore considered that taken as a whole, the Proposed Scheme accords with GNLP Policy 4 and satisfies the requirements of DM DPD policies TS2 and TS3 and so is considered to accord with Development Plan.

Local Transport Plan 4 Strategy and Implementation Plan – Transport Improvements

5.3.61 In relation to NCCs duties as set out in subsection 108 of the Transport Act 2000 where regard must be had to the proposals made in the local transport plan – in this case LTP 4 and its Implementation Plan, the below is provided to inform a judgement on the discharge of these.

5.3.62 Policies 4, 8, 10, 11, 13, 15, 17 and 21 of the LTP 4 are considered of most relevance to the Proposed Scheme and are addressed below.

5.3.63 Policy 4 of the LTP states that:

'We will work with people to shape the way they travel, why they are travelling and whether they need to travel, encouraging behaviour change and interventions that can help to increase the use of sustainable transport'.

5.3.64 The Proposed Scheme will encourage a modal shift with the NMU provision and improvements to the major road network that would support improved public transport considered to assist in increasing the use of sustainable transport in line with the aims of Policy 4 of the LTP.

5.3.65 Policy 8 of the LTP states that:

'Our priority will be to improve major road and rail connections between larger places in the county, and to major ports, airports and cities in the rest of the UK'.

5.3.66 The supporting text of Policy 8 of the LPT identifies the Proposed Scheme as a priority project for NCC in ensuring quick, reliable journey times for longer-distance journeys.

5.3.67 Policy 10 of the LTP states that:

'We will seek to improve connectivity between rural areas and services in urban centres.'

5.3.68 It is considered that the Proposed Scheme aligns with Policy 10 of LTP as it will improve connectivity between rural areas and services in urban centre (see paragraphs 6.3.21 to 6.3.25 of this Statement).

5.3.69 Policy 11 of the LTP states that:

'When making changes and improvements to our transport network, and in working with users on how they choose to use the transport network, we will seek to understand the consequences of the decisions on meeting the collective challenge of protecting and improving our global environment to meet the environmental policy target of working towards carbon neutrality'.

5.3.70 In relation to Policy 11 of the LTP, section 6.6 of this Statement discusses carbon emissions in further detail.

5.3.71 Policy 13 of the LTP states that:

> *'We will seek to improve quality of place, conserving and enhancing our built and historic environments, when we take action to improve the transport network'.*

5.3.72 When taken as a whole the Proposed Scheme is considered to improve the quality of place in line with Policy 13 for the communities to the west of Norwich, with the mitigation hierarchy employed throughout the optioneering process (see Chapter 4 of this Statement). Where impacts could not be avoided, a suite of mitigation proposals has been committed to as set out in the ES (document reference: 3.10.00). Compensation measures have also been committed to by the Applicant.

5.3.73 Policy 15 of the LTP states that:

> *'We will identify routes important for sustainable and active transport and give priority – especially in urban areas – to sustainable and active modes of transport.'*

5.3.74 Section 6 of the Sustainable Transport Strategy (Document reference: 4.02.00) sets out the NMU provision that forms part of this application and explains in section 7 how a suite of wider complementary sustainable transport measures will be pursued in the vicinity of the Proposed Scheme at a more strategic level supporting sustainable and active modes of transport in line with Policy 15 of the LTP.

5.3.75 Policy 17 of the LTP states that:

> *'Using the safe systems approach, the county council and road safety partners will work together to contribute to a reduction in the number of people killed and seriously injured on the road network.'*

5.3.76 The Transport Assessment (Document reference: 4.01.00) concludes that the Proposed Scheme will reduce road accidents and improve access to the MRN and SRN to the west of Norwich. In line with Policy 17 of the LTP.

5.3.77 Policy 21 of the LTP states that:

> *'The likely impacts of climate change on the highway network should be addressed to ensure assets are resilient. Where assets can't be made resilient to impacts of climate change, such as coastal erosion, we should have planned alternatives so we can respond faster and avoid disruption. We will use a risk-based approach to determine the priority for action'.*

5.3.78 Policy 21 of the LTP relating to climate change is discussed in further detail under section 6.6 of this Statement.

5.3.79 It is therefore judged that the Applicant has had regard to the proposals contained in the LTP 4 when developing the Proposed Scheme and that~~'s~~ its development would support the overall aims of the plan.

5.4 Air Quality and Noise & Vibration

Relevant Development Plan Policy

5.4.1 **GNLP Policy 2(7) ('Sustainable Communities')** states that development proposals should where relevant:

> *"Avoid risks of unacceptable levels of soil, air, water and noise pollution and/or land instability".*

5.4.2 **GNLP Policy 4 (Strategic Infrastructure)** sets out that the aims of the policy will be achieved by '*Having regard to the Transport for Norwich Strategy including consideration of its aims to - Reduce carbon emission and improve air quality'*.

5.4.3 In relation to pollution from Air Quality and Noise & Vibration, **DM DPD Policy EN4 ('*Pollution'*)** sets out that:

"Development proposals will be expected to include an assessment of the extent of potential pollution. Where pollution may be an issue, adequate mitigation measures will be required. Development will only be permitted where there will be no significant adverse impact upon amenity, human health or the natural environment."

5.4.4 The supporting text to this policy confirms at paragraph 3.29 that: "*in considering development proposals regard will be given to the risk and impact of potential pollution including that of land, water, noise or air*".

National Policy and other Material Considerations

5.4.5 Paragraph 180 of the NPPF states that developments should contribute to and enhance the natural and local environment by:

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

5.4.6 Paragraph 192 of the NPPF states that planning applications should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking account of the presence of Air Quality Management Areas.

5.4.7 Paragraph 194 of the NPPF states that planning decisions should assume that the control of emissions will operate efficiently but that 'Planning decisions should assume that these regimes will operate effectively'.

Air Quality

Accordance with Policy

5.4.8 Chapter 6 of the ES (Document reference: 3.06.00) identifies the impacts and assess the effects of the Proposed Scheme on Air Quality within a defined study area (see sections 6.3.6 to 6.3.13 of Chapter 6 of the ES (Document

reference: 3.06.00)). It considers the emissions associated with the construction and the likely significant effects of the operation of the Proposed Scheme on local air pollution concentrations on the affected road network.

Construction Stage Air Quality Effects

5.4.9 The following elements are considered to have the potential to give rise to likely significant effects on Air Quality during the construction stage of the Proposed Scheme and have therefore been considered within the ES assessment:

- *Dust generated during construction impacting human and ecological receptors;*
- *Emissions from road traffic in relation to human health at human receptors; and*
- *Emissions from road traffic in relation to sensitive habitats at ecological receptors.*

5.4.10 The construction contractor will be required use Best Practicable Means to mitigate potential dust impacts. The requirements for these are set out in the OCEMP (Document reference: 3.03.01) that accompanies this application. The contractor will be required to routinely monitor the effectiveness of dust mitigation. Regular inspections will be undertaken to monitor dust. The frequency of monitoring will be increased when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions. This requirement is set out in the OCEMP (Document reference: 3.03.01).

5.4.11 Subject to the mitigation set out in the OCEMP (Document reference: 3.03.01), it is reported that the residual effect will be negligible in the construction stage and therefore not significant in EIA terms.

5.4.12 The assessment in Chapter 6 of the ES (Document reference: 3.06.00) considered the potential effects of changes to vehicle emissions caused by construction traffic on people (human health) and wildlife.

5.4.13 In relation to the effects on people, the assessment concluded that changes in air quality, are likely to be negligible (not significant). It is therefore reported that the residual effect of emissions from construction traffic will be negligible and therefore not significant in EIA terms.

5.4.14 In relation to impacts on sensitive habitats at ecological receptors, the significance of these effects is considered further in Section 6.5 of this Statement.

Operational Stage Air Quality Effects

5.4.15 Chapter 6 of the ES (Document reference: 3.06.00) sets out that the following elements may give rise to likely significant effects during the operational stage of the Proposed Scheme:

- *Emissions from road traffic in relation to human health at human receptors; and*
- *Emissions from road traffic in relation to sensitive habitats at ecological receptors.*

5.4.16 In relation to the effects on human health, the assessment concluded that changes in air quality, both positive and negative, are predicted to be negligible (not significant) and recommended no further mitigation.

5.4.17 In relation to impacts and effects on sensitive habitats at ecological receptors, the significance of these effects is considered further in Section 6.5 of this Statement.

Summary in relation to Air Quality

5.4.18 It is considered that the Proposed Scheme accords with GNLP Policies 2(7) ('Sustainable Communities'), GNLP Policy 4 (Strategic infrastructure) and DM DPD Policy EN4 as they relate to air quality, with the application accompanied by a full assessment of potential emissions to air in both its construction and operational stages (Chapter 6 of the ES (Document reference: 3.06.00)).

5.4.19 Where significant adverse effects have been reported, mitigation has been set out in the OCEMP (Document reference: 3.03.01), with the resulting residual effects being reported as negligible in the construction stages and therefore not significant in EIA terms.

5.4.20 It is considered that in relation to Air Quality, the Proposed Scheme will have a negligible residual effect (and so not significant in EIA terms) on the above noted receptors within the air quality study area in both the construction and operational stages.

5.4.21 In relation to impacts and effects on sensitive habitats at ecological receptors arising from changes to air quality, again the significance of these effects is considered further in Section 6.5 of this Statement.

Noise / Vibration

Accordance with Policy

5.4.22 Chapter 7 of the ES (Document reference: 3.07.00) assesses likely significant environmental effects arising from the Proposed Scheme in relation to noise and vibration.

5.4.23 The assessment focussed on identifying likely significant effects on residents and businesses located near to the Proposed Scheme both during construction and once it opens to traffic, setting out appropriate mitigation to avoid or reduce adverse effects.

5.4.24 In terms of the existing baseline at the northern end of the Proposed Scheme, noise levels are currently dominated by road traffic from Fakenham Road (A1067). Moving south there is some contribution to the baseline noise levels from road traffic on the nearby local roads, albeit at a low level. At the southern end of the Proposed Scheme, noise levels are dominated by road traffic from the A47. Generally, for homes and businesses not located near to either the A1067 or A47, the Proposed Scheme is situated in a mainly rural area and the existing noise levels are low.

Construction Stage Noise and Vibration Effects

5.4.25 The construction stage assessment found that significant adverse effects from on-site construction noise could potentially occur at 6 residential dwellings near to the Proposed Scheme, with significant adverse noise effects also being reported in relation to receptors within 50m of the proposed site access route on Wood Lane / Paddy's Lane from construction traffic noise.

5.4.26 After taking into account the mitigation measures proposed in the OCEMP (Document reference: 3.03.01), the assessment concluded that significant residual adverse effects would still occur at 6 properties.

5.4.27 However, it is noted that these effects would be temporary. Construction works shall be monitored on site in line with the process set out in the OCEMP (Document reference: 3.03.01) to ensure that best practicable means and other appropriate mitigation measures are being adhered to.

Operational Stage Noise and Vibration Effects

5.4.28 The operational stage assessment found that significant adverse effects are predicted for 12 properties located north-east of the Proposed Scheme as a result of noise levels from the Proposed Scheme.

5.4.29 The operational stage assessment also found that close to the Proposed Scheme significant beneficial effects are predicted for 3 properties located directly off Wood Lane, anticipated as a result of reduced traffic flows on Wood Lane.

5.4.30 Further afield, there would be a combination of significant beneficial effects resulting from a reduction in traffic flows predicted on some existing local roads, but also significant adverse effects on other existing local roads as a result of increases in traffic flows. This is a consequence of traffic re-routing to take advantage of the Proposed Scheme.

5.4.31 Mitigation has been proposed in Chapter 7 of the ES (Document reference: 3.07.00), but significant adverse residual effects remain for the 12 properties.

Summary in relation to Noise and Vibration

5.4.32 It is considered that the Proposed Scheme accords with GNLP Policy 2(7) ('Sustainable Communities') and DM DPD Policy EN4 as they relate to noise and vibration as the application is accompanied by a full assessment of potential effects in both its construction and operational stages (Chapter 7 of the ES (Document reference: 3.07.00)).

5.4.33 Where significant adverse effects have been reported, mitigation has been set out in the OCEMP (Document reference: 3.03.01) to reduce the residual effects as far as reasonably practicable.

5.4.34 In the construction stage, works shall be monitored on site in line with the process set out in the OCEMP (Document reference: 3.03.01) to ensure that best practicable means and other appropriate mitigation measures are being adhered to. It is noted that the adverse effects as part of this stage are by their nature temporary.

5.4.35 In the operation stage, mitigation measures relating to the adverse effects including a low noise road surface, screening from earthworks and the River Wensum Viaduct barrier are included in the Proposed Scheme design. However, significant adverse residual effects remain for the 12 noted properties.

5.4.36 It is therefore considered that the Proposed Scheme has adhered to the mitigation hierarchy and has provided mitigation that the Applicant is committed to. The Proposed Scheme is therefore considered to accord with GNLP Policy 2(7) ('Sustainable Communities') and DM DPD Policy EN4 as they relate to noise and vibration.

5.5 Biodiversity

Relevant Development Plan Policy

5.5.1 **GNLP Policy 3 ('Environmental Protection – the Natural Environment')** states that:

"Development proposals should enhance the natural environment through:

• Being designed to respect, conserve and enhance natural assets, taking account of local design and other guidance such as landscape character assessment;

• Avoiding harm to designated and non-designated assets of the natural environment, having regard to their level of significance (local, national, and international) in accordance with the requirements of the NPPF and relevant policies in other Development Plan Documents and Neighbourhood Plans.

• Following a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated.

• Undertaking a relevant assessment (such as a landscape or ecological assessment) if impacts to a natural asset might arise.

• Provision of new, or conservation or enhancement of existing, green infrastructure to contribute (directly or indirectly) to the strategic green infrastructure network having regard to local green infrastructure strategies.

• Respecting landscape character and retaining important views and features, having regard to landscape character assessments and sensitive areas such as landscape settings, strategic gaps and green spaces identified in Local or Neighbourhood Plans, and to the importance of the nationally designated Broads Authority area and its setting.

In applying the above, regard will be given to the level of importance of the natural asset.

In addition, development will deliver net biodiversity gain through the provision of on-site or off-site natural features, creating new or enhancing existing green infrastructure networks that have regard to local green infrastructure strategies. It should be demonstrated that the gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the existing situation."

5.5.2 **GNLP Policy 3 ('Environmental Protection – the Natural Environment')** goes on to state:

"Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations at application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the application will be refused unless it passes the tests set out in Regulation 62, and any necessary compensatory measures will need to be secured.

Within the catchments of the River Wensum Special Area of Conservation (SAC), The Broads SAC and the Broadland Ramsar: (Non-residential development that)

- *by virtue of its scale and type may draw people from outside the catchments of the SACs;*
- *and/or may generate unusual quantities of surface water;*

  and/or, by virtue of the processes undertaken, may contain unusual pollutants within surface water run-off,

must provide evidence to enable the local planning authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites in an unfavourable condition."

5.5.3 **GNLP Policy 4 (Strategic Infrastructure)** sets out that the aims of the policy will be achieved by '*Having regard to the Transport for Norwich Strategy*

including consideration of its aims to - Reduce carbon emission and improve air quality'.

5.5.4 **Policy EN1 (Biodiversity and Habitats)** of the DM DPD states that:

> *'Development proposals will be expected to protect and enhance the biodiversity of the district, avoid fragmentation of habitats, and support the delivery of a co-ordinated green infrastructure network throughout the district.*
>
> *Where harmful impacts occur, it should be adequately demonstrated that:*
>
> - *The Development cannot be located where it would cause less or no harm;*
> - *That adequate mitigation is incorporated, including specific mitigation requirements to address impacts upon international wildlife sites (Natura 2000 sites; and*
> - *That the benefits of the development clearly outweigh the impacts'*

5.5.5 The supporting text of **Policy EN1 (Biodiversity and Habitats)** of the DM DPD sets out that:

> *'All new developments will ensure that there will be no adverse impacts on European and Ramsar designated sites and no adverse impacts on European protected species in the area and beyond including by storm water runoff, water abstraction, or sewage discharge. They will provide for sufficient and appropriate local green infrastructure to minimise visitor pressures. Development likely to have any adverse effect on nationally designated sites and species will be assessed in accordance with national Policy and legislation.'*

5.5.6 The supporting text of **Policy EN1 (Biodiversity and Habitats)** of the DM DPD also states:

'In areas not protected through international or national designations, development will:

- *minimise fragmentation of habitats and seek to conserve and enhance existing environmental assets of acknowledged regional or local importance. Where harm is unavoidable, it will provide for appropriate mitigation or replacement with the objective of achieving a long-term maintenance or enhancement of the local biodiversity baseline.*
- *contribute to providing a multifunctional green infrastructure network, including provision of areas of open space, wildlife resources and links between them, both off site and as an integral part of the development.*
- *help to make provision for the long-term maintenance of the green infrastructure network.*
- *protect mineral and other natural resources identified through the Norfolk Minerals and Waste Development Framework.'*

5.5.7 **Policy EN3 ('Green Infrastructure')** of the DM DPD states that:

"*All development will be expected to maximise opportunities for the creation of a well-managed network of wildlife habitats'* and

'*development will also be expected to make adequate arrangements for the management and maintenance of green infrastructure*."

National Policy and other Material Considerations

5.5.8 When assessing compliance with National Planning Policy Guidance, the NPPG states that, with reference to NPPF, *"Where a development cannot satisfy the requirements of the 'mitigation hierarchy', planning permission should be refused".* The NPPF itself conveys this narrative at paragraph 186 a) stating that: *"If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused".*

5.5.9 In relation to development on land within or outside a SSSI, paragraph 186 b) of the NPPF states that:

> *'development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest'.*

5.5.10 In respect of Arboricultural impacts, paragraph 186 c) of the NPPF sets out that:

"c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;"

5.5.11 Footnote 67 of the NPPF identifies examples of what would constitute '*wholly exceptional circumstances*' as: '*For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat*.'

Accordance with policy

5.5.12 In accordance with the hierarchy as set out in GNLP Policy 3, the design of the Proposed Scheme, where possible, has included embedded mitigation to seek firstly to avoid potential adverse effects to biodiversity.

5.5.13 The baseline biodiversity studies carried out to inform the EIA process identified the presence of a range of habitats that are international, national and county level designated sites and a range of protected and other species of conservation value.

5.5.14 The design of the Proposed Scheme has sought to retain and protect woodland and hedgerows as far as reasonably practicable to minimise effects upon a range of protected species (bats, badgers, other mammals, breeding birds, reptiles, and invertebrates). This includes the retention and maintenance of Habitat of Principal Importance (HPI) for their intrinsic value.

5.5.15 The preferred alignment of the Proposed Scheme has been optioneered to avoid important ecological features where possible, most notably the River Wensum SAC/ SSSI and Notable, Veteran and Ancient Trees, with this iterative optioneering process described in Chapter 4 of this Statement Each stage of the optioneering process described in Chapter 4 of this Statement and Chapter 4 of the ES (Document reference 3.04.00) and its associated appendices has considered ecological impacts as part of the process, to seek to avoid where impacts as much as is possible. This has included design development following the preferred option being chosen and consideration of impacts to particular ecological interests such as bats, ancient and veteran trees and ancient woodland.

5.5.16 Avoidance measures embedded in Proposed Scheme design include:

- Refining the route to avoid a tree supporting a barbastelle maternity roost within Rose Carr woodland, and reducing the area of woodland loss in adjoining woodland;
- Retaining further bat roosts, by refining the construction clearance extents where possible;
- Refining the construction clearance extents where possible to reduce vegetation loss throughout the Proposed Scheme; and
- Implementing a sensitive lighting strategy during construction, to avoid light spill on known roosts, and sensitive foraging and commuting routes.

5.5.17 Where impacts such as habitat loss has been unavoidable, mitigation in line with local and national planning policy has been provided.

5.5.18 The Proposed Scheme includes the following broad ecological mitigation measures:

- Landscape planting as part of the Proposed Scheme design;
- The provision of a viaduct over the River Wensum. The design of the viaduct structure comprises a ten-span single-deck weathering steel trapezoidal box girder bridge with a reinforced concrete deck slab. The span arrangement responds well to the constraints of the surrounding environmental baseline by minimising the number of piers within the floodplain. Additionally, a 1.2m acoustic barrier proposed for the entire length of both carriageways of the River Wensum viaduct would provide noise mitigation for ecological features.
- Green bridges are proposed to provide multi-functional connections east to west, across the Proposed Scheme. The green bridges have been designed in response to their setting, to replicate as far as is practicable, the conditions which enable use / navigation by wildlife such as linear vegetation and 'dark' corridors, to ensure continued use of these routes.
- Drainage systems designed to intercept and divert run-off away from watercourses and floodplains, most notably the River Wensum.
- Where culverts are required, these would be 'oversized' culverts wherever feasible to encourage the passage of otter, water vole, fish, aquatic invertebrates and plants.
- The provision of earth bunds within the design, which would provide screening from noise.
- Habitat enhancement – Areas of habitat (such as watercourses and ditch networks) within and adjacent to the Proposed Scheme will be managed to improve their condition.

- Translocation or displacement – Features will be moved or displaced from an area affected by the Proposed Scheme (the donor site) to a new area (a receptor site) that will be managed for wildlife.

5.5.19 Where impacts are unable to be mitigated then compensation measures are being put in place, namely:

- Habitat creation – Habitat creation will be undertaken to replace areas lost to the Proposed Scheme, including the creation of new areas of woodland, wetland and grassland. Newly created habitats will be either planted, sown or left to re-colonise naturally. It is considered that on reaching maturity, newly created habitats will be effective in the long-term at achieving compensation for the habitats lost and the species they support.
- The creation of features to provide replacement (or additional) breeding, sheltering and hibernating opportunities.
- The creation of new (or the enhancement of existing) structures or features to provide replacement (or additional) connective habitat.

5.5.20 In this way, the Applicant has followed the mitigation hierarchy. Chapter 10 of the ES (Document reference 3.10.00) reports the potential effects of the Proposed Scheme on habitats, protected species and designated sites of ecological importance, other than those that relate to bats which are reported separately in Chapter 11: Bat Ecology of the Environmental Statement (Document reference: 3.10.11).

Construction Stage Effects on Biodiversity

5.5.21 The construction stage assessment in Chapter 10 of the ES (Document reference 3.10.00) has shown that, taking into account the embedded mitigation measures and those set out in the OCEMP (Document reference: 3.03.01), the majority of species and habitats assessed would not be significantly affected by the Proposed Scheme.

5.5.22 In particular, it is noted that following mitigation that no significant effects are reported in the ES (Document reference 3.10.00) in relation to SSSIs during the construction stage.

5.5.23 Chapter 6 (Air Quality) of the ES (Document reference: 3.06.00) reported the construction effects in relation to designated sites and considered that with the use of Best Practicable Means to mitigate potential dust and traffic emissions impacts that negligible residual effects (not significant in EIA terms) would result. The mitigation requirements are set out in the OCEMP (Document Reference: 3.03.01).

5.5.24 However, despite these and other mitigation measures, there would remain significant effects associated with habitat loss affecting veteran trees and on bats during the construction stage and these are discussed further below.

Construction Stage Effects on Notable, Veteran and Ancient Trees

5.5.25 Several ancient and veteran trees were located along the NWL alignment. Whilst seven would require removal which cannot be avoided (See Arboricultural Impact Assessment **Appendix 10-35** of the Environmental Statement (Document Reference 3.10.35) for tree locations of the referenced trees) the design development has identified options that have been adopted to retain others. These are outlined below:

- Tree Reference - T34 – The tree was in conflict with the ditch next to pond number 5 and the earthworks would impact its Root Protection Area (RPA). Pond number 5 was reshaped to retain the tree.
- Tree Reference - T45 – The tree was in conflict with the creation of an earth bund and would have been impacted by the earthworks ditch. Earthworks were redesigned to allow retention.
- Tree Reference – T99 – Located east of the alignment next to the earth bund to be built. It would be impacted by the excavation of the ditch for the drainage pre-works. As such the earth bund design was reshaped to avoid the RPA and ditch next to it.

- Tree Reference – T113 – RPA slightly overlapped with an earth bund. As such the earth bund design was reshaped to avoid the RPA.
- Tree Reference – T309 – The tree was within an area earmarked for a construction compound. The construction compound boundary was moved so the RPA was outside the area.
- Other ancient or veteran trees (Tree references T33, T47, T72, T105, T112, W318) were reviewed at the very edge of the Proposed Scheme boundary and it was confirmed these could be retained without design changes. During construction, suitable tree protection measures would be included if works are carried out in proximity to the RPA boundary.
- Through the alignment refinement of the preferred route around Rose Carr, several veteran trees were protected from risk of removal.

5.5.26 Seven ancient and veteran trees are located along the Proposed Scheme alignment where they have been identified for removal. An optioneering report (**Appendix 4.4: Ancient and Veteran Trees Avoidance Alignment Optioneering Report** (Document reference 3.04.04)) which assessed the scheme impacts of retaining the seven trees has been produced. The report highlights how revising the alignment to avoid these trees will be detrimental to other environmental factors, including additional tree clearance and/or impact to bat habitats, and that therefore their retention is not possible.

5.5.27 For more details refer to Appendix 4.4 of Document reference 3.04.04. A summary of the main conclusions is provided below:

- Tree Reference – T20 and T49 – To save these trees, at least another Veteran or Ancient tree in addition to other Category A trees and areas of woodland would be removed. The Broadway Green Bridge (GB1) would also need to be realigned that would impact the alignment to the existing bat flight path, which would likely reduce its effectiveness.
- Tree Reference – T77 and T82 – To save these trees, the Broadway Green Bridge would have to be amended. The change could impact

the alignment to the existing bat flight path, which would likely reduce its effectiveness. Alignment shift will also result in removal of other ancient and veteran trees as a result of the new design footprint.

- LG138 and LG141– Change in alignment would increase and/or skew the spans of both Morton and Broadway green bridges. It would also result in clearance of other veteran trees, meaning the alignment shift to save LG138 and LG141 would have a net negative environmental impact.
- Tree Reference – T220 – cannot be saved without shifting the alignment north or south that would result in additional clearance of ancient woodland, other ancient / veteran trees and other woodland.

5.5.28 The proposed alignment of the Proposed Scheme is designed to avoid important ecological features where possible. This resulted in a reduction in the number of veteran trees being directly impacted from twelve to seven (see Chapter 4: Alternatives (Document Reference: 3.04.00) for further details). Noting this process and the justification it provides for the preferred alignment, it is therefore considered that the loss of these seven veteran trees cannot be avoided.

5.5.29 In relation to the direct loss of seven veteran trees, the Applicant is also committed to a compensation strategy to compensate the environment for the loss of these irreplaceable trees (acknowledging that compensation would not fully reduce the significance of the adverse effect associated with their loss or deterioration). Section 6.3 of the Arboricultural Impact Assessment (Appendix 10.35) (Document reference: 3.10.35) sets out an outline of compensation strategy that identifies measures to compensate for this direct loss.

5.5.30 The loss of irreplaceable habitat cannot be mitigated but compensation measures in addition to tree planting would be included in the Landscape and Ecological Management Plan (LEMP) for the Proposed Scheme, which would be developed with input from ecology and arboriculture and agreed with the Local Planning Authority. This will be developed in line with the requirements

of the OCEMP (Document reference: 3.03.01), its appended Outline Arboricultural Method Statement and the Ecological Mitigation Strategy (Document reference: 3.10.33).

5.5.31 Compensation measures would include veteranisation of established trees, proactive management of veteran tree and retention of felled material to provide essential habitats for the local flora and fauna. Furthermore, after being felled, each veteran tree would be placed as close to their original location as possible or near existing woodland to provide a deadwood habitat area. A 3-for-1 replacement of the root protection areas of all the veteran trees is also proposed.

5.5.32 The residual effect on ancient and veteran trees is a major adverse effect that remains significant following the implementation of compensation measures. Monitoring of retained features and of mitigation and compensation measures will be set out in a LEMP secured via a suitable planning condition.

5.5.33 In terms of 'wholly exceptional reasons' to justify their removal, it is considered that the transport benefits of the Proposed Scheme along with the wider economic, social and environmental benefits that align with the three overarching objectives of sustainable development as set out in paragraph 8 the NPPF (see Chapter 3 of this Statement and section 3.8 for a summary of these benefits) justify the proposed loss of the veteran trees. The NPPF recognises (in footnote 67) that infrastructure projects are examples of the type of case where public benefits could clearly outweigh the loss of habitat so as to constitute the required wholly exceptional reasons needed to justify removal.

5.5.34 It is therefore considered that the Proposed Scheme has adhered to the mitigation hierarchy, with the Applicant committing to a suitable compensation strategy and has wholly exceptional reasons to justify the loss of the veteran trees. The Proposed Scheme is therefore considered to accord with GNLP Policy 3 and paragraph 186 (c) of the NPPF as it relates to the impacts on veteran trees.

Construction Stage Effects on Bats

5.5.35 Notwithstanding that impacts to bats have been sought to avoided wherever possible through the optioneering process described in section 4 (with bats considered as a specific consideration in scoring options), including a specific refinement to avoid a maternity roost, significant effects in the construction phase have been identified, until mitigation measures establish.

5.5.36 In relation to these effects, the Applicant has put in place specific embedded design measures to limit and mitigate effects (such as the green bridges and underpasses) and is committed to the measures set out in the Outline Bat Mitigation Strategy (Document reference 3.11.06) that seeks to mitigate and compensate for the loss or harm to bats.

5.5.37 The Outline Bat Mitigation Strategy (Document reference 3.11.06) will be delivered and secured via the development of the OCEMP (Document reference: 3.03.01), a Construction Lighting Management Plan, the habitat creation and enhancement measures shown on the Landscaping Design Plans and Essential Environmental Mitigation Plans, the detail of which will be approved as part of a LEMP in detailed design, and the scheme plans conditioned by the planning permission. The detail of those measures will then be used to obtain a European Protected Species (EPS) Mitigation Licence to be obtained from Natural England (see further discussion below on this).

5.5.38 Chapter 11 (Document reference 3.11.00) concludes that the Proposed Scheme will in the long-term, reduce the significance of the adverse effect associated with their habitat loss or deterioration such that the effects will not be significant.

5.5.39 However, a significant adverse effect will remain until the habitat creation and compensation measures have reached their target condition.

5.5.40 The Applicant is committed to the measures set out in the Outline Bat Monitoring Strategy (Document reference 3.11.07), that will be developed into

final measures secured by the EPS Licence that will monitor the performance of the committed mitigation and compensation.

5.5.41 It is therefore considered that the Proposed Scheme has adhered to the mitigation hierarchy and has provided suitable mitigation that the Applicant is committed to and will be secured through a suitable planning condition. The Proposed Scheme is therefore considered to accord with GNLP Policy 3 in this regard.

Operational Stage Effects on Biodiversity

5.5.42 The operational stage assessment set out in Chapter 10 of the ES (Document reference 3.10.00) has shown that, taking into account the proposed mitigation, the majority of species and habitats assessed would not be significantly affected by the Proposed Scheme.

5.5.43 In particular it is noted that following mitigation that no significant effects are reported in the ES (Document reference 3.10.00) in relation to SSSIs during the operational stage.

5.5.44 However, emissions from vehicles using the Proposed Scheme are assessed as potentially leading to significant effects on veteran trees, ancient woodland and at other ecologically sensitive sites.

5.5.45 This is detailed further below but as a starting point, in respect of the effects to veteran trees and ancient woodland, it is considered that economic, social and environmental benefits of the Proposed Scheme as set out in Chapter 3 of this Statement provide the wholly exceptional reasons to justify the predicted deterioration in this context.

Operational Stage Effects on veteran trees, ancient woodland and at other statutory and non-statutory designated sites.

5.5.46 In relation to air quality impacts on designated sites, the Air Quality Ecological Impact Assessment (Document reference: 3.10.34) that accompanies this application reports the following non-significant beneficial effects in the opening year (2029) of the Proposed Scheme relation to:

- Nitrogen Deposition at 17 sites;
- NH_3 at 21 sites; and
- NO_x at 17 sites.

5.5.47 The Air Quality Ecological Impact Assessment (Document reference: 3.10.34) reports the following significant adverse effects from pollutants on the following sites and years:

- Primrose Grove Ancient Woodland – Nitrogen deposition (moderate adverse effect – 2029 and 2044) and Ammonia (large adverse – 2029 and 2044).
- Broom and Spring Hills CWS – Ammonia (moderate adverse effect – 2029 and 2044).
- Fakenham Road RNR – Nitrogen deposition (moderate adverse effect- 2029 and 2044) and Ammonia (moderate adverse effect – 2029 and 2044).
- Land Adjoining Foxburrow Plantation CWS – Nitrogen deposition (moderate adverse effect – 2029) and Ammonia (moderate adverse effect – 2029 and 2044).
- Primrose Grove CWS – Ammonia (moderate adverse effect – 2029 and 2044).
- River Wensum Pastures CWS – Nitrogen deposition (moderate adverse effect – 2029 and 2044), Ammonia (moderate adverse effect – 2029 and 2044) and nitric oxide (moderate adverse effect 2044).
- Wensum Pastures at Morton Hall CWS – Ammonia (moderate adverse effect – 2029 and 2044).

5.5.48 Of the 73 veteran and / or ancient trees assessed, the Proposed Scheme is concluded to have moderate adverse effects i.e., significant effects on the 12 trees as follows:

- Tree references - T13 (T277), T12 (T278), T11 (T279), T3 (T268), T10 (T281), T24 (T105), T23 (T45), T16 (T99), T19 (T74), and T9 (T295) – Ammonia (moderate adverse effect - 2029 and 2044).
- Tree references - T26 (T152), T25 (T113), T18 (T72), T17 (T96), T6 (T160), and T21 (T34) – Ammonia (moderate adverse effect – 2044 only).

5.5.49 An Air Quality Compensation Strategy is proposed to compensate for the predicted degradation on these assets. An Outline Air Quality Compensation Strategy (Document reference: 6.01.01) has been prepared and includes the following measures to compensate for air quality impacts on veteran trees, ancient woodland and at other statutory and non-statutory designated sites:

- Management opportunities to promote improvement of the natural habitat for native species;
- Increase the diversity of the canopy cover;
- The removal of coniferous species not native to the locality;
- The creation of open areas to promote a diverse understory ground flora;
- The veteranisation of a selection of trees;
- A reduction in the grazing pressure caused by cattle;
- The implementation of a grassland management regime and deer fencing to promote natural regeneration; and
- Seeding and planting to improve species diversity.

5.5.50 These measures will be used to inform the production of a final Air Quality Compensation Strategy, secured by condition. This compensation strategy forms the suitable compensation for the purposes of paragraph 187(c) of the NPPF.

5.5.51 It is also noted that no significant effects are reported in the ES (Document reference 3.10.00) in either the construction or operational stages in relation to SSSI's and soils in relation to development on land within or outside a SSSI, paragraph 186 b) of the NPPF is not considered relevant.

5.5.52 In summary it is considered that the Proposed Scheme has adhered to the requisite mitigation hierarchy as required by the NPPF and has wholly exceptional reasons to justify the loss of and impacts on the veteran trees and has provided suitable compensation strategies that the Applicant is committed to and will be secured through a suitable planning condition. The Proposed Scheme is therefore considered to accord with GNLP Policy 3 ('Environmental Protection – the Natural Environment') and aligns with paragraph 186 'a)' and 'c)' of the NPPF as it relates to the impacts on veteran trees or deterioration of ancient woodland and ancient or veteran trees due to pollution.

Statutory Duties and Council Policies and Strategies

The Hedgerows Regulations 1997

5.5.53 The Hedgerows Regulations 1997 make provision for the protection of important hedgerows in England and Wales.

5.5.54 Regulation 5 of the Hedgerow Regulations 1997 seeks to protect important hedgerows and require that they are retained if proposed to be removed unless the local authority is '*satisfied, having regard in particular to the reasons given for its proposed removal, that there are circumstances which justify the removal*'.

5.5.55 Regulation 6 of the Hedgerow Regulations 1997 suggests that important hedgerows can be removed if planning permission is granted which would be the case for the Proposed Scheme. Notwithstanding this exemption, it is recognised that Important Hedgerows are a matter the CPA may find relevant given that statutory starting point, and so such impacts are considered here.

5.5.56 A Hedgerow Report 2021 (Appendix 10.10) (Document reference: 3.10.10) accompanies the application. Hedgerow surveys identified a total of 22

hedgerows totalling 8.27 kilometres within or partially within the Red Line Boundary (Document reference: 3.10.10; Document reference: 3.10.33). A total of eighteen hedgerows totalling 7.33 kilometres that were within or partially within the Proposed Scheme qualified as Important (as defined under the Hedgerows Regulations 1997), however none of the hedgerows were found to contain ancient or veteran features.

5.5.57 In light of the benefits of the Proposed Scheme elucidated in this Planning Statement, which give sufficient circumstances to justify this impact, the impact should be seen in the context that, in addition to the ecological mitigation measures stated supporting document 'Ecological Mitigation Strategy' (Document reference:3.10.32) proposals for habitat compensation have been designed with regard to the impacts on hedgerows. Mitigation measures include the creation or enhancement of 16 kilometres of hedgerow habitat (see ES Figure 10.5 and Biodiversity Net Gain Technical Report 2023 (Document reference: 3.10.33)).

5.5.58 The preferred alignment of the Proposed Scheme has been optioneered to avoid important ecological features such Important Hedgerows as far as reasonably practicable, with this iterative optioneering process described in Chapter 4 of this Statement. It is considered alternate alignments would result in similar impacts noting the rural nature of the area to the west of Norwich and as is reflected in the results of the OSR.

5.5.59 Noting this process and the justification it provides for the preferred alignment, it is considered that the loss of these Important Hedgerows (as Important (as defined under the Hedgerows Regulations 1997)) cannot be avoided.

Natural Environment and Rural Communities Act 2006

5.5.60 As promoter of the Proposed Scheme, the Applicant has met its duties as a public authority under section 40 of the Natural Environment and Rural Communities Act 2006, to exercise its functions to further the general biodiversity objective to 'conserve and enhance biodiversity', including in respect of Habitats of Principal Importance, and considers that the CPA will

be able to conclude that it has done so in positively determining the planning application for the Proposed Scheme.

5.5.61 It has done so by minimising impacts to biodiversity as much as possible, as set out above such as to 'conserve' it as much as possible, and through the habitat creation and enhancement proposals set out in the Landscaping Design Plans and the Essential Environmental Mitigation Plans, delivered a net gain both in qualitative terms and quantitatively, as set out in the Biodiversity Net Gain Technical Report (Document reference 3.10.33), achieving a quantifiable 10.97% BNG outcome for the non-excluded habitats using Metric 3.1 and 11.58% using the Statutory Metric. As such, it is also considered that the Proposed Scheme would not prevent the achievement of a Local Nature Recovery Strategy for Norfolk, once it is developed.

The Conservation of Habitats and Species Regulations 2017

5.5.62 To assist the CPA in discharging its Regulations 63 and 64 duties under the Conservation of Habitats and Species Regulations 2017, the report "Information to Inform a HRA" (Document reference: 4.03.00) has been submitted to assess the Proposed Schemes impacts on Habitats Sites. This assessment identified Likely Significant Effects ('LSE') potentially affecting two Habitats Sites; River Wensum SAC and Norfolk Valley Fens SAC. No likely significant effects were identified potentially affecting Paston Great Barn SAC.

5.5.63 For River Wensum SAC, mitigation measures would avoid adverse effects to the integrity of the Habitats Site. Mitigation would comprise control of construction through imposition of the OCEMP (Document reference: 3.03.01), biosecurity measures during the construction stage and a drainage design to remove the effects of sediment and chemical run-off during operation.

5.5.64 No mitigation measures are proposed for Norfolk Valley Fens SAC where assessment of effects of the Affected Road Network on fen habitats

concluded there would be no adverse effects as a result of the Proposed Scheme.

5.5.65 It is therefore concluded that Proposed Scheme will have no adverse effects on the integrity of either of these Habitat sites.

5.5.66 As such, no further HRA stages are considered to be required to determine the effects of the Proposed Scheme on Habitats Sites, whose integrity would be maintained during the Proposed Scheme construction stage.

5.5.67 With reference to the Regulation 9 duty, it is noted that there is, as a result of the impacts of the Proposed Scheme, the requirement to obtain a licence under Regulation 55 in respect of bats.

5.5.68 Although with the measures in the Outline CEMP, likely significant effects to otters are not predicted, if breeding was confirmed and exclusion zones of the size set out above were not possible, works would be undertaken in accordance with a European Protected Species (EPS) Mitigation Licence (EPSML) to derogate the legislation protecting otter (except during periods of active breeding). As part of the licence, appropriate compensation would be provided to ensure that alternative habitat is provided in advance of the impact occurring. The Applicant is not aware of any impediment to this being able to be obtained.

5.5.69 In respect of bats, the Applicant has been undertaking long-term liaison with Natural England throughout the design evolution process, to make the overall assessment as to whether the Regulation 55 tests can be met, and that adequate confidence in the assessment can be met in order that Natural England will grant a licence post-planning.

5.5.70 This has included discussions regarding survey effort, baseline data, impacts associated with the Proposed Scheme, and the mitigation and compensation design.

5.5.71 A draft European Protected Species Mitigation Licence (EPSML) for bats was submitted prior to the submission of the planning application. The licence

documents assessed the impacts, and detailed the mitigation, compensation and monitoring designs for the Proposed Scheme.

5.5.72 It also set out the case for the imperative reasons of overriding interest for the Proposed Scheme (and thus its impacts to bats, as mitigated) and set out why there is no alternative to the Proposed Scheme and the route it has chosen. This drew on the Case for the Scheme as set out in this Planning Statement.

5.5.73 It also set out the relevant information to enable Natural England to ascertain that the favourable conservation status test can be met.

5.5.74 This included a Method Statement, Outline Bat Mitigation Strategy (produced to detail the mitigation and compensation, required to address the significant effects of the Proposed Scheme) (Appendix 11.6: Outline Bat Mitigation Strategy (Document reference 3.11.06)) and a draft EPSML masterplan, which all set out impacts associated with the Proposed Scheme and associated mitigation and compensation design included to maintain the FCS of the extant bat populations.

5.5.75 The Method Statement specifically addresses the overall impact assessment of the Proposed Scheme, through construction and operation and the Outline Bat Mitigation Strategy draft master plan details the construction works and associated activities, programme, predicted impacts and proposed avoidance, mitigation, and compensation measures. It emphasises how the green bridges, underpasses and wide-ranging habitat creation and enhancement measures that form part of the Proposed Scheme, alongside the measures proposed whilst they are established, will mitigate impacts.

5.5.76 It includes details on mitigation and compensation for bats for each stage at a landscape scale and considers post-construction monitoring and habitat management in the wider area, to demonstrate that the Proposed Scheme will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.

5.5.77 Engagement with Natural England is on-going with a view to addressing matters currently raised in relation to the draft licence documentation, in order

to progress to a position that the CPA can be content that there is no reason why a licence should not be forthcoming in due course.

Environment Act 2021 - Biodiversity Net Gain

5.5.78 In the context of the Environment Act 2021, and in accordance with GNLP Policy 3 that requires development to demonstrate that the '*gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the existing situation',* the Biodiversity Net Gain technical report (Document reference: 3.10.33) predicts that the Proposed Scheme will achieve a quantifiable 10.97% BNG outcome for the non-excluded habitats with Metric 3.1 and 11.58% using the Statutory Metric. As the Proposed Scheme impacts upon irreplaceable habitat full 'BNG' cannot be achieved under the metric, but it has been achieved for habitats where it is possible to do so.

5.5.79 The BNG proposals are reflected in the post-development landscape designs (please refer to the Landscape Design Plans (Document reference: 2.07.00)) and the Ecological Mitigation Strategy [Document reference: 3.10.32). Creation and enhancement areas have been designed to mitigate and compensate for impacts within the Red Line Boundary.

5.5.80 Where impacts on very high distinctiveness habitats and irreplaceable habitats were unavoidable, bespoke strategies were designed to compensate for the loss, and these areas of impacts and associated compensation were excluded from the quantitative calculation following best practice. However, the Proposed Scheme does not comply with one of the Principles as it cannot avoid the loss of veteran trees, an irreplaceable habitat.

5.5.81 The Biodiversity Net Gain technical report concludes by confirming that opportunities to deliver river units within the Red Line Boundary have been identified. These units will be achieved by proposals to enhance watercourses to improve their condition, removing artificial structures and restoring historic features (such as the restoration of a meander along the River Wensum). These enhancements will also contribute to Water Framework Directive

objectives and River Basin Management Plans, and also include bespoke measures for the River Wensum.

Norwich Airport

5.5.82 The Applicant engaged with a Bird Strike consultancy to determine any potential bird strike risks through the construction and final design of the Proposed Scheme. The Bird Strike Consultancy have generated two reports to support this development. The first report is a 'Wildlife Hazard Management Design Risk Assessment (Document reference: 4.05.04. The second report is a 'Wildlife Hazard Management Plan for Airport Safeguarding' (Document reference: 4.05.05). The Bird Strike consultancy have also generated a Suitability Statement (Document reference: 4.05.06).

5.5.83 The Applicant will ensure that the management of the project site will be fully committed in all three phases to supporting the aims and goals set out in the above reports.

NCC Environmental Policy

5.5.84 It is considered that the Proposed Scheme is consistent with the NCC Environmental Policy. Internationally and nationally designated sites are protected, a large amount of new woodland planting is proposed, and biodiversity net gain is achieved above and beyond the statutory minimum.

5.5.85 It is also considered that environmental net gain more broadly is achieved through provision of new green infrastructure and WFD related mitigations and enhancements. Through the Air Quality Compensation Strategy, it is also anticipated that whilst the impacts of the Proposed Scheme are dealt with, overall improvement to woodland condition will also be able to be achieved. Submitted with the Application is an Environmental Net Gain Technical Report (Document reference: 3.10.33) which confirms this.

Summary

5.5.86 The Proposed Scheme has been developed to avoid impacts where possible and enhance the natural environment and biodiversity in line with the aims of

GNLP Policy 3 ('Environmental Protection – the Natural Environment') as follows:

5.5.87 The Proposed Scheme has been designed to respect, conserve and enhance natural assets through the optioneering process as set out in Chapter 4 of this Statement. Chapter 4 of this Statement sets out the reasonable alternatives considered for the Proposed Scheme and that the preferred route could not be located elsewhere, where on balance it would cause less or no harm. Adequate mitigation and compensation where required has been incorporated into the design and when taken as a whole, the benefits of the Proposed Scheme as set out in section 3.8 of this Statement are considered to clearly outweigh the impacts on natural assets. It is therefore considered that the Proposed Scheme accords with this element (bullet point 1 under Natural Environment) of GNLP Policy 3 ('Environmental Protection – the Natural Environment').

5.5.88 The design of the Proposed Scheme has sought to avoid harm to designated and non-designated assets having regard to their level of significance. Chapter 4 of the ES (Reasonable Alternatives Considered) (Document reference: 3:04:00) notes that the preferred option route balances the significant environmental issues (with no direct impact to the River Wensum SAC and Norfolk Valley Fens SAC designation). The document 'Information to Inform a Habitats Regulations Assessment' (Document reference: 4:03.00) concludes that there would be no adverse effects on the integrity of either of these sites as a result of the Proposed Scheme. Chapter 10 of the ES (Biodiversity) (Document reference: 3.10.00) reports that following mitigation that no significant effects in relation to SSSIs during the construction or operational stage will arise as a result of the Proposed Scheme in line with paragraph 186 (b of the NPPF. Where impacts on lower designations for example at a county or local level are reported in the ES, suitable mitigation and where required compensation has been set out to minimise effects as far as reasonably possible. It is therefore considered that the Proposed Scheme accords with this element (bullet point 2 under Natural Environment) of GNLP

Policy 3 ('Environmental Protection – the Natural Environment') and Policy EN1 (Biodiversity and Habitats) of the DM DPD.

5.5.89 In accordance with the hierarchy as set out in GNLP Policy 3 ('Environmental Protection – the Natural Environment') the design of the Proposed Scheme, where possible, has sought to avoid biodiversity impacts (as set out in Chapter 4 of the ES (Reasonable Alternatives Considered) (Document reference: 3:04:00)). The avoidance measures are summarised in paragraph 6.5.16 above. Where impacts such as habitat loss has been unavoidable, mitigation in line with local and national planning policy has been provided, with these summarised in paragraph 6.5.18 above.

5.5.90 There are however some notable significant effects reported in relation to the natural environment where avoidance and mitigation is not considered sufficient. In these cases, compensation has been proposed as below.

5.5.91 The Proposed Scheme would result in the loss of seven veteran trees as well as adverse impacts on Ancient Woodland, which makes paragraph 186(c) of the NPPF directly relevant. This sets out a presumption that: '*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*.'

5.5.92 The design of the Proposed Scheme has embedded mitigation as part of the design to avoid potential adverse effects to Notable, Veteran and Ancient Trees. Relevant embedded mitigation includes the proposed alignment of the Proposed Scheme being designed to avoid important ecological features where possible. This resulted in a reduction in the number of veteran trees being directly impacted from twelve to seven (see Chapter 4 of this Statement and Chapter 4 of the ES (Alternatives) (Document reference: 3.04.00) for further details). The drainage system has been designed to intercept and divert run-off away from watercourses and floodplains and will reduce impacts on such veteran trees.

5.5.93 In relation to the direct loss of the seven veteran trees, the Applicant has committed to a compensation strategy (see paragraphs 6.5.29 to 6.5.33 of this Statement) that seeks to compensate the environment for the loss or harm to these irreplaceable trees. This compensation would however not fully reduce the significance of the adverse effect associated with their loss or deterioration.

5.5.94 In relation to the deterioration of trees from pollutants the effect of air quality on ancient woodland and veteran trees was modelled as these were the most sensitive receptors amongst trees, tree groups and woodlands. A total of 73 were scoped into the Air Quality Ecological Impact Assessment (Document reference: 3.10.34). All trees modelled were currently exceeding the critical level and load for Nitrogen (N) deposition and Ammonia (NH_3) and are predicted to continue exceeding the critical level and load for N deposition and NH_3 regardless of the Proposed Scheme being in place.

5.5.95 An Air Quality Compensation Strategy is proposed to compensate for the predicted deterioration of these assets. The Outline Air Quality Compensation Strategy (Document reference: 6.01.01) includes the measures to compensate for air quality impacts on veteran trees, ancient woodland and at other statutory and non-statutory designated sites as set out in section 6.4. of this Statement.

5.5.96 The 'wholly exceptional reasons' are explained in footnote 67 of the NPPF to include infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat. It is considered the need for (chapter 3 of this Statement) and transport, economic, social and environmental benefits (as set out in section 3.8 of this Statement) would outweigh the loss of these seven veteran trees.

5.5.97 It is therefore considered that the Proposed Scheme has adhered to the mitigation hierarchy in relation to the impacts on these veteran trees, has wholly exceptional reasons to justify their loss of and has provided suitable compensation strategies that the Applicant is committed to and will be

secured through a suitable planning condition. The Proposed Scheme is therefore considered to accord with GNLP Policy 3 ('Environmental Protection – the Natural Environment') and aligns with paragraph 186 'a)' and 'c)' of the NPPF as it relates to the impacts on veteran trees or deterioration of ancient woodland and ancient or veteran trees due to pollution.

5.5.98 In relation to the significant effects associated with bats during the construction stage, the Applicant is committed to the measures set out in the Outline Bat Mitigation Strategy (Document reference 3.11.06) that seeks to mitigate and compensate for the loss or harm to bats.

5.5.99 However, a significant adverse effect will remain until the habitat creation and compensation measures have reached their target condition. The Applicant is committed to the measures set out in the Outline Bat Monitoring Strategy (Document reference 3.11.07), that will be developed into final measures secured by a European Protected Species Licence that will monitor the performance of the committed mitigation and compensation. A monitoring regime will be secured by a suitable planning condition.

5.5.100 The Outline Bat Mitigation Strategy (Document reference 3.11.06) concludes that the Proposed Scheme will in the long-term reduce the significance of the adverse effect associated with their habitat loss or deterioration. It is therefore considered that the Proposed Scheme has adhered to the mitigation hierarchy and has provided suitable mitigation that the Applicant is committed to and that will be secured through a suitable planning condition.

5.5.101 It is therefore considered that the Proposed Scheme accords with this element (bullet point 3 under Natural Environment) of GNLP Policy 3 ('Environmental Protection – the Natural Environment') and Policy EN1 (Biodiversity and Habitats) of the DM DPD.

5.5.102 The construction and operational stage assessment of Biodiversity impacts as set out in Chapter 10 of the ES (Document reference 3.10.00) accords with the requirement to undertake 'a relevant assessment' as set out in GNLP

Policy 3 ('Environmental Protection – the Natural Environment') (bullet point 4 under Natural Environment).

5.5.103 In accordance with GNLP Policy 3 ('Environmental Protection – the Natural Environment') (bullet point 5 under Natural Environment) significant green infrastructure in the form of green bridges (see Chapter 2 of this Statement) and ecological mitigation are proposed as part of the landscape design. This is also seen to accord with Policy EN1 (Biodiversity and Habitats) and Policy EN3 ('Green Infrastructure') of the DM DPD.

5.5.104 In the context of the Environment Act 2021, and in accordance with GNLP Policy 3 ('Environmental Protection – the Natural Environment') that requires development to demonstrate that the 'gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the existing situation', the Biodiversity Net Gain technical report (Document reference: 3.10.33) predicts that the Proposed Scheme will achieve a quantifiable 10.97% BNG outcome for the non-excluded habitats based on Metric 3.1 and 11.58% based on the Statutory Metric.

5.5.105 As the Proposed Scheme impacts upon irreplaceable habitat full 'BNG' cannot be achieved under the metric, but it has been achieved for habitats where it is possible to do so. It is however considered that the Proposed Scheme accords with aim of delivering BNG as set out in GNLP Policy 3 ('Environmental Protection – the Natural Environment').

5.5.106 In relation to development within the catchments of the River Wensum SAC, again the document 'Information to Inform a Habitats Regulations Assessment' (Document reference: 4:03.00) concludes that there would be no adverse effects on the integrity of either of these sites as a result of the Proposed Scheme and so the Proposed Scheme is therefore considered to accord with this element of GNLP Policy 3 ('Environmental Protection – the Natural Environment').

5.5.107 The Proposed Scheme is therefore considered to accord with GNLP Policy 3 ('Environmental Protection – the Natural Environment'), Policy EN1

(Biodiversity and Habitats) and Policy EN3 ('Green Infrastructure') of the DM DPD.

5.5.108 In relation to GNLP Policy 4 (Strategic Infrastructure) the wider assessment of air quality is set out in section 6.4 above. In relation to air quality impacts on veteran trees, ancient woodland and at other statutory and non-statutory designated sites, as noted above an Air Quality Compensation Strategy is proposed to compensate for the environment from the predicted deterioration of these assets in lien with the mitigation hierarchy as set out in GNLP Policy 3 ('Environmental Protection – the Natural Environment'). It is therefore considered that the proposed Scheme has sought to improve air quality as far as reasonably practicable and so accords with this element of GNLP Policy 4 (Strategic Infrastructure).

5.6 Greenhouse Gases and Climate Change

Relevant Development Plan Policy

5.6.1 Sustainability and carbon objectives are threaded throughout the policies of the GNLP.

5.6.2 Table 5 (Climate Change Statement) of the GNLP sets out the way in which local plans can support the transition to a post-carbon future. A summary of relevant parts of Table 5 of the GNLP is shown below in Table 6.

Table 6: GNLP coverage of relevant climate change issues

Measure:	**GNLP Coverage**
Requiring the location and design of development to: 1. deliver the highest viable energy efficiency, including the use of decentralised energy; 2. reduce the need to travel, particularly by private car; 3. secure the highest possible share of trips made by sustainable travel.	**Location of development: Policies 1 and 7** The policies covering the location of development ensure that new housing will be close to every-day services and jobs. The great majority of the development is in urban areas and large villages, where sustainable access to services and jobs is best, thus reducing the need to travel and making it easier to walk, cycle and use public transport.
Requiring the location and design of development to: 1. deliver the highest viable energy efficiency, including the use of decentralised energy; 2. reduce the need to travel, particularly by private car; 3. secure the highest possible share of trips made by sustainable travel.	**Design of development: Policies 1, 2, 3 and 4** Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. To achieve this, development must be designed to promote local service provision, include green infrastructure and reduce the need to travel. It must promote the use of public transport and active travel, along with supporting electric vehicle use.

Measure:	GNLP Coverage
Shape places and secure new development to minimise vulnerability and provide resilience to impacts from climate change.	**Policies 1, 2, 3, 4 and** 7 support further development of the green infrastructure network which will provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats.
Increase sustainable transport use and local transport solutions.	**Policies 2 and 4** support the further development of low carbon transport networks. This includes improved walking and cycling facilities, the promotion of bus travel, Park and Ride and rail use, increased use of electric vehicles and demand management measures.

5.6.3 As referred to in paragraph 6.4.43 of this Statement the third part of the second element of **GNLP Policy 4 (Strategic Infrastructure)** sets out how the preceding two parts will be achieved and includes reference to the TfN strategy and to the transport proposals planned or underway by other bodies, including by NCC as local highway authority, National Highways, and rail operators. It states that the second two parts will be achieved:

> • *Having regard to the Transport for Norwich Strategy including consideration of its aims to:*
>
> *o Reduce carbon emissions and improve air quality'.*

5.6.4 In relation to climate change, **Policy GC4 (Design)** of the DM DPD states that:

> *Proposals should pay adequate regard to:*
>
> *x. Minimising resource and energy consumption and how it is located and designed to withstand the longer-term impacts of climate change.*

National Policy and other Material Considerations

5.6.5 In addition to the adopted Development Plan polices, further national, local and regional climate change and carbon related policies are relevant to the Proposed Scheme.

5.6.6 The NPPF sets out the core national planning principle of supporting "*the transition to a low carbon future in a changing climate*…". Chapter 9: Promoting Sustainable Transport - considers how people should be limited in their need to travel and offered a genuine choice of transportation modes to reduce congestion and GHG emissions. Its states:

> *"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
>
> *(c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
>
> *(d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains".*

5.6.7 Paragraph 157 of the NPPF also urges that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, and states:

> *"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."*

5.6.8 Paragraph 158 of the NPPF states that:

> *"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure".*

5.6.9 The NPPF further states within Chapter 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change (under paragraph 159) that:

> *"New development should be planned in ways that:*
>
> *(b) can help to reduce GHG emissions, such as through its location, orientation and design".*

The Revised National Policy Statement for National Networks (March 2024)

5.6.10 NPSs were created under the Planning Act 2008 to provide guidance for decision-makers on the application of government policy when determining development consent for NSIPs. While the Proposed Scheme is not classed as an NSIP, as it will be determined under the Town and County Planning Act 1990 (as amended), certain elements of the associated revised NN NPS may have relevance.

5.6.11 Of note is the section covering 'Decision Making' within the revised NN NPS. Here it's established that the Secretary of State must be satisfied that the applicant has as far as possible assessed the greenhouse gas emissions at all stages of the development. It states under para 5.39:

> *"S.1(1) of the Climate Change Act 2008 reflects and puts into effect the net zero target set in light of the temperature goal of the Paris*

Agreement. The target was increased from 80% emission reductions by 2050 to 100% emission reductions by 2050 in June 2019. Carbon budgets 1 to 5 were set to meet the 80% emission reduction target, but carbon budget 6 (2033-2037) has been set to meet the 2050 net zero target, so it is more stretching. The UK's current Nationally Determined Contribution (set in line with Article 4 of the Paris Agreement) commits to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels, so it is more stretching than carbon budget 5. The UK's Nationally Determined Contribution is on the pathway to the 2050 net zero target. Where it provides useful context, applicants may wish to compare their scheme emissions against carbon budgets, net zero and the UK Nationally Determined Contribution. Where an applicant assesses the carbon impacts of its scheme against carbon budget 6, and later carbon budgets, it is to be taken also to have assessed the carbon impacts of the scheme against the net zero target in the Climate Change Act 2008, as they are in line with this target."

5.6.12 It goes on to states under para 5.40:

"The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the total carbon emissions at all stages of development. The Secretary of State should also give positive weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and within the proposed development. However, given the important role national network infrastructure plays in supporting the process of economy wide decarbonisation, the Secretary of State accepts that there are likely to be some residual emissions from construction of national network infrastructure".

5.6.13 Whilst it is accepted that the advice in the revised NN-NPS is (for understandable reasons) focused on schemes which are expected to take place on national networks, the Applicant considers it is reasonable to take a

similar approach for schemes which relate to the major road network, which also has an important role to play in supporting the process of economy-wide decarbonisation. The role of the major road network in complementing the strategic road network is outlined in the Transport Assessment (Document Reference 4.01.00) and for many journeys it is a critical link in connecting people and places. Providing suitable routes for shorter/quicker and less congested journeys to take place is one component of assisting the process of decarbonisation. The revised NN NPS concludes this matter by stating under paragraphs 5.41-5.42 that:

> *"Operational carbon emissions from some types of national network infrastructure cannot be totally avoided. Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that a net increase in operational carbon emissions is not, of itself, reason to prohibit the consenting of national network projects or to impose more restrictions on them in the planning policy framework….*
>
> *Any carbon assessment will include an assessment of operational carbon emissions, but the policies set out in chapter 2 of this NPS, apply to these emissions. Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. Therefore, approval of schemes with residual carbon emissions is allowable and can be consistent with meeting net zero".*

Norfolk County Council Climate Strategy (2023)

5.6.14 The purpose of Norfolk County Council's Climate Strategy is to provide a clear statement of NCC's strategic framework to help tackle climate change. The document outlines how Norfolk aims to meet its commitment to reach net zero by 2050.

5.6.15 Paragraphs 89 and 90 of the strategy states that:

"We aim to take a pragmatic approach to supporting carbon reduction county-wide by prioritising the areas where we have the greatest opportunity to make positive change.

Our work on transport is worth highlighting here. Being a large, rural county means that a good road network is vital for connecting Norfolk's communities and businesses. However, transport also represents nearly a quarter of Norfolk's carbon footprint, so we need to ensure that we keep Norfolk connected while supporting decarbonisation of this sector".

5.6.16 The above paragraphs echo the supporting text (paragraph 241 of the GNLP) that accompanies GNLP Policy 4 in recognising that 'Greater Norwich is a mixed urban and rural area in which travel and access issues vary, with the use of the private car being particularly important to the rural economy'.

5.6.17 The document states its aim to take a pragmatic approach to supporting carbon reduction county-wide by prioritising the areas that have the greatest opportunity to make positive change. One of these areas includes transport.

5.6.18 Three dimensions are stated within the Climate Strategy in its approach to decarbonising Norfolk's transport:

- supporting the switch to electric vehicles;
- improving the county's public transport; and
- encouraging more sustainable and active travel.

5.6.19 The Climate Strategy states that Norfolk needs investment in transport infrastructure to enable businesses and communities to thrive. The Council will promote investments that support sustainable housing and economic growth plans and reduce traffic and pollution in town centres.

Norfolk Local Transport Plan 4 Strategy 2021-2036 and Implementation Plan

5.6.20 The LTP sets out NCC's plans, policies and programmes on transport and is used as a guide for investment priorities and may be material to planning decisions.

5.6.21 Policy 11 of LTP states:

> *"When making changes and improvements to our transport network, and in working with users on how they choose to use the transport network, we will seek to understand the consequences of the decisions on meeting the collective challenge of protecting and improving our global environment to meet the environmental policy target of working towards carbon neutrality".*

5.6.22 The LTP recognises that:

> *"Transport is the largest emitter of carbon in the county and, in recent years, emissions have been rising. We have recently (2019) adopted our Environmental Policy, which alongside national policies, means that we have a responsibility to meet targets to reach carbon neutrality. The Norfolk target is to move towards carbon neutrality across all sectors by 2030. Emissions from transport on the networks, including rail, road and waterways, will need to contribute towards achieving this target and the council will have to work in partnership with other agencies as appropriate, or where we do not manage the network. Policy 11 above reflects the adopted environmental Policy. There is a separate target for net carbon zero on our own estate (i.e. the operations that the council directly undertakes) in our Environmental Policy. Our strategy, set out in this plan, is to achieve a shift towards active travel and cleaner vehicles. LTP4 Implementation Plan sets out how we will deliver the strategy and our ambitious carbon target."*

Climate Change Act (2008)

5.6.23 The 2019 amendment to the Climate Change Act 2008 established a legal requirement for reaching net zero GHG emissions in the UK economy by 2050. The 2008 Act also created an independent Committee on Climate Change to advise the UK and devolved governments on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions and preparing for and adapting to the impacts of climate change.

5.6.24 In line with the recommendation from the independent Climate Change Committee, this sixth Carbon Budget limits the net amount of GHG emissions that the UK can release to 965 $MtCO_2e$ during the five-year period from 2033 to 2037. The sixth carbon budget implies reducing GHG emissions by 78% by 2035 compared to 1990 levels and taking the UK more than three-quarters of the way to reaching net zero by 2050. The Carbon Budget will ensure Britain remains on track to end its contribution to climate change while remaining consistent with the Paris Agreement temperature goal to limit global warming to well below 2°C and pursue efforts towards 1.5°C.

Decarbonising Transport: A Better, Greener Britain (2021)

5.6.25 Further to the sixth Carbon Budget and Climate Change Act, UK Government's adopted 'Decarbonising Transport' strategy document, is similarly a relevant consideration. The plan follows on from Decarbonising transport: setting the challenge, published in March 2020, which laid out the scale of additional reductions needed to deliver transport's contribution to legally binding carbon budgets and delivering net zero by 2050. In July 2022 the UK Government published Decarbonising transport: one-year-on review which gave a summary of progress over the 12 months since Decarbonising transport: a better, greener Britain was published and outlined upcoming milestones.

5.6.26 The Decarbonising Transport document sets out the government's commitments and the actions needed to decarbonise the entire transport system in the UK. It includes:

- The UK Government's pathway to net zero transport in the UK;
- The wider benefits net zero transport can deliver; and
- The principles that underpin the Governments approach to delivering net zero transport.

5.6.27 The 'Decarbonising Transport' document seeks to maximise decarbonisation efforts through a number of key initiatives and commitments encompassing:

- Increasing Cycling and Walking;
- Zero emissions buses and coaches;
- Decarbonising Railways;
- Zero emission cars, vans & motorcycles;
- Accelerating maritime and aviation decarbonisation.

5.6.28 The UK's transport decarbonisation plan sets out the commitments, actions and timings to decarbonise all forms of transport in the UK by 2050. Key commitments set out in plan to decarbonise road transport include ending the sale of new petrol and diesel cars and vans by 2030, requiring all new cars and vans to be 100% zero emission at the tailpipe by 2035, ending the sale of all non-zero emission HGVs by 2040 and ensuring the UK's charging infrastructure network meets demand.

5.6.29 In September 2023 the UK Government pushed the ban on the sale of new petrol and diesel cars and vans from 2030 to 2035. However, the UK Government did not change the requirement for all new cars and vans to be 100% zero emission at the tailpipe by 2035, the requirement for HGVs and the zero-emission vehicle mandate. The Climate Change Committee released a statement regarding the UK Government's comments: "Delaying the fossil car phase-out date to 2035 is expected to have only a small direct impact on future emissions, due to the now-confirmed ZEV Mandate, which will ensure that 80% of new cars sold by 2030 will be zero-emission. However, there may

be other indirect consequences, through the uncertainty that has been introduced by changing near-term consumer targets.

Net Zero Strategy: Build Back Greener (2021)

5.6.30 The UK's Net Zero Strategy sets out the policies to decarbonise all sectors to meet the UK's net zero target by 2050. Key transport policies include a zero-emission vehicle mandate, further funding for zero emissions vehicle grants and EV infrastructure including further funding for local EV infrastructure and expanding zero road freight trials to zero emissions HGV technologies at scale on UK roads.

Accordance with Policy – Carbon

5.6.31 Specifically in relation to carbon, as referred to in paragraph 6.4.43 of this Statement, **GNLP Policy 4 (Strategic Infrastructure)** sets out that the aims of the policy will be achieved by '*Having regard to the Transport for Norwich Strategy including consideration of its aims to - Reduce carbon emissions…*'. It is to be noted that Policy 4 does not itself mandate that all transport infrastructure schemes must reduce carbon emissions, but that when considering such proposals, regard will be had to the TfN Strategy, including giving consideration to its aim to reduce carbon emissions. In other words, the issue of carbon emissions needs to be considered as part of the assessment process, but the policy does not require reductions to be achieved in every case.

5.6.32 In relation to carbon, (Carbon is a generic term used traditionally in carbon footprinting parlance to describe the combination of greenhouse gas emissions reported as carbon dioxide equivalent (CO_2e).), Chapter 15 (Climate – Greenhouse Gases) of the ES (Document reference: 3.15.00) assesses the significance of carbon emissions by putting them into context through comparison with the respective UK carbon budgets and Norfolk carbon targets for transport (set out in Tables 15-4 and 15-5 of Chapter 15 of the ES Document reference: 3.15.00) to assess their compatibility with the UK's net zero trajectory and local policy.

Construction Stage – Carbon

5.6.33 The total carbon emissions arising from the design and construction of the Proposed Scheme (includes product stage, transportation of materials, transport of waste away from site, waste disposal, plant use for the construction as well as land use, land use change and forestry) are estimated to be approximately 129,724 tCO2e.

5.6.34 The construction phase carbon emissions have been contextualised against the UK carbon budgets with construction of the Proposed Scheme assumed to start in 2025 and finish in 2029. The construction stage carbon emissions are assumed to be emitted at a linear rate over the four years of the construction stage and as a result construction carbon emissions are apportioned evenly between UK Carbon Budgets Four and Five.

5.6.35 Table 15-13 of Chapter 15 of the ES (Document reference: 3.15.00) contextualises the construction phase carbon emissions against the UK Carbon Budgets as shown in Table 7 below.

Table 7: Contextualisation of construction phase carbon emissions against the UK carbon budgets

UK carbon budget	**Carbon budget (tCO_2e)**	**Construction GHG emissions (tCO_2e)**	**Percentage of budget**
Fourth carbon budget (2023-27)	1,950,000,000	64,862	0.003%
Fifth carbon budget (2028-32)	1,725,000,000	64,862	0.004%

5.6.36 Chapter 15 of the ES (Document reference: 3.15.00 assess the magnitude of GHG emissions from the construction stage to have a moderate adverse (significant in EIA terms).

5.6.37 The total carbon emissions arising from the construction stage of the Proposed Scheme would therefore fall short of fully contributing to the UK's trajectory towards net zero.

5.6.38 The residual moderate adverse effect judgement considers mitigations already implemented by the Proposed Scheme as well as additional mitigations committed to by the Principal Contractor which are as follows:

- Adopting the London Low Emission Construction Partnership requirements for vehicles involved in construction activities;
- Following the Non-Road Mobile Machinery Practical Guidance which sets the emission standards for carbon monoxide, hydrocarbons, oxides of nitrogen and particulate matter for diesel engines;
- Promoting the use of start-stop technology plant on site;
- Implementation of a network of electricity sockets to feed a fleet of electric site vehicles for the contractor's vehicle fleet where practicable;
- Maximising the re-use of site won materials for earthworks and pavements;
- The majority of earthworks materials that are non-hazardous surplus excavated arisings would be reused off-site (recycle);
- Using solar panels for site lighting where practicable;
- Showing preference for providers that use 100% renewable sources of electricity;
- Minimise energy consumption including fuel usage by, for example, minimising plant use and idling;
- Maximising the use of local suppliers; and

- Producing a Carbon Management Plan.

5.6.39 The residual moderate adverse effect judgement for the construction stage does not however consider additional mitigation measures being actively explored which are as follows:

- Promoting the use of Hydrotreated Vegetable Oil fuel by the supply chain;
- Use of sustainable concrete such as Ground Granulated Blast-Furnace Slag or Concrete (graphene-enhanced concrete) where practicable and subject to design specification compliance;
- Use of low or cold application asphalts where practicable and subject to design specification compliance;
- Use of re-cycled construction materials for haul roads and temporary working areas or platforms where practicable and subject to design specification compliance;
- Subject to the Principal Contractors Detailed Quantitative Risk Assessment outputs, bituminous materials cold milled during the works could be reused where they do not present a pollution hazard in the permanent works and subject to design acceptance. For example, a substitute for type 1 subbase in footways and hard standings;
- Pavement design is being developed using a fully analytical / performance approach that would result in a considerable reduction in pavement thickness with the associated CO2e reduction. Furthermore, there is an ongoing investigation, testing campaign and design work to demonstrate that the sub-base can be constructed and stabilised using site won material reducing the requirements for importing aggregate to virtually zero;

- The Principal Contractor would be encouraged to use solar power and facilities to reduce water use where practicable e.g., charging of traffic signal and sign batteries if applicable;
- Procuring sustainable welfare cabins;
- Maximise the use of local waste management facilities;
- Identification of synergies among suppliers during the procurement stage; and
- Incentivisation of carbon reduction practices within the supply chain via procurement strategies.

5.6.40 The total carbon emissions associated with the construction stage of the Proposed Scheme could be reduced further if the above mitigation measures set out in paragraph 6.6.36 above were introduced.

Operational Stage – Carbon

5.6.41 The total carbon emissions arising from replacement, operational land use, land use change and forestry and end user traffic during the operation of the Proposed Scheme over its 60-year appraisal period are estimated to be approximately 293,549 tCO_2e, which is approximately 4,892 tCO_2e per year. Table 15- 17 of Chapter 15 of the ES (Document reference: 3.15.00) contextualises the operational phase carbon emissions against the UK Carbon Budgets as shown in Table 8 below.

Table 8: Contextualisation of operational phase carbon emissions against the UK carbon budgets

UK carbon budget	**Carbon budget (tCO_2e)**	**Operational GHG emissions (tCO_2e)**	**Percentage of budget**
Fifth carbon budget (2028-32)	1,725,000,000	26,70914	0.002%

UK carbon budget	Carbon budget (tCO_2e)	Operational GHG emissions (tCO_2e)	Percentage of budget
Sixth carbon budget (2033-2037)	965,000,000	26,63864	0.003%

5.6.42 Overall, the operation of the Proposed Scheme is predicted to have a moderate adverse (significant in EIA terms) effect during operation.

5.6.43 The reported operational stage effects again did not take additional mitigation measures into account. The total carbon emissions associated with the eventual operation of the Proposed Scheme could be reduced by, amongst others:

- Specifying efficient mechanical and electrical equipment such as lighting that is long-lasting and based on its durability, repairability and energy efficiency credentials.
- Opportunities to sequester carbon through increased tree planting and high organic soil restoration.
- Use low carbon road surface options, informed using the carbon reduction hierarchy.
- Use road surface options with greater longevity, to reduce frequency of replacements.
- Operating and maintaining the Proposed Scheme using best-practices in energy efficiency, and using low / no-carbon approaches, plant, and equipment.

Summary

5.6.44 The Proposed Scheme is seen to accord with Norfolk County Council's Climate Strategy in that it is actively improving access to the county's public transport, and through the additional NMU provision as identified in the NMU provision Plan (Document reference: 4.01.01) is actively seeking to encouraging more sustainable and active travel.

5.6.45 In relation to GNLP Policy 4, it is considered that the Proposed Scheme has had regard to the aims of the TfN Strategy in terms of reducing carbon.

5.6.46 At each stage of the development of the Business Case for the Proposed Scheme, the carbon emissions have been assessed and reported, with a detailed assessment accompanying the application and reported in Chapter 15 (Climate – Greenhouse Gases) (Document reference 3.15.00).

5.6.47 Efforts to reduce carbon emissions throughout the construction stage have been considered as part of the optioneering process. It is noted that the contractor has committed to a number of measures to reduce such emissions during the construction phase with additional recommendations to further reduce carbon emissions as part of the operational stage also having been made.

5.6.48 The Proposed Scheme is also considered to be aligned with the environmental aims of the TfN Strategy that seeks to reduce carbon emission by facilitating 'active travel', through the NMU provision. The Transport Assessment (Document reference: 4.01.00) also notes improvements to the public transport journey times with the Proposed Scheme in place. With the Proposed Scheme in place, the Applicant will seek to pursue the wider Complementary Sustainable Transport Measures (see Chapter 2 of this Statement) at a more strategic level, aligning with the aims of the TfN Strategy in relation walking and cycling.

5.6.49 The Proposed Scheme would also improve public transport journey times by addressing the existing congestion on the local road network as set out in Chapter 3 of this Statement and would enhance access to existing Park and

Ride sites (see paragraph 6.3.26 of this Statement). The enhancement of the public transport and Park and Ride network is considered to align with the aims of the TfN Strategy in terms of reducing carbon emission.

5.6.50 Following design and mitigation efforts, some residual significant effects in terms of carbon are considered unavoidable, though these have been minimised as far as reasonably practicable. It is considered that residual carbon emissions are likely when developing major road schemes such as the Proposed Scheme and what is important is not the fact that there are some residual emissions, but their scale when seen in context, together with other relevant considerations, including non-planning policies aimed at decarbonising the transport system.

5.6.51 It is considered that the residual effects in relation to carbon must also be weighed against the longer term and wider benefits of the Proposed Scheme in terms of its transport, economic, social and environmental benefits as set out in Chapter 3 of the Statement and summarised in section 3.8 of this Statement.

5.6.52 It is therefore considered that due regard to the aims of the TfN Strategy, as they relate to reducing carbon emission have been had and that the Proposed Scheme, when considered as a whole with the conclusions in terms of accordance with policy as set out in Section 6.3 (Transport Improvements) and Section 6.4 (Air Quality and Noise & Vibration), can be seen to accord with GNLP Policy 4.

Local Transport Plan 4 Strategy and Implementation Plan - Carbon

5.6.53 The Proposed Scheme is a priority major project for NCC as identified in the LTP with Policy 8 of the LTP stating:

> *'Our priority will be to improve major road and rail connections between larger places in the county, and to major ports, airports and cities in the rest of the UK'.*

5.6.54 Policy 11 goes on to state that:

'When making changes and improvements to our transport network, and in working with users on how they choose to use the transport network, we will seek to understand the consequences of the decisions on meeting the collective challenge of protecting and improving our global environment to meet the environmental policy target of working towards carbon neutrality'.

5.6.55 Chapter 5 of the LTP Implementation plan sets out the annual trajectories and pathway to 2037 for the carbon reduction targets as a means of monitoring progress. Table 15-5 of ES Chapter 15 (Climate – Greenhouse Gases) (Document reference: 3:15:00) sets these out in full.

5.6.56 Table 15-18 of ES Chapter 15 (Climate – Greenhouse Gases) (Document reference: 3:15:00) contextualises the carbon emissions from traffic against these annual trajectories from the opening year of the Proposed Scheme in 2029 to 2037 (the final year covered by the LTP). It can be seen that the carbon emission from traffic reduce year on year until 2037 where 5.7 $ktCO_2e$ is emitted by the Proposed Scheme. It should be noted that this amounts to 1.2% of the carbon trajectory for that year (noting that the trajectory is not a target but is a monitoring tool) as set out in LTP Implementation Plan.

5.6.57 Furthermore, the Applicant has already committed to demonstrating tangible action towards wider carbon reduction measures in the county through the LTP, Environmental Policy (2019) and the wider list of transport proposals with funding secured to advance decarbonisation in the area including:

- Transforming City Fund;
- Zero Emission Transport City;
- Zero Emission Bus Regional Area;
- Bus Service Improvement Fund; and
- Active Travel Fund.

5.6.58 It is therefore considered that the Proposed Scheme can be seen to align with Policy 11 of the LTP, with year on year carbon reductions being evident, echoing the trajectory for carbon reduction in the LPT Implementation Plan, albeit the rates of reduction differ, with the former being derived simply from a Norfolk-level apportionment of a national figure for tailpipe emissions whereas the latter is the product of specific traffic modelling for the Proposed Scheme. It is not surprising that a new road link, designed to attract traffic currently using unsuitable routes in the area west of Norwich, should show carbon reductions that differ from nationally derived trends for all traffic on all roads. However, both the amounts and the percentages for the period to 2037 are small in scale and there is no reason to consider that, even in aggregate, they would jeopardise achievement of the LTP4 IP target by 2050. This, set against the further mitigation as set out in paragraph 6.7.53 above and the variety of other carbon reduction measures in the county being promoted by the Applicant aligns with aims of Policy 11 of the LTP working towards carbon neutrality. The wide-ranging benefits that the Proposed Scheme will delivery as set out in section 3.8 above, including social, economic, transport and environmental improvements mean that when taken as a whole, the Proposed Scheme can be seen to align with the adopted LTP. The Proposed Scheme is identified as one of the key priority road schemes within the LTP policy document, that will help achieve Norfolk County Council's future transport objectives for the region.

Climate Change Adaptation

5.6.59 Adaption to climate change adaptation requires more than just managing carbon emissions. Therefore, chapter 15 of the ES assesses the various impacts on climate change and associated mitigation measures proposed by the Proposed Scheme.

5.6.60 Chapter 14 of the ES (Materials Assets and Waste) (Document Reference 3.16.00) reports the outcome of the assessment of likely significant effects arising from the Proposed Scheme from the consumption of material assets and the generation and disposal of waste.

5.6.61 The Proposed Scheme would consume materials resources (including those recovered from site arisings) and generate and dispose of waste during the construction stage. The design incorporates reuse of excavated arisings as fill for the Proposed Scheme, as embankments and in environmental bunds. The cut and fill balance on the scheme produces a surplus of excavated earthworks of approximately 12,214m3 (28,092 t). These arisings will be used on-site where possible and only taken off site for reuse in other projects in a worst-case scenario. In addition, during construction, mitigation measures to minimise impact to material assets and waste will be implemented via the OCEMP (Document reference: 3.03.01).

5.6.62 Chapter 16 of the ES (Climate Resilience) (Document Reference 3.16.00) assesses the vulnerability of the Proposed Scheme to climate change.

5.6.63 Mitigation measures have been embedded in the design of the Proposed Scheme to enhance climate resilience; these are listed in Table 16-14 in Chapter 16 of the ES (Climate Resilience) (Document Reference 3.16.00).

5.6.64 Additional mitigation measures are listed in Table 16-18, and a schedule of monitoring is recommended. With the implementation of these mitigation measures it is concluded that there are likely no significant effects to climate resilience.

5.6.65 Road Drainage and the Water Environment is assessed under chapter 12 of the ES (Document reference: 3.12.00) and the submitted Flood Risk Assessment (FRA) (Document reference: 3.12.02) assess flood risk from all sources including the River Wensum, Tud Tributary, surface water, groundwater, sewers and artificial sources. These are discussed in further detail in section 6.8 of the Statement.

5.6.66 It is therefore considered that the proposed Scheme accords with Policy GC4 (Design) of the DM DPD in that it has paid adequate regard to minimising resource consumption and has been designed to withstand the longer terms impacts of climate change.

5.7 Landscape and Visual

Relevant Development Plan Policy

5.7.1 **GNLP Policy 2(3) ('Sustainable Communities')** states that development proposals should where relevant:

> *"Create and contribute to multi-functional green infrastructure links, whether provided on-site or off-site, including through landscaping, street trees and other tree planting, taking account of local green infrastructure strategies and delivery plans".*

5.7.2 **GNLP Policy 3 ('Environmental Protection and Enhancement')** states that in respect of the natural environment, development proposals should enhance the natural environment through:

> *"• Being designed to respect, conserve and enhance natural assets, taking account of local design and other guidance such as landscape character assessment;*
>
> *• Undertaking a relevant assessment (such as a landscape or ecological assessment) if impacts to a natural asset might arise.*
>
> *• Respecting landscape character and retaining important views and features, having regard to landscape character assessments and sensitive areas such as landscape settings, strategic gaps and green spaces identified in Local or Neighbourhood Plans, and to the importance of the nationally designated Broads Authority area and its setting."*

5.7.3 **Policy EN2 ('*Landscape*')** of the DM DPD states that:

> *'In order to protect the character of the area, development proposals should have regard to the Landscape Character Assessment SPD and, in particular, consider any impact upon as well as seek to protect and enhance where appropriate:*
>
> *i. Gaps between settlements;*

ii. Visually sensitive skylines, hillsides and valley sides and important views, including the setting of the Broads Area;

iii. Nocturnal character;

iv. Conservations Areas;

v. Scheduled Ancient Monuments; and

vi. Historic Parks and Gardens; and

vii. Green spaces including natural and semi-natural features as well as geological/geomorphological features which make a significant contribution towards defining the character of an area.'

National Policy and other Material Considerations

5.7.4 Paragraph 135 of the NPPF states that in making planning decisions, LPAs are to: '*ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change'*.

5.7.5 **Policy 13 ('Quality of Place')** of LTP states:

'We will seek to improve quality of place, conserving and enhancing our built and historic environments, when we take action to improve the transport network.

Accordance with Policy

5.7.6 Chapter 9: Landscape and Visual of the ES (Document reference: 3.09.00) assesses the likely effects of the Proposed Scheme on landscape character and visual receptors. These include the four LCAs listed above, residential receptors, commercial receptors, transport receptors and surrounding PRoWs.

5.7.7 The Proposed Scheme is located within two Broadland District Landscape Character Areas (LCAs), being the Wensum River Valley and Weston Green Tributary. It also sits adjacent to the Horsford Woodland Heath Mosaic and Cawston Tributary Farmland LCAs.

Construction Stage Landscape and Visual Effects

5.7.8 In terms of landscape effects during the construction stage reported significant effects on the two LCAs (Wensum River Valley and Weston Green Tributary) albeit it is noted that these are temporary.

5.7.9 In terms of visual effects, the impacts on viewpoints were assessed as greatest in the construction stage and reduces as the Proposed Scheme opens for use and the landscape planting grows over time. Visual effects during construction were found to be in the range of neutral (not significant) to moderate adverse (significant), with moderate adverse effects only experienced at three viewpoints associated with Weston Road and two PRoWs that are close to the main engineering works and which have open views of the construction activities.

Operational Stage Landscape and Visual Effects

5.7.10 During the operational stage, Chapter 9: Landscape and Visual of the ES (Document reference: 3.09.00) potential significant medium-term landscape and visual effects (up to Year 1). These were reported at the four LCAs, the Western Green Road residential receptor, Ringland Lane transport Receptors and Honingham PRoW. Again, these were reported to be medium term with no significant long-term effects (up to Year 15) on any of the receptors.

Summary

5.7.11 The design of the Proposed Scheme, where possible, has included primary mitigation embedded into the Proposed Scheme design to avoid potential adverse landscape and visual effects, and a robust landscape-led approach to the Proposed Scheme has been employed to ensure that it is successfully integrated into the landscape.

5.7.12 This includes the considered design of structures to complement the rural setting, creation of landscaped bunds along the Proposed Scheme to minimise the impact on visual amenity of nearby visual receptors and

incorporating landscape mitigation planting to provide screening and visual amenity.

5.7.13 One of the aims of the proposed landscape mitigation within the Proposed Scheme is to avoid adverse effects of the Scheme and assimilate it into the landscape. By doing so, the visibility of the Scheme will be significantly reduced within surrounding views. As confirmed by the supporting ES (Chapter 9 – Landscape and Visual Effects) the design of the Proposed Scheme incorporates embedded mitigation into the layout to avoid likely adverse landscape and visual effects, such as through the considered design of structures to complement the rural setting, creation of landscaped bunds along the Proposed Scheme to minimise the impact on visual amenity of nearby visual receptors, and incorporating landscape mitigation planting to provide screening and visual amenity.

5.7.14 In order to respond to those instances where adverse impacts were identified, the Proposed Scheme introduces earth bunds and cuttings along the new highway to limit visibility to the surrounding landscape. Whist the earth bunds will introduce new features within the landscape and have an impact in and of themselves, they are considered a more natural feature with considerably less impact than the highway.

5.7.15 Additionally, the introduction of new planting along the highway (please refer to the Landscape Design Plans (Document reference 2.07.00)) as well as on the earth bunds will reduce the magnitude of effect on the landscape and help integrate the Proposed Scheme into the surrounding landscape context.

5.7.16 As detailed in chapter 9 of the ES (Document reference: 3.08.08) and supporting Design and Access Statement (Document reference: 1.02.00), the alignment of the Proposed Scheme has been chosen to minimise the landscape and visual impacts. The Proposed Landscape Design Plans (document reference 2.07.00) have sought to mitigate impacts and effects where possible and incorporates environmental mitigation and compensation notably in relation to landscape, ecology and flood impacts. It is therefore

considered that the Proposed Scheme accords with GNLP Policy 2(3), GNLP Policy 3 and DM DPD Policy EN2. Subsequently the potential adverse effects are limited, will not be permanent and are therefore considered to be consistent with the objectives of policy EN2 of the DM DPD.

5.8 Surface Water, Drainage and Flood Risk

Relevant Development Plan Policy

5.8.1 The GNLP discusses 'Flood Risk' from paragraph 104, and states:

> *"The main inhabited area at risk of fluvial (river) flooding in Greater Norwich is in the Wensum valley covering parts of central Norwich… This plan will need to provide strategic level policies to address flood risk in new development, locating the great majority of development away from areas at risk of flood and promoting development which supports more natural functioning of the water environment.*

5.8.2 **GNLP Policy 2(7) ('Sustainable Communities')** states that development proposals should where relevant:

> *"Avoid risks of unacceptable levels of soil, air, water and noise pollution and/or land instability".*

5.8.3 **GNLP Policy 2(8) ('Sustainable Communities')** states:

> *"To contribute to the achievement of sustainable communities, development proposals should, where relevant, address the following matters:*
>
> *8. Avoid locating inappropriate development in areas at risk of flooding by applying the sequential and exceptions tests and ensuring that flood risk is not increased elsewhere. Sustainable drainage systems should be incorporated unless there is clear evidence that this would be inappropriate".*

5.8.4 **Policy CSU5 ('Surface water drainage')** of the DM DPD states that:

'Mitigation measures to deal with surface water arising from development proposals should be incorporated to minimise the risk of flooding on the development site without increasing flood risk elsewhere.

In particular, within the Critical Drainage Catchment and other areas at significant risk of flooding as identified by the Lead Local Flood Authority, all development proposals involving new buildings, extensions and additional areas of hard surfacing should ensure that adequate and appropriate consideration has been given.

Developers will be required to show that the proposed development would:

i. not increase the vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows; and

ii. wherever practicable, have a positive impact on the risk of surface water flooding in the wider area.

Development must, as appropriate, incorporate mitigation measures to reduce surface water runoff, manage surface water flood risk to the development itself and to others, maximise the use of permeable materials to increase infiltration capacity, incorporate on site water storage and make use of green roofs and walls wherever reasonably practicable.'

National Policy and other Material Considerations

5.8.5 Paragraph 159 of the NPPF requires new development to be planned for in such a way that will avoid increased vulnerability to the range of impacts arising from climate change. It states:

'When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed

through suitable adaptation measures, including through the planning of green infrastructure'.

5.8.6 Paragraph 168 of the NPPF states:

"The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.

Accordance with Policy

5.8.7 Road Drainage and the Water Environment is assessed under chapter 12 of the ES (Document reference: 3.12.00) and the submitted Flood Risk Assessment (FRA) (Document reference: 3.12.02) assess flood risk from all sources including the River Wensum, Tud Tributary, surface water, groundwater, sewers and artificial sources.

5.8.8 The summary of findings in the ES can be seen at table 12.27 of that chapter and should be read in conjunction with this report. It identifies that during the construction stage, potential effects may include but not limited to, sedimentation, pollution risk and impacts on flooding, with the residual effects of these ranging from neutral to moderate adverse. Of note are the following two sets of findings, where moderate adverse residual effects are identified:

Table 9: Potential effects to River Wensum

Receptor:	Potential Effects:	Residual Effects:
River Wensum (Very High Sensitivity)	Sedimentation Pollution Risks Changes to WFD and Geomorphology	Moderate Adverse residual effect (significant) Slight Adverse residual effect (not significant)

And:

Table 10: Potential effects to Foxburrow Stream

Receptor:	Potential Effects:	Residual Effects:
Foxburrow Stream (Medium Sensitivity)	Sedimentation Pollution risks Works within the watercourse Changes to WFD	Moderate Adverse residual effect (significant)

5.8.9 Chapter 12 of the ES (Document reference: 3.12.00) reports a moderate adverse residual effect (significant in EIA terms) at the River Wensum due to potential effects from sedimentation and pollution. Monitoring of water quality would be undertaken during and following the works as set out in Appendix 3.1: OCEMP (Document Reference: 3.03.01).

5.8.10 Chapter 12 of the ES (Document reference: 3.12.00) reports a moderate adverse residual effect (significant in EIA terms) at the River Wensum and Foxburrow Stream due to potential effects from sedimentation and pollution. Section 4.1 of Appendix 3.1: OCEMP (Document Reference: 3.03.01) details the need for further consultation with the Lead Local Flood Authority during the development of the ordinary watercourse consent application. Appropriate

and site-specific method statements would be submitted which would further reduce the risk of increased sedimentation and pollution risks and as a result, potential effects to the Foxburrow Stream. This process is separate to the planning process.

5.8.11 While there are two instances where moderate adverse residual effects are identified, this reflects the risk of an incident occurring and best practices would be adhered to lower this risk as far as is reasonably practicable. These measures have been proposed, as detailed in section 4.1 of Appendix 3.1: OCEMP (Document Reference: 3.03.01) and would be secured by an appropriate planning condition. This details that Preliminary Earthwork Drain (PED) network, the infrastructure for the management of surface water runoff, should be installed at the start of the construction phase. Section 4.1 of Appendix 3.1 also details the need for further consultation with the Environment Agency during the development of the FRAP application. In addition to pollution incident management provisions, appropriate and site-specific method statements would be submitted which would help reduce the risk of increased sedimentation and pollution risks and as a result of potential effects to the River Wensum / Foxburrow Stream.

5.8.12 The majority of the Proposed Scheme is located in the low-risk Flood Zone 1 although some sections are located in the medium risk Flood Zone 2, and areas to the north and south of the River Wensum and the viaduct crossing are in the high-risk Flood Zone 3.

5.8.13 Once operational, the FRA concludes that the Proposed Scheme will remain operational and safe for users in times of flood, will result in no net loss of floodplain storage and does not impede water flows or increase flood risk elsewhere, save for a negligible impact at Ringland Lane. It is determined that the Proposed Scheme is not at significant risk of flooding from artificial sources, sewers or groundwater. It is deemed that sufficient measures are embedded in the design of watercourse crossings to prevent inundation of the Proposed Scheme to the 100 year + 44% annual probability event assessed.

5.8.14 As discussed in the supporting FRA (Document reference 3.12.02) in respect of the flooding impacts at Ringland Lane there are increases in water levels at the upstream limit of the attenuation feature which extend onto agricultural land outside of the red line boundary and Ringland Lane within the red line boundary. This is shown in Figure 5-4 of the FRA. The increases to both receptors occur in the 1 in 100 annual probability event and above. The FRA confirms:

"The affected area of agricultural land is approximately 3000m2. The maximum increase is of the order of 1000mm in the 1 in 100 plus 45% annual probability event with depths dropping quickly away from the red line boundary. The increases are limited to the 1 in 100 annual probability event and above and so it is not envisaged that there would be a material change to the viability of the agricultural land for its current use or the safety of users of this land given the existing inundation in the local vicinity".

5.8.15 The agricultural land at Ringland Lane is classified as a less vulnerable receptor and in accordance with the appropriate assessment methodology the impact significance would be Moderate. The LA 113 methodology looks at depth alone. In this location peak depths are associated with the functioning of the attenuation feature and so velocities are low (less than 0.1 m/s) meaning the flood hazard remains low. The location is also on agricultural land and surrounded to the north east and south west by active floodplain. The FRA concludes that the inundation occurs in low frequency events only. On the basis of the above, the flood risk, reflecting the probability and consequences of flooding, is considered to remain negligible in this location.

5.8.16 Ringland Lane is affected for a distance of approximately 20m in an area already susceptible to flooding to a depth of 100mm and the maximum increase is of the order of 130mm in the 1 in 100 plus 45% annual probability event.

5.8.17 Ringland Lane is classified as a less vulnerable receptor and in accordance with the methodology promoted in LA 113, considering depth alone, the

impact significance would be Moderate. Flood depths in the highway are already 100mm and would remain less than 300mm in the 1 in 100 plus 45% annual probability event. The resulting flood hazard rating could continue to be classed as low. On this basis flood risk is considered to remain unchanged in this location of Ringland Lane.

5.8.18 In summary the FRA states:

"There is a moderate impact to the agricultural land and Ringland Lane upstream of the attenuation feature. Localised increases in flooding are limited to the 1 in 100, 1 in 1000 and 1 in 100 plus 45% annual probability events so no change to the consequences of flooding is expected and therefore no change to the existing viability of the land or highway or safety of users is envisaged. Flood depths in the highway would remain less than 300mm in the 1 in 100 plus 45% annual probability event and so would maintain a low hazard rating. In both cases the change in flood risk from existing is considered to be negligible".

5.8.19 Given that appropriate mitigation measures have been incorporated in the design of Proposed Scheme to ensure that flood risk will not materially increase as a result of the Proposed Scheme, and measures will be in place during construction to manage risk from flooding, it is considered that the Proposed Scheme is consistent with GNLP Policy 2(8) and Policy CSU5 of the DM DPD.

5.8.20 The NPPG for Flood Risk and Coastal Change (Paragraph: 001 Reference ID: 7-001-20220825 to Paragraph: 080 Reference ID: 7-080-20220825) sets out how certain policies, including those relating to flood risk, should be implemented.

5.8.21 Significant updates to the NPPG for Flood Risk and Coastal Change were made in August 2022 and have been considered in the supporting FRA (Document reference: 3.12.02). The NPPG for Flood Risk and Coastal Change identifies how new developments must take all flood risks into account and steer development to those areas at lowest risk.

5.8.22 The NPPG describes the Sequential Test that ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account and ignoring the presence of flood management infrastructure. Only where development cannot be located in low and medium risk areas should high risk areas be considered. For individual planning applications subject to the Sequential Test, the NPPG states that the area to apply the Sequential Test will be defined by local circumstances relating to the type of development proposed.

5.8.23 Following the application of the Sequential Test and if it is demonstrated that the proposed development cannot be located outside of the Environment Agency's defined Flood Zones (discussed below) the Exception Test is applied to assess the flood risk vulnerability and development's incompatibility with the identified Flood Zone.

5.8.24 The full results of the Sequential / Exceptions tests are set out in section 6 of the FRA (Document reference: 3.12.02). In relation to the Sequential Test the FRA concludes:

The following points are noted with respect to the context of the Sequential Test for the selected route alignment of the Proposed Scheme:

- *There were no route alternatives identified that could avoid works to cross the River Wensum.*
- *The preferred route avoids crossing the River Tud, which was not the case for all route options.*

5.8.25 The Proposed Scheme is considered to be 'Essential Infrastructure' and therefore according to Table 3 of the Flood Risk and Coastal Change Guidance, this development can be located in all Flood Zones, provided the Exception Test is satisfied.

5.8.26 To meet Part 1 of the Exception Test it must be demonstrated that the Proposed Scheme provides wider sustainability benefits to the community that outweigh flood risk.

5.8.27 In summary it is considered that the sustainability benefits of the Proposed Scheme including the transport benefits, along with the wider economic, social and environmental benefits that align with the three overarching objectives of sustainable development as set out in paragraph 8 the NPPF outweigh flood risk. Those benefits include transport benefits including the addressing of the strategic connectivity gap in the road network between the A1067 and the A47 to the west of Norwich, reducing congestion and provide greater certainty over journey times for motorists, enhancing the local transport network for pedestrians, cyclists and horse riders. Economic benefits include unlocking capacity in the highway network that will be used by vehicles travelling to and from existing and proposed housing and employment sites, supporting economic activity in Norfolk by reducing transport journey times and so costs, and increasing the potential for job creation and stimulation of the local economy. Social benefits include the reassignment of trips away from areas of congestion on the local road networks, moving this traffic onto a more appropriate and faster route, traffic reduction through local villages and rural areas will help make the network more suitable and attractive for walking and cycling and would help to promote active travel, which is consistent with improving quality of life. Lastly environmental benefits when seen at a high level the Proposed Scheme is likely to result in enhanced environmental amenity within the local villages and a net gain in biodiversity has been assessed to occur following development of the Proposed Scheme.

5.8.28 Only short sections of the route of the Proposed Scheme are in Flood Zone 3 and (as explained further above) the changes in flood risk are negligible compared to the baseline position and only relate to areas already at risk of flooding. The benefits more than outweigh these flood risks.

5.8.29 To satisfy Part 2 of the Exception Test, a FRA is required to demonstrate the Proposed Scheme remains operational and safe for users in times of flood, results in no net loss of floodplain storage and does not impede water flows or increase flood risk elsewhere. The submitted FRA (Document reference: 3.12.02) demonstrates how this is achieved.

5.8.30 Section 3.8 of the submitted FRA summarises the existing flood risk sources across the site and so identifies those sources of flood risk that require further consideration within the FRA. The Proposed Scheme is not within an area of tidal flood risk and is not within proximity of known sewer flooding sources. The implications of the Proposed Scheme should be considered for:

- fluvial flooding from the River Wensum and Foxburrow Stream
- surface water flooding from overland flow paths,
- groundwater flooding,
- reservoir flooding from Haveringland Lake in the event of a breach,

5.8.31 The FRA (Document reference: 3.12.02) appraises Part 2 of the Exception Test; that the Proposed Scheme remains operational and safe for users in times of flood and that the Proposed Scheme results in no net loss of floodplain storage and does not impede water flows or increase flood risk elsewhere.

5.8.32 It is determined that the Proposed Scheme is not at significant risk of flooding from artificial sources, sewers or groundwater. It is deemed that sufficient measures are embedded in the design of watercourse crossings to prevent inundation of the Proposed Scheme to the 100 year plus 44% climate change event. It is therefore concluded the Proposed Scheme satisfies the first half of Part 2 of the Exception Test.

5.8.33 In considering whether the Proposed Scheme satisfied the second half of Part 2 of the Exception Test it is necessary to consider the definition of flood risk. The NPPF defines flood risk as the product of the likelihood or chance of a flood occurring (flood frequency) and the consequence or impact of the

flooding (flood consequence) such as potential damages, danger and disruption. The findings of this assessment confirm that for the great majority of the Proposed Scheme, the embedded mitigation and SuDS design mean there is no change in flood risk elsewhere from the existing situation. In some areas there is a slight change in flood depth compared to the baseline, these increases are very localised and typically within areas already affected by flooding. It is therefore considered there is no change to the potential damage, danger or disruption from a flood event as a result of the Proposed Scheme.

5.8.34 In summary the FRA states:

"The assessment concludes that, with the inclusion of mitigation, the Proposed Scheme is not at significant risk of flooding from all sources of flooding and would remain operational in times of flood during the 1 in 100 annual probability event plus appropriate climate change allowance and the 1 in 1000 annual probability event. The Proposed Scheme therefore satisfies the first half of Part 2 of the Exception Test and is compliant with NPPF Paragraph 173 (b) and (e).

In considering whether the Proposed Scheme satisfied the second half of Part 2 of the Exception Test it is necessary to consider the definition of flood risk. The NPPF defines flood risk as the product of the likelihood or chance of a flood occurring (flood frequency) and the consequence or impact of the flooding (flood consequence) such as potential damages, danger and disruption. The findings of this assessment confirm that for the great majority of the Proposed Scheme, the embedded mitigation and SuDS design mean there is no change in flood risk elsewhere from the existing situation. In some areas there is a slight change in flood depth compared to the baseline, these increases are very localised and typically within areas already affected by flooding. It is therefore considered there is no change to the potential damage, danger or disruption from a flood event as a result of the Proposed Scheme. Some minor flood risk impacts are predicted during construction, but these are temporary in nature and can be appropriately managed during the

construction phase so as to not pose increased risk to potentially vulnerable receptors."

5.8.35 On the basis of change to flood risk as defined in the NPPF it is concluded that the Proposed Scheme satisfies the second half of Part 2 of the Exception Test and is compliant with NPPF Paragraph 173 (c) and (d). Please refer to the submitted FRA (Document reference: 3.12.02) for full confirmation of the results arising from the Sequential and Exception Tests to demonstrate acceptability.

5.8.36 The Proposed Scheme includes design features to manage surface water that take account of water quantity (flooding), water quality (pollution) biodiversity (wildlife and plants) and amenity. The Surface Water Drainage Strategy (Document reference: 4.04.00) provides a detailed description of the proposed surface water drainage strategy and the infiltration testing undertaken.

Summary

5.8.37 The Proposed Scheme is considered to accord with GNLP Policy 2(8) and DM DPD Policy CSU5 (as well as paragraph 159 of the NPPF) the FRA (Document reference: 3.12.02) concludes that the development passes the Sequential Test as there were no route alternatives identified that could avoid works to cross the River Wensum. The Proposed Scheme is considered to be 'Essential Infrastructure' and therefore according to Table 3 of the Flood Risk and Coastal Change Guidance, this development can be located in all Flood Zones, provided an Exception Test is satisfied. The Proposed Schemes wider sustainability benefits and the fact that it will remains operational and safe for users in times of flood, with no net loss of floodplain storage with no impedance to water flows or increased flood risk elsewhere resulting in this test also being passed.

5.8.38 It is considered noting the mitigation in the OCEMP (Document Reference: 3.03.01) and that that will be undertaken outside of the town and country planning process e.g. ordinary water course consents that the mitigation

hierarchy has been followed and that the significant residual effects at the River Wensum and Foxburrow Stream will be mitigated as far reasonably practicable. The Proposed Scheme is therefore considered to accord with GNLP Policy 2(7) ('Sustainable Communities') as it relates to avoiding risk of unacceptable levels of water pollution.

5.8.39 The Proposed Scheme is therefore seen to be in accordance with applicable local and national planning policies in relation to flooding.

5.8.40 With the Proposed Scheme in place there would be a more resilient and future proofed highway network available, with contingency in the event future emergency works as a result of flooding such as at the A140 crossing of the River Wensum with the Proposed Scheme providing an alternative route.

5.9 Cultural Heritage

Relevant Development Plan Policy

5.9.1 In summary **GNLP Policy 3 (Environmental Protection and Enhancement – The Built and Historic Environment)** states:

> *The development strategy of the plan and the sites proposed for development reflect the area's settlement structure of the city, towns and villages, retaining the separate identities of individual settlements.*
>
> *Development proposals should enhance the built and historic environment through:*
>
> *• Being designed to create a distinct sense of place and enhance local character, taking account of local guidance such as conservation area appraisals and historic landscape character assessments.*
>
> *• Avoiding harm to designated and non-designated heritage assets, including their setting, having regard to their level of significance in accordance with the requirements of the NPPF and relevant policies in other Development Plan Documents and Neighbourhood Plans.*

• Providing a continued or new use for heritage assets whilst retaining their historic significance.

• Undertaking a heritage impact assessment if significant impacts to a heritage asset might arise.

• Where relevant, heritage interpretation measures should be provided to enhance the appreciation and understanding of local heritage assets.

National Policy and other Material Considerations

5.9.2 The NPPF states at paragraph 205:

"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".

5.9.3 It goes on to state at paragraph 207:

"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use."

5.9.4 Paragraph 208 of the NPPF then goes on to state:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

5.9.5 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is also relevant, as discussed in section 5 of this Statement.

Compliance with Policy

5.9.6 Chapter 8 of the ES (Cultural Heritage) (Document reference: 3.08.00) reports on the outcome of the assessments of likely significant cultural heritage effects. The assessment of cultural heritage focussed on identifying and describing potential impacts within two topic areas; buried heritage assets (including archaeological artefacts, monuments or landscape features) and above ground heritage assets (buildings, structures and landscapes of heritage interest and their wider setting).

Construction Stage Cultural Heritage Effects - buried heritage assets

5.9.7 The construction stage assessment found there is the potential for significant adverse effects to buried heritage assets.

5.9.8 Mitigation is recommended with targeted archaeological excavations (strip, map and sample) to be carried out prior to the construction stage in areas where significant remains have been identified in Chapter 8 of the ES (Cultural Heritage) (Document reference: 3.08.00) and that an archaeological watching brief is maintained in relation to remains of lesser significance. A programme of archaeological mitigation works undertaken in line with a Written Scheme of Investigation (WSI) to be agreed with the County

Archaeologist (a draft WSI has been prepared has part of ES (Appendix 4 of Chapter 8 - Document reference 3.08.04), that will be secured via a suitable planning condition. Taking into account this mitigation, the assessment concludes there would be no significant environmental effects on buried heritage assets in the construction stage.

Operational Stage Cultural Heritage Effects - buried heritage assets

5.9.9 An assessment of operational effects on buried heritage assets have been scoped out on the basis that, once the Proposed Scheme has been completed, no further ground disturbance would occur as part of the Proposed Scheme

Construction Stage Cultural Heritage Effects - above ground heritage assets

5.9.10 The construction stage assessment found there would be no significant adverse effects to above ground heritage assets.

Operational Stage Cultural Heritage Effects - above ground heritage assets

5.9.11 The operation stage assessment found that there would be no significant adverse effects to above ground heritage assets or their settings, with one exception. That exception relates to the Grade II listed Barn 50m north-west of Low Farm House and is located within the Red Line Boundary of the Proposed Scheme and where a moderate adverse effect has been identified.

5.9.12 The Proposed Scheme would not lead to any direct impact on the listed building, but the barn's rural agricultural setting would be impacted by the Proposed Scheme's presence. The Proposed Scheme requires a crossing of the River Wensum and its flood plain. This would be by means of the River Wensum Viaduct, located at its closest point, 45 metres to the north-west of the Grade II listed Low Farm Barn. The construction of the River Wensum Viaduct and abutment would introduce a new and visually intrusive built element into the isolated rural location of the asset, impacting on its wider rural setting, although the introduction of a tall hedge to the south-west of the barn screens its current visual connection to the agricultural landscape.

5.9.13 The impact or harm of the Proposed Scheme on the significance of Grade II listed Barn 50m north-west of Low Farm House is considered in the Historic Environment Desk Based Assessment (HEBDA) in Appendix 8.1 (Document reference: 3.08.01), which accompanies this application.

5.9.14 Professional judgement is used to consider the impact (the magnitude of change) of future development on the significance a known or potential heritage asset.

5.9.15 The HEBDA (Document reference: 3.08.01) concludes that the Proposed Scheme would not impact on the Grade II listed barn's key visual and historic relationship to the wider farm complex, notably to the dairy barn, or to the farmhouse. The asset's relationship to The Street, the key network that links the farm to Ringland, would also not be impacted by the Proposed Scheme, while the footpath leading to Attlebridge would be retained. Views of the wider landscape when viewed out from the end of The Street towards the north-east, east and south-east would not be impacted by the Proposed Scheme, preserving the relationship of the barn and the wider farm complex to much of the surrounding rural landscape and to the Wensum Valley.

5.9.16 Taken overall, the HEBDA (Document reference: 3.08.01) concludes that the Proposed Scheme would result in 'less than substantial harm' to the significance of the Grade II listed Barn 50m north-west of Low Farm House (as well as to the significance of the dairy barn and Low Farm House which are presumed to be curtilage listed to the barn).

Summary

5.9.17 Based on the findings of the of Chapter 8 of the ES (Cultural Heritage) (Document reference: 3.08.00) and the HEBDA (Document reference: 3.08.01), the Proposed Scheme can be seen to be in accordance GNLP Policy 3 (Environmental Protection and Enhancement – The Built and Historic Environment) as a heritage impact assessment has been undertaken noting the potential for significant impacts to a heritage asset, with the ES reporting that no significant environmental effects on buried heritage assets in the

construction or operational stages will occur, subject to the recommended mitigation (agreement of draft WSI (Appendix 4 of Chapter 8 - Document reference 3.08.04) with the County Archaeologist and completion of archaeological mitigation works). No significant environmental effects on above ground heritage assets will take place in the construction or operational stages, with the exception of the moderate adverse (therefore significant in EIA terms) on the listed Barn 50m north-west of Low Farm House.

5.9.18 Taken overall, the HEBDA (Document reference: 3.08.01) concludes that Proposed Scheme would result in less than substantial harm to the significance of the Grade II listed Barn 50m north-west of Low Farm House (as well as to the significance of the dairy barn and Low Farm House which are presumed to be curtilage listed to the barn).

5.9.19 Noting that Proposed Scheme would result in less than substantial harm, it is considered that paragraph 207 of the NPPF is not relevant. However, paragraph 208 requires that this harm should be weighed against the public benefits of the proposal.

5.9.20 It is also noted that NCC as the CPA also has a statutory duty under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 that when considering whether to grant planning permission for development which affects a listed building or its setting, the planning authority shall have 'special regard' to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses.

5.9.21 This consideration should be seen in the context that the Proposed Scheme is not causing direct impacts to the listed buildings or any features of special architectural or historic interest which it possesses, only its setting (and it is not considered that the setting itself contributes to any special architectural or historic interest of the asset).

5.9.22 It should also be seen in the context that Chapter 4 of this Statement has demonstrated that extensive consideration has been given to potential reasonable alternatives to the Proposed Scheme prior to reaching the

preferred option which has this option. The Proposed Scheme has been refined in response to known environmental constraints and there is an evidence base of surveys and background data underpinning the option selection and refinement. Considerable effort has been made to assess the potential environmental effects throughout the design process and to balance different environmental effects. Relevant surveys and data have been collected holistically to inform the detailing of the design and mitigation measures.

5.9.23 It is considered that the less than substantial harm to listed Barn 50m north-west of Low Farm House as a result of the Proposed Scheme should be weighed against the public benefits that the Proposed Scheme will provide. These benefits are wide ranging and include tackling the issues that local residents are currently experiencing in terms of highway safety, air quality, noise and congestion as a result of rat running in the villages and wider local road network. Without the Proposed Scheme being developed, the strategic connectivity gap to the west of Norwich will remain with the resulting capacity, resilience, journey times and reliability issues exacerbating the impacts on local residents. Additionally, when examining the planning balance, it must be recognised that the Proposed Scheme would also improve NMU provision in the local area, bringing health benefits with greater access to walking and cycling as well as access to the countryside and Green Infrastructure.

5.9.24 The wider public benefits as set out in Section 3.8 of this Statement in terms of enhanced regional connectivity, which would enhance access to employment sites and support residential developments, thereby growing the local and regional economy, would not be realised without the Proposed Scheme being developed. The Proposed Scheme will both address the existing local issues, as well as provide capacity to help support the delivery of the proposed economic development that is contained in the GNLP.

5.9.25 In summary it is considered that the public benefits of the Proposed Scheme including the transport benefits, along with the wider economic, social and environmental benefits that align with the three overarching objectives of

sustainable development as set out in paragraph 8 the NPPF (see Chapter 3 of this Statement and section 3.8 for a summary of these benefits) on balance outweigh the 'less than substantial harm' to listed Barn 50m north-west of Low Farm House. That harm concerns changes to some parts of the non-designed setting of the heritage asset but involves no impacts on its fabric and is more than outweighed by the nature and scale of the public benefits of the Proposed Scheme.

5.10 Soils and Agricultural Land

Soils

Relevant Development Plan Policy

5.10.1 **GNLP Policy 2(7) ('Sustainable Communities')** states that development proposals should where relevant:

> *"Avoid risks of unacceptable levels of soil, air, water and noise pollution and/or land instability".*

5.10.2 In relation to pollution from soils, **DM DPD Policy EN4 ('*Pollution*')** sets out that:

> *'Development proposals will be expected to include an assessment of the extent of potential pollution. Where pollution may be an issue, adequate mitigation measures will be required. Development will only be permitted where there will be no significant adverse upon amenity, human health or the natural environment.'*

5.10.3 The supporting text to this policy confirms at paragraph 3.29 that: '*in considering development proposals regard will be given to the risk and impact of potential pollution including that of land, water, noise or air*'.

National Policy and other Material Considerations in relation to soils

5.10.4 Chapter 15 of the NPPF sets out the provisions for planning decisions in relation to ground conditions and pollution issues as follows. Paragraph 180 of the NPPF states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans".

5.10.5 Paragraph 189 of the NPPF states that 'Planning policies and decisions should ensure that:

(a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);

(b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and

(c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

5.10.6 Norfolk County Council's Environmental Policy (November 2019) – "Using and Managing Land Sustainably" requires soil health to be improved.

Accordance with Policy

5.10.7 Chapter 13 of the ES (Geology and Soils) (Document reference: 3.13.00) focusses on contamination to soils and any associated risk to human health,

the water environment and wildlife as well as assessed the potential effects to soils supporting good quality agricultural land.

5.10.8 The construction phase assessment found that taking into account the proposed mitigation there would be no significant effects associated with geology and soils, with one exception (loss of agricultural land – please paragraphs 6.11.12 to 6.11.36 below). The proposed mitigation measures set out in the OCEMP (Document reference: 3.03.01 which include further ground investigation work to identify contaminated land and make it safe, measures to address any unexploded bombs (from World War Two) and standard measures to protect workers during construction, will mitigate the risks.

5.10.9 The assessment concludes that the proposed mitigation to manage soil handling and storage, will protect soils temporarily used during construction. A Materials Management Plan will be produced in line with the requirements of the OCEMP (Document reference: 3.03.01) and implemented to mitigate and monitor impacts during construction.

5.10.10 In respect of Norfolk County Council's Environmental Policy (November 2019), the route selection optioneering has been undertaken to limit impacts caused by the Proposed Scheme, as discussed in section 4 of this Statement, and evidenced within chapter 4 of the support ES (Reasonable Alternatives Considered) (Document reference: 3.04.00).

Summary in relation to Soils

5.10.11 It is considered that the Proposed Scheme accords with GNLP Policy 2(7) and DM DPD Policy EN4 as it relates to soils. Where significant adverse effects have been reported, mitigation has been set out in the OCEMP (Document reference: 3.03.01), with the Materials Management Plan protecting soils temporarily used during construction. No significant operational effects were reported.

5.10.12 It is considered that the mitigation proposed as part of the construction stage of the Proposed Scheme, will where possible protecting high-quality soils in accordance with paragraph 180 (a) of the NPPF.

Agricultural Land

5.10.13 There are no specific policies in the GLNP or the DM DPD that directly address development impacts on agricultural land.

5.10.14 The **GNLP** discusses agricultural land under paragraph 125 where it states:

> *"Large tracts of rural Greater Norwich are valuable for their agricultural land. As map 6 below shows, a high proportion of Greater Norwich's agricultural land is of high quality (grades 1-3), with the majority of the most valuable land being located between Norwich and Acle. Protecting high-quality soils is an important consideration both for supporting agriculture and shaping our rural landscape character. This will need to be balanced with development needs through the plan."*

5.10.15 The supporting text to DM DPD **Policy EN1 – Biodiversity and Habitats** refers to the economic and other benefits of the best and most versatile agricultural land as set out in the paragraph 180 of the NPPF.

National Policy and other Material Considerations in relation to agricultural land

5.10.16 Chapter 15 of the NPPF sets out the provisions for planning decisions in relation to ground conditions and pollution issues as follows. Paragraph 180 of the NPPF states that:

> *"Planning policies and decisions should contribute to and enhance the natural and local environment by:*
>
> *a. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland".*

Accordance with Policy

5.10.17 The majority of the existing land use within the Site Boundary is agricultural/arable land and areas of existing woodlands.

5.10.18 A detailed Agricultural Land Classification (ALC) and soil resources survey was undertaken in November 2022 (Chapter 13 Geology and Soils - Appendix 13.4 and Appendix 13.5) (Document References: 3.13.04 and 3.13.05) within the Site Boundary.

5.10.19 Best and Most Versatile (BMV) Agricultural Land is defined as Grades 1, 2 and 3a in the ALC by the NPPF. This is the land which is determined to be most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass. Grades 3b, 4, and 5 are used to classify land that is of moderate quality to very poor quality.

5.10.20 Agricultural land quality within the Site Boundary of the Proposed Scheme is primarily classified as Grade 2 (BMV), Subgrade 3a (BMV) and Subgrade 3b (non-BMV). Land within the River Wensum floodplain is restricted to Grade 4 (non-BMV) because of the flood risk.

5.10.21 Tables 13.14 and 13.15 of Chapter 13 Geology and Soils - (Document reference: 3.13.00) provides a summary of the total area of each ALC grade and the area of each grade which is subject to temporary and permanent land take within the areas of the Site Boundary subject to the detailed ALC survey.

5.10.22 In summary, based upon the detailed Agricultural Land Classification survey the permanent land take of BMV land (ALC Grade 2 and 3a) required for the Proposed Scheme within the Site Boundary is approximate 20.72ha and the temporary land take of BMV land required for the Proposed Scheme within the Site Boundary to support construction activities is approximate 8.76ha, largely located in the southern extent of the Proposed Scheme.

5.10.23 For areas not subject to a detailed ALC survey, based upon pre-1988 mapping, the permanent land take of BMV land (Grade 2 only) is estimated to

be 9.34ha. This permanent land take is for Environmental Enhancement and Essential Mitigation Areas. Based upon pre-1988 mapping alone it is not possible to determine the proportion of Grade 3 which is Grade 3a (BMV) or Grade 3b (non-BMV). However, the area of permanent Grade 3 land take within the Red Line Boundary is 33.24ha for areas of Environmental Enhancement and Mitigation. This does not include the area of proposed Woodland/Scrub Enhancement which is mapped as being 19.96ha of Grade 3 land because this is considered to be non-agricultural in nature as it is already used as woodland. Areas identified for the location of bat boxes and hedgerow enhancement have also not been included as it does not represent a change or impact to agricultural use. An additional area of 17.76ha of Grade 3 land is required temporary land take within the Red Line Boundary for Temporary Construction Areas.

5.10.24 Therefore, the total area of BMV anticipated to be required for the Proposed Scheme is conservatively estimated to be 89.82ha. This assumes worst case where all Grade 3 land is assumed to be Grade 3a (BMV), although this is unlikely. Of this total, 26.52ha is for temporary land take and 63.3ha is permanent land take.

5.10.25 Chapter 13 of the supporting ES (Geology and Soils) (Document reference: 3.13.00) discusses the loss of BMV with section 13.7 to that chapter specifically covering 'Assessment of Potential Effects, Mitigation and Residual Effects.' There are very limited measures that can be put in place to mitigate such permanent effects on agricultural land. Mitigation is best achieved by limiting the extent of development to the smallest size possible, consistent with operational requirements.

5.10.26 Land take for the Proposed Scheme has been minimised as far as reasonably practicable through the option selection process as set out in Chapter 4 of this Statement and in more detail in Chapter 4 (Reasonable Alternatives) (Document reference: 3.04.00).

5.10.27 The preferred option for the location and alignment of the Proposed Scheme has been justified as part of the options selection process with this undertaking a comparison of different route alignments assessed against a set of defined criteria with environmental impacts considered. The preferred option was selected as it best met the strategic and project specific objectives of the project, whilst balancing competing environmental constraints.

Summary in relation to agricultural land

5.10.28 The remaining permanent loss of BMV land will need to be balanced with the transport benefits, along with the wider economic, social and environmental benefits that align with the three overarching objectives of sustainable development as set out in paragraph 8 the NPPF (see Chapter 3 of this Statement and section 3.8 for a summary of these benefits).

5.11 Mineral Safeguarding Areas

Relevant Development Plan Policy

5.11.1 The Proposed Scheme bisects an area of land that is identified as a Mineral Safeguarding Area for Sand and Gravel Extraction in the emerging Norfolk Minerals and Waste Local Plan.

5.11.2 **Core Strategy Policy CS16** (Safeguarding mineral and waste sites and mineral resources) of the Norfolk Minerals and Waste Development Framework outlines the aims of safeguarding specific mineral resources. It states:

"The County Council will safeguard existing, permitted and allocated mineral extraction and associated development and waste management facilities, within the following categories:

- Waste management facilities with a permitted input of over 20,000 tonnes per annum;
- Key wastewater and sludge treatment facilities (listed in the Waste Site Specific Allocations DPD);

- Waste water pumping stations;
- All mineral extraction sites that are active, and sites with planning permission and allocated sites; and
- Infrastructure located at railheads, wharves and quarries which can transport or handle minerals.

5.11.3 Policy CS16 confirms that the County Council will oppose development proposals which would prevent or prejudice the use of safeguarded sites for those purposes unless suitable alternative provision is made.

5.11.4 The Proposed Scheme bisects an area of land that is identified as a Mineral Safeguarding Area for Sand and Gravel Extraction in the emerging Norfolk Minerals and Waste Local Plan. As the Proposed Scheme crosses a section of this Mineral Safeguarding Area for 'sand & gravel', Policy CS16 requires that the Mineral Planning Authority should be consulted which the applicant has done so. Policy CS16 identifies that the Mineral Planning Authority will expect to see appropriate investigations carried out to assess whether any mineral resource there is of economic value, and if so, whether the material could be economically extracted prior to the development taking place. These investigations can be seen under ES chapter 13 Geology and Soils (Document reference: 3.13.00).

National Policy and other Material Considerations

5.11.5 Paragraph 218 of the NPPF states the following requirement placed on determining authorities:

> *"Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.*

Accordance with Policy

5.11.6 A proportionate Mineral Resource Assessment (which also confirms the difference between allocated mineral sites, and MSAs) is included in Section

14.5.10 of Chapter 14 of the ES (Materials and Waste) (Document reference: 3.14.00).

5.11.7 Consultation with the NCC Materials and Waste Policy Advisor was undertaken as part of the EIA Scoping exercise with the comments received captured in Chapter 14 of the ES (Materials and Waste) (Document reference: 3.14.00),

5.11.8 The following information has been provided in accordance with Policy MP11:

- A ground investigation has been undertaken to determine the viability of the resource for reuse on the Proposed Scheme - a brief synopsis of the findings describes superficial deposits comprising a thickness range of 0.5 – 34.9m comprising peaty loam/loamy peat, alluvium and river terrace deposits are encountered across the floodplain; Lowestoft Formations (Glacial Till) are encountered across the site, overlying the chalk. The Sheringham Cliffs Formation (granular glacial deposits) are encountered across the site above the Lowestoft Formation and below the topsoil;
- Extraction of sand and gravel mineral resources is to be limited to the depth of the Proposed Scheme road construction requirements: it is not deemed economically viable or proportionate to extract resource from below these depths. For example, in some cases, deposits extend more than 30m below ground level, which means that up to 1.35Mm3 (1.69Mt) of resource might need to be extracted to capture the full value of the sand and gravel presently at site. Any extraction material would need transportation and storage, and any void engineered below the typical road level would need to be backfilled with primary material (which would also require transportation to site). All of these activities, in addition to the impacts on the overall programme, provide a sound financial and logistical case for not extracting the existing resource at site, beyond the road depth.

- Reuse of excavated arisings on the Proposed Scheme would be maximised to limit the requirement for imported fill. A Materials Management Plan would be produced to manage the reuse of excavated arisings on site;
- Surplus excavated arisings would be taken off site and diverted from landfill for reuse in high value applications on other schemes.

5.11.9 In accordance with above-bulleted information, the design and assessment teams have applied their professional judgement to conclude that all reasonable and proportionate approaches to minimising impacts on the Mineral Safeguarding Area have been taken, and no further action in this context is required. The effect on the Mineral Safeguarding Area is therefore assessed in Chapter 14 of the ES (Materials and Waste) (Document reference: 3.14.00) to be negligible and therefore not significant and no mitigation measures are required.

5.11.10 In summary the Mineral Resource Assessment states that a visual inspection of the NCC Interactive Policy Map shows that the Proposed Scheme would substantially impact (potentially sterilise) less than 1% of the available mineral resource in the region. In accordance with the assessment criteria set out in the National Highways' Design Manual for Road and Bridges (DMRB) LA 110 Material Assets and Waste (see Table 14-4 of Chapter 14 of the ES (Materials and Waste) (Document reference: 3.14.00), the Proposed Scheme therefore does not sterilise one or more mineral safeguarding site or peat resource, in its entirety.

5.11.11 Sales of sand and gravel in the East of England were recorded at just over 10 Mt during 2021, demonstrating good historical availability and supply in the region. Based on the significant presence of unsterilised deposits of these resources remaining across the East of England, it is reasonable to conclude that the availability and supply of sand and gravel is unlikely to diminish in the short to medium term, and the percentage sterilised by the Proposed Scheme would not adversely impact future access to supply.

5.11.12 It is considered that the Proposed Scheme fully accords with Core Strategy Policy CS16 of the Norfolk Minerals and Waste Development Framework as appropriate investigations have been carried out to assess whether any mineral resource there is of economic value (the Mineral Resource Assessment (see Chapter 14 of the ES (Materials and Waste) (Document reference: 3.14.00)) that has concluded that the mineral could not be economically extracted below the depth of the Proposed Scheme road construction prior to the Proposed Scheme taking place.

5.12 Sustainable Communities

Relevant Development Plan Policy

5.12.1 **GNLP POLICY 2 (Sustainable Communities)** states:

> *"To contribute to the achievement of sustainable communities, development proposals should, where relevant, address the following matters:*
>
> - *Ensure safe and convenient access for all, including by non-car modes, to on-site and local services and facilities such as schools, health care, shops, recreation/ leisure/community/faith facilities and libraries; encourage walking, cycling and public transport through the layout of development;*
> - *Create and contribute to multi-functional green infrastructure links, whether provided on-site or off-site, including through landscaping, street trees and other tree planting, taking account of local green infrastructure strategies and delivery plans.*
> - *Create beautiful, well-designed places and buildings which respect the character of the local area and seek to enhance it through appropriate design, having regard to any local design guidance (including design codes).*
> - *Promote an inclusive, resilient, and safe community through the provision of facilities and services commensurate with the scale*

and type of the development; and the design and layout of development reflecting best practice to deter crime.

- *Avoid risks of unacceptable levels of soil, air, water and noise pollution and/or land instability.*
- *Avoid locating inappropriate development in areas at risk of flooding by applying the sequential and exceptions tests and ensuring that flood risk is not increased elsewhere. Sustainable drainage systems should be incorporated unless there is clear evidence that this would be inappropriate.*
- *Protect water quality and ensure a low level of energy consumption.*

Accordance with Policy

5.12.2 Chapter 17 of the ES (Population and Human Health – Document reference 3.17.00) presents the assessment on the likely impacts and associated effects upon the components of private property and housing, community land and assets, land and businesses and walkers, cyclists and horse-riders and human health.

5.12.3 The proposed interventions in the surrounding highway network for which consent is sought, including the provision of new PRoWs, the diversion and reclassification of existing roads and rights of way and improvements to side roads will enhance NMU provision as an integral part of the Proposed Scheme.

5.12.4 In addition to those interventions that form part of the Proposed Scheme, a wider package of complementary sustainable travel measures that seek to improve sustainable transport by taking advantage of the reduction of traffic on local rural roads as a result of the Proposed Scheme coming into operation will also be pursued by the Applicant. These measures will be brought forward by the Applicant outside of the Proposed Scheme for which planning permission is sought.

5.12.5 During construction there is likely to be temporary access restrictions and disruption to nearby properties, residents, PRoWs and agricultural land holdings. This will be minimised as far as reasonably practicable with the implementation of mitigation as set out in the OCEMP (Document reference: 3.03.01). Once the Proposed Scheme is operational, access to private property, housing, community land and assets, development land and businesses will be restored.

5.12.6 Chapter 17 of the ES (Population and Human Health – Document reference 3.17.00) reports negative residual effects in relation to human health as a result of reduced physical activity, accessibility and social cohesion noting impacts on Marriotts Ways along with mental health impacts associated with noise and visual effects during the construction stage. Increased employments opportunities during the construction stage will however have positive effects in terms of human health.

5.12.7 Both positive and negative human health effects are reported during the operational stage of the Proposed Scheme in relation to noise in relation to the locations at Great Witchingham, Mattishall, Taverham North, Taverham South and Upper Wensum with negative to neutral effects on human health resulting from visual effects. Negative health effects are also reported in relation to fear and intimidation by road traffic in relation to the similar locations.

5.12.8 Given that the Proposed Scheme will result in both negative and positive human health at specific locations, it is considered that these effects should be weighed against the wider transport, economic, social and environmental benefits to the locality and region as a whole (see section 3.8 of this Statement). Taken with the specific mitigation, compensation as set out in terms of air quality and noise (see section 6.4 of this statement), landscape and visual (see section 6.7 of this statement), flood risk (see section 6.8 of this Statement), it is considered that the Proposed Scheme accords with Development Plan as follows:

- Part 1 of GNLP Policy 2 and DM DPD Policy GC4 as they pertain to the encouragement of walking, cycling and public transport as well as creating a safe environment and increasing community safety and the benefits this will bring for the local communities;
- Noting the ecological and landscape design measures it is therefore considered that the Proposed Scheme accords with part 3 of GNLP Policy 2 and DM DPD Policy GC4 as they pertain to the creation and contribution to multi-functional green infrastructure and the benefits this will bring for the local communities;
- The Proposed Scheme is also seen to accord with parts 3 and 5 of GNLP Policy 2 and DM DPD Policy GC4 as they pertain to the creation and contribution to landscaping and well-designed places that considers the impacts upon the amenity of existing properties;
- Part 7 of GNLP Policy 2 as they pertain to the following environmental factors and their potential impacts of residents and businesses including agriculture:
  - Soil - Chapter 13 of the ES (Document reference: 3.13.00) assesses the Proposed Scheme's effects on soils and the measures taken to avoid or mitigate significant adverse effects as far as reasonably practicable – this is discussed further in this Statement under section 6.10;
  - Air - Chapter 6 of the ES (Document reference: 3.06.00) assesses the Proposed Scheme's effects in terms of air pollution and the measures taken to avoid or mitigate significant adverse effects as far as reasonably practicable – this is discussed further in this Statement under section 6.4:
  - Noise - Chapter 7 of the ES (Document reference: 3.07.00) assesses the Proposed Scheme's effects in terms of noise and vibration and the measures taken to avoid or mitigate significant

adverse effects as far as reasonably practicable – this is discussed further in this Statement under section 6.4.

- Water - Chapter 12 of the ES (Document reference: 3.12.00) assesses the Proposed Scheme's effects in terms of road drainage and the water environment and the measures taken to avoid or mitigate significant adverse effects as far as reasonably practicable – this is discussed further in this Statement under section 6.8.

5.13 Sustainable Growth

Relevant Development Plan Policy

5.13.1 **GNLP POLICY 1 (The Sustainable Growth Strategy)** states:

"Sustainable development and inclusive growth are supported by delivery of the following between 2018 and 2038:

• To meet the requirement for around 40,550 new homes, provision is made for a minimum of 45,041 new homes.

• To aid delivery of around 33,000 additional jobs and support key economic sectors, around 360 hectares of employment land is allocated, and employment opportunities are promoted at the local level.

• Supporting infrastructure will be provided in line with policies 2 and 4.

• Environmental protection and enhancement measures including further improvements to the green infrastructure network will be delivered."

5.13.2 **GNLP Policy 6 (The Economy)** in summary states:

"1. Sufficient employment land is allocated in accessible locations to meet identified need and to provide for choice. Opportunities for sustainable access to sites should be maximised through development proposals and infrastructure investment.

2. The needs of small, medium and start-up businesses are addressed through:

• The allocation and retention of smaller scale employment sites across the area, with limited expansion where this can be justified.

• Encouraging the provision of small-scale business opportunities in all significant residential and commercial developments.

• Support for rural enterprises through the conversion of rural buildings, the development and diversification of agricultural and other land based rural businesses and well-designed new build. If new build development is proposed to meet local business and community needs in rural areas the use of previously developed land and sites that are physically well-related to existing settlements should be encouraged where suitable opportunities exist. For sites beyond existing settlements and in locations not well served by public transport then development should be well designed and sensitive to its surroundings, should not have an unacceptable impact on local roads and should exploit any opportunities to make the location more sustainable.

• Encouraging flexible building design and innovative approaches in new and existing residential developments to encourage local working and business opportunities.

3. Larger scale needs are addressed through the allocation of sufficient land to provide a choice and range of sites, including key strategic sites targeted at specific sectors. Investment strategies will ensure that a readily available supply of land is maintained throughout the plan period.

4. Land identified for employment uses in this local plan will only be considered for other uses that are ancillary to and supportive of its employment role.

5. Tourism, leisure, environmental and cultural industries will be promoted

and assisted by:

• The general emphasis in this local plan on achieving high-quality design, resource efficiency, environmental enhancement and retention of local distinctiveness.

• Protection, enhancement and expansion of the green infrastructure network.

• Encouragement for sustainable tourism initiatives and development that supports cultural industries.

• Promotion of the creative industries cluster focussed on the city centre.

6. Opportunities for innovation, skills and training will be expanded through facilitating the expansion of, and access to, vocational, further and higher education provision.

5.13.3 **DMD DPD Policy H4 (Change of Use of a Dwelling)** states:

"Proposals for change of use of a dwelling, including to allow working from home will be considered acceptable in principle provided that:

i. *The sale of any goods is limited to those produced on site; and*

ii. *The scale and nature of the use relates acceptability to the surroundings; and*

iii. *The benefits arising from the new use outweigh the loss of the dwelling.*

When considering applications for the change of use of part or all of a dwelling, the local planning authority must be satisfied that no undue adverse effects will arise, to the detriment of neighbours or character and appearance of the surrounding area in general.

National Policy and other Material Considerations

5.13.4 Paragraph 8 of the NPPF goes onto state that '*Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)'*.

5.13.5 Paragraphs 85 - 87 of the NPPF set out the Government's view on building a strong and competitive economy. Paragraph 93 states that the sequential approach should not be applied to applications for small scale rural offices or other small rural developments. Paragraph 88 regards supporting a prosperous rural economy stating:

"Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;

Accordance with Policy

5.13.6 As discussed in Section 3.6 of this Statement a number of housing and employment developments are proposed within the wider Norwich region as identified in GNLP Policy 1 (The Sustainable Growth Strategy).

5.13.7 The development of the Proposed Scheme has the potential to catalyse substantial regional economic benefits, acting as a crucial driver for growth and development and will foster a range of economic advantages for the region as set out in section 3.6 of this Statement.

5.13.8 The Proposed Scheme will support future growth in housing and employment by providing infrastructure that supports the projected economic growth in Norwich, and proposed developments such as the expansion of Norwich Airport and the Food Enterprise Zone.

5.13.9 In addition, the Proposed Scheme will improve journey times around the west of the city which will create stronger and more effective links to the Midlands and the North of England making the region more attractive for investors, commuters and customers with easier access to Norwich airport.

5.13.10 The Proposed Scheme will significantly enhance connectivity, reducing travel time and cut congestion. This improved accessibility will facilitate the movement of goods and services, creating more efficient supply chains within the region, which businesses can seek to capitalise on, and use this added efficiency to reach wider markets, attracting investments, and expanding their operations. Additionally, the streamlined transportation of goods could lead to cost savings for businesses, ultimately contributing to increased competitiveness and profitability for the Greater Norwich region.

5.13.11 The enhanced connectivity brought about by the Proposed Scheme will also have a direct impact on employment opportunities. As the Greater Norwich region becomes more accessible, businesses are more likely to establish or expand their operations in these areas, generating a demand for local labour. This, in turn, leads to job creation and reduced unemployment rates. Moreover, improved connectivity attracts skilled professionals who may have been deterred by the lack of efficient transportation options, contributing to a more diverse and skilled workforce in the region.

5.13.12 Furthermore, the construction and maintenance of the Proposed Scheme will generate an increase in economic activity during the construction and operational stages. Local businesses, including construction firms, material suppliers, and service providers, experience increased demand for their products and services. This injection of capital into the local economy will stimulate growth and creates a multiplier effect, as the money circulates through various sectors, creating a ripple of economic benefits.

5.13.13 The proposed change of use of Low Farm House is seen to be in accordance with policy H4 of the DM DPD, as the scale and nature of the development relates acceptably to the surroundings (with no adjustments to the existing

building proposed either internally or externally), with therefore no impacts affecting the character and appearance of the surrounding area with no undue adverse effects will arising. The proposed change of use can likewise be seen to be in accordance with the National Policy enshrined within the NPPF, as this supports the stainable growth and expansion of all types of business in rural area, through the conversion of existing buildings, and the diversification of agricultural and other land-based rural businesses. The change of use of Low Farm House, to site offices for the contractor to utilise during construction will directly support the development of the Proposed Scheme so will support all of the economic and social objectives the development is seeking to realise as described in section 3 of this Statement. Given the significant benefits the Proposed Scheme, the loss of the single residential dwelling can be seen to be outweighed by the wider benefits brought about through development of the Proposed Scheme.

5.13.14 The Proposed Scheme is not required to facilitate specific housing and employment developments within the area to the west of Norwich. However, in the absence of the Proposed Scheme and the additional capacity in the highway network that it will provide, it is considered that the additional traffic generated from these proposals would result in the current issues on the local road network and local communities being exacerbated.

Summary

5.13.15 Given the Proposed Scheme will support the projected growth in the region, it is considered that it aligns with the economic objectives as set out in GNLP policy 1 (The Sustainable Growth Strategy) and GNLP policy 6 (The Economy) and so accords with these policies.

6 Planning Balance and Conclusions

6.1 Introduction

6.1.1 This chapter undertakes the exercise set out in paragraph 11 of the NPPF of identifying whether the Proposed Scheme should benefit from the presumption in favour of sustainable development.

6.1.2 It considers the planning balance given to the Proposed Scheme in terms of its overall accordance with the policies in the Development Plan as well as other national/regional/local policy. It also considers other material considerations should these be considered to be required by the CPA.

6.2 Overall accordance with the Development Plan

6.2.1 The Development Plan is the starting point for decision making. The relevant Development Plan for this application again consists of the following documents:

- The Greater Norwich Local Plan (2024);
- The Development Management DPD (2015); and
- The Norfolk Minerals and Waste Development Framework.

6.2.2 This section addressees how the Proposed Scheme accords with each of the main Development Plan policies from the GNLP as well as related relevant policies from the DM DPD and the Norfolk Minerals and Waste Development Framework

6.2.3 It is acknowledged that introducing engineering works of the scale and nature proposed as part of the Proposed Scheme, into the predominantly undeveloped rural area west of Norwich for the purpose of providing a strategic connection between the A47 and the A1067/A1270 will result in some adverse environmental effects. These effects were assessed in terms of accordance with Development Plan policy in Chapter 6 of this Statement.

6.2.4 The main residual adverse environmental effects as reported in the ES (Document reference 3.10.00) that need to be considered in the context of relevant Development Plan policies are as follows:

- Flood Risk;
- Biodiversity – Ancient or Veteran Trees;
- Biodiversity – Bats;
- Cultural Heritage – less than substantial harm to listed barn 50m north west of Low Farm House; and
- Mineral Safeguarding.

6.2.5 It is also considered that although no direct Development Plan policy exists in relation to the loss of BMV land, that this should also be considered in the context of the NPPF.

6.2.6 It is helpful to examine the issues by following the sequence of the relevant policies in the GNLP, which provides the strategic framework for considering development within its plan area. It is noteworthy in relation to infrastructure that **GNLP Policy 1 (Sustainable Growth Strategy)** states that '*The sustainable growth strategy will be supported by improvements to the transport system…'*. Whilst it has been acknowledged that the Proposed Scheme is not a specific proposal of the GNLP and is not directly required for any specific site in the GNLP's growth strategy to come forward, it remains the case that by addressing the strategic connectivity gap in the road network between the A1067/A1270 and the A47 to the west of Norwich, the Proposed Scheme will substantially enhance the accessibility of key growth sites and the Cambridge Norwich Tech Corridor. Given the Proposed Scheme will support the projected growth in the region, it is considered that it aligns with the economic objectives as set out in GNLP Policy 1 (The Sustainable Growth Strategy) as well as the aims of **GNLP Policy 6 (The Economy)** and so accords with these policies.

6.2.7 The design of the Proposed Scheme is considered to accord with the relevant parts of **GNLP Policy 2 (Sustainable Communities**) and **Policy GC4 ('Design') of the DM DPD** as well as aligning with paragraph 135 of the NPPF, with good design evident in the Proposed Scheme in line with the mitigation hierarchy, avoiding where possible impacts based on the environmental constraints and minimising adverse effects in terms of landscape, visual, soils, air quality, noise, water and flooding. Where mitigation is no considered sufficient, the Applicant has committed to the provision of compensation.

6.2.8 The Proposed Scheme is considered to accord with **GNLP Policy 2 (8) (Sustainable Communities)** and **DM DPD Policy CSU5** (as well as aligning with paragraph 159 of the NPPF) as the FRA (Document reference: 3.12.02) concludes that the development passes the Sequential Test as there were no route alternatives identified that could avoid works to cross the River Wensum. The Proposed Scheme is considered to be 'Essential Infrastructure' and therefore according to Table 3 of the Flood Risk and Coastal Change Guidance, this development can be located in all Flood Zones, provided an Exception Test is satisfied. The Proposed Schemes wider sustainability benefits and the fact that it will remains operational and safe for users in times of flood, with no net loss of floodplain storage with no impedance to water flows or increased flood risk elsewhere resulting in this test also being passed.

6.2.9 In accordance with the hierarchy as set out in **GNLP Policy 3 ('Environmental Protection – the Natural Environment')** the design of the Proposed Scheme, where possible, has included for embedded mitigation to seek firstly to avoid potential adverse effects to local residents, landscape, biodiversity and other environmental constraints.

6.2.10 Significant green infrastructure in the form of green bridges (see Chapter 2 of this Statement) and ecological mitigation are proposed as part of the landscape design for the Proposed Scheme in accordance with **Policy EN1**

(Biodiversity and Habitats), and **Policy EN3 ('Green Infrastructure')** of the DM DPD**.**

6.2.11 In accordance with Policy EN1 (Biodiversity and Habitats) of the DM DPD it is considered that, as set out in Chapter 4 of this Statement, that the preferred route could not be located elsewhere, where on balance it would cause less or no harm. Adequate mitigation and compensation where required has been incorporated into the design and when taken as a whole, the benefits of the Proposed Scheme as set out in section 3.8 of this Statement clearly outweigh the harmful impacts.

6.2.12 The construction stage assessment in Chapter 10 of the ES (Document reference 3.10.00) has shown that, taking into account the embedded mitigation measures and those set out in the OCEMP (Document reference: 3.03.01), the majority of species and habitats assessed would not be significantly affected by the Proposed Scheme.

6.2.13 The operational stage assessment set out in Chapter 10 of the ES (Document reference 3.10.00) has shown that, taking into account the proposed mitigation, the majority of species and habitats assessed would not be significantly affected by the Proposed Scheme.

6.2.14 In relation to paragraph 186 (b of the NPPF It is noted that following mitigation that no significant effects are reported in the ES (Document reference 3.10.00) in relation to SSSIs during the construction or operational stage.

6.2.15 In the context of the Environment Act 2021, and in accordance with **GNLP Policy 3 ('Environmental Protection – the Natural Environment')** that requires development to demonstrate that the '*gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the existing situation',* the Biodiversity Net Gain technical report (Document reference: 3.10.33) predicts that the Proposed Scheme will achieve a quantifiable 10.97% BNG outcome for the non-excluded habitats using Metric 3.1 and a provisional 11.58% based on copying the 3.1 data into the Statutory Metric. As the Proposed Scheme impacts upon irreplaceable habitat full 'BNG' cannot

be achieved under the metric, but it has been achieved for habitats where it is possible to do so.

6.2.16 There are however some notable significant effects reported in relation to the natural environment that are considered further in relation to GNLP Policy 3 ('Environmental Protection – the Natural Environment') below.

6.2.17 The Proposed Scheme would result in the loss of seven veteran trees as well as adverse impacts on Ancient Woodland, which makes paragraph 186 (c of the NPPF directly relevant. This sets out a presumption that: '*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.*'

6.2.18 The design of the Proposed Scheme has embedded mitigation as part of the design to avoid potential adverse effects to Notable, Veteran and Ancient Trees. Relevant embedded mitigation includes the alignment of the Proposed Scheme being chosen and designed to avoid important ecological features where possible. This resulted in a reduction in the number of veteran trees being directly impacted from twelve to seven (see Chapter 4 of this Statement and Chapter 4 of the ES (Alternatives) (Document reference: 3.04.00) for further details). The drainage system for the Proposed Scheme has also been designed to intercept and divert run-off away from watercourses and floodplains and will reduce impacts on veteran tree root systems.

6.2.19 In relation to the direct loss of the seven veteran trees, the Applicant has committed to a compensation strategy (see paragraphs 6.5.29 to 6.5.33 of this Statement) that seeks to compensate the environment for the loss or harm to these irreplaceable trees. This compensation would however not fully reduce the significance of the adverse effect associated with their loss or deterioration.

6.2.20 In relation to the deterioration of trees from pollutants the effect of air quality on ancient woodland and veteran trees was modelled as these were the most sensitive receptors amongst trees, tree groups and woodlands. A total of 73

were scoped into the Air Quality Ecological Impact Assessment (Document reference: 3.10.34). All trees modelled were currently exceeding the critical level and load for Nitrogen (N) deposition and Ammonia (NH_3) and are predicted to continue exceeding the critical level and load for N deposition and NH_3 regardless of the Proposed Scheme being in place.

6.2.21 An Air Quality Compensation Strategy is proposed to compensate for the environment from the predicted deterioration of these assets. The Outline Air Quality Compensation Strategy (Document reference: 6.01.01) includes the measures to compensate for air quality impacts on veteran trees, ancient woodland and at other statutory and non-statutory designated sites as set out in section 6.4. of this Statement.

6.2.22 The '*wholly exceptional reasons'* are explained in footnote 67 of the NPPF to include infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat. It is considered the need for (as set out in chapter 3 of this Statement) and the transport, economic, social and environmental benefits as set out in sections 3.5 and 3.6 and summarised in section 3.8 of this Statement) would outweigh the loss of these seven veteran trees.

6.2.23 It is therefore considered that the Proposed Scheme has adhered to the mitigation hierarchy, has wholly exceptional reasons to justify the loss of and impacts on the veteran trees and has provided suitable compensation strategies that the Applicant is committed to and will be secured through a suitable planning condition. The Proposed Scheme is therefore considered to accord with GNLP Policy 3 ('Environmental Protection – the Natural Environment') and aligns with paragraph 186 'a)' and 'c)' of the NPPF as it relates to the impacts on veteran trees or deterioration of ancient woodland and ancient or veteran trees due to pollution.

6.2.24 In relation to paragraph 186 (b) of the NPPF It is noted that following mitigation that no significant effects are reported in the ES (Document

reference 3.10.00) in relation to SSSIs during the construction or operational stage.

6.2.25 In relation to the significant effects associated with bats during the construction stage, the Applicant is committed to the measures set out in the Outline Bat Mitigation Strategy (Document reference 3.11.06) that seeks to mitigate and compensate for the loss or harm to bats.

6.2.26 However, a significant adverse effect will remain until the habitat creation and compensation measures have reached their target condition. The Applicant is committed to the measures set out in the Outline Bat Monitoring Strategy (Document reference 3.11.07), that will be developed into final measures secured by a European Protected Species Licence that will monitor the performance of the committed mitigation and compensation. A monitoring regime will be secured by a suitable planning condition.

6.2.27 The Outline Bat Mitigation Strategy (Document reference 3.11.06) concludes that the Proposed Scheme will in the long-term reduce the significance of the adverse effect associated with their habitat loss or deterioration.

6.2.28 It is therefore considered that in relation to bats that the Proposed Scheme has adhered to the mitigation hierarchy and has provided suitable mitigation that the Applicant is committed to and that will be secured through a suitable planning condition. The Proposed Scheme is therefore considered to accord with GNLP Policy 3 ('Environmental Protection – the Natural Environment') in this regard and aligns with paragraph 186 (a) of the NPPF.

6.2.29 The Proposed Scheme will help to unlock capacity in the highway network that will be used by vehicles travelling to and from the proposed housing and employment allocations, supporting the timely delivery of the aims of the GNLP and the wider growth needs of the area in accordance with **GNLP Policy 4 (Strategic Infrastructure)** as set out in the first element of the policy.

6.2.30 In relation to the aim of developing the role of Norwich as the regional capital by addressing the strategic connectivity gap in the road network, the

Proposed Scheme will substantially enhance the accessibility of key sites the Cambridge Norwich Tech Corridor and the market towns/rural areas to the west of Norwich in accordance with the first part of the second element of GNLP Policy 4 (Strategic Infrastructure).

6.2.31 The NMU provision and the improved bus journey times are considered to promote a modal shift away from private cars promoting sustainable and active transport in the area in line with the aims of the TfN. The amalgamation of the above factors is considered to influence attitudes to travel in a positive manner in line with the aims of the TfN and so in accords with third part of the second element of GNLP Policy 4 (Strategic Infrastructure).

6.2.32 The third part of the second element of GNLP Policy 4 (Strategic Infrastructure) sets states that the objectives will be achieved by '*Having regard to the Transport for Norwich Strategy including consideration of its aims to…Reduce carbon emissions and improve air quality*'.

6.2.33 In relation to improving air quality it is considered that the Proposed Scheme aligns with the aim of the TfN as it is accompanied by a full assessment of potential emissions to air in both its construction and operational stages (Chapter 6 of the ES (Document reference: 3.06.00)). It is considered that in relation to Air Quality, the Proposed Scheme will have a negligible effect (and so not significant in EIA terms) on the above human health receptors in both the construction and operational stages. In relation to air quality impacts on sensitive ecological habitats, the significance of these effects was considered in Section 6.5 of this Statement. As noted, an Air Quality Compensation Strategy (Document reference: 6.01.01) is proposed to compensate for the predicted deterioration of ancient woodland and veteran trees.

6.2.34 In relation to reducing carbon emission it is considered that the Proposed Scheme has had regard to the aims of the TfN Strategy with efforts to reduce emissions throughout the construction stage having been considered as part of the optioneering process. It is noted that the Principal Contractor has committed to a number of measures to reduce such emissions during the

construction phase as set out in section 6.6 above with additional recommendations to further reduce carbon emissions as part of the operational stage also having been made.

6.2.35 The Proposed Scheme is also considered to be aligned with the environmental aims of the TfN Strategy that seeks to reduce carbon emission by facilitating 'active travel' (the NMU provision) and improvements to the public transport journey times aligning with the aims of the TfN Strategy in relation walking, cycling and encouraging more use of public transport.

6.2.36 Following design and mitigation efforts, some residual significant effects in terms of carbon are considered unavoidable, though these have been minimised as far as reasonably practicable. It is considered that some residual carbon emissions are likely when developing major road schemes such as the Proposed Scheme and what is important is their extent and their context. Whether seen in a national or a local context, the scale of emissions is unlikely to prejudice the achievement of carbon reduction objectives.

6.2.37 It is considered that the residual effects in relation to carbon must also be weighed against the wider longer term and wider benefits of the Proposed Scheme in terms of its transport, economic, social and environmental benefits as set out in Chapter 3 of the Statement and summarised in section 3.8 of this Statement.

6.2.38 It is therefore considered that due regard to the aims of the TfN Strategy, as they relate to reducing carbon emission have been had and that the Proposed Scheme, when considered as a whole with the conclusions in terms of accordance with policy as set out in Section 6.3 (Transport Improvements) and Section 6.4 (Air Quality and Noise & Vibration), can be seen to accord with GNLP Policy 4 (Strategic Infrastructure).

6.2.39 Given that the application is accompanied by a full Transport Assessment (Document reference: 4.01.00), that the future preparation of a Travel Plan for the construction stage will be secured by way of a relevant planning condition, the measures relating to maximising access by foot, cycle and

public transport as set out in the Sustainable Transport Strategy (Document reference: 4.02.00) along with the safety objectives as set out in the PIA that would be realised, the Proposed Scheme can be seen to fully accord with the **DM DPD policies TS2 and TS3.**

6.2.40 The HEBDA (Document reference: 3.08.01) concludes that the Proposed Scheme would result in 'less than substantial harm' to the listed barn 50m north west of Low Farm House. It is considered that the less than substantial harm to listed Barn 50m north-west of Low Farm House as a result of the Proposed Scheme should be weighed against the public benefits that the Proposed Scheme will provide.

6.2.41 In summary it is considered that the public benefits of the Proposed Scheme including the transport benefits, along with the wider economic, social and environmental benefits (see Chapter 3 of this Statement and section 3.8 for a summary of these benefits) on balance outweigh the 'less than substantial harm' to listed Barn 50m north-west of Low Farm House.

6.2.42 The Proposed Scheme bisects an area of land that is identified as a Mineral Safeguarding Area for Sand and Gravel Extraction in the emerging Norfolk Minerals and Waste Local Plan. Core Strategy Policy CS16 of the Norfolk Minerals and Waste Framework defines Mineral Safeguarding Area and Mineral Consultation Areas and outlines the aims of safeguarding specific mineral resources.

6.2.43 The effect on the Mineral Safeguarding Area that the Proposed Scheme bisects is assessed in Chapter 14 of the ES (Materials and Waste) (Document reference: 3.14.00) to be negligible and therefore not significant and no mitigation measures are required.

6.2.44 It is considered that the Proposed Scheme fully accords with Core Strategy Policy CS16 of the Norfolk Minerals and Waste Framework as appropriate investigations have been carried out to assess whether any mineral resource there is of economic value (the Mineral Resource Assessment (see Chapter 14 of the ES (Materials and Waste) (Document reference: 3.14.00)) that has

concluded that the mineral could not be economically extracted below the depth of the Proposed Scheme road construction prior to the Proposed Scheme taking place.

6.2.45 The remaining permanent loss of BMV land is not the subject of Development Plan policy but it is accepted that it will need to be balanced with the transport benefits, along with the wider economic, social and environmental benefits (see Chapter 3 of this Statement and section 3.8 for a summary of these benefits).

6.2.46 Having regard to the scale of residual loss and the context for the resource within Norfolk, it is concluded that the benefits outweigh the moderate extent of loss of BMV Land.

6.2.47 Having regard to the conclusions above (and supported by the detailed analysis in Chapter 6 of the Statement), it can be concluded that the Proposed Scheme accords with the Development Plan taken as a whole.

6.3 Presumption in Favour of Sustainable Development

6.3.1 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development and states:

> *"Plans and decisions should apply a presumption in favour of sustainable development" …*
>
> *For decision-taking this means:*
>
> *(c) approving development proposals that accord with an up-to-date development plan without delay.*

6.3.2 For the reasons already set out, it is concluded that the Proposed Scheme does accord with the Development Plan taken as a whole (with its key component, being the GNLP, clearly being up to date – see section 5.2 of this statement). Paragraph 11(c) of the NPPF therefore applies and the application should be approved without delay in line with the presumption in favour of sustainable development.

6.3.3 In the event that the CPA were to form a different view, were ~~it~~ some aspect of the Proposed Scheme be thought to not fully accord with a specific planning policy (noting, of course, that the statutory scheme requires the development plan to be considered as a whole), consideration is given to the applicability of paragraph 12 of NPPF, which seeks to establish whether material considerations and the wider benefits of a scheme, justify a deviation from the adopted Development Plan.

6.3.4 Paragraph 12 of the NPPF states that the presumption in favour of sustainable development does not change the status of the Development Plan as the starting point for decision making and whilst permission should typically be refused for schemes that don't accord with the Development Plan, exceptions are possible if material considerations in a particular case warrant the deviation. The Applicant considers that if the Proposed Scheme were found to not fully accord with a specific planning policy, that such material considerations exist. These material considerations are considered below using the three overarching objectives of the planning system as it pertains to achieving sustainable development. These are set out in paragraph 8 of the NPPF as follows:

- *1. an economic objective;*
- *2. a social objective; and*
- *3. an environmental objective.*

6.3.5 These overarching objectives are interdependent and need to be pursued in mutually supportive ways, so that opportunities can be taken to secure net gains across each of the different objectives.

6.3.6 Paragraph 9 of the NPPF states:

> *"These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an*

active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area."

6.3.7 The three overarching objectives of the planning system as it pertains to achieving sustainable development are therefore not criteria to be used to judge the merits of the Proposed Scheme. They are however considered to provide a helpful framework to capture the three dimensions of sustainable development and so are adopted below as a useful structure when looking across the wide range of planning issues that the Proposed Scheme gives rise to, for the purpose of considering whether those factors may provide reasons for a decision departing from the Development Plan, in the event that some degree of conflict with the policies in the Development Plan were considered to arise by the CPA.

The Economic Objective of Sustainable Development

6.3.8 It is evident that well-planned and efficiently executed transport improvements have the potential to deliver a range of regional economic benefits.

6.3.9 Beyond the direct transport improvements, the impact of the Proposed Scheme is expected to yield various economic advantages for the region, playing a pivotal role in driving growth and supporting Norwich's development as a regional capital in line with strategic growth aims of the GNLP.

6.3.10 By significantly improving connectivity and reducing travel time, the Proposed Scheme is poised to alleviate congestion and enhance the efficiency of supply chains. This enhanced accessibility will enable smoother movement of goods and services, allowing businesses in the area and wider region to capitalise on the transport improvements. The increased efficiency can be leveraged to access broader economic markets, attract outside investment, and expand operations, ultimately leading to cost savings and heightened competitiveness for the Greater Norwich region.

6.3.11 Furthermore, the improved connectivity facilitated by the Proposed Scheme will directly influence employment opportunities. As the Greater Norwich

region becomes more accessible, businesses are likely to establish or expand operations, creating a demand for local labour and subsequently contributing to job creation and decreased unemployment rates. Additionally, the enhanced connectivity will attract skilled professionals who were previously deterred by inefficient transportation options, thereby fostering a more diverse and skilled workforce in the region. It is noted that the Norwich Cambridge Tech Corridor sites would benefit from enhanced access should the Proposed Scheme be developed, an important part of the Vision of the GNLP.

6.3.12 Additionally, the building and maintenance of the Proposed Scheme is anticipated to trigger an increase in local economic activity. This anticipated economic growth will manifest through heightened demand for products and services from local businesses involved with the construction, encompassing construction firms, material suppliers, and service providers.

6.3.13 The anticipated reduction of vehicles and pedestrian accidents has been judged to lead to cost savings in terms of transport costs.

6.3.14 The impacts on physical activity will likely provide beneficial economic impacts in respect of the NMU provision through enhanced walking and cycling provision.

6.3.15 In addition, by alleviating congestion on the local road network, the Proposed Scheme will also support the required housing and employment growth within the Norwich urban area and to the west of Norwich.

6.3.16 In summary, the Proposed Scheme has the potential to deliver a range of regional economic benefits, in both the short and long term. From increased business competitiveness and job creation to stimulating local economic activity and attracting investments, the positive impacts will reverberate throughout the region, paving the way for sustained growth and prosperity in the Greater Norwich region.

The Social Objective of Sustainable Development

6.3.17 The evidence from the supporting Transport Assessment (Document reference: 4.01.00) and from the public consultations is that high volumes of traffic through the rural areas to the west of Norwich are having an impact on the amenity of local residents, and the Proposed Scheme will help to improve their wellbeing by reducing traffic on local roads.

6.3.18 By reducing traffic congestion on the local road network, the Proposed Scheme will help support people to walk and cycle more. The Proposed Scheme will support the promotion of healthy communities by providing significantly improved NMU facilities in terms of cycle and pedestrian enhancements in the area. This will result in a likely modal shift change and more people cycling and walking. To build on the benefits provided by the NMU provision, delivery of the project will enable a wider set of complementary sustainable transport measures (as set out in the Sustainable Transport Strategy (Document reference: 4.02.00)) to complement the existing and proposed highway network.

6.3.19 The construction stage for the Proposed Scheme would result in some disturbance to the local community from noise and construction traffic. Any construction works near to receptors have the potential to cause disturbance to nearby residents due to noise and vibration. Given the scale of the construction works associated with the Proposed Scheme, there is the potential for adverse effects to occur. In order to mitigate adverse construction effects, a spectrum of embedded mitigation and Best Practice Means are outlined in the OCEMP (Document reference: 3.03.01).

6.3.20 There is substantial amount of public support for addressing the congestion issues to the west of Norwich, as set out in the Statement of Community Involvement (Document reference: 1.03.00), and it is considered that addressing this issue will have a positive social impact on the local and wider regional communities.

The Environmental Objective of Sustainable Development

6.3.21 The environmental impacts including both the reported adverse and beneficial effects have been reported in the ES (Document reference: 3.10.00) that accompanies the application and are considered in Chapter 6 of this Statement against the relevant policies of the Development Plan and wider national planning policy.

6.3.22 The Proposed Scheme has been developed so it can be delivered in an environmentally responsible way.

6.3.23 The preferred route of the Proposed Scheme was selected for a number of reasons including its less pronounced adverse effects on environment assets as out in Chapter 4 of this Statement.

6.3.24 It will improve the environment for local communities by reducing road traffic congestion and will provide ecological and landscape enhancements along its proposed route.

6.3.25 Opportunities to enhance the environment along the route have been taken by integrating suitable landscaping with the creation and enhancement of habitats and areas for the public to access nature through the proposed NMU provisions. The Proposed Scheme will deliver BNG **(**10.97% BNG outcome for non-excluded habitats based on Metric 3.1 and 11.58% based on the Statutory Metric), which means that it will leave all applicable habitats in a measurably better state than before construction began. The delivery of the BNG will be provided as per the detail provided in the supporting Biodiversity Net Gain technical Report (Document reference: 3.10.33). The provision of BNG is considered to be a substantial, ongoing environmental benefit.

6.3.26 The design integrates measures to adapt to climate change. This includes the use of suitable materials to adapt to the changing climate and to accommodate increased rainfall patterns and flood events. Where appropriate, the surface water drainage scheme will utilise SUDS as set out in the Drainage Strategy Report (Document reference: 4.04.00).

6.3.27 Where necessary the design of the Proposed Scheme has been revised to preserve or enhance the environment and includes mitigation to reduce the potential effects of the on the receiving environment. The design sought to avoid sensitive receptors as a starting position in line with the mitigation hierarchy as evidenced through the option selection process summarised in Chapter 4 of this Statement. Where it has not been possible to avoid such impacts, then mitigation has been proposed to reduce adverse effects as far as reasonably practicable. Where mitigation does not fully mitigate certain effects, compensation strategies have been developed and are committed to by the Applicant. The main adverse effects of the proposed Scheme are discussed from section 7.2.4 above.

Other Material Considerations

6.3.28 The LTP 4 Strategy is highly supportive of the Proposed Scheme confirming that:

> '*Completion of the Norwich Western Link will connect the Broadland Northway to the A47 in the west and will be complemented by sustainable transport measures. The Norwich Western Link would provide a higher standard route between the western end of Broadland Northway and the A47 and significantly improve travel between these two major roads. Traffic congestion, rat-running and delays to journeys are all significant issues on minor roads to the west of Norwich*.'

6.3.29 Furthermore, the supporting text for LTP Policy 8 (Enhancing Connectivity, and what it means in practice (p48)) identifies the dualling of the Norwich Western Link as a priority in ensuring quick, reliable journey times for longer-distance journeys.

6.3.30 The need to address the highway issues to the West of Norwich, the reduction in road traffic accidents that the Proposed Scheme is modelled to bring, are also strong material considerations in favour of approving the application.

6.3.31 In terms of meeting the seven core strategic objectives of the LTP, the development of the Proposed Scheme clearly achieves the majority of these objectives as it will:

- Help deliver a sustainable Norfolk (***Objective 2*** *of the LTP*),
- Enhance Connectivity (***Objective 3*** *of the LTP*),
- Enhance Norfolk's Quality of Life (both for those living rurally who will benefit from a reduction in localised traffic on small roads and those seeking shorter journey times around Norwich) (***Objective 4*** *of the LTP*),
- Increasing Accessibility (***Objective 5*** *of the LTP*),
- Improving Transport Safety (***Objective 6*** *of the LTP*),
- Providing a Well Managed and Maintained Transport Network (***Objective 7*** *of the LTP*).

6.3.32 Taking into account the need for the Proposed Scheme, which is clearly recognised as a strategic priority in the LTP 4 Strategy, and the positive benefits it will deliver when considered against the three overarching objectives of the planning system, it is clear that there are powerful and weighty material considerations to support the approval of the Proposed Scheme, even if there were thought to be some degree of conflict with the policies of the Development Plan.

6.4 Summary

6.4.1 The Proposed Scheme is considered to accord with the policies of the Development Plan as well as the relevant parts of the NPPF as set out in section 7.2 above.

6.4.2 Although there would be some residual adverse environmental effects arising from the proposals as assessed and reported in Chapter 6 of this Statement, where these have been identified, the mitigation hierarchy has been applied with the resulting residual effects in general being less than significant.

Where residual effects cannot be reduced to acceptable levels through the use of mitigation, the Applicant has committed to a number of compensation and monitoring strategies and will continue to develop proposals to reduce effects through the detailed design and construction stages of the Proposed Scheme.

6.4.3 In this case the benefits of the Proposed Scheme are considered to outweigh the above environmental effects and so the Proposed Scheme is considered to accord with relevant Development Plan policies and so with the Development Plan taken as a whole. The Proposed Scheme is therefore considered to benefit from the presumption in favour of sustainable development contained in paragraph 11 of NPPF and so planning permission should be approved.

6.4.4 Even if the view were to be taken that there were to be some degree of conflict with the policies of the Development Plan, then on balance it is considered that the outcome would not change because, should paragraph 12 of the NPPF be applied, there are positive and powerful factors in favour of the Proposed Scheme including the significant wider benefits of the Proposed Scheme, to outweigh any such conflicts. .

7 Conclusions

7.1.1 The Proposed Scheme is required to address the strategic connectivity gap in the road network between the A1067 and the A47 to the west of Norwich. This existing gap results in a high volume of traffic on the rural road network and has an adverse impact on local residents, including people living within the villages of Ringland, Weston Longville and Honingham.

7.1.2 The delivery of the Proposed Scheme is supported by a wide range of policy at local, regional and national levels. The Development Plan provides a wide range of policies and development goals that the Proposed Scheme supports.

7.1.3 Outside of the Development Plan itself, there are a number of regional policy documents that are material considerations in determining the planning application, which are supportive of the proposals objectives including NCC's LTP and its Implementation Plan 4, Norfolk Strategic Infrastructure Delivery Plan 2021, and the TfN.

7.1.4 Support for the aims and objectives of the Proposed Scheme can also be seen within wider national policy documents including the revised NN NPS (2024).

7.1.5 The Proposed Scheme has been designed to address a number of major highways, capacity and safety issues including, but not limited to:

- The Proposed Scheme offers a new direct link between A47 and A1270 on the west side of Norwich;
- Through-traffic in rural communities such as Weston Longville and Ringland is reduced by 88-95% with the Proposed Scheme in place;

- Journey distances are reduced by about 4.6km per journey for those using B1535 route from A47 to A1270 with the Proposed Scheme in place;
- Journey times are quicker and more reliable for those using B1535 route from A47 to A1270 (a saving of about 5 minutes per vehicle);
- The Proposed Scheme alleviates future junction capacity and safety issues on A1067 at Weston Longville and Morton on the Hill;
- With through-traffic removed from local villages in the west of Norwich, there are less barriers to walking and cycling and the local network is more conducive to active travel;
- The Proposed Scheme would offer better opportunities for pedestrians and cyclists and public transport provision;
- Personal injury collisions reduce with the Proposed Scheme in place; and
- There is traffic reduction on A47 southern bypass around Norwich as traffic switches to use available capacity on the A1270.

7.1.6 The Proposed Scheme is the result of an extensive optioneering exercise that has been carried out over a number of years to ensure that the best available route to minimise environmental impacts has been proposed.

7.1.7 The public consultations undertaken as part of the development of the Proposed Scheme has identified a considerable amount of public support for the Proposed Scheme from the villages and settlements to the west of Norwich that are affected by the issues that currently impact on the area.

7.1.8 From the background economic assessments, it can be demonstrated that a well-planned and efficiently executed highways scheme has the

potential to deliver a range of regional economic benefits. From increased business competitiveness and job creation to stimulating local economic activity and attracting investments, the positive impacts reverberate throughout the region, paving the way for sustained growth and prosperity. As discussed under chapter 3 of this Planning Statement (Needs and Benefits of the Proposed Scheme), the Proposed Scheme has the potential to catalyse substantial regional economic benefits, acting as a crucial driver for economic development, with the impact of the Proposed Scheme going beyond the infrastructure improvements themselves and will fosters a range of economic advantages for the region.

7.1.9 The high-level objectives of the Proposed Scheme are stated to be:

- Improve strategic connectivity with the national road network.
- Support sustainable economic growth;
- Improve the quality of life for local communities; and

Promote an improved environment.

7.1.10 In seeking to meet those objectives, the Proposed Scheme is able to demonstrate and enable the following:

- Significantly enhance connectivity, reducing travel time and cutting congestion;
- The enhanced connectivity brought about by the Proposed Scheme will also have a direct impact on employment opportunities;
- Wider economic benefits will be realised by the Proposed Scheme owing to the enhanced access to existing and proposed employment and residential developments as well as to the tourist economy;

- Improve the local environment and bringing beneficial social impacts to local residents.
- Offer a scheme that is BNG net positive,
- Improve journey times around the west of the city will create stronger and more effective links to the Midlands and the North of England making the region more attractive for investors; and
- Support further residential developments.

7.1.11 The Proposed Scheme will deliver a range of economic benefits, in both the short and long term. From increased business competitiveness and job creation to stimulating local economic activity and attracting investments, the positive impacts reverberate throughout the region, paving the way for sustained growth and prosperity in the Greater Norwich region. Furthermore, the Proposed Scheme will also create a number of jobs both directly and indirectly, which is strongly supported in planning terms and is a strong material consideration in favour of the Proposed Scheme.

7.1.12 It is therefore considered that the Proposed Scheme is consistent with the overarching economic objective of sustainable development as set out in the NPPF 2023 in terms of supporting employment and housing growth as set out in the GNLP.

7.1.13 In consideration of the social benefits arising from development of the Proposed Scheme, it has been found that it will help support the promotion of healthy communities:

- By providing a significantly improved environment, with the network more suitable and attractive for walking and cycling helping to promote active travel;
- Providing increased road safety, which is consistent with an improved quality of life for local communities both existing and proposed;

- The reassignment of trips away from areas of congestion and low capacity and move this traffic onto a more appropriate and faster route. This will have the knock-on effect of improving life for residents in local villages;
- Reduce rat running through the rural villages to the west of Norwich which will improve the quality of life for local residents, by reducing and removing congestion and relocating those larger vehicles not suited to the smaller roads currently being used.
- Improving ambient noise and air pollution levels.

7.1.14 In consideration of the environmental impacts of the Proposed Scheme, the selected route option has been chosen to avoid impacts on environmental assets where reasonably practicable. Significant environmental mitigation is proposed as part of the Proposed Scheme, seeking to minimise adverse environmental impacts arising from construction whilst also aiming to minimise impact of the Proposed Scheme in terms of climate change and greenhouse gas emissions during its operational stage.

7.1.15 A net increase in biodiversity has been assessed to occur following development of the Proposed Scheme. The Proposed Scheme is predicted to achieve a quantifiable 10.97% increase in BNG outcome for the non-excluded habitats.

7.1.16 In this case the benefits of the Proposed Scheme are considered to outweigh the above environmental effects and so the Proposed Scheme is considered to accord with relevant Development Plan policies. The Proposed Scheme is therefore considered to benefit from the presumption in favour of sustainable development contained in the NPPF and so planning permission should be approved without delay. Even if there were thought to be some degree of policy conflict, there are powerful material considerations and positive benefits delivered by the Proposed Scheme that would outweigh any such conflict and justify

approval. As such, it is considered that the planning application should be granted planning permission in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Appendix A: National and Local Validation Requirements for County Council (Regulation 3) Planning Applications

National Requirements

NCC Validation Requirement – REG 3	Submission Document Reference	Stand Alone Document or Within ES
Planning Application Forms	1.00.00	Stand Alone
Planning Application Fee	Not applicable / No reference #	Stand Alone
Site Location Plan	2.02.00	Stand Alone
Certificates	1.00.00	Stand Alone
Design and Access Statement (DAS)	1.02.00	Stand Alone

Local Requirements

NCC Validation Requirement – REG 3	Submission Document Reference	Stand Alone Document or Within ES
Existing and Proposed Site/Block Plan	2.02.00	Stand Alone
Existing and Proposed Elevations	2.05.00	Stand Alone

NCC Validation Requirement – REG 3	Submission Document Reference	Stand Alone Document or Within ES
Existing and Proposed Floor Plans	*Not a validation requirement for Highways Schemes*	*Not a validation requirement for Highways Schemes*
Existing and Proposed Site Sections including finished floor and site levels	2.04.00	Stand Alone
Existing and Proposed Roof Plans	*Not a validation requirement for Highways Schemes*	*Not a validation requirement for Highways Schemes*
Photographs and photomontages	3.09.04 / 3.09.05	ES Ch.9
Planning Statement	1.00.01	Stand Alone
Statement of Community Involvement (SoCI)	1.03.00	Stand Alone
Airport Safeguarding Statement	4.05.01	Stand Alone
Air Quality Impact Assessment	3.06.00	ES Ch.6
Archaeological Assessment (below ground heritage)	3.08.03	ES Ch.8 Appendix 8.3
Biodiversity Surveys and Assessments	3.10.00	ES Ch.10
Biodiversity Net Gain (BNG) Statement / Assessment	3.10.00 3.10.33	ES Ch.10 Appendix 33

NCC Validation Requirement – REG 3	Submission Document Reference	Stand Alone Document or Within ES
Climate Change, Energy Statement, Renewable Energy and Sustainability Statement	3.15.00 3.16.00	ES Ch.15/16 ES Ch.15/16
Construction Management Plan / Construction Consideration Statement	3.03.01	ES Ch.3 Appendix 3.1
Daylight/Sunlight Assessment	3.10.37	ES Ch.10 Appendix 37
Environmental Impact Assessment	3.01.00	ES Ch.1
External Materials Sample Board	Not applicable	Stand Alone
Flood Risk Assessment	3.12.02	ES Ch.17 Appendix 2: FRA
Foul Sewage and Utilities Assessment	*Not a validation requirement for Highways Schemes*	*Not a validation requirement for Highways Schemes*
Health Impact Assessment (HIA)	3.17.00	ES Ch.17
Heritage Statement (above ground heritage)	3.08.00	ES Ch.8
Land Contamination Assessment	3.13.03	ES Ch.13 Appendix 3

NCC Validation Requirement – REG 3	Submission Document Reference	Stand Alone Document or Within ES
Landscape and Visual Impact Assessment	3.09.01	ES Ch.9 Appendix 9.1
Landscape Scheme	3.09.00	ES Ch.9
Lighting Scheme	2.09.00	Stand Alone
Mineral Resource Assessment	3.14.00	ES Ch.14
Net Zero Carbon Statement	3.15.00	ES Ch.15
Noise Impact Assessment	3.07.00	ES Ch.7
Nutrient Neutrality Statement / Assessment	3.10.34b	ES Ch.10 Sub Appendix 34b
Odour Details / Assessment	*Not a validation requirement for Highways Schemes*	*Not a validation requirement for Highways Schemes*
Open Spaces and Playing Field Assessment	*Not a validation requirement for Highways Schemes*	*Not a validation requirement for Highways Schemes*
Parking Provision Assessment	*Not a validation requirement for Highways Schemes*	*Not a validation requirement for Highways Schemes*
Public Rights of Way (PRoW) Statement	4.01.00	ES Ch.7 Stand Alone

NCC Validation Requirement – REG 3	Submission Document Reference	Stand Alone Document or Within ES
Travel Plan	4.01.00 4.01.12	ES Ch.7 Stand Alone
Structural Survey	*Not a validation requirement for Highways Schemes*	*Not a validation requirement for Highways Schemes*
Sustainable Drainage Systems (SuDs)	3.12.00	ES Ch.12
Transport Assessment/Statement	3.19.00 4.01.00	ES Ch.7 Stand Alone
Tree Survey, Arboricultural Impact Assessment (AIA), Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP)	3.10.35	ES Ch.10 Sub Appendix 35

Appendix B: Schedule of Planning Drawings

Please refer to Plans, Drawings and Sections Introduction Index, Document reference 2.00.00 Revision 1 2.00.00

Appendix C: Major residential development allocations

There are several major residential developments identified on the western edge of Norwich which are currently going through the planning process or proposed for site allocation as part of the GNLP. These have been considered as committed developments within the traffic modelling for the Proposed Scheme within this Transport Assessment. An extract of the GNLP allocations map used for the Regulation 19 submission in July 2021 is shown overleaf which illustrates the location and scale of these sites:

- Site STR.11 Land between Fir Covert Road and Reepham Road, Taverham (78.5 ha) allocated for residential development. The site is likely to accommodate approximately 1,400 homes, including specialist care housing and older persons housing units, associated public open space, and a local centre, primary school and local medical centre.
- Site STR.08 Land south and east of Easton (approx. 52.12 ha) allocated for residential development and associated infrastructure. This will accommodate approximately 962 homes.
- B.DR.1 Land east of Cator Road and north of Hall Lane, Drayton (Approx. 12.5 ha) is allocated for residential development, allotments and open space. This will accommodate approximately 250 homes.
- B.HD.1 Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (approx. 14.7 ha) is allocated for mixed-uses residential and employment uses. The site will accommodate approximately 300 homes, and E(g) employment uses.
- HEL2 - Land at the Royal Norwich Golf Club, either side of Drayton High Road, Hellesdon (approx. 48.1 ha) is allocated for residential and open space uses. This will accommodate approximately 1,000 homes.
- STR.03 – Land known as ‘Site 4’ at Norwich Airport (43.66 hectares) is allocated for aviation related employment, aviation educational uses and

general employment. Aviation related uses shall be those that fall within the following use classes: E(g)(ii) (the research and development of products and processes), E(g)(iii) (any industrial process), B2 (industrial), B8 (storage and distribution and F1(a) (for the provision of education). General employment shall be for those that fall within the use classes E(g)(ii) (the research and development of products and processes), E(g)(iii) (any industrial process), B2 (industrial) and B8 (storage and distribution).

- STR.14 - Land east of the A140 and north of Norwich Airport, Horsham St Faith (38 hectares) is allocated for employment uses. This will be to provide a full range of employment uses including for those benefitting from a location close to the airport.

The above major allocations offer a total of approximately 4,000 dwellings in the area to the west of Norwich to be developed within 10 years of opening the Proposed Scheme (if permitted). Whilst these sites are not considered to be dependent development, without the Proposed Scheme in place, there would be increased pressure on the highway network in Costessey, Taverham, Easton and Drayton.

Figure 5: Major residential development allocation