

**Weston Longville Parish Council.**  
**Comments on Western Link Planning Application: FUL/2024/0022**

**The Weston Longville Parish Council is supportive of the proposal for the Norwich Western Link, as laid out in this planning application, subject to some conditions on some aspects which are outlined below.**

These comments refer largely to the middle section of the road, which most impacts the parish of Weston Longville and in particular, the community of Weston Green.

Throughout the planning application documentation, there are a number of 'outlines' and 'overviews' given in documents, the key ones being

1.02.00 - Design and Access Statement

And

3.03.01 - Environmental Statement - Chapter 3 - Description of Scheme - Appendix 1 - (OCEMP) Outline Construction Environmental Management Plan (1.30 MB)

These indicate that there will be more detailed documents coming forward on lighting, compound construction, construction traffic management, section 61 agreements for monitoring etc.

Whilst the 'outline' documents give an overview of what is proposed and how things may be carried out, as in all things, the devil is in the detail – exactly which routes will be closed and when, exactly what compound and material storage designs will be implemented, exactly how will air / noise monitoring be carried out, exactly where will bat or badger mitigation proposals be implemented etc. The application suggests that the production of detailed documents will be required by approval of the application with conditions requesting the documents be submitted. There seems to be no opportunity for statutory bodies such as the local parish councils, or other interested parties such as local residents, to have sight of, or be consulted on, such detail documents even though these have considerable impact for those living in the immediate vicinity.

**We would ask that it is a condition of approval that there is an opportunity to be consulted on the detailed documents.**

**1. Comments relating to road design.**

• Material of Construction.

The application states in section 3.07.00 7.3.57 that stone mastic asphalt, low noise road surface type, will be used in construction. It is known that the surface properties which cause the acoustic reduction change in time. In almost all situations this lead to a decline of the noise suppressing capabilities.

**We would like a condition whereby a monitoring program to determine the change of acoustic effect in the lifetime is implemented so as to optimise the performance management of silent roads.**

This is in line with EU recommendations.

- Bund height

The HSE Vehicles and Loads guidance indicates that *Road vehicles in the UK are usually less than 4.5 m tall. Road vehicles including any load they are carrying should not exceed 5.03m (which is the normal minimum clearance under highway bridges in the UK)*

In the Design and Access Statement Document Reference: 1.02.00, section 4.6.4 it states *Earth bunds are provided either side of the carriageway in necessary locations as to provide visual screening for local residents and properties.*

To meet this desire, bund heights at a minimum of 5.03m should be made for bunds where these shield the road from local residents. Using the data supplied in the subsections of 2.04.00 Key Plan For Cross Sections at 100m Intervals, for the chainage lines 2950, 3050, 3250 and 3650, the bund heights to the north of the road ie close to the residents of Weston Green, the bund heights are inadequate to fully screen the road. At these points the heights are 4.54m, 4.21m, 4.87m and 4.54m respectively. Due to the length of time any planting would take to mature, there should be no reliance on such planting to act as either a noise or visual mitigation

**We would ask that it is a condition of approval that these bunds are made up to greater than 5m.**

- Lighting

The Design and Access Statement Document Reference: 1.02.00, Table 4.2 and Chapter 9: Landscape and Visual Effects Document Reference: 3.09.00 section 9.7.6 indicates that *No highway lighting is proposed (other than at the southern-most extent where the scheme meets the A47).*

**We are supportive of this stance. We would ask that it is a condition of approval that it should include no lighting in any laybys, police observation points and NMU routes** mentioned in the scheme – including the Ringland Lane underpass – as indicated in Design and Access Statement Document Reference: 1.02.00, section 4.6.11.

- Laybys

Whilst it is recognised that the *Design Manual for Roads and Bridges CD 169 The design of lay-bys, maintenance hardstandings, rest areas, service areas and*

*observation platforms* requires the provision of a layby on each carriageway, Section 2 General Principles section 2.1.1 states *To avoid noise and visual intrusion and to reduce the possibility of trespassing, parking lay-bys, maintenance hardstandings, rest areas, MSAs, all-purpose trunk road service areas and observation platforms should be sited away from residential and industrial areas.* In locating the northerly layby between chainage 3150 and 3250, it has been positioned as close to local residents at the end of Weston Green Road and on Church Lane as it is possible to get for the entire length of the road. **We would ask that it is a condition of approval that the position of the laybys be revisited. In any event, the laybys must not be lit or have any provision for overnight parking, or any form of vending.**

- Planted screening

There appears to be some conflict between 2.07.00 Landscape Key sheets 6 – 8 when compared with 3.10.33a2 - Environmental Statement - Chapter 10 - Biodiversity - Sub Appendix 33A2 - Post Development Habitat Map with regard to the amount of woodland planting specified immediately north of the road – between chainage 2350 and 3750. Both drawings show there to be neutral grassland on the northerly slope of the bund, with a ribbon of lowland mixed deciduous woodland. This woodland will act as a noise baffle for the local residents. Section 2.07.00 shows more woodland than does 3.10.33a2. There would appear to be no woodland screening of the road from chainage 2750 to 2950, and 3350 to 3750 such that the road bunds, and the Broadway and Morton Green Bridges would be visible to the housing on Breck Rd and Weston Green Rd.

**We would ask that it is a condition of approval that the woodland planting extends the full length of the base of the northerly bunds and that a condition is in place requiring the planting to be maintained, and failures replaced, for at least 10 years from planting.**

- Location of the Morton Green Bridge

Whilst it is noted that an explanation of the siting for the Morton Green Bridge is given in the response section to the Weston Longville Parish Council comments in 5.01.11 - Pre-application Consultation Report - Appendix 11 - Responses to Matters Raised at Pre-application Consultation (Organisation Responses), we still have concerns as to how this location fits in with the NMU strategy. Weston Rd/Church Hill Lane is currently used frequently by the cycling community as part of the network of minor roads. When the Morton Green bridge is in place, it's access will be via BlackBreck Lane. As described in 4.01.00 - Transport Assessment - Part 1 of 2 Section 3.13.18 – BlackBreck Lane will remain unsurfaced which will make it unattractive for cyclists or carriage drivers.

**We are not advocating that BlackBreck Lane changes from the current pleasant unsurfaced highway, between hedges but ask that – if changes to ecology permit, that the location of the Morton Green Bridge is moved to keep the connectivity of Weston Rd/Church Hill Lane for NMUs.**

## **2. Comments related to Construction Phase**

- Construction Compound of Paddy's Lane.

3.03.00 - Environmental Statement - Chapter 3 - Description of Scheme section 3.5.5, and 3.03.01 - Environmental Statement - Chapter 3 - Description of Scheme - Appendix 1 - (OCEMP) Outline Construction Environmental Management Plan, section 3.7 refer to the site compounds and welfare facilities. To minimise the impacts of these facilities on local residents,

**we would ask that it is a condition of approval that:**

- **All power is supplied by mains supply and not via generators**
- **That the compounds are themselves screened in with acoustic fencing or bunding to minimise noise and visual intrusion.**
- **That the main compound and haul road be subject to a tarmac topped layer to reduce / prevent dust.**

- **That access to the compounds – for both HGV and ‘commuting’ traffic is via a route agreed with the local community and which does not use the route via Weston Longville village.**
  - This is particularly pertinent given that working hours are 07:00 to 19:00 on weekdays, and 08:00 to 13:00 on Saturdays so it would be expected that vehicles would be arriving at their workplace prior to this start time.
  
- Road closures

On commencement of the project – ie from when the enabling work starts, we would expect that Breck Rd and The Broadway will be closed to motorised traffic and the roads stopped up as described in Document Reference: 4.01.00 Transport Assessment – Part 1 of 2, sections 3.3.15 and 3.3.16. If Church Hill Lane / Weston Road has not already been closed by Norfolk County Council as part of the National Highways A47 Easton to North Tuddenham scheme mitigations then this road too will be closed at the start of the scheme as described in Document Reference: 4.01.00 Transport Assessment – Part 1 of 2, sections 3.3.17.

Ringland Lane is expected to be kept open for as long as possible however it is recognised that it will have to be closed for approx. 12 months to allow construction of the over-bridge.

**For the connectivity of riding, walking and cycling routes, we would ask that it is a condition of approval that one crossing point over the Norwich Western Link is required to be available at all times. Thus when Ringland Lane is closed, then the route across the Broadway green bridge or the Morton Green Bridge must be available.**
  
- NMU network connectivity during construction.

3.03.01 - Environmental Statement - Chapter 3 - Description of Scheme - Appendix 1 - (OCEMP) Outline Construction Environmental Management Plan Section 4.9.2 states that *Where there would be any temporary or permanent diversions or closures to public rights of way during construction, the Applicant would seek to identify an alternative. The Applicant will consult with the local authority access officer and Traffic Regulation Orders (TRO) will be applied for where traffic regulation is necessary.*

Recent experience with the Hornsea 3 cable construction is that – under Outline Code of Construction Practice A8.5, in Public Rights of Way and pedestrian access

*6.1.1.25 The contractor, where reasonably practicable and where safe to do so will maintain access for pedestrians and other non-motorised users along the public highway and along any PRowS or bridleways. PRowS are discussed in more detail in section 6.8. In section 6.8 –*

*6.8.1.10 Where a PRow crosses the onshore cable corridor the contractor is to either:*

  - *Seek to maintain a pedestrian access. This route will be maintained by fencing and the use of a gating, ensure that the users of the access route have a safe route to cross the onshore cable corridor; or*
  - *Provide a localised diversion.*

6.8.1.11 Outside of the agreed site working hours (see section 4.1.1), the construction contractors will make reasonable endeavours to provide for access a route crossing the onshore cable corridor.

**We would ask that it is a condition of approval that similar such access is provided during the construction of the NWL.**

- Construction traffic

- Noise

The 3.03.01 - Environmental Statement - Chapter 3 - Description of Scheme - Appendix 1 - (OCEMP) Outline Construction Environmental Management Plan, Section 4.8 Noise and Vibration, says little about how the noise from the use of equipment near residential properties will be managed. Nuisance noise is often caused by the use of reversing alarms. There is no legal requirement for reversing signals to be used. The HSE guidance on Workplace Transport – Reversing, indicates that whilst audible alarms can be fitted, *Other safety devices can also be fitted to vehicles: For example, a number of 'sensing' and 'trip' systems are available, which either warn the driver or stop the vehicle when an obstruction is detected close to, or comes in contact with, the reversing vehicle.* HSG144 The Safe Use Of Vehicles On Construction Sites - Table 3 Hierarchy of control measures for reversing operations places such devices further up the table than audible alarms, which are at the bottom of the desired hierarchy.

**We would ask that it is a condition of approval that all vehicles used within the construction zone have radar proximity or similar such devices fitted to vehicles to indicate to drivers when there are objects near the vehicle, rather than use audible reversing indicators.**

- Routing

4.01.00 - Transport Assessment - Part 1 of 2, Section 3.8.3 indicates that there would be no construction HGV access through the village of Weston Longville.

Section 10.3.1 The main internal haul road will occupy the footprint of the Proposed Scheme main carriageway south of Ringland Lane. This will connect from the A47

Wood Lane junction to Ringland Lane, allowing materials to be delivered and moved, with minimal impact on the minor roads within the surrounding highway network. A temporary haul road will also be installed parallel with Ringland Lane to the south of the existing road.

**We welcome these commitments but would ask that it is a condition of approval that this extended to all vehicles – private or commercial – which require access to any part of the construction site or compounds.**

- Traffic signalling

Section 10.3.5 of 4.01.00 - Transport Assessment - Part 1 of 2 states *In the interests of highway safety, site access junctions may be controlled by traffic management measures such as temporary signals on approach to the site compounds. A Construction Traffic Management Plan will be developed containing further details of traffic management measures prior to construction.*

This could have a significant impact on access to Weston Longville via the most heavily trafficked road

**we would ask that it is a condition of approval that an assessment is made on the impact such signaling would have on the side roads in the immediate area – in particular Weston Green Rd (north), Hungate Common and Rectory Rd prior to any implementation and the results consulted on with the Parish Council and local residents.**

○ Marl Hill

Section 10.4.9 of 4.01.00 - Transport Assessment - Part 1 of 2 states *Temporary localised widening of Marl Hill Road junction with A1067 is also being considered to safely accommodate two-way movement of large HGVs. This localised widening is expected to be achieved within the Proposed Scheme red line boundary which extends to the east of Marl Hill Road encompassing the Marl Hill Road cycleway works which form part of the NMU Provision shown in Appendix 1 (Document Reference 4.01.01). Further south, construction vehicle movements could either be accommodated via a temporary haul road alongside Marl Hill Road or via additional passing bays.* This could have a significant impact on access to Weston Longville via the most heavily trafficked road.

**we would ask that it is a condition of approval that an assessment is made on the impact such work and additional traffic burden would have on the side roads in the immediate area – in particular Morton Lane and Field Rd prior to any implementation and the results consulted on with the Parish Council and local residents.**

**3. Comments related to other aspects.**

● Change in designation of the B1535.

On completing the Western Link, we would like to see the classification of the B1535 downgraded to the C route it originally was, and an HGV restriction (except for access) applied to the road. That some form of restriction will be put on is alluded to in 5.01.11

Pre-application Consultation Report: Appendix 11: Responses to Matters Raised at Pre-application Consultation in the section on responses to the comments of the Weston Longville Parish Council. There appears to be no further mention in the application although the WLPC has a worded agreement with NCC – which was accepted at a *meeting between NCC and WLPC representatives on 8<sup>th</sup> June 2023 that the following condition would be added to the planning application: ‘B1535 HGV Access Only To ensure that all through HGV traffic uses the Norwich Western Link, Norfolk County Council will promote a scheme in consultation with the local parish councils and Broadland district Council to restrict the B1535 to access only for HGVs on opening of the Norwich Western Link to traffic.*

● Initial Noise assessments

The study details for noise and vibration are laid out in 3.07.00 - Environmental Statement - Chapter 7 - Noise and Vibration. We have some concerns with regard to the baseline data gathering which has then been used for comparison and modelling. An example of which is that section 7.5.5, identifies 2 The Cottages, Breck Rd, NR9 5LQ as sample receptor C8 in the *Table 7-17 of Sample receptors for construction noise assessment.* Section 7.5 Sensitive receptors - 7.5.1 *Given the differing Study Areas for the*

*construction noise and vibration, and operational assessments, it is appropriate to consider the sensitive receptors within each area individually* however – as a for instance - no noise monitoring has been carried out at this location at all, so no baseline has been established. The nearest data for comparison with this location would have to be taken from Monitoring Point 5, which is being used as a measure for the noise generated by Paddy's Lane/Honingham Rd near the Weston Green Crossroads. This does not offer comparable baseline data to that which would have been obtained at receptor C8 since C8 is away from the much larger volume of traffic using Paddy's Lane / Honingham Rd and therefore recorded by MP5. Only 3 hours worth of data, taken mid-morning was recorded at MP4 or MP5 and it is hard to see how such a short sampling period can be valid.

3.07.00 - Environmental Statement - Chapter 7 - Noise and Vibration section 7.4.20 states that *Situations such as this, where local very lightly trafficked roads are replaced*

*by a distant much busier road are difficult to assess given the different nature of the sources. Nearby local roads result in short, high noise levels, followed by periods of quiet, whereas, the Proposed Scheme would generate lower, but more constant noise levels.*

**Since noise levels are a key concern for local residents we question the baseline data for the noise assessment and we would ask that it is a condition of approval that this is revisited.**

- Traffic Volumes through Weston Longville post scheme implementation

The 1.01.00 - Planning Statement, section 2.5.4 indicates *Through-traffic in rural communities such as Weston Longville and Ringland is forecast to reduce by 88-95% with the Proposed Scheme in place (as compared to the 2029 baseline forecast without the Proposed Scheme)*. In section 4.2.8 of 4.01.00 - Transport Assessment - Part 1 of 2 it states *In the opening year of 2029 the route through Weston Longville is forecast to carry about 4,400 vehicles per day (Annual Average Daily Traffic or AADT), increasing to about 5,300 AADT by 2044 in the DM scenario without the Proposed Scheme*

88% of 4400 would give a residual traffic volume of 528 vehicles per day passing through Weston Longville if the scheme was implemented.

WLPC has a worded agreement with NCC – which was accepted at a meeting between NCC and WLPC representatives on 8<sup>th</sup> June 2023 with regard to traffic flows through Weston Longville. The agreements stated that Traffic monitoring will take place in the centre of Weston Longville village, approximately 6 months after the NWL opens to traffic, at a timescale to align with previous surveys completed in April and October. If this monitoring shows that the volume of traffic is in excess of 800 vehicle per day on average, then a further scheme of traffic management measures and a timetable for their implementation must be submitted to and approved in writing by the relevant planning authority, following consultation with Weston Longville Parish council and Broadland District Council. The approved scheme to be implemented by Norfolk County Council in full within 12 months of the need for further traffic mitigation measures being identified.

At that point, the predicted residual flows were 800. Now they are predicted to be below the 550 level. **We would like to see a condition included such**

that Traffic monitoring will take place in the centre of Weston Longville village, approximately 6 months after the NWL opens to traffic, at a timescale to align with previous surveys completed in April and October. If this monitoring shows that the volume of traffic is in excess of 550 vehicle per day on average, then a further scheme of traffic management measures and a timetable for their implementation must be submitted to and approved in writing by the relevant planning authority, following consultation with Weston Longville Parish council and Broadland District Council. The approved scheme to be implemented by Norfolk County Council in full within 12 months of the need for further traffic mitigation measures being identified.

- Pathway adjacent to Marl Hill.

4.01.00 - Transport Assessment - Part 1 of 2. Section 3.13.27 indicates the provision of a new Route 12: Marl Hill Road : A new segregated shared cycleway and footway is proposed within the western edge of the field boundary adjacent to Marl Hill Road, offering a new surfaced route to connect Weston Longville with A1067, Morton on the Hill and Attlebridge. A new crossing of A1067 is also proposed about 50m to the east of the Marl Hill Road junction. A central refuge will assist users crossing A1067 and a reduced 40mph speed limit is proposed on this section of A1067 for about 800m passing through Morton on the Hill. This should enhance highway safety. Passive provision is made to enable traffic signals to be added to this crossing if required.

**We are very supportive of this.**

- Cycle route Connectivity.

2.03.00 General Arrangement Sheet 1 and 4.01.01 - Transport Assessment - Appendix 1 - NMU Provision Plan both show a lack of connectivity of cycle routes between those on the NWL and those of the NDR (Broadland Northway). Cycle route 10a terminates near to the viaduct, with a private means of access just the other side of the river which -if joined – would allow connectivity to route 11. The alternative means of crossing the river is via NMU route 7 which is only an unsurfaced footpath and is unsuitable for bicycles.

**We would ask that, as a condition of approval, the option of providing a new river crossing for cyclists, or upgrading the existing NMU 7 to make it suitable for cycling.**