



Natural Environment Team - Landscape

To: Planning Services

Ref: FUL/2024/0022

Date: 19th August 2024

CONSULTATION RESPONSE

Norwich Western Link Planning Application: FUL/2024/0022

1. Norfolk County Council Natural Environment Team – Landscape August 2024

Thank you for your consultation on the above application. These comments are provided at officer level in regard to Landscape impacts of the scheme. Previous advice has been given in a pre-application capacity to the applicant in regard to the design and visual appearance of the proposed structures. This constitutes an initial response in respect of Landscape and outlines the headline issues based on our initial observations of the submitted documents at this stage and covers where additional information or clarification is required in order to assess the landscape and visual impacts of the scheme. It is expected that further comments will be provided in due course should more information be submitted.

1.1. Site Location:

Land between the A1270 Broadland Northway near Ringland and the A47 near Honingham.

1.2. Proposals:

- 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)
- 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.

2. Key Documents Reviewed (not exhaustive list):

- Environmental Statement Chapter 9 Landscape and Visual
- Environmental Statement Chapter 9 Landscape and Visual – Appendix 1 – LVIA Methodology
- Environmental Statement Chapter 9 Landscape and Visual – Appendix 2 – LVIA In-Combination Assessment
- Environmental Statement Chapter 9 Landscape and Visual – Appendix 3 – LVIA Figures
- Environmental Statement Chapter 9 Landscape and Visual – Appendix 4 – LVIA Photographs
- Environmental Statement Chapter 9 Landscape and Visual – Appendix 5 – LVIA Photomontages
- Landscape Key Plan
- Landscape Layout Sheet 1 – 10
- Ecological Key Plan
- Ecological Plan Sheet 1 – 5
- Design and Access Statement
- Lighting Scheme
- Environmental Statement Chapter 21 – Non-Technical Summary
- Environmental Statement Chapter 3: Description of Scheme
- Environmental Statement Chapter 3: Description of Scheme – Appendix 3.1 Outline Construction Management Plan (OCEMP)

3. Headline Comments

- 3.1. The Landscape and Visual Impact Assessment (LVIA) uses suitable industry standard guidance (namely LA 104, LA 107 and GLVIA3) when setting out the methodology for the assessment. Overall, the methodology of the LVIA is considered to follow industry standard guidance, however there are a number of clarification and consistency errors and in places it is felt more detail is needed in the assessment. As such it is considered the document is currently not sufficient to support the planning application.
- 3.2. Appendix 9.3 contains unreadable plans which need resubmitting in order for comments to be made.
- 3.3. There is insufficient detail provided in both landscape plans and detailed designs of structures, including viaduct and bridges, to comment on the design of the scheme. High level comments are made on the principles of design only. These design elements are not considered suitable to be reserved for conditions due to the sensitive landscape in which the proposals sit.

4. Designations

- 4.1. The proposed scheme does not contain or lie within 10km of any National Landscapes (formerly known as Areas of Outstanding Natural Beauty), ¹ National Parks or Historic Parks and Gardens². The proposals do however cross the River Wensum Special Area of Conservation (SAC) and River Wensum Site of Special Scientific Interest (SSSI), the LVIA states there are no other SAC/SSSI designations within the Landscape Study area, however this cannot be confirmed as the listed figure 9.1 does not show the Landscape Study Area. However, the Fakenham Road Roadside Nature Reserve (RNR) conflicts with the proposed

¹ Environmental Statement Chapter 9 Landscape and Visual paragraph 9.4.10 requires updating to National Landscapes.

² Environmental Statement Chapter 9 Landscape and Visual paragraph 9.4.10 lists National Parks and Gardens and needs clarification on terms.

scheme along with several County Wildlife Sites (CWS), Ancient Woodland and Veteran Trees are within the expected study area – this has not been included within the LVIA baseline information.

5. Legislation, Policy, and Guidance

5.1. Policies considered relevant to this application on Landscape and Visual grounds are as follows:

5.1.1. Norfolk Minerals & Waste Development Framework: Core Strategy and Minerals and Waste Development Management Policies and Development Plan Document 2010-2026 (2011)

- Policy CS16: Safeguarding mineral and waste sites and mineral resources; and
- Policy CS17: Use of secondary and recycled aggregates.
- Development Management Policy DM2 – Core River Valleys

5.1.2. Norfolk Minerals & Waste Development Framework: Minerals Site Specific Allocations Development Plan Document (2013) (with amendments adopted December 2017)

- Policy SD1: The Presumption in Favour of Sustainable Development.

5.1.3. Weight can also be given to the emerging Norfolk Minerals and Waste Local Plan (as per Paragraph 48 of the NPPF)

5.1.4. Greater Norwich Local Plan (GNLP) (Adopted March 2024)

- Policy 1: The Sustainable Growth Strategy
- Policy 2: Sustainable Communities;
- Policy 3: Environmental Protection and Enhancement; and
- Policy 4: Strategic Infrastructure; and
- Policy 6: The Economy.

5.1.5. Broadland District Council Development Management Development Plan Document (Adopted August 2015)

- Policy GC1: Presumption in favour of sustainable development;
- Policy GC2: Location of new 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 TS4: Parking guidelines;
- Policy TS 6: Public safety zones;
- Policy CSU5: Surface water drainage;
- The Broadland District Council Development Management Plan also identifies several “Locally Defined Area of Biodiversity Important e.g. County Wildlife Site/Local Nature Reserves/RIGS” which fall within the vicinity of the proposals.

5.1.6. Breckland Local Plan (Adopted September 2023)

- Policy GEN 01: Sustainable Development in Breckland;
- Policy GEN 02: Promoting High Quality Design;
- Policy GEN 05: Settlement Boundaries;
- Policy TR 01: Sustainable Transport Network;
- Policy TR 02: Transport Requirements;
- Policy ENV 01: Green Infrastructure;
- Policy ENV 02: Biodiversity Protection and Enhancement;
- Policy ENV 05 Protection and Enhancement of the Landscape;
- Policy ENV 06 Trees, Hedgerows and Development;
- Policy ENV 07 Designated Heritage Assets;
- Policy ENV 08 Non-Designated Heritage Assets;
- Policy ENV 09: Flood Risk & Surface water Drainage;
- Policy COM 01: Design;
- Policy COM 02 Healthy Lifestyles; and
- Policy COM 03 Protection of Amenity

5.1.7. Neighbourhood Plans

- There are no Neighbourhood Plans covering the proposals area.

5.1.8. National Planning Policy Framework (December 2023)

- Section 2: Achieving sustainable development: Paragraph 11
- Section 4: Decision-making: Paragraph 47
- Section 8: Promoting healthy and safe communities
- Section 12: Achieving well-designed and beautiful places
- Section 15: Conserving and enhancing the natural environment

5.1.9. Other Documents for consideration:

- Norfolk County Council Environment Policy (2019)
- Broadland District Council: Landscape Character Assessment SPD (Supplementary Planning Document) (2013)
- Broadland District Council: Place Shaping Guide (2012)
- Breckland District Council: Breckland Landscape and Settlement Character Assessment
- Breckland District Council: Breckland Design Guide (2024)

5.2. Other documents considered in the review of this application:

5.2.1. Landscape Institute

- Guidelines for Landscape and Visual Assessment, 3rd Edition 2013 (GLVIA3)
- GLVIA Statement of Clarifications:
 - o 1/13 10-06-13
 - o 2/13 8-07-13
 - o 1/14 28-01-14
 - o 2/14 28-01-14
- Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) Technical Guidance Notes 1/20 (10 Jan 2020)
- TGN 06/19 Visual Representation of development proposals
- TIN 07/19 Visual Representation Glossary

- TIN 08/19 Camera Auto Settings
- TIN 09/19 Earth Curvature

6. Landscape and Visual Impact Assessment

6.1. Consultation, Scope, Methodology and Significance Criteria

- 6.1.1. Table 9-1 summarises consultation activities undertaken. Only one of these, proposed viewpoint agreement in March 2020 involved Norfolk County Council. We can confirm this allowed for a discussion around the proposed viewpoints and agreement that, as per guidance, these would be amended on site as necessary to fine tune the location or amend due to access constraints. No consultation with Norfolk County Council took place on the other matters discussed in row 3 of the table so comments cannot be made.
- 6.1.2. Norfolk County Council was consulting on the Scoping Opinion and within Table 9-2 reference is made to the comments provided and responses given – this has been suitably summarised and shows that comments have responded to suitably.
- 6.1.3. We are broadly in agreement with Table 9-3 which scopes out Townscape, suitable justification is given for this decision.
- 6.1.4. Paragraph 9.3.5 considers that the landscape will change both seasonally and over time. The scenarios given are suitable and reflect best practice approaches to assessment regarding Landscape and Visual Impact.
- 6.1.5. Landscape Study Area – Paragraph 9.3.7 states that the study area is shown in figure 9.1 Site Context Plan of Appendix 9.3. Within this Appendix 1-1 is shown as the Site Context Plan but this is unreadable due to low resolution imagery. Comments cannot be made on the suitability of this area until sufficiently detailed plans have been submitted.
- 6.1.6. The same applies to Visual Study area which is shown on Figure 9.2 or 1-2 which is also unreadable at the submitted resolution.

6.2. Site Visits, Surveys and Methodology

- 6.2.1. These comments relate to paragraphs 9.3.14 – 9.3.21 of ES (Environmental Statement) Chapter 9 and Appendix 9.1 Landscape and Visual Assessment Methodology.
- 6.2.2. Broadly speaking the methodology and approach to site visits is consistent with industry standard guidance. To an extent elements of a Landscape and Visual Impact Assessment rely on the expertise of the person undertaking the assessment to draw conclusions on what they believe is the value/sensitivity/impact of the proposals. No information has been given as to who the assessments have been undertaken by. The Landscape Institute considers that it should be undertaken by a suitably qualified and experienced Landscape Professional or other professionals with appropriate training and experience. Confirmation should be given that this is the case for this assessment.

6.3. Baseline Landscape Conditions

- 6.3.1. The description of the local landscape considers the broad characteristics of the surrounding area.
- 6.3.2. It is however noted that within neither the “Local Landscape” nor “Vegetation and Field Pattern” are Ancient Woodlands mentioned. These are an important aspect of the landscape and situated adjacent to the proposals, this should also include the update recently supplied by Natural England which increases the ancient woodland designation which we understand has come out since the document was prepared.

- 6.3.3. Within the “Topology and Hydrology” it is felt that more weight could be placed on the rising topography that ultimately is proposed to be cut through with the scheme. In this landscape this hill is very noticeable and an imposing landscape feature. Whilst the LVIA does state there is a change in AOD, this does not clearly convey the landform.
- 6.3.4. Public Rights of Way will be covered in detail with comments from the Public Rights of Way Officer at Norfolk County Council. However, in the context of landscape, Figure 9.1 (Labelled 1-1) in Appendix 9.3 does not clearly show the Public Rights of Way from which to comment on.
- 6.3.5. Paragraph 9.4.10 mentions that the Fakenham Road Roadside Nature Reserve (RNR) is located immediately adjacent to the proposed scheme, however, plans clearly show that the proposals interact with the RNR and include the proposal to remove a section of it and recreate it further along. This is not clear within this paragraph.
- 6.3.6. Paragraph 9.4.11 mentioned that the nearest Ancient Woodland is Park Grove around 1km West of the proposed Scheme. This will need amending in light of the updated Ancient Woodland boundaries and the allocation of North Wood as Ancient Woodland which will be immediately adjacent to the red line. Whilst paragraph 9.4.11 is factually correct, the wording begins by suggesting the nearest ancient woodland is 1km away. Rewording the order of this paragraph could assist in clarity.
- 6.3.7. In terms of listed buildings this will primarily be covered by Historic and Conversation colleagues. However, the baseline information appears accurate from a desk-based review in that no listed buildings are within the red line area but may be subject to views to or from the proposals. This would be of primary concern should the higher aspects of the proposals, such as the viaduct, impact the setting of listed buildings.
- 6.3.8. Baseline information regarding Landscape Character Areas appears to be sufficiently detailed and providing accurate information.
- 6.3.9. In respect of the ZTV and viewpoints, methodology follows industry standard guidance, and we have been consulted on the location of the viewpoints previously. From Figure 9.4 (Figure 1-4) it is impossible to see which each numbered viewpoint relates to.
- 6.3.10. Whilst there is no requirement for photographs to be updated for use in an LVIA we note that the majority of the photos were taken over 4 years ago, with some being confirmed over 2 years ago. As the landscape is constantly changing it may be that some of the assessment (presumably carried out 4 years ago at the point of undertaking site visits) would no longer be accurate.

7. Scheme Design and Mitigation

- 7.1. Comments on detailed design cannot be made at this stage as further information is required. However high-level comments are made below on some matters. This is not an exhaustive list of elements which may require commentary from a design perspective, it is likely further comments will be made following subsequent submissions.

7.2. Lighting

- 7.2.1. It is understood that the only proposed lighting is on the approach to the A47 with 10m lighting columns. Within the LVIA this is stated as approximately 185m, but this is not clarified in the Lighting Statement. The Lighting Scheme references document 2.09.00 and 2.09.01 however we have only been able to locate 2.09.00. Outside of these clarification elements no further comments are made regarding landscape impacts at this stage. Should the lighting proposals be extended further than the columns on 2.09.00, further assessment will need to be undertaken as to the potential impacts.

7.3. Viaduct Crossing

7.3.1. The submitted “River Wensum Viaduct ER1 General Arrangement” Sheets 1-3 show the engineering-based design for the proposed viaduct. These combined with viewing the Photomontages (Chapter 9, Appendix 9.5 LVIA Photomontages), gives a broad impression of the scale and design of the proposed viaduct. However, at this stage there is insufficient detail for conclusions to be drawn on the landscape and visual impacts of the proposals. Further detailed design will need to be submitted including, but not limited to, measurements, materials, finishes, colours (including RAL codes or similar) etc.

7.4. Other proposed structures

7.4.1. Similarly to the Viaduct mentioned above, further detailed design documents are needed to assess the full landscape and visual impact.

7.5. Landscape Layout and Planting Plans

7.5.1. The plans submitted show high level strategic layouts and no planting detail. Due to this, comments cannot be provided on the suitability of planting.

7.5.2. At this stage, the submitted Landscape Layout Plans are essentially a Landscape Strategy and do not contain specific details on substantial amounts of detail, therefore at this stage it is not possible to provide a substantive response.

7.5.3. It is however felt that at this stage there could be a provision for more advanced planting which would help with screening of construction, but also result in some established planting at the point of road opening – from paragraph 9.7.7 of the Landscape and Visual Impact it appears that planting is proposed as one of the later stages in construction.

7.5.4. Paragraph 9.7.11 of the LVIA states that the primary mitigation will be detailed within the LEMP (Landscape Ecological Management Plan) – this requires submitting.

7.5.5. Architectural Design of the Viaduct:

From currently submitted documentation the viaduct appears to have quite an industrial and block like appearance to it. It is disappointing to not see a more exemplar design which reflects the landscape setting and complements it. A structure of this size cannot be “lost” or “hidden” in the landscape and therefore we would have liked to see something which in itself becomes part of the landscape as a feature.

7.5.6. Closing of Lanes crossed by the scheme

It is appreciated that some of the lane closure will allow for greater NMU connectivity and where not in the vicinity of the proposals these have the potential to offer tranquil and peaceful routes. However, it is also noted that the proposals, cross existing PRoW and will have a dramatic change of the experience of using these routes, whether by diversions (to the south of the scheme), or by going above or adjacent to the PRoW. These experiences will be considerably less tranquil and peaceful than they currently are. For example, Honingham Restricted Byway 1 appears to now be running adjacent to the proposed road with environmental banking to the east of it. This route may benefit from being situated to the east of the banks to retain some separation from the roadway.

7.5.7. It is noted that Ecological Plans show “retained tree,” whilst the Landscape Plans show “trees to be retained if possible.” This should be clarified.

7.6. Impact on Landscape Features

- 7.6.1. Notably is the loss of 7 veteran trees to facilitate the scheme and potential adverse effects causing deterioration on other notable, veteran, or ancient trees. The NPPF (National Planning Policy Framework) sets out 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.”* Whilst the applicant has laid out some steps towards compensation, it is not felt that this would fully reduce the adverse effects of their loss or deterioration. The applicant has provided the reasoning for their *“wholly exceptional reasons”* as set out by the NPPF as being the *“need for and transport, economic, social and environmental benefits”* of the scheme and that these would outweigh the loss of the veteran trees.
- 7.6.2. The assessment does not appear to suitably assess the impact on the setting of the Ancient Woodland which is adjacent to the scheme. The threat to these irreplaceable landscape features cannot be overlooked. As mentioned above the NPPF emphasises the importance of protecting ancient woodland from development.
- 7.6.3. Whilst designated for their ecological value, the impact on designated sites can also not be overlooked as prominent features in the landscape. The Wensum Valley Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) and County Wildlife Sites are at risk of being adversely impacted by the proposals. These key areas are recognised for their ecologically important habitats which form part of the landscape. The deterioration of these through physical impacts, pollution or other disturbance will have impacts that reach beyond the ecological damage into changes in the landscape.
- 7.6.4. Where the viaduct cuts into the landscape it is felt that a more detailed assessment could be made on the impacts here. The fragmentation of the landscape here has the potential to be more adverse than the assessment appears to conclude.

8. Outline Construction Management Plan

- 8.1. At this stage, the high-level Landscape and Visual elements of the OCEMP (Section 4.6) appear to be fit for purpose in order to ensure protection of the existing landscape setting and views to the site. It is understood further details will be provided within the detailed CEMP(s). It will be important that details are given on precisely what measures are, how these will be achieved and how they will be monitored for the duration of the construction period. Hoarding colour (including RAL code or similar), size and locations will need to be submitted as part of a detailed CEMP (Construction Environmental Management Plan). Construction Lighting details including location and type will need to be submitted, including their direction and hours of usage. Where sites are to be cleared, suitable assessment should be undertaken to ensure landscape feature losses are minimal and that suitable replacement planting or seeding is agreed in advance. It is expected a more substantive response will be possible when a detailed CEMP and/or the above details are submitted.

9. Consistency and Clarification Concerns

- 9.1. Environmental Statement Chapter 9 Landscape and Visual paragraph 9.4.10 requires amendments to correct designation names.
- 9.2. LVIA figures are named as 9.X within the LVIA, however within Appendix 9.3 are labelled as 1-X.

9.3. Appendix 9.3: LVIA Figures (Document Reference 3.09.03) Figures are not legible.

10. Recommendations

- 10.1. At this stage there is too much additional information still required to confirm what landscape conditions may be required.
- 10.2. From our perspective the details required in regard to landscaping and structure details are not suitable to be secured at conditions stage due to the sensitive landscape the proposals reside within and the scale of the proposals. Therefore, these details must be submitted as part of the planning application as these design elements required to assess whether the proposals are acceptable in landscape and visual terms. Design documents needed:
- 10.3. Detailed Landscaping Plan which should at a minimum include:
- Existing Planting (both being removed and retained, where retained, protection should be shown too)
 - Detailed Planting with plant schedule showing individual species and mixes labelled on the plan
 - Planting Schedule showing species, size, spacing, quantities
 - Planting Specification detailing all elements of ground preparation and planting, this may also include details on sourcing and storing of plants prior to planting
 - Planting Maintenance detailing the maintenance period for all planting, we would suggest a minimum of 10 years from a landscape perspective. This should include the provision of replacement planting for any failures as well as steps to be taken to ensure the planting thrives in order to provide the mitigation, screening or softening it has been proposed for.
- 10.4. Structure Design Detailing:
- Further detail is required on the design of the proposed structures, including the viaduct. This should include at a minimum; measurements, materials, finishes and colours (including RAL code or similar). It may be helpful to use visualisations, alongside details and materials palettes to best demonstrate the overall appearance of these structures.
- 10.5. The LVIA needs to be updated to reflect comments made above. Including a resubmission of Appendix 9.3 with legible plans. Some elements of confirmation are needed and minor updates due to latest information since the assessment was undertaken.
- 10.6. The LVIA should offer a more detailed assessment of the impacts of the viaduct and cut through area where changes in topography mean the proposals will be visible and cause a greater change in the landscape.