

Communities & Environment Planning Services County Hall Martineau Lane Norwich NR1 2SG

Ralph Lewis **WSP** 70 Chancery Lane London WC2A 1AF

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Your Ref

Date: 11 November 2024

My Ref: FUL/2024/0022

Tel No.:

Email: NWLPlanning@norfolk.gov.uk

Dear Mr Lewis,

Town and Country Planning Act 1990 (as amended) & The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Land between the A1270 Broadland Northway near Ringland and the A47 near Honningham: 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.

I refer to the above application and write further to confirm that following the initial round of statutory consultation on the application and based on the advice from consultees, the County Council requests that further information be submitted under Regulation 25 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations").

The request is based on the consultees responses to the initial consultation, but also takes into account comments from third parties and the County Council's own assessment of the

Environmental Statement (ES) and other information submitted with the planning application.

For full copies of the consultee comments and upon which this request is based, please refer to the consultee responses, which are available through the following link:

https://norwichwesternlink.oc2.uk/document/7

and then clicking on the "Documents" tab where they can be found under the heading of "Consultee Responses". Copies of the third-party representations can be found by clicking on the "View Comments" tab.

To assist, the accompanying table (Appendix 1) clearly sets out details of the further information requested under regulation 25 for each ES chapter. It is important that you read the full response from each consultee to fully understand the scope of the context and additional information, or points of clarification required. There are direct links to the Consultee Comments in the second column of the table and within the body of the text in the third column, direct links are provided to the specific documents within the Environmental Statement that are being referred to.

A separate table (Appendix 2) is provided on other information that is being requested by the County Planning Authority that is required to come to a position on the application that falls outside of the scope of Regulation 25 of the EIA Regulations.

If you require Appendix 1 and 2 in another format for accessibility purposes this can be provided on request by emailing NWLPlanning@norfolk.gov.uk.

Although we have endeavoured to include details of any additional information in this request, this does not mean that we may not subsequently request further information or clarification, if this becomes apparent and is considered necessary.

Yours faithfully

Nick Johnson Head of Planning

Regulation 25 R	equirements		
Environmental Statement (ES) Chapter	Consultee	Additio	onal Environmental Information Required
Chapter 1 – Introduction	Lead Local Flood Authority	1.01	No specific additional information required unless the changes sought to other chapters requires an amendment.
	County Planning Authority		
Chapter 2 – Existing Site	Lead Local Flood Authority	2.01	No specific additional information required unless the changes sought to other chapters requires an amendment.
	County Planning Authority		
Chapter 3 – Description of Scheme	Broadland District Environmental Quality Team	3.01	Document 3.03.01 should be updated at 4.7.1 to make it clear that any previously unknown contamination that is discovered should be discussed with Broadland Council and the Environment Agency prior to remediation as they are both the regulatory authorities.
	Environment Agency	3.02	Document 3.03.01b should provide clarification at 7.1.2 on the reuse of asphalt waste in roadways as the Contaminated Land Report indicates they are unsuitable. At 8.1.6 it should be made clear that the Materials Management Plan is to be agreed with the Local Authority
	Natural England	3.03	along with the Environment Agency. Document 3.03.01b should be updated to ensure waste is described, classified and coded
	County Planning Authority		correctly. Waste streams should be identified that required a Classification Report and <u>technical guidance</u> is available and should be used to determine the extent of the reports required.
		3.04	Document 3.03.01a should be updated as follows; - Restoration Plans presenting the detailed ALC grades should be produced - An Aftercare Programme is required to enable an agricultural after use - A Specialist Land Drainage Consultant should be appointed to prepare a preliminary pre
		3.05	and post construction agricultural land drainage plan Document 3.03.01c should be updated in regard to the findings of point 3.04 above through the preparation of a Soil Resource Plan including the following:

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			 Detail on the reuse of soils across the site given that un-contaminated soils are non-hazardous and do not pose a threat to human health. The Agricultural Land Classification should be used to inform Soil Resource Plans with stockpile locations and sizes based on soil types. Inclusion of a soil balance to identify soil surplus for each type of soil type and potential for reuse
		3.06	Further clarification should be provided on the need for the scheme and the issues and problems the scheme is seeking to address given that the proposal is not considered to be a requirement for the delivery of the Greater Norwich Local Plan (2024).
Chapter 4 – Reasonable Alternatives Considered	NETi Ecology County Planning Authority	4.01	Document 3.04.03 should be updated with a thorough reasoned statement as to why the alignment refinement option was not considered in greater detail expanding on constraints identified by NETi Ecology, Natural England and Norfolk Wildlife Trust. This is because 1.9.3 of 3.04.03 shows the proposed development would have a very large adverse impact on biodiversity and that no further evidence has been collected that would lead to a refinement of the Options Selection Report (OSR). Justification and further assessment should be provided on whether there are satisfactory
			alternative alignments or other transport interventions that would be considered feasible or viable that would avoid the location of the species afforded favourable conservation status by Natural England and still meet the identified need of the project.
Chapter 5 – Approach to EIA	NETi Ecology County Planning Authority	5.01	Document 3.05.03 Part 1 and Part 2 states there is little change in survey scope. However, as NETi Ecology have set out in Chapter 10, this has changed in the intervening time since the document was produced and various receptors have been brought into the scope from the likes of Norfolk Wildlife Trust which will need to inform the approach to the EIA as a whole.
Chapter 6 – Air Quality	NCC Public Health Natural England County Planning Authority	6.01	An appropriate Air Quality Monitoring Programme is required to be submitted to cover both construction and initial operation and agreed with relevant Environmental Health Officers at the District Council to ensure it is possible to tell if pollutants are breaching legal thresholds. It should also be made clear in Chapter 6 that monitoring during the operational phase will take place for a minimum of 1 year and agreed with the District Environmental Health Officer. Table 6-14 in 03.06.00 requires additional explanation about how in the Do Something (DS) scenario the PM2.5 level is lower than the Do Minimum (DM) scenario when the DS has included an additional source of pollution.

		6.03 6.04 6.05 6.06	Justification on why no assessment has been carried out on human receptors in 2044 when this has been done for ecological receptors in Table 6-16 and 6-18. Table 6.19 of 03.06.00 should be expanded upon to provide details of the positions of the MCerts Accredited Air Quality Monitors for the construction and operational phases in discussion with the District Environmental Health Officer. Justification and explanation needs to be provided on the results of Table 1-3 of 3.06.06 as 5 receptors are above 10ug/m3 (the legal limit) for 2040 but the level appears to decrease when the proposed road is included. An updated filtered copy of Chapter 6: Air Quality: Appendix 6.7: Operational Phase Ecological Receptor Results – Parts 1 to 6 report for SSSIs and SACs only should be provided identifying which designated site each receptor relates to.
Chapter 7 – Noise & Vibration	NCC Public Health Broadland District Environmental Quality Team County Planning Authority	7.01 7.02 7.03 7.04 7.05 7.06 7.07 7.08	Further information is required regarding the extent and timing of likely noise and vibration during construction to be able to determine the likely impacts to health. Exploration of further noise mitigation measures for affected residents during the operational phase of the project both adjacent to the new road and on the broader road links listed at 7.6.104 of 3.07.00 who will experience wider network effects should be undertaken. Further details of the proposed noise monitoring should be provided in relation to monitoring of noise levels in the run up to the construction works, during the construction works and during the operational phase so that eligibility tests for Noise Insulation Regulations (NIR) can be completed. A Noise Impact Assessment should be prepared for all habitat creation projects. At 7.6.65 of 3.07.00 it states operational monitoring is not required. However, it needs to be demonstrated that cloud based accredited noise monitors with preset alert limits are provided for a minimum of 1 year. At Table 7-26 of 3.07.00 details of the proposed mitigation for the 12 properties which are identified as having a Significant Adverse Impact' should be provided. Justification should be provided on why group 6 at paragraph 7.6.87 and 7 at 7.6.88 of 3.07.00 receptors do not require mitigation. A Noise Impact Assessment should be carried out under BS4142 of the proposed site compounds.

Chapter 8 –	NCC Historic	8.01	At Table 8-7 of 3.08.00 it is recommended that the cropmarks of low significance (eg. A16 and
Cultural	Environment		A148) are considered to be higher unless they are investigated further.
Heritage		8.02	Clarification is required on Section 8.6.15 of 3.08.00 and whether the area of Essential
	Historic England		Environmental and Water Framework is included in the preliminary deposit model.
		8.03	Recommend at section 8.6 that 'Preserving Archaeological Remains' (2016) is referred to.
	County Planning	8.04	Recommended at section 8.6.3 that 'Piling and Archaeology' (2019) is referred to.
	Authority	8.05	Clarification on table 8-8 of 3.08.00 is required to explain why some of the undated crop
			marks are classed as low heritage significance as this could lead to the loss of information if
			the significance has been misassigned.
		8.06	Paleoenvironmental deposits should be considered as a sensitive receptor or mitigation
			stated that will be included in these areas in Table 8-8 of <u>3.08.00</u> .
		8.07	Clarification is required on the volume of the bulk samples at section C.1.2 of 3.08.03 and
			whether 20l was the maximum amount recovered or 100% of the available material.
		8.08	Section 2.4.8 of 3.08.04 should state how the potential impacts of the proposed scheme will
			be mitigated for in the Wensum Valley.
		8.09	Section 3.1.6, 4.1.2 and 6.2.2 of 3.08.04 doe not reference the most recent CIFA guidance
			from 2023 and should be updated along with section 5.1.1 which refers to an outdated
			Regional Research Framework.
		8.10	Section 3.2 of 3.08.04 should refer to Radiocarbon Dating and Chronological Modelling
			<u>(2022)</u> .
		8.11	It would be beneficial if the maximum time trenches are open for is stated in $3.08.04$.
		8.12	The aims and objectives of the sampling strategy should be stated in Section 3.3.17 of
			<u>3.08.04</u> .
		8.13	Sections 3.3.22 and 4.3.16 of 3.08.04 states artefacts will be washed, but this should be
			made clear to be on a case by case basis as cleaning may damage some finds.
		8.14	A specific sampling strategy should be developed if human remains are found and included in
			3.08.04.
		8.15	Clarification should be provided on whether samples will be recovered from the areas
			identified for monitoring.
		8.16	Section 5 of <u>3.08.04</u> should include details of how the purposeful boreholes will be recovered
			and recorded or sampled including information about the types of remains that will be
			assessed.

		8.17	Clarification needs to be provided on whether further excavation will be carried out if
			Significant remains are identified at section 3.6.8 of <u>3.08.04</u> .
		8.18	At section 3.2.1 of <u>3.08.05</u> it should be demonstrated how many geotechnical borehole and
			trial pit data was used to construct the model.
		8.19	At section 7.2.1 of <u>3.08.05</u> it should be stated if any geotechnical cores have been retained
			and available for sample.
Chapter 9 –	NETi Landscape	9.01	3.09.03 contains unreadable plans which must be resubmitted so they can be reviewed.
Landscape &		9.02	Further detail required on landscape plans 2.07.00 Sheet 1-10 and detailed designs of
Visual	County Planning		structures 2.06.01 to 2.06.09 in relation to the proposed materials, hard and soft landscaping,
	Authority		detailed appearance and confirmed dimensions of the scheme.
		9.03	Figure 1-1, 1-2, 1-3, 1-4 of 3.09.03 must be updated with high resolution imagery as they are
			currently unreadable. Figure 1-1 needs to show the details of the Landscape Study Area to
			confirm if the site lies within 10km of any landscape designation.
		9.04	Details of the individuals that carried out the site visits should be provided in 03.09.00
			confirming their qualifications and experience in-line with The Landscape Institute guidance.
		9.05	The Baseline Landscape Conditions at Section 9.4 of <u>03.09.00</u> should make reference to
			Ancient Woodlands in the location of the scheme including the newly designated woodland by
			Natural England.
		9.06	Further exploration is required within Section 9.4.6 of <u>03.09.00</u> of the rising topography that
			the proposal cuts through as this is not clearly demonstrated.
		9.07	Figure 1-1 of 3.09.03 needs to be updated to clearly show the relevant Public Rights of Way.
		9.08	Paragraph 9.4.10 of <u>03.09.00</u> needs to be clear in how the removal of the section of Fakenham
			Road Roadside Nature Reserve is being recreated and what this would require.
		9.09	Most of the photographs used to inform 3.09.04 are some 4 years old and should be updated
			given that the landscape in constantly changing and the photographs are no longer likely to
			accurately portray the landscape. This should be checked by a qualified individual and a
			statement provided to demonstrate if the photographs are still relevant and new photographs
			provided where required.
		9.10	The design of all proposed structures should be further developed as there is insufficient
			detail in terms of measurements, materials, finishes, colours (including RAL numbers) and
			context provided in drawings 2.06.01 to 2.06.09 and the Photomontages in 03.09.05.
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		9.11	Paragraph 9.7.11 of 03.09.00 states that detailed landscaping plans will be provided with the
			Landscape Ecological Management Plan (LEMP). This should be submitted prior to
		0.40	determination due to the sensitive nature of the proposal.
		9.12	The loss of the 7 veteran trees needs further consideration in terms of the compensation
			proposed which currently do not fully reduce the adverse effects of their loss or deterioration.
		9.13	The impact of the proposal on the newly designated Ancient Woodland by Natural England
			should be addressed in 03.09.00.
		9.14	Section 9.4.10 of <u>03.09.00</u> requires amendments to correct designation names.
		9.15	03.09.00 figures are named as 9.X. However, within 3.09.03 are labelled as 1-X. This should be
			corrected for consistency.
Chapter 10 -	NETi Ecology	10.01	The following surveys should be updated in-line with <u>CIEEM Guidance</u> as most are 2 or more
Biodiversity			years old. You should consult with your own expert ecological and planning advisors in
	NETi Arboriculture		relation to the scope and duration of these;
			- Aquatic Ecology Surveys (2022);
	Natural England		- River Habitat Field Surveys (2021);
			- Fungi (2021) and Lichen (2021) Surveys;
	Norfolk Wildlife Trust		- Macrophytes Survey (2022);
			- Fish Survey (2022),
	Forestry Commission		- Great Crested Newt Survey (2021);
			- Wintering Birds Survey (2021);
	Friends of the Earth		- Breeding Birds Survey (2021);
			- Barn Owl Survey (2021);
	Environment Agency		- Bats: Roost, activity, Vantage Point Surveys, and Static Monitoring (2022);
			- Badger Survey (2022);
	County Planning		- Otter Survey (2021);
	Authority		- Water Vole Survey (2022);
			- Reptiles Survey (2020);
			- Desmoulin's Snail Survey (2021);
			- Whiteclaw Crayfish Survey (2019);
			- Terrestrial Invertebrates Survey (2021), and
			- Aquatic Macroinvertebrates Survey (2022).
		10.02	Direct Impacts of County Wildlife Sites within the study area require further mitigation in
			03.10.32, and specifically more detail as to how the impacts will be compensated for.

Natural England published a change to the Ancient Woodland inventory on 31st July 2024. This
area now is directly adjacent to the red line boundary of the planning application. Whilst this
change happened after the submission of the application, the impacts on this area need to be
assessed and mitigated for.
Justification is required on the statement at section 5.9.1 of $03.10.32$ relating to the exclusion
zone distance for breeding otters and the reduction to 100m and that a reference for the
evidence is provided for this.
Documents <u>03.10.35</u> and related appendices require the following updates:
- The underpinning survey data should be updated given that the majority is over 2 years old
and should ensure the additional ancient woodland identified by <u>Natural England</u> is accounted for.
- Set out reconciliation of ancient and veteran trees with the Ancient Tree Inventory.
- Clarification of trees being lost, and how many are replanted.
 Clarification of how "replacement RPA" of lost trees relates to tree numbers and woodland areas planted.
- Clarification of mitigation in relation to removed hedgerows
- Further details of what woodland enhancement encompasses.
An Arboricultural Method Statement in accordance with BS5837 is required and should
include the following:
- Tree Removal Plan
- Tree Protection Details around individual trees and the protection of the buffer zones of
Ancient Woodland
Document 3.10.34 of Chapter 10 and Chapter 6 need to be updated in relation to the
assessment of the proposal on Air Quality and Sensitive Ecological Receptors with the
following information;
 Further consideration of the impact of atmospheric nitrogen oxides (NOx) and ammonia (NH3) on interest features of designated
- Further consideration of the impact of construction on all relevant SAC's and SSSI's
- Updated air quality assessment using correct critical levels and loads and clear
consideration of ecological receptors in designated sites. This should include an amended
assessment of Norfolk Valley Fens SAC and component SSSI using the correct critical load

		10.08	Clarification of the hydrological impacts on Foxburrow County Wildlife Site and any changes
			to vegetation communities the consequent likely impacts on the River Tud should be
			addressed.
		10.09	The wetland habitat in the Tud Tributary near the southern edge of the application, where it is
			proposed to culvert the tributary under the road has the potential to be fen habitat as
			indicated by third party surveys. Therefore, the Baseline Habitat Surveys should be updated
			based on the information available at this time or justification provided as to why a different
			assessment has been made.
		10.10	Consideration should be given to the scale of habitat restoration and mitigation planting given
			there are opportunities to create larger woodland blocks outside the redline boundary.
		10.11	Document 3.10.34 requires clarification in relation to the impacts on the River Wensum
			Floodplain from vehicle emissions during the operation phase. This particularly relates to
			whether consideration has been given to the ditches within the County Wildlife Site which
			discharge into the Wensum and what mitigation has been proposed to reduce impacts on
			water quality and habitat degradation through reduced air quality.
		10.12	Clarification of the boundaries of the study areas provided in the document for each of the
			species surveys undertaken that are reported in the Environmental Statement Chapter 10.
		10.13	Further information is sought on the alternative options considered, as well as what potential
			there is for additional off-site habitat creation that could sequester sufficient carbon to ensure
			the proposal contributes positively towards national climate change targets, rather than
			undermining them.
Chapter 11 –	NETi Ecology	11.01	Additional surveys to provide an up-to-date assessment of bat assemblages across the scheme
Bats			area, flight lines and any seasonal variations would be considered appropriate and should
	Natural England		consider the findings of Norfolk Wildlife Trust's Independent Surveys.
		11.02	Document 3.11.00 requires the following updates:
	Norfolk Wildlife Trust		- Further measures would be expected to be provided to the southern part of the scheme,
			particularly in light of the surveys undertaken to date and their limitations.
	Friends of the Earth		- Further information is required to see if it's possible to maintain species (barbastelle)
			Favourable Conservation Status in order to satisfy one of the three tests.
	County Planning	11.03	Document 3.11.03 requires the following updates:
	Authority		- Confirmation required of the Legend Figure B1 that structures overlayed with red polygons
			are roosts.

11.0	 Justification and additional information to demonstrate why structures have been scoped out in different surveys and why structures that were subjected to dusk emergence or dawn re-entry surveys did not also have an assessment or survey for hibernation suitability. Status of roosts for all roost types is required to be considered and surveys are considered to be out of date Document 3.11.06 requires the following updates: A plan of Temporary Flight Lines post-construction monitoring, and remedial measures. Information regarding impacts and mitigation in reference to the vegetation maturing. Further information regarding the breakdown of woodland creation areas.
11.0	
	 Broad overviews of Morton and Nursery Woodland Green Bridges, and the culverted bat underpass are included.
	- Separate landscape plans for all bridges and underpasses at different times (post construction, 1 year, 5 years)
11.0	Document <u>3.11.07</u> requires the following updates:
	 The document states at paragraph 2.1.4 that "Monitoring methods and requirements should be reviewed periodically by the BAG and the Named Ecologist in light of future research findings, and amended where appropriate, subject to agreement with Natural England." The wording "reviewed periodically" is open to interpretation and should be defined.
	 Monitoring of lighting during operation should be also included in the monitoring plans, with reference to Objective 4. This Objective would also require the monitoring of bats, and an analysis of bat assemblage data with environmental and climatic variables.
11.0	,
	 Vantage Point 10 to be added onto figure 11.6 and for the figures to be better compressed. Legend text is not always clear to read.
11.0	barbastelle flightlines. Barbastelle are found in the wider area so there is inadequate
	information and knowledge to design a wider scale mitigation approach over a longer period.
11.0	Olarification is required about other sources of noise and vibration during construction, and any impacts on bats.
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		11.10	Further information is required on how bat species and populations will be impacted over the
			time period of mitigation planting reaching maturity and any mitigation required for bats during
			this time.
		11.11	Additional surveys to provide an up-to-date assessment of bat assemblages across the
			scheme area, flight lines and any seasonal variations are required, in line with current best
			practice survey guidance, with any deviations fully rationalised.
		11.12	Further information is also requested in relation to the use of thermal imaging cameras,
			including recording errors and surveys abandoned. These matters should be addressed in the
			Further Information.
		11.13	No assessment or survey has been undertaken in respect of mating or swarming sites.
			Additional surveys or a reason for why these have not been undertaken or are considered
			inappropriate should be provided. Without this information, it is not possible to ascertain if
			the nature of, or sufficient mitigation and compensation measures are proposed.
		11.14	Additional information in respect of the impacts of, for example, climate change upon the
			habitats supportive of the bat species assemblage, present within the Red Line Boundary and
			at a local level, need to be included.
		11.15	The mitigation and compensation measures outlined within the submissions attempt to
			provide some landscape connectivity, but the construction and operational effects on bats
			(including barbastelle) remain negatively significant until vegetation has established. As such,
			additional consideration, information and provision is required.
		11.16	The <u>Lighting Scheme</u> states, in paragraph 1.10.1, that the signage lighting at junctions is not
			considered to be of a level to significantly disturb sensitive ecological features. No
			information is provided as to the details of this lighting, such as any lux contour plan,
			placement in relation to recorded bat flight lines or roosts, and specifications
		11.17	Further information is required to fully outline how the lighting design is compliant (or where it
		,	is not) with the Bat Conservation Trust and Institute of Lighting Professionals GN 08/23 Bats
			and Artificial Lighting in the UK (2023) guidance
		11.18	The lighting proposed as part of the A47 junction along with signage lighting should also be
			considered within a landscape setting, from the surrounds, in order to provide an assessment
			of the lighting as an attractant for invertebrates and other species on passage or migration;
			and any trophic implications assessed.
Chapter 12 –	Natural England	12.01	The Flood Risk Assessment (3.12.02) and Drainage Strategy (4.04.00) should be updated as
Road Drainage			follows;

and Water	Lead Local Flood		- Demonstration that the development is in accordance with National Planning Policy
Environment	<u>Authority</u>		Framework (NPPF) with regard to the risk of flooding. There is currently insufficient and
			unclear information provided to demonstrate that surface water can be managed on the
	Environment Agency		site and discharged to either ground or surface water without resulting in an increase in the
			risk of flooding elsewhere. Therefore, the application has not demonstrated there is an
	County Planning		achievable surface water drainage proposal for this application
	Authority		- The FRA presented has been partly undertaken using the LA 113 method of assessment rather than the NPPG method of assessment. Therefore, the application has not
			demonstrated that there is no increase in flood risk for this application. A review the FRA
			should be carried out and where appropriate amendments to the text to apply the appropriate method of flood risk assessment; and
			- The application lacks Flood Exceedance Flow Route Plans for the whole scheme and a
			construction phasing plan. These are required to be submitted
		12.02	Documents 3.12.02, 3.12.02b and 3.12.02e do not currently comply with the Planning
			Practice Guidance (PPG) on Flood Risk and Coastal Change and therefore do not provide a
			suitable basis for the assessment to be made on flood risk. The approach should be reviewed,
			and changes undertaken.
		12.03	The Hydraulic Modelling used to challenge the existing flood risk of the site must be submitted
			to the Environment Agency (EA) so they can confirm if the models submitted are
			representative of the flood risk to the area.
		12.04	Confirmation is required as to whether there will be significant effect on the River Wensum as
			Table 12-8 of $\underline{3.12.00}$ currently conflicts with Table 8-1 of $\underline{4.03.00}$. Details should be provided
			on what the impacts are and how they would arise.
		12.05	Document 3.12.01 and paragraph 5.5.1 requires details of how to operate the penstock.
		12.06	Clarification is required on the locations of the penstocks at each outlet as the detail is
			missing on drawing <u>2.08.00</u> and 2.08.01 Sheets 1-7.
		12.07	Details of the design specification and capacity of the forebays that should be sufficient to
			hold spillage of a worst-case scenario namely 2x22m3 tankers during rainfall above normal water level when penstock is operated.
		12.08	The figure associated with private abstraction AL4 in Table 12-5 in $3.12.00$, is not currently
			correct. This appears to be the same abstraction referenced as ABT4 in Table 2-3 of $\underline{3.12.05}$. It
			advises that abstraction is currently licensed for 204,500m3 per year (rather than 199,389m3)
			and 3273m3 per day and that the daily limit has increased and is much higher than the

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		12.09	previous figure which is shown in the table (546m3). This figure is used to calculate the chloride impact in paragraph 8.5.1 of 3.12.05. Therefore, it advises the model will need rerunning to ensure that there is no impact on the water quality of the agricultural abstraction licence for spray irrigation. Document 3.12.05 requires the following:
			 At section 7.1 requires additional modelling to be undertaken on the assumption that the whole area of the road itself has no groundwater recharge as this is captured and discharged at other points.
			 At 7.2.1 the hydraulic conductivity of site materials has been taken from literature values and poorly characterised. This should be assessed as site specific and updated in the model.
			- The weathered chalk depth in the model should be site specific and fractures should be used to refine the model for both chalk layers.
			- At paragraph 2.6.2 the borehole referenced as ABT4 is incorrect. A non-constant abstraction rate should be modelled
			 What would the effects be on the groundwater body, remaining abstractors and the River Wensum as receptors if any or all the abstraction licence(s) were reduced or entirely
			revoked, and whether the effects of climate change on rainfall and therefore recharge been considered for the 100-year model.
Chapter 13 – Geology &	Natural England	13.01	3.13.00 should include further consideration of the impact of the removal of peaty soils from the flood plain and River Wensum particularly given the need for dewatering mentioned in
Soils	Environment Agency		Table 13-25.
		13.02	Parts of the route have not been subject to a detailed Agricultural Land Classification (ALC)
	County Planning		Survey and this needs to be carried out to inform an appropriate restoration of disturbed land
	Authority		to the baseline ALC.
		13.03	Details about what will happen to all excavated soil needs to be clearly and comprehensively
		10.04	provided given the assumption soil will be reused in Table 13-25 of 3.13.00.
		13.04	Paragraph 5.1.2 of 3.03.01a appear to conflict with Table 14-13 and paragraph 14.5.14 of
			<u>03.14.00</u> in that the latter indicates almost 70,000 tonnes of soils with a high organic content will be removed and disposed of as they are potentially hazardous. This should be
			reconsidered and particularly classing the soils as hazardous given Table 13-25 of $03.14.00$ assuming soils will be reused across the site.

Chapter 14 – Materials & Waste	NCC Minerals & Waste Policy	14.01	Further information is required regarding the potential County Level impacts on the supply of construction aggregates and landfill capacity given that there is County Level data available.
	County Planning Authority		
Chapter 15 – Climate & Greenhouse Gasses	NCC Sustainability Team County Planning Authority	15.01 15.02 15.03	The scheme is to follow the PAS2080 climate standard, but that it is then unclear as to what, if any ongoing operational monitoring of the scheme there will be. Further clarification is required regarding the details of ongoing operational monitoring of the scheme. Further details and evidence are required as to what mitigation measures there are associated with this scheme that will compensate for the impacts generated. Further clarification is required regarding where this scheme sits within the wider net zero/carbon neutrality policy ambitions that are stated in Chapter 15 and other policy documents within the application submission. Further justification is required in the 'Wider Economic, Social and Environmental Benefit' section of the submitted Planning Statement, in terms of exactly how and the importance of the proposed scheme in support of growth and development strategy set out in the Greater
Chapter 16 –	NCC Sustainability	16.01	Norwich Local Plan (GNLP). No specific additional information required unless the changes sought to other chapters
Climate & Resilience	Team	10.01	requires an amendment.
	County Planning Authority		
Chapter 17 – Population & Human Health	NCC Public Health NCC Public Rights of Way Norfolk Ramblers	17.01	An assessment should be provided of significance for those health determinants scoped into the Environmental Statement population and human health chapter, which should draw on the findings from other relevant chapters, including air quality and noise. The guidance issued by the Institute for Environmental Management and Assessment (IEMA) should be used as a basis for the assessment of significance. Chapter 17 should be updated to include a broader programme of liaison and engagement should be put in place to alleviate community anxiety and stress with regular communication
	County Planning Authority	17.03	with residents by a variety of communication methods, including face to face meetings, given the demographics of the population, and occurring on a regular basis. Document 3.17.00 requires the following clarifications:

			 Attlebridge RB3 - Require further information as to the exact section to be temporarily closed and the duration of the proposed closure. Attlebridge RB4 - Require further information as to the exact section to be temporarily closed and the duration of the proposed closure. Ringland FP1 - Require a Highway Boundary plan showing the full legal extent of the PRoW, overlaid with the viaduct structure and access tracks and require details of the proposed duration of the temporary closure of the Public Footpath. Weston Longville FP9 - Require further details regarding the proposed temporary closure and details of the proposal to upgrade the Public Footpath to a Restricted Byway. Honingham FP5 - Require details regarding the proposed temporary closure and details of the proposal to upgrade the Public Footpath to a Restricted Byway. Weston Longville FP1 - Require details regarding the timescale for the proposed temporary closure. Weston Longville FP7 - Require further details regarding the timescale for the proposed temporary closure. Ringland FP2 - Require further details regarding the timescale for the proposed temporary closure. Attlebridge FP5 - Require further details regarding the timescale for the proposed temporary closure.
Chapter 18 – Major Accidents & Disasters	NCC Resilience Team Health and Safety Executive County Planning Authority	18.01	No specific additional information required unless the changes sought to other chapters requires an amendment.
Chapter 19 – Traffic & Transport	NCC Local Highway Authority Active Travel England	19.01	Document 3.19.07 should be updated to ensure junctions and roundabouts are correctly labelled and that traffic flows are correctly presented.

	19.02	Document 3.19.07 should be resubmitted with corrected diagrams and confirmation on how
National Highways	10.02	the data was utilised and evidence that correct traffic data was utilised for the traffic
- National Inglittage		assessments.
Transport Action	19.03	There are errors with road names, definitions, and some are omitted altogether in document
Network		Section 4 of <u>4.01.00</u> and Chapter 19 in general which need addressing.
	19.04	Document <u>04.01.11a</u> requires a review of the traffic modelling results as the estimated
Norwich Cycling		queues are likely to be a result of the junction modelling.
Campaign	19.05	Document 04.01.111 suggests increased stress at A1270 Broadland Northway/B1149 Holt
		Road roundabout could be a result of increased flows at A1270. However, it must be
Trail Riders Fellowship		demonstrated that the Reepham Road roundabout would not be adversely impacted.
·	19.06	Document 4.01.01 is required to reconsider cycle provision to the north of the proposed
County Planning		scheme and seek to provide a connection over the Wensum broadly in line with the proposed
Authority		road. It is questionable whether the proposal provides a continuous route that is suitable for
,		the majority of cyclists from the north end of the proposed scheme to the area south of the
		Wensum.
	19.07	RB4 on Route 11 shown on 4.01.01 is unlikely to be suitable for cyclists and should be
		reconsidered.
	19.08	RB3 on Route 11 shown on $4.01.01$ is an unsurfaced route but less challenging the RB3.
		Clarification is required whether this route would be passable at times of agricultural activity.
	19.09	It is noted that maintenance tracks are proposed either side of the river. These potentially
		could connect cyclists to routes either side of the river with Route 11/BR6/A1067 (East) and
		Route 10a. Those routes combined with a light-weight pedestrian/cycle bridge over the
		Wensum provide potential.
	19.10	Confirmation of why the proposed bridge at Weston Road/Church Hill Lane is off the desire
		line on drawing <u>2.03.00 Sheet 3</u> .
	19.11	Route 9 shown on $\underline{4.01.01}$ is heavily encroached by vegetation and intended to be
		downgraded to a bridleway. The proposals for the surface treatment at this section to at least
		meet the specification at the new sections of Route 9, along with significant hedge
		maintenance.
	19.12	A scheme for an alternative route between Ringland and Weston Longville is required to be put
		forward for the time of the closure of Ringland Lane during construction.
	19.13	Details of how the segregation of pedestrians and other users (cyclists and equestrian) need
		to be provided.

		1.5	-
		19.14	Details of any proposed barriers need to be provided that may restrict some users to ensure the scheme allows for inclusive mobility.
		40.45	•
		19.15	Details of suitable surfaces for all Active Travel provision and that all walking/cycling routes adhere to LTN 1-20 Chapter 8.1.
		19.16	To ensure good connectivity north-south, further details and clear explanation of how the
			scheme will reasonably link the Fakenham Road and the A47 is required. This should also
			include existing infrastructure and other key trip attractors in the area, to demonstrate how
			connections for all modes will be made along the route. Safe access and good connectivity for
			all modes must be considered along the new Western Link Road to provide a route/s, which
			is/are coherent, direct, safe, comfortable, and attractive for all active travel users.
		19.17	Details should be provided on how the proposed development will contribute to offsite
			infrastructure and also the improved crossing facilities as in the <u>4.02.03</u> .
Chapter 20 –	County Planning	20.01	Chapter 20 and the relevant appendices of the Environment Statement considering the
Cumulative	Authority		cumulative impact of the development on each specific topic areas (for example Chapter 10 –
Assessment	,		Biodiversity 3.10.36) should be updated to take account of recent schemes that have been
			determined within the study area.
		20.02	Further justification should be provided on the reasoning behind the Study Area and its size
			set out on 3.20.02 when considering the cumulative impact when considering developments
			that have been determined and/or are in construction or have been submitted and likely to be
			determined prior to the proposed development. Also, whether the 'Study Area' should be
			considered to be the Zone of Influence (ZOI) when considering specific cumulative impacts of
			the scheme in topic areas such as Biodiversity, Air Quality, Heritage etc.
		20.03	It would be beneficial if a Table could be provided in Chapter 20 that encompasses the Study
			Area Extents/ZOI for each discipline topic setting out the long list, short list, information
			gathering and assessment stage. The table should include the application reference and
			description, distance from project, status, whether within ZOI/Study Area, scale and nature of
			development likely to have a significant effect, other factors, temporal scope and the
			proposed mitigation measures.
		20.04	Details of the recent application approved at Pump Farm (NCC planning reference:
		20.04	FUL/2024/0033) should be included in the update of this Chapter and including any likely
			cumulative effects and provided in the requested table at 20.03.
Chapter 21 –	NETi Landscape	21.01	The Non-Technical Summary (NTS) should be updated and resubmitted to ensure consistency
Non-technical	<u></u>		with the updated information provided in response to the Regulation 25 request.
			and appeared

Appendix 1 Regulation 25 Table

Non-Regulatio	n 25 Information		
Planning Statement	County Planning Authority	1.01	Further detail on the proposed change of use of Low Farm is required and what the proposed use of Low Farm would be following the completion of construction of the NWL if approved.
		1.02	Further justification for the proposal is required (as an addendum to the Planning Statement). Given that the application has been advertised as a departure from the development plan, as the NWL is not included as a specific capital project in the current development including the recently adopted Greater Norwich Local Plan (GNLP) and is not required to deliver the development strategy set out in the GNLP.
		1.03	Following all of the changes sought the Planning Statement and Design and Access Statement should be updated to take account of these and resubmitted.
Plans and Drawings	NETi Landscape	2.01	The <u>Lighting Scheme</u> references drawings <u>2.09.00</u> and 2.09.01. However, only one drawing is provided on lighting, namely 2.09.00. This should be clarified.
	NETi Arboriculture	2.02	The Landscape Plans <u>2.07.00</u> should be updated to provide detailed landscaping proposals including all hard and soft landscaping along with detailed planting information given the sensitive nature of the proposal and the need for a LEMP in Section 9.7.11 of <u>3.09.00</u> .
	County Planning Authority	2.03	It is noted that Ecological Plans <u>02.07.00</u> Sheet 1-5 show "retained tree," whilst the Landscape Plans <u>2.07.00</u> Sheet 1 to 10 show "trees to be retained if possible." This should be clarified and amended where necessary.
		2.04	In relation to all of the changes required we will require the Drawing Register and Document Register to be updated accordingly and resubmitted with the additional information requested.
		2.05	The plans and drawings submitted should be updated to reflect any changes sought from other documents that would result in a conflict with the supplied drawings.

Biodiversity Net Gain	NETi Ecology County Planning	3.01	Details of the proposals in relation to statutory BNG, including the mechanism that will be used to deliver BNG, and the submission of a Habitat Monitoring and Maintenance Plan (HMMP), and what provision for suitable funds will be provided to maintain the BNG units put in place and secured for 30 years.
	Authority	3.02	Document 3.10.33 clarification is sought on the approach being taken to the recording of the temporary works within the BNG metric with respect to the culverts installed on the floodplain as part of the temporary works platform (OWC5). There appears to be a discrepancy between the length of culverts proposed in the BNG Technical Report, and the length of culverts shown in the FRA.
		3.03	The submitted <u>Biodiversity Metric</u> should all be transferred to the <u>Statutory Metric</u> and all Baseline Habitat Surveys updated to reflect the revised Metric Calculation and habitat types and only the Statutory Metric referred to throughout the submission with surveys updated as set out in Chapter 10.
Habitats Regulation Assessment (HRA)	Natural England NETi Ecology	3.01	Further information is required to determine the significance of the impacts and scope for mitigation on the River Wensum (SAC), River Wensum (SSSI), Norfolk Valley Fens (SAC), Potter and Scarning Fens, East Dereham (SSSI) and Alderford Common (SSSI) through the following information:
	County Planning		- Additional detail and evidence to support conclusions within the HRA, including proper consideration of designated features
	Authority		- Further consideration of impacts of air quality and soil removal from the floodplain of the River Wensum SAC.
		3.02	The mitigation measures proposed throughout the HRA need to be updated to provide sufficient detail for the County Planning Authority to have certainty that the proposed mitigation measures will avoid harming the special features of the River Wensum SAC (directly or indirectly) in regards to for example 3.03.01, 3.10.32 and 2.07.00 Landscape Ecological Key Plan and 2.07.00 Landscape Key Plan.

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	3.03	Information on how the wider river works, including its floodplain, need to be considered when assessing likely significant effects on the River Wensum SAC.
	3.04	The hydrogeological function of the soils on the River Wensum floodplain needs to be assessed and considered against the designated features of the SAC. See further comments on Chapter 13 – Geology and Soils.
	3.05	Insufficient consideration in Chapter 6 on air quality impacts arising from the proposal at construction and operational stages and how these impact designated sites.
	3.06	An annotated plan of the Temporary Works Platform (TWP) should be provided where it crosses the River Wensum to provide an understanding of how it would impact the SAC. It needs to be demonstrated in greater detail why the TWP will have a negligible impact on the hydrology of the river and floodplain. The stated limitations of the modelling, the TWP not being represented in the model and the different properties of the fill to the removed material suggest this needs further consideration before being able to reach a decision.
	3.07	it is difficult to fully understand what the impacts of the construction and operational phases of the road will be on the existing surface water drainage network and the consequential impacts on the River Wensum. Further assessment is required.
	3.08	The documents submitted do not sufficiently consider the impacts on the lateral flow of water between the river and the floodplain, as well as the flow of water across the floodplain. This is key to the ecological operation of the River Wensum SAC and River Wensum SSSI, but also the other non-statutory designated sites including county wildlife sites.
	3.09	Any potential impacts to interest features for which the River Wensum SSSI has been designated should be considered. Please note that some of the SSSI interest features are different from the SAC features.
	3.10	The HRA has scoped out air quality as not having a likely significant effect on a number of sites due to investigations into where specific interest features are located. This should not be

			considered at the screening stage, and that screening is a broad, high-level tool to consider whether further assessment is required under the Appropriate Assessment.
		3.11	Further consideration is required within the HRA of the River Wensum SAC "restore" objective for air quality. Natural England advice is that a significant effect could occur if the process contribution (emissions as a result of the development) is above 1% of the critical level. The submitted documents show that the process contribution is up to 260% of the critical level for ammonia at some of the ecological receptors (ECO28 and ECO29) in some scenarios. Therefore, Natural England consider there is potential for significant impacts.
		3.12	Further Information should be presented, which is as follows:
			 One document relating to SSSIs and European sites noting the Critical Loads/Critical Levels used, with an assessment of impacts addressing all of our comments above. This should include an amended assessment of Norfolk Valley Fens SAC and component SSSI using the correct critical load;
			- An assessment of air quality impacts from construction on all relevant SACs and SSSIs – although we would recommend this is a clear addendum for clarity;
			- An amendment to the HRA which considers the findings of the revised assessments, as described in the two bullet points above;
Drainage Strategy	Environment Agency County Planning Authority	4.01	In relation to the attenuation lagoons <u>4.04.00</u> states that "The detention pond has been designed to contain a spillage event and can be isolated from the downstream network using the pollution control valve, allowing time for the contaminated water to be removed and disposed of safely off site." The infiltration lagoons will require a similar system, confirmation should be provided and the text amended to make this clear.
Chapter 8 – Cultural Heritage	Historic England	5.01	Additional details should be provided on creating wider heritage benefits for the scheme such as a wayfinding strategy, connectivity and heritage interpretation to add heritage value.

	County Planning Authority		
Chapter 10 - Biodiversity	Forestry Commission	6.01	The biosecurity of all planting stock needs to be considered to avoid the introduction of pests and diseases and long-term management plans should be provided for the management and maintenance of any new woodland.
	Environment Agency		
Chapter 11 - Bats	NETi Ecology	7.01	A copy of Natural England's Shadow Protected Species Licence Discretionary Advice Service (DAS) response. This is required to help understand the likelihood of the Natural England issuing a European Protected Species Licence in relation to Barbastelle Bats.
	County Planning Authority		
Chapter 14 - Materials & Waste	NCC Minerals & Waste Policy	8.01	The preparation and implementation of a Materials Management Plan (MMP) with a specific objective to maximise the potential for the reuse of extracted materials, estimating the quantities of material which could be extracted from the scheme and reused, is required to be
	County Planning Authority		submitted. You may wish to supply the MMP for consideration prior to determination of the application, otherwise a pre commencement condition (with your agreement) will be required to be imposed should the application be recommended for approval.
Chapter 18 – Major Accidents & Disasters	Health and Safety Executive	9.01	Contact should be made with the National Grid Gas PLC in order to establish whether they have any legal interest (easement, wayleave, etc.) in the vicinity of the pipeline, that would impose any restriction, and to confirm any standards to which the pipeline is designed and operated which may restrict occupied buildings or major traffic routes within a certain
	County Planning Authority		proximity of the pipeline. Please confirm what contact you have had with the pipeline operator in relation to this matter and, if so, what their response has been.
Chapter 20 – Cumulative Assessment	Equinor New Energy Limited	10.01	The CPA recommends the applicant engages with Equinor to resolve any potential conflicts with the proposed scheme in relation to Dudgeon Extension Limited (DEL) and Scira Extension Limited (SEL), granted consent by the SoS for the Department of Energy Security and Net Zero. Potential conflicts relate to:

County Planning	- ecological and landscape mitigation works;
Authority	- timescales for the implementation of landscaping proposal;
	- exclusion zones
	 the need to underground any third-party overhead service in the intersection areas between the two projects;
	- traffic and transport plans
	Direct contact should be made with Equinor Energy to respond to their query regarding the application Shapefile and advise us when you have done this. Equinor Energy has requested copies of the latest shapefiles for the Application so that it can make an accurate overlay plan of the NWL planning application, to aid its understanding of the overlap between Sheringham Shoal and Dudgeon Extensions Wind Farms ("SEP and DEP") including the alignment of the export cables and ducts connecting the SEP and DEP offshore wind farms to Norwich Main substation.