



# **Norwich Western Link**

## **Environmental Statement**

### **Chapter 5: Approach to EIA**

#### **Appendix 5-4: Environmental Impact Assessment Scoping Opinion Addendum 2022**

Author: WSP

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## 1 Introduction

- 1.1.1 This document is the Scoping Opinion adopted by Norfolk County Council as County Planning Authority in September 2022. This Opinion is a response to scoping addendum submitted in 2022 (Appendix 3 of **Chapter 5: Approach to EIA** (Document Reference 3.05.03)), together with the original scoping report submitted in 2020 (Appendix 1 of **Chapter 5: Approach to EIA** (Document Reference 3.05.01)). The Opinion outlines the scope and level of detail required to be provided in the Environmental Statement.
- 1.1.2 We have included a summary of key information shown in this document in an accessible format in section 1.1.1. However, some users may not be able to access all technical details that are included in the rest of this document. If you require this document in a more accessible format, please contact [norwichwesternlink@norfolk.gov.uk](mailto:norwichwesternlink@norfolk.gov.uk)

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Dear Mr Green

## **Town and Country Planning Act 1990 (As Amended)**

### **Scoping Opinion Request under Regulation 15 of Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

**Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works.**

## **INTRODUCTION**

### **Background**

On 14<sup>th</sup> July 2022 the County Planning Authority (“CPA”) received an updated Environmental Impact Assessment (“EIA”) Scoping Opinion Request from Norfolk County Council Infrastructure Delivery Team (“the Applicant”) under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended (“the EIA Regulations”) for the proposed Norwich Western Link (“the Proposed Development”).

The request follows from an earlier request for a Scoping Opinion that was submitted in June 2020, and in response to which a Scoping Opinion was first issued on 16<sup>th</sup> October 2020 (“the Original Scoping Opinion”), a copy of which is included in Appendix 1 to this letter. The current request has been submitted as an EIA Scoping Addendum (“the Addendum”) to the original Environmental Impact Assessment Scoping Report (“the Original Scoping Report”). The Addendum sets out how the scheme has developed since the adoption of the Original Scoping Opinion, including a change to the route alignment, and includes confirmation of the delivery of Biodiversity Net Gain (“BNG”) as a scheme Objective and further information about the off-site ecological mitigation and compensation areas. The Addendum Report considers where and how these changes should impact on the scope of the EIA and Environment Statement (“ES”) compared with the Original Scoping Opinion.

Since the submission of the Original Scoping Report in June 2020 and the issuing of the Original Scoping Opinion, an alignment refinement exercise has been undertaken for the Proposed Development. This has resulted in a localised re-alignment of the northern section the scheme, east of Ringland Lane to the A1067 (referred to in the Addendum as the “alignment refinement”).

This is the Scoping Opinion (“the Opinion”) adopted by Norfolk County Council as the CPA in respect of the Proposed Development. It is made on the basis of the information provided in the submitted Addendum, together with the Original Scoping Report, that is included as an Appendix to the Addendum.

The Opinion can only reflect the proposals as currently described by the Applicant, and should be read in conjunction with the Addendum and the Original Scoping Report and consultation responses received as a result of the consultation process, including where appropriate the consultation responses to the request for the Original Scoping Opinion, where these are referred to or remain valid.

As set out in paragraph 1.3.2 of the Original Scoping Report, the Applicant is of the view the Proposed Development falls within Schedule 2, 10(f) of the EIA Regulations, and in accordance with the EIA Regulations intends to provide an ES in respect of the Proposed Development, to accompany the subsequent planning application. The Addendum has been submitted on the basis that Proposed Development continues to fall within Schedule 2, 10(f) of the EIA Regulations. The CPA agrees with this view and remains of the view that the Proposed Development is EIA development, that is that EIA is required.

In accordance with Regulation 15(6) before adopting a Scoping Opinion the CPA must take account of:

- (a) any information provided by the applicant about the proposed development;
- (b) the specific characteristics of the particular development;
- (c) the specific characteristics of development of the type concerned; and
- (d) the environmental features likely to be significantly affected by the development.

The Opinion has taken into account the requirements of the EIA Regulations and relevant guidelines regarding the preparation of an ES.

The Addendum and the Original Scoping Report have been carefully considered and the Opinion is based on officers’ professional judgement. The Opinion is without prejudice to the consideration of any subsequent planning application relating to the Proposed Development.

Regulation 15(2)(a) states that a request for a Scoping Opinion must include:

- (i) a plan sufficient to identify the land;
- (ii) a brief description of the nature and purpose of the development, including its location and technical capacity;
- (iii) an explanation of the likely significant effects of the development on the environment; and
- (iv) such other information or representations as the person making the request may wish to provide or make;

The CPA is satisfied that the Addendum meets this requirement.

In accordance with Regulation 18(4)(a) of the EIA Regulations, the ES that accompanies a planning application must be based on the most recent Scoping Opinion issued, unless the Proposed Development becomes materially different.

### **The County Planning Authority's Consultation**

In accordance with the EIA Regulations the CPA has consulted the consultation bodies before adopting the Opinion. The consultation responses received during the consultation period that have been taken into account in the preparation of the Opinion are included in Appendix 3 at the end of this letter; you should refer to these when preparing the ES. They can also be found on the County Council's website via the following link:

<http://eplanning.norfolk.gov.uk/Planning/Display/SCO/2022/0001#>

The consultation responses to the Original Scoping Opinion request are included in Appendix 2.

The submitted ES to accompany the planning application should demonstrate consideration of the points raised by the consultees. For ease, when considering the application, it is recommended that a table is provided in the ES summarising the scoping responses from the consultees and how they are, or are not, addressed in the ES.

Please note that any consultation responses received after the statutory deadline for receipt of comments have not been taken into account within this Opinion. However, any late responses received will be forwarded to you as the Applicant and uploaded to the Council's website under the planning reference: SCO/2022/0001, for consideration when preparing the ES.

### **The European Union (Withdrawal Agreement) Act 2020**

On 31 January 2020, the United Kingdom ("UK") left the European Union ("EU"), followed by a transition period that ended on 31 December 2020. This provided for the relevant EU legislation relating to Environmental Assessment to be retained as UK law, until amended by Parliament. This Scoping Opinion is based on the retained law.

## **THE PROPOSED DEVELOPMENT**

### **Description of the Proposed Development**

The Applicants description of the Proposed Development, site and its surroundings is set out in Section 2, paragraphs 2.3.1 to 2.4.7 of the Original Scoping Report, as amended by Section 2.1, paragraph 2.1.1 of the Addendum. A Location Plan, Constraints plan and Project Layout Plan are included at Appendices A to C of the Original Scoping Report, with a Plan of the Alignment Refinement Route, included as Figure 2-1 in the Addendum.

The Proposed Development comprises the construction of a dual carriage way link road from the A1067 Fakenham Road, at its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, completing an orbital route around Norwich. To facilitate the Proposed Development associated works include: a viaduct crossing of the River Wensum (a Special Area of Conservation ("SAC") and Site of Special Scientific Interest ("SSSI")); wildlife crossings in the form of bat and badger

underpasses; bridges at interaction with Ringland Lane, Weston Road and Breck Road; Green bridge crossings; and culvert crossing the River Tud.

Passing through arable and agricultural fields and woodland, the Proposed Development is located to the North-West of Norwich A1270 running south to the A47 at its junction with Wood Lane and Berrys Lane.

Whilst in principle the CPA considers that the description set out in the Original Scoping Report as amended by the Addendum is an accurate description of the Proposed Development, the potential constraints of the site and receptors, paragraph 2.4.1 of the Original Scoping Report states that the dual carriageway is 2.8 miles and at paragraph 1.2.4 states 3.9 miles. The correct distance should be set out in the ES.

It is the CPA's understanding that at this stage the detailed design of the Proposed Development is evolving and therefore the description of the Proposed Development may not yet be confirmed as being complete. However, the Applicant will need to ensure that the description of the Proposed Development in the ES for which the subsequent planning application is made is as accurate as possible, including any proposed works required as ancillary to the scheme, (whether on or off-site), because this will form the basis of the EIA and should be assessed as part of an integrated approach to EIA.

Subject to planning approval and all other relevant consents, it is now understood that construction would commence in 2024, rather than 2022 as previously stated.

## **Construction**

The CPA notes that little information was provided in the Original Scoping Report regarding the temporary access road and the formation of the construction compounds, with paragraph 1.1.3 stating that these are yet to be confirmed. Nor is any information provided regarding the size and location of construction compounds. It is noted that the Figure 2-1 in the Addendum, now includes additional land that may be used for the temporary construction access and/or construction compounds, although no other additional information is included. Whilst it is appreciated that this information may not be available at this stage in the evolution of the Proposed Development, this information will be required in the ES and the access and compounds should be encompassed within the application site boundary. The Applicant should consider making this information explicit within the ES.

The CPA considers that information on construction including; construction phasing; construction methods, plant and activities associated with each phase; siting of construction compounds (including on and off site); lighting equipment/requirements; and the number, movements and parking of construction vehicles (both HGVs and staff) should be clearly indicated in the ES. It should be made clear whether any materials would be arriving by road, rail or other means.

## **Alternatives**

Regulation 18(d)(c) of the EIA Regulations requires an ES to include a description of the reasonable alternatives which are relevant to the Proposed Development and its specific characteristics, and an indication of the main reasons for the chosen option, taking into account the environmental effects.

In setting out the structure of the Original Scoping Report, Paragraph 1.5.1 states that the proposed approach for the alternatives considered as part of the design development is set out in Chapter 3. It is not clear from Chapter 3 what the approach is.

The CPA acknowledges that Paragraph 2.1.3 of the Original Scoping Report advises that the Applicant has completed assessments and undertaken environmental studies on alternative options including alternative routes to inform the selection of the preferred road alignment of the Proposed Development, and the Addendum sets out what is now proposed as an alignment refinement. Paragraph 3.3.1 goes on to state the scheme design may be subject to change due to information from ongoing environmental surveys. The ES should clearly set out the rationale and justification for the Proposed Development, in response to the issues it is seeking to address, taking into account a range of traffic interventions including but not limited to alternative routes as the possible solution. The ES should include the reasonable alternative options, the justification for the preferred/chosen option, including a comparison of the environmental effects, and a description of any further issues that may lead to changes to the final alignment of the scheme which the ES will examine in detail.

The Original Scoping Report refers to the Option Selection Report (“OSR”) and Strategic Outline Business Case (“SOBC”) and that an Outline Business Case (“OBC”) is to be developed alongside the ES for the scheme. If this is where the information regarding the alternatives is to be set out, it should be demonstrated with clear cross referencing.

## **Flexibility**

The CPA notes that a number of elements of the Proposed Development are yet to be finalised, such as the traffic forecasts (with paragraph 6.2.8 of the Original Scoping Report stating that finalised traffic forecasts were not available at the time of writing the Original Scoping Report), detailed design, mitigation measures and whether further water quality analysis is required.

The Applicant’s attention is drawn to the Rochdale Envelope principle in dealing with areas of uncertainty when preparing the ES. Case law has established an acceptable way of dealing with uncertainty in preparing and assessing projects, (particularly those prepared in an outline manner). This approach should only be used where exceptional and necessary. It is for the CPA as decision maker to agree the level of flexibility that can be permitted. Whilst this provides for an element of flexibility, the ES should assess the worst-case variations, to ensure the likely significant environmental effects have been fully assessed.

During the preparation of the planning application every attempt should be made to narrow the elements of the Proposed Development to be finalised. Where this is not possible, the ES should clearly explain which elements of the Proposed Development have yet to be finalised and provide reasoned justification. At the time of application, any proposed scheme parameters should not be so wide-ranging as to represent effectively different schemes from that in the accompanying ES. In preparing the ES, the Applicant will need to consider whether it is possible to robustly assess a range of impacts resulting from a number of undecided parameters.

It should be clear in the application submission what is being applied for. If the Proposed Development changes substantially during the EIA process, prior to the submission of the planning application the Applicant may wish to consider the need to request a new Scoping Opinion.



## **Mitigation / Monitoring**

The CPA notes that a Construction Environmental Management Plan (“CEMP”), Construction Traffic Management Plan (“CTMP”), Materials Management Plan (“MMP”) and Site Waste Management Plan (“SWMP”) are to be produced.

The ES should identify specific mitigation measures to be delivered (rather than an outline of the measures). Where the ES relies upon mitigation measures which would be secured through management plans, it should be demonstrated (with clear cross-referencing) where each measure is set out in the management plan. Full copies of the relevant management plans should be included or appended to the submitted ES and the Applicant should also demonstrate how the measures will be secured. Where full copies are not included in the subsequent planning application, clear justification must be provided stating the reason for such approach.

The ES should identify and describe any proposed monitoring. It is suggested the Applicant agrees methods, any necessary mitigation and or/compensatory measures and monitoring regimes with the relevant consultees.

## **Planning Policy Context**

In developing the Proposed Development and preparing the EIA Report, regard should be given to the relevant provisions of the EIA Regulations and good practice guidance. The Planning Application should demonstrate compliance with the adopted Development Plan, unless materials considerations, such as Emerging Plans (depending on the stage of the plan process), National Planning Policy Guidance, and Transport Plans, indicate otherwise.

## **Topics proposed to be scoped out of the Environmental Statement**

Table 4-1 of the Original Scoping Report provides a list of the topic areas to be scoped out. The comments of consultees on the topics to be scoped out are set out below, where these are not agreed or fully agreed. The Applicant should seek agreement of these matters with the CPA and/or the relevant consultee(s). To ensure topic areas have not been overlooked during the EIA process, justification should be provided for the topic to be scoped out and why this particular approach has been taken.

## **Confidential Information**

It may be appropriate for information relating to rare/protected species or commercially sensitive information, to be kept confidential. Where documents are intended to be confidential, separate copies should be provided, clearly marked confidential, together with a statement setting out the reason the Applicant considers the information to be of a confidential nature. The CPA may be obliged to disclose information under the Freedom of Information Act 2000 and/or Environmental Information Regulations 2004. If such a request is received by the CPA, consideration will be given to the reasons provided why the information should not be disclosed.

In accordance with the General Data Protection Regulations (“GDPR”), the CPA will seek to minimise the publication of personal details.

## **Coronavirus (Covid – 19) Survey work and data collection**

In response to the issues relating to the Coronavirus Pandemic , the CPA understands that Central Government and/or Local Authority enforced restrictions may have had consequences for the ability to conduct certain surveys and obtain relevant data required for the purposes of the EIA.

In determining a planning application accompanied by an ES, the CPA must in examining the environmental information, reach a reasoned conclusion on the significant effects of the Proposed Development on the environment. The CPA will also consider the advice received from consultees during the planning process.

Given the recent and on-going circumstances, the CPA strongly advise the Applicant to continue the dialogue with the relevant consultees and agree approaches/methodologies to data collection that may have been or continues to be affected, and how this is to be presented in the ES.

## **EIA Scope and Topics**

Following consultation with the statutory consultation bodies, the scope and level of detail of the information to be provided in the ES using the factors listed in Regulation 4(2) of the EIA Regulations, is set out below:

### Chapter 5 Air Quality

The Addendum identifies that the alignment refinement does not affect what is scoped in or out of the assessment as per the Original Scoping Opinion and therefore no change is proposed to the methodology and no change to the scope of the EIA is proposed in the Addendum, in relation to Air Quality.

In Table 5-5 of the Original Scoping Report - Elements Scoped In or Out of Further Assessment, proposes to scope out emissions from plant and machinery during the construction phase. The District Council Environmental Health Officer advised that they were content that this is scoped out, however, they also advised that all plant and machinery used should be maintained to ensure that emissions are minimised, with particular care taken with semi static plant.

The CPA notes that the Original Scoping Report sets out methodology for Air Quality Assessment in accordance with current best practice. Within the scope of Air Quality, the ES should consider the impacts of the proposed development on public health and take account of the risks of air pollution, road and dust and emissions and how these can be managed or reduced during the operation of the project.

The CPA advises that consideration should be given to Public Health England's 2019 "net health gain" principles which are intended to deliver an overall benefit to people's health. Any new development should be clean by design, incorporating interventions into design to reduce emissions, exposure to pollutants and contribute to better air quality management, applicable irrespective of air quality assessments. The CPA accordingly recommends that these principles are considered in addition to standard methodologies.

The Environment Act 2021 introduces a binding duty on the government to bring forward at least two new air quality targets by October 2022; the impact of the proposal on these targets should be reflected in the EIA.

The scope of Air Quality also falls within other ES chapters, including biodiversity. Information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System [www.apis.ac.uk](http://www.apis.ac.uk)

## Chapter 6 Noise and Vibration

The Addendum identifies that the new alignment refinement does not change the scope outlined in the noise and vibration chapter of the ES. All the key assessments, comprising those relating to construction noise and vibration and operational noise, were proposed to be scoped into the ES and therefore, the new alignment would not require any additional assessments to be scoped in. The Addendum accordingly does not propose any change to the ES scope.

The Addendum identifies that the methodologies outlined in the Original Scoping Report for the above assessments are based on appropriate standards and guidance. Whilst the specific location of the Proposed Development will be crucial for the noise and vibration assessment that will be carried out, the new alignment would not affect the methodologies proposed. The Addendum further identifies that the new alignment would not mean that the baseline noise climate within the vicinity of the scheme is significantly different from that discussed in the Original Scoping Report. The Proposed Development remains in a predominantly rural location with only a small number of isolated receptors within the 600m study area for operational noise.

According to Paragraph 6.8.1 of the Original Scoping Report a study area is yet to be determined. The ES should clearly state and justify the study area selected.

The Original Scoping Report does not include any baseline monitoring for the Proposed Development, i.e. the completed road scheme. The ES should include noise monitoring to validate modelling and establish background levels.

The ES should also include an assessment of the potential effects of noise on tranquillity and on the character of potentially noise sensitive areas as applicable.

In addition, as traffic noise can affect bat activity and feeding behaviour, animals such as bats should be identified as noise sensitive receptors in the ES.

## Chapter 7 Cultural Heritage (Archaeology and Heritage)

The Addendum identifies that the new alignment does not change the approach to the archaeology assessment. Although new land will be considered within the area of the alignment refinement, this it states, will be considered in line with the scope set out within the Original Scoping Report. Accordingly, no change to the ES scope is proposed, although new areas of land will now need to be considered. The approach will therefore remain as set out in the Original Scoping Report.

In relation to the built environment the Addendum proposes amendment to Table 7-2 of the Original Scoping Report. It identifies that the barn 50m north-west of Low Farm will now be

scoped in for further assessment during the construction phase due to the proximity of the new alignment, but that there is otherwise no other change to the ES scope.

Justification should be provided for the extent of the study area used to assess the baseline conditions in the Original Scoping Report. This includes the 500m study area proposed for non-designated heritage assets, as no justification for this area is given.

Historic England has advised that the realigned route is closer to Ringland and the Grade I Church of St Peter. The realignment brings the route adjacent to the Grade II listed 17th-century threshing barn at Low Farm, encompassing the designated heritage asset on three sides. They advise that there could be potential for significant adverse effects during construction and operation phases, and in line with the National Planning Policy Framework (“NPPF”) they would expect the ES to contain a thorough assessment of likely effects and mitigation strategy.

Given the nature of the structures associated with the proposed development and the surrounding landscape character, Historic England advises that the scheme has the potential to be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from the site. They therefore advise that the assessment should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by the scheme have been included and are properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages should be used of part of this.

The CPA advises that whilst the content of Chapter 7 of the Original Scoping Report remains valid, the baseline information in relation to below-ground archaeology has changed since the Original Scoping Report. A geophysical survey has been undertaken, and it is understood that archaeological trial trenching is nearing completion or has been completed. The CPA advises that the archaeological desk-based assessment which will form an Appendix to the ES will need to have an addendum to reflect the results of the geophysical survey and the emerging results of the trial trenching.

Historic England has advised that the realigned route is closer to Ringland and the Grade I Church of St Peter. The realignment brings the route adjacent to the Grade II listed 17th-century threshing barn at Low Farm, encompassing the designated heritage asset on three sides. They advise that there could be potential for significant adverse effects during construction and operation phases, and in line with the NPPF they would expect the ES to contain a thorough assessment of likely effects and mitigation strategy.

Given the nature of the structures associated with the proposed development and the surrounding landscape character, Historic England advises that the scheme has the potential to be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from the site. They therefore advise that the assessment should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by the scheme have been included and are properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages should be used of part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) would have upon

perceptions, understanding and appreciation of the heritage assets in the area. The assessment should consider the potential impacts on designated heritage assets as well as non-designated heritage assets of historic, architectural, archaeological, or artistic interest as these can also be of national importance and make an important contribution to the character and distinctiveness of an area and its sense of place.

## Chapter 8 Landscape and Visual

In relation to landscape and visual impacts the Addendum identifies that the new alignment does not change the fundamental approach to landscape and visual assessment. It states that the alignment refinement is minor in the context of the whole of the Proposed Development, being focused on a short north-eastern section. It identifies that the type of infrastructure is also the same as the previous alignment with a viaduct of a similar height and scale with approach roads and associated embankment profiles. The alignment refinement would not affect the elements scoped into and out of the Landscape and Visual Impact Assessment (“LVIA”), and consequently the types of effects and the types of receptors considered for the LVIA will not change and therefore the Addendum proposes no change to the ES scope.

There is potential that shading impacts may change due to the new viaduct design and new alignment. Any changes to potential shading impacts, the Addendum states, will be determined through an updated shading assessment produced as part of the ES undertaken in line the existing scope of the ES.

The CPA considers that the proposed methodology for this topic area is appropriate and in line with the Landscape Institute’s Guidelines for Visual Impact Assessment 3 (“GLVIA3”). The baseline work undertaken and proposed is considered acceptable. Both should inform the assessment of the landscape and visual impacts, including mitigation measures and where they are to be situated.

The Original Scoping Report states that the study area will be agreed with the CPA. As set out on the Original Scoping Opinion, the justification for this should be set out in the ES, and viewpoint locations agreed. Considering the revised alignment, the CPA advises that there may be a need to slightly adjust the location of viewpoints where the view may now be changed either by the location, or the height/massing of infrastructure.

Photomontages/visualisations to be taken from agreed viewpoint locations should be provided to demonstrate the possible visual impacts of the Proposed Development. These should show visual effects (at various intervals) on completion of the Proposed Development through to after the establishment of the landscaping scheme. The Applicant should seek to agree the methodology for, and number of required photomontages/visualisations and the intervals the photomontages/visualisation should illustrate, with the relevant consultees.

Similarly, the Zone of Theoretical Visibility (“ZTV”) may require minor amendments to reflect the new alignment. Although it is noted the realignment is relatively close to the original proposed footprint, there may be a need to slightly change the study area for the ZTV and Landscape Character Assessment. These may be details which can be confirmed through refinement and work with stakeholders as discussed in paragraph 8.2.2 of the Original Scoping Report. Otherwise, the methodology for defining the study area has been suitably determined for the preliminary ZTV and can be refined as necessary following field work and consultation. The LVIA study area will need to be determined and agreed with the CPA.

In relation to Table 8-1 – Elements Scoped In or Out of Further Assessment set out in the Original Scoping Report, the elements scoped out have been suitably justified and we would broadly agree with the conclusions drawn but advise that construction lighting should be considered as part of the overall impacts. This is on the basis that operational lighting is restricted to minimal lighting which only serves to light a specific element such as signage and at the junction with the A47, so that the impacts should be minimal.

In relation to the opportunities for enhancing the environment, this should be considered in light of the LVIA and in conjunction with BNG enhancements and a suitable Arboriculture Compensation strategy, which should include the translocation of veteran trees and demonstrate how this can be used to enhance the landscape and visual context of the development.

Confirmation that the delivery of BNG is now a scheme objective is welcomed as well as the provision of further information about offsite ecological mitigation and compensation areas. Whilst this is not directly related to the Landscape and Visual impacts of the scheme, there is overlap when it comes to the wider context of protecting, enhancing and adding to the surrounding landscape in ways which may either prevent, minimise or overcome some of the landscape and visual impacts. Paragraph 3.10.2 of the Addendum notes that planting will be designed to avoid impacts on landscape character and views, but the potential to improve and enhance through planting should not be overlooked. Where woodland or tree planting habitat creation is proposed, this should be done as early as possible to potentially offer some screening of views and to increase the landscape features in the area. Where areas are proposed for removal, this should be done as late in the process as possible.

In respect of the new alignment, the CPA therefore agrees that this does not fundamentally change the scope or approach to landscape and visual assessments and impacts. It is understood that the proposed infrastructure including the viaduct and embankments will remain fundamentally the same, albeit in a slightly adjusted location. It is therefore agreed that the types of effects and types of receptors are unlikely to be different, but viewpoints should be reviewed to ensure they meet the requirements posed by the new alignment and any differences in height or massing of the proposed structures.

The CPA would draw your attention to the comments received from the County Council's Natural Environment Team, and Natural England, copies of which are included in Appendices 3 attached to this letter. You should also refer to the comments from Broadland District Council in relation to the Original Scoping Opinion request, which are included in Appendix 2.

## Chapter 9 Biodiversity

The Addendum identifies that the new alignment does not propose any change to the scope of the assessment, although new areas of land will be considered. The proposed approach therefore remains as set out in the Original Scoping Report. The Addendum, makes specific comments on Scoping Assessment in light of the Alignment Refinement in relation to a number of specific matters as follows:

- General
- Protected/notable species (bats, fish, Badgers, birds, Water Voles, Otter, invertebrates, Desmoulin's Whorl Snail);
- River Wensum SAC/SSSI
- County Wildlife Sites (River Wensum Pastures; Ringland Estates);

- Primrose Grove County Wildlife Site (“CWS”) and Ancient Woodland;
- Habitats of Principal Importance/Important hedgerows;
- Protected/Notable Flora including macrophytes; and
- Roadside Nature Reserve (Fakenham Road)

In relation to all of these matters the likely significant effects were identified during construction and operation within the Original Scoping Report. Surveys to fill in information gaps related to the area of land the new alignment and associated study areas are being completed in 2022. Although the new alignment will consider a different area of land, the Addendum states that this will not fundamentally change the approach or outcomes, and therefore no change, to the scope is proposed, although new areas of land will now be considered.

The Original Scoping Report did not rule out impacts on ancient woodland. The new alignment is closer to an area of ancient woodland at Primrose Grove. Consequently, the Addendum proposes that whilst there may be no direct loss, that there are potential impacts that will be assessed.

The CPA considers that the broad approach set out in Chapter 9 is considered acceptable, noting the scope of the protected species and habitat surveys has been agreed with Natural England. Ongoing liaison with Natural England is advised.

Surveys should adhere to best practice guidelines and be undertaken by appropriately licensed and experienced ecologists. Any deviations from best practice guidelines should be justified, and evidence based. The results of all surveys should be presented in a clear, concise manner within the ES.

The bat hibernation structures identified in section 9.2.60 of the Original Scoping Report should include all potentially suitable underground structures, including ice houses.

Section 9.2.64 of the Original Scoping Report states that Vantage Point (“VP”) surveys will last for a minimum of two or three hours; it should be clear whether it is 2 or 3 hours, and the length of survey justified. The VP surveys at sunset are designed to establish the use of the feature by barbastelle bats but will potentially miss bats using the linear feature at other times of the night. The presence of human surveyors may also affect barbastelle activity. Consideration should be given to surveying throughout the night and during sub-optimal periods, as bat behaviour may be significantly different during sub-optimal periods compared to optimal periods. Surveyors should be positioned either side of the proposed breach (rather than in the middle of it) to allow for comparison with any post-construction monitoring.

Regarding section 9.2.78 of the Original Scoping Report, please note the settings on camera traps for badgers is important to ensure animals are not missed. See:

<https://www.conservationevidence.com/reference/download/2436>

The approach set out in Table 9-9 in the Original Scoping Report (Biodiversity Scoped In or Out of Further Assessment) appears broadly acceptable. However, it will be important to ensure that impacts scoped out of other chapters, relating to lighting and noise, are adequately cross-referenced with the ecology chapter to ensure a consistent approach to these topics.

In relation to section 9.4.11 of the Original Scoping Report and the proposed production of a CEMP and Habitat and Species Environmental Management Plan (“HSEMP”) (or similar), it will be important to ensure pre-construction surveys are carefully designed so as to enable an effective post-construction monitoring strategy to be developed. Use of bat detection dogs for post-construction monitoring of bats killed by passing vehicles should be considered.

All relevant biodiversity data, including absences, should be submitted to Norfolk Biodiversity Information Service, in accordance with Chartered Institute of Ecology and Environmental Management (“CIEEM”) guidelines.

In relation to Habitat Regulations Assessment (“HRA”), it is noted in Table 9-1 of the Original Scoping Report that Natural England has previously highlighted the requirement for an HRA to be carried out and it was agreed, notwithstanding HRA caselaw, that mitigation should be included within the outline design.

With specific regard to the nutrient neutrality the Addendum states that the ES will also consider the issue of nutrient neutrality, as referred to in Natural England’s letter of 16 March 2022. The CPA agrees that this will need to be considered and refers you to the consultation response from Natural England, which is attached in Appendix 3. The Applicant should ensure that the ES includes the necessary information to allow the CPA to undertake an HRA and Appropriate Assessment to address the nutrient impacts, as well as any other impacts.

The proposed approach set out in section 9.6.13-17 of the Original Scoping Report appears acceptable, noting the limitations and assumptions identified in section 9.7.

In response to the Addendum the CPA welcomes the delivery of biodiversity net gain as a scheme objective (Section 1.2.2 of the Addendum). It is also noted in Section 1.2.3 that the alignment refinement has been “driven by an improved understanding of environmental conditions on site and an approach to look to design out impacts”. Additionally, it is noted in Section 1.2.6 that now the off-site habitat creation requirements are better defined, it is anticipated that land identified within the indicative red line boundary would be sufficient to deliver BNG and ecological mitigation measures. However, should further land be required, this will be included in the planning application red line boundary (“the Red Line Boundary”).

The Alignment Refinement Impact Scoping Review, as summarised in Table 2-1 of the Addendum, is acceptable regarding the various ecology topics, however it is important to note that in relation to Primrose Grove CWS and Ancient Woodland, the new proposed alignment is now closer to this ancient woodland; it is therefore important that all potential impacts are fully assessed in the ES.

Section 3 of the Addendum sets out an acceptable approach, in relation to ecology, as to how the ES will consider the implications, should additional mitigation and compensation measures outside of the Original Scoping Report Site Boundary be required.

It should be noted that barn owl mitigation may require relatively distant off-site mitigation/compensation measures to be delivered, and that appropriate s.106 agreements or similar may be necessary, if and where these measures fall beyond the application red line boundary.



In relation to BNG, the approach set out in section 3.7.3 is acceptable, and the commitment to achieving 10% is welcomed. However, on-site BNG delivery should be the preferred option (which is reflected in the weighting within the Defra metric), with local off-site delivery the next option; and the use of habitat banks (which could result in BNG delivery outside the county or region) should be considered as a 'last resort'.

Regarding habitat creation (particularly woodland/tree planting), it is advised that this is carried out at the earliest opportunity, and that those habitats proposed for removal are retained for as long as possible.

It is also important to note that a 10% BNG is considered to be a minimum figure in the Environment Act, and that the delivery of a higher percentage should be sought wherever possible, with for example, a number of English local authorities setting a figure of 20% BNG within their relevant local plans or policies.

It should also be noted that whilst the Defra Metric v.3.1 is currently the most up to date version, it is anticipated that a 'final version' of the metric will be released ahead of the implementation of mandatory BNG, and therefore whichever is the most up to date version of the metric at the point of the planning application being submitted, should be used.

Norfolk County Council adopted its Environmental Policy on 25 November 2019. Although it doesn't form part of the Development Plan, it is a material consideration when determining Planning Applications for County Council development. The Applicant is encouraged to demonstrate how the Policy has informed the Proposed Development, whether it is compliant, and a minimum of 10% BNG, in line with the requirements of the Environment Act 2021. It is noted that as part of the BNG and mitigation measures additional land is likely to be required. Once the extent of the off-site mitigation and compensation measures are known, the scope of the ES should be reviewed. The additional land should be included in the application site boundary and the scope of the ES.

A copy of the Council's Principal Ecologist full comments is included in Appendix 3 at the end of this letter.

Natural England has advised that a robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. A copy of its full response is included in Appendix 3 to this letter. Annex A to its letter provides Natural England's advice on the scope of the EIA for the proposed development.

It is noted from the Original Scoping Report that a Water Vole Survey has been carried out, on the River Wensum, but it is not clear whether other watercourses have been surveyed. The Norfolk Rivers Internal Drainage Board ("IDB") recommend that a Water Vole Survey and other protected species surveys (as required) are undertaken in the IDB's adopted water course, and on other riparian watercourses likely to be impacted by the Proposed Development.

The comments of the CPA in relation to the assessment of the impact on trees is set out below under the heading of Arboriculture.

It is recommended that data is also submitted as shape files and all relevant biodiversity data, including be submitted to Norfolk Biodiversity Information Service ("NBIS").

## Chapter 10 Road Drainage and the Water Environment

Paragraph 10.7.26 of the Original Scoping Report states that a standalone Flood Risk Assessment (“FRA”) will be prepared to support the ES. This should cover all sources of flooding.

### Fluvial Flood Risk

The Addendum identifies that the alignment refinement will not affect the scoping for the flood risk assessment, given the only minor change to the alignment. It states that the proposed viaduct will cross perpendicular to the channel of the River Wensum, thus minimising potential impacts on flood flows. The new alignment will have fewer piers within the floodplain and will therefore reduce the potential impact within the floodplain.

It similarly identifies that the new alignment will not affect the scoping for the fluvial geomorphology.

The Lead Local Flood Authority (“LLFA”) notes that since 2020, various changes and updates have occurred in the applicable policy, regulation and legislation in relation to flood risk and the water environment. In particular you should note that the Planning Practice Guidance on Planning and Flood Risk which was updated in August 2022 provides a new definition of the functional floodplain is now regarded as the 3.3% Annual Exceedance Probability (AEP), or 1 in 30 year event. Therefore, any scheme specific hydraulic modelling will need to account for this updated definition. The LLFA would expect these changes to be reflected and included in the ES. The LLFA has also updated the LLFA Developer Guidance recently. Further guidance for developers can be found on our website at:

<https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

The Environment Agency has confirmed that its previous advice remains valid. The Environment Agency will continue to work with the Applicant on the FRA, which should assess the flood risk of the Proposed Development; and support the proposal to submit a 1D-2D hydraulic model which will assess the current flood risk, take account of climate change and demonstrate that the Proposed Development will not increase flood risk extents or depths elsewhere.

### Surface Water Drainage

The Addendum does not propose any change to scope of the assessment in relation to Surface Water Drainage.

The Addendum identifies that the new alignment will not affect the scoping for the Highways England Water Risk Assessment Tool (HEWRAT) assessment given that the change is only minor. Any required changes to the drainage design will deliver the appropriate required attenuation and treatment trains to manage potential impacts.

Highways England (now National Highways) previously advised that the drainage system from the Proposed Development must be separate to the A47 and expects the Applicant to consider the effects of flooding on the A47. Their updated comments further advise that where there is an interaction of the link road with the A47, the design should be in accordance with the requirements of the Design Manual for Roads and Bridges (“DMRB”).

In particular they comment that in respect of road drainage, surface water runoff has a risk of containing pollutants, and consequently, in the assessment and identification of suitable measures, the drainage system for the link road is to be separate to that of the A47. Likewise, any effects of flooding on the A47 will need to be taken into account.

The FRA to accompany the ES should include a surface water drainage strategy to address local sources of flood risk (e.g from ordinary watercourses, surface water flow, including impacts to overland flow paths), identify how surface water drainage will be managed on site, compliance with the SuDS hierarchy, ensure the four pillars of SUDs are applied, any required mitigation measures and maintenance and management plan, and ensuring flood risk does not increase during the construction phase.

As set out above in the comment from the LLFA in relation to Flood Risk, any changes in applicable policy, regulation and legislation in relation to the water environment should be reflected and included in the ES.

The Original Scoping Report acknowledges that the Proposed Development lies within the Internal Drainage District (“IDD”) of the Norfolk Rivers IDB. Any works as part of the Proposed Development that fall within the IDD will require separate consent from the IDB. Works that effect the flow of an ordinary watercourse, outside of the IDB remit, will require consent from the LLFA. The Applicant should obtain the relevant drainage consents at the earliest opportunity and prior to any construction activities. This process will be separate and in addition to the planning process.

The CPAs comments otherwise remain unchanged from the original Scoping Opinion.

### Surface Water Quality

The Addendum identifies that the new alignment does not affect the scoping for the Water Frame Directive (“WFD”) given that the alignment refinement is only minor and is within the same WFD water body. In addition, the minor changes to the alignment would not result in any notable changes to the potential impacts upon the WFD quality elements or overall WFD water body status. A survey of the new river crossing point will be undertaken.

As previously advised in the original Scoping Opinion, whilst the Original Scoping Report covers the Surface Water Quality impacts of the Proposed Development during both construction and operation, there is no mention of containment or contingency for a road traffic accident leading to a spillage, in the assessment methodology. It was previously assumed that this is an omission and should be clarified in the ES. The Environment Agency in their latest comments have reiterated their requirement that this matter be addressed.

The WFD assessment referred to in the Original Scoping Report should include the River Tud and highlight the two key objectives of no deterioration in waterbody status and ultimate aim of improving all waterbodies to good status. To ensure no adverse effects on the water quality of the Wensum, The Habitats Directive assessment for the River Wensum SAC needs to include consideration of the tighter water quality targets.

### Surface Water Resources

The Addendum does not propose any change to scope of the assessment in relation to Surface Water Resources. The CPA’s comments therefore remain unchanged from the original Scoping Opinion.

Regarding surface water resources the Original Scoping Report does not make reference to the use of water as resource during construction or operation therefore, it is presumed that no local water will be used or abstracted. This needs to be clarified in the ES and consideration should be given to the impact of water abstraction licenses, particularly abstraction points within close proximity to the Proposed Development.

Measures to deliver BNG are supported. Regarding the reference to the River Wensum Restoration Strategy (in particular at 10.3.34), the Environment Agency highlights opportunities to address changes to the River Wensum should not be overlooked, because it does not necessarily mean that there are not potential improvements to be made to the morphology of the river.

### Groundwater

The Addendum identifies that the new alignment will not affect the scoping for the groundwater assessment as the change is localised. The same methodology will be applied for the assessment of the refined alignment as outlined in the Original Scoping Report.

The CPA's comments remain essentially unchanged from the original Scoping Opinion.

The scope for groundwater resources is generally considered appropriate and your attention is drawn to specific comment in the consultation response received from the Environment Agency in response to the Original Scoping Report. Paragraph 10.3.20 states that "A data request to determine any nearby licensed and unlicensed groundwater abstractions will be completed moving to ES Stage". Broadland District Council's Environmental Health Officer requested that they be consulted on this in order to assist in identifying private drinking water supplies in the vicinity.

The Environment Agency advised that shallow groundwater is likely to be present in many places along the route of the Proposed Development, which could affect the viability of using simple infiltration features, SuDS features should be in accordance with the Construction Industry Research and Information Association ("CIRIA") SuDS Manual and that direct discharge of potentially hazardous substances is not permitted.

As set out above in the comment from the LLFA in relation to flood risk, any changes in applicable policy, regulation and legislation in relation to the water environment should be reflected and included in the ES.

Detailed comments received from the LLFA, the Environment Agency, Highways England/National Highways, Anglian Water and the Norfolk Rivers Drainage Board can be found in the consultation responses attached in Appendices 2 and 3 at the end of this letter. The Applicant should liaise with the relevant water bodies to ensure an appropriate drainage strategy is proposed.

Anglian Water suggest the Applicant checks for Anglian Water assets in the area, using asset maps which can be found via [www.digdat.co.uk](http://www.digdat.co.uk)

## Chapter 11 Geology and Soils

The Addendum identifies that the new alignment does not affect what is scoped in or out of the assessment as per the Scoping Opinion and therefore doesn't change the proposed methodology.

It indicates that land outside of the Red Line Boundary will be required to facilitate some of the creation of the habitat areas, but that there will be limited below ground works and disturbance to soils therefore the creation of habitat areas are not likely to result in a significant effect. Where relevant the habitat creation measures will be reviewed as appropriate under the geology and soils ES chapter.

As previously advised paragraph 12.3.6 of the Original Scoping Report suggests that the assessment of safeguarded material resources and use of minerals in construction is included in Chapter 11 of the Original Scoping Report. This does not appear to be case, as the assessment appears to be included in Chapter 12 – Materials Assets and Waste.

As previously advised in the original Scoping Opinion there is a safeguarded waste management facility (former Attlebridge Landfill) close to the site boundary for the Proposed Development, which has a 250m consultation zone around it that intersects part of the northern site boundary for the Proposed Development. As a result, there is the potential for indirect impacts to the aftercare of the former waste facility that need to be assessed.

It is not clear whether paragraphs 11.3.5 and 11.3.7 of the Original Scoping Report are referring to licensed abstractions or all abstractions? This needs to be clearly set out in the ES.

Paragraph 11.4.2 regarding mitigation should also include validation (if required) and monitoring (if required).

Paragraphs 11.7.3 and 11.7.4 should note that Contaminated Land Report 11 (“CLR11”) has been superseded. The most up to date guidance to follow is Land contamination: risk management guidance, see:

<https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

In light of planning policy for the protection of the best and most versatile agricultural land, it is recommended that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource.

## Chapter 12 Material Assets and Waste

The Addendum identifies that the new alignment does not affect scoping for materials and waste as the baseline takes a regional approach to the scheme, meaning that the availability of materials and landfill capacity will be the same for either alignment (original and new). It is also assumed that the material/waste types used for the new alignment will be similar to those in the original design and therefore there will be no effect on scoping.

No significant volumes of waste are anticipated from the creation of the habitat areas. Only a small amount of materials will be required for the habitat creation areas and these, the Addendum states, are not likely to result in a significant effect on either the availability of materials or landfill capacity. Where relevant any changes will be included in the Bill of Materials used to undertake the materials and waste assessment in the ES.

The CPA's comments remain essentially unchanged from the original Scoping Opinion.

The site covered by the Original Scoping Report is mostly underlain by a Mineral Safeguarding Area (for sand and gravel).

Paragraph 12.1.2 states that Defra have been consulted and stated that Construction Demolition & Excavation ("CDE") waste arisings data is only available at national level for England. Whilst this is correct in terms of waste arisings, other information on CDE waste is available that would be relevant to the ES.

Paragraph 12.2.2 lists the Minerals Planning Authorities ("MPAs") and Waste Planning Authorities ("WPAs") in the East of England. However, for clarity and completeness it does not include the unitary authorities. These should be included in the ES.

Paragraph 12.3.6 acknowledges that the Proposed Development passes through both sand and gravel and silica sand deposits and states that the scheme will not sterilise resources. However, this statement is incorrect because any location of safeguarded mineral that is built upon without prior extraction of the underlying mineral will sterilise the underlying mineral as it cannot be extracted in the future. Whilst there are other locations of that mineral in the County, the quantity of mineral that underlies the development will have been sterilised by the Proposed Development being located upon it. This paragraph refers both to safeguarded sand and gravel, and silica sand deposits. Please note that safeguarded silica sand deposits only occur close to the western boundary of Norfolk. Paragraph 12.3.6 goes onto state "...the importance of these resources and impact of the Proposed Development will be reported in the Geology and Soils chapter of the ES." On review of the Original Scoping Report, it appears that Chapter 11 Geology and Soils focusses on ground contamination and does not currently refer to mineral resources either in terms of use or safeguarding or use in the project.

It is not clear from Paragraph 12.3.10 what the quantity of materials required for the construction of the Proposed Development will be, or that this will be set out in the ES. Although it is noted that the Paragraph states that the sensitivity of materials needed for the Proposed Development is low. Table 12-5 - Potential design, mitigation and enhancement measures, makes reference to a Materials Management Plan ("MMP"); this should include information on the quantity of materials (including minerals) to be used in the project.

Paragraph 12.3.12 states that there is not data available for CDE production or recovery rates in the East of England. However, it is possible to get figures for the quantities of CDE waste that have been recovered in the East of England (and in the individual WPA areas) from the EA's Waste Data Interrogator ("WDI"). Table 12-1 includes all types of waste (hazardous, non-hazardous and inert) arising from all sectors and therefore is not necessarily directly comparable to any trends in CDE waste recovery. This information should therefore be replaced with data specifically for CDE waste recovery from the EA's WDI.

Table 12-3 - Permitted waste recovery management sites in East of England (2018), lists the number of waste management facilities in the East of England. It does not include their capacity, the types of waste that they can accept, or whether there is sufficient capacity available arising from the construction of the Proposed Development. The EA's WDI may provide more information surrounding this particular issue. For information, you should note

that CPA, as MPA, publishes annual monitoring reports which include data on waste management which may be relevant for the ES. See:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/environment-and-planning-policies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review>

The CPA, as WPA, has also published a Waste Management Capacity Assessment which contains information on waste arisings, waste movements and the capacity at waste management facilities in Norfolk. See:

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/environment-and-planning-policies/minerals-and-waste-planning-policies/norfolk-minerals-and-waste-local-plan-review>

The other WPA's in the East of England are likely to publish similar information.

The Original Scoping Report does not appear to include information regarding the quantities of waste that are likely to arise from the project, or regarding the quantity of minerals that are likely to be needed in the project, or the quantity of minerals that are likely to be extracted as part of the project. Therefore, a Site Waste Management Plan and Material Management Plan – Minerals should be included in the ES.

With regard to Table 12-8 – Significant Criteria, please note the project area is not located on a Peat resource and safeguarding mineral resources are shown as area on maps, therefore it is not appropriate to measure the impact on mineral safeguarding in terms of sites.

The CPA has published standing advice on mineral safeguarding, which can be found on the Norfolk County Council website at: [www.norfolk.gov.uk/nmwdf](http://www.norfolk.gov.uk/nmwdf) on the 'Adopted Policy Documents' page, and welcomes discussion, if there are any queries regarding the preparation of a Mineral Resource Assessment.

The EA advise that an appropriate waste exemption or an Environmental Permit will be required for any use of waste in the works.

Included in this Scoping Opinion is a full consultation response from the Mineral and Waste Planning Authority, and relevant contact details should you have any queries.

### Chapter 13 Climate

The Addendum identifies that the new alignment does not affect the scoping of the climate assessment. It states that the 25km grid square location taken from the UKCP18 data used to identify the current and future baseline will not change, and therefore there will be no change in the figures. As the infrastructure proposed is similar to the original alignment, the Addendum states that it is unlikely that the mitigation for climate effects will change and that there will be no change to the ES scope.

The Addendum also identifies that the new alignment will not change the approach to the Green House Gases ("GHG") assessment set out in the Original Scoping Report as GHG emissions from the embodied carbon of construction materials, transport of materials to site, construction plant and end-user traffic have already been scoped in. Consequently, no

change to the ES scope is proposed. It does however state that if there is land use change as a result of the alignment refinement exercise, which has the potential to result in a large change in GHG emissions, this emission source will be included in the ES.

The England Biodiversity Strategy published by Defra establishes principles for the consideration of the effects of climate change. The ES should reflect these principles and identify how the Proposed Development effects on the natural environment will be influenced by climate change, the impacts greenhouse gases, climate resilience both during construction and when in operation.

The Original Scoping Report included reference to the Council's Environmental Policy. The CPA advises that whilst the County Council's Environmental Policy provides the context to its climate change policy targets, it has no direct bearing on any assessment methodology, other than how this scheme contributes to a commitment to net zero, which any assessment process would be expected to demonstrate.

The assessment should include reference to PAS 2080 (which mirrors the approach set out in the DMRB LA114 guidance), as should reference to WebTAG guidance and the government's 'Decarbonising Transport Plan'.

The CPA advises that the data shown in Table 13.1 of the Original Scoping Report should be reviewed to reflect the latest reports on regional and national emissions trends to reset the baseline for the ES.

The CPA advises that the government's forecasting within the Decarbonising Transport Plan (July 2021) should be addressed as part of work envisaged to address 'end user emissions' as part of operational use (referred to Tables 13-2 and 13-3 of the Original Scoping Report). This should look beyond direct users of the scheme, with due reference being made to related modelling approaches, to get the broadest picture of how the scheme will contribute to emissions reduction scenarios, particularly with regard to end user emissions.

This should be demonstrated by applying the approach outlined through the DMRB (as referenced in Original Scoping Report paragraph 13.4.5) to underpin any projections supporting an emissions reduction narrative.

The CPA further advises that as part of the assessment, an indication of how the scheme contributes to meeting local carbon targets, should be included, including within the context of the Local Transport Plan ("LTP"), given the breadth of scope outlined in the 'Transport Assessment Scoping Statement', insofar as the scheme contributes to alleviating emissions across the network.

In relation to climate resilience, the longer-term impact of climate change, should as is proposed, be addressed together with details of the mitigation measures proposed to reflect the impact probability of the climate variables stated, insofar as they affect the scheme.

A full copy of the County Council's Sustainability Manager's comments is included in Appendix 3 to this letter.

#### Chapter 14 Population and Health

The Addendum identifies that the alignment refinement will not affect scoping for population and health because the demolition of private property has already been considered in the



Original Scoping Report. Elements scoped in as part of the Original Scoping Report which remain relevant to the new alignment include private property and housing, community land and assets, development land and assets, agricultural land and holdings, walking, cycling horse riding (“WCH”) and human health.

As advised in the original Scoping Opinion, it is noted that consultation has not been undertaken relating to this chapter. However, the Original Scoping Report states that “Consultation with the Norfolk County Council and Broadland District Council may be required for the ES.” The CPA would again advise that consultation is undertaken with the relevant Authorities relating to this topic area, to ensure detailed assessment of the Population and Health impacts are included in the ES.

It maybe that the Applicant proposes to address some of the public health considerations within the Air Quality chapter. The assessment of the impacts of the scheme on public health should include risks of air pollution, road and dust and emissions and how these can be managed or reduced during construction and in operation.

The CPA notes that the guidance used to evaluate the effects of the proposal on population and human health is the DMRB and that this guidance focuses on quantitative indicators. The CPA would encourage the Applicant to work with stakeholders and members of the public to take into account their views and to ensure that an assessment of the health impact of the proposal demonstrates that it has:

1. Robustly considered health inequalities and demonstrate an understanding of how health inequalities apply in the context of the proposal;
2. Clearly and appropriately identified vulnerable populations as part of the health impact assessment process;
3. Utilised relevant local health profiles and other appropriate community data, preferably down to electoral ward level where possible;
4. Robustly considered the wider determinants of health, and demonstrated an understanding of what these are in the context of the proposal and wider communities; and
5. Been balanced in its findings.

It is recommended that the Applicant consults with Public Health Norfolk on the detail of the health impact assessment process.

Whilst there does not appear to be any historical or cultural Gypsy Roma Traveller Sites that would be affected by the Proposed Development. It is suggested, when developing the final design, that you consider the potential for areas to create stopping places that may become vulnerable to use, resulting in unauthorised encampments.

### Chapter 15 Arboriculture

The Addendum identifies that the new alignment does not affect the scoping for arboriculture. The Original Scoping Report followed data collection in line with the methodology of British Standard BS5837:2012. The approach was applied to the scheme, with a 15m buffer, thereby capturing data for all trees with potential to be impacted. The new alignment will incorporate new areas of land, with the same approach detailed within the Original Scoping Report to be reapplied to capture data for any change to the limits of the scheme. An additional survey will gather the information for the refined alignment. Therefore, no change of scope is proposed.

Broadland District Council Arboricultural Officer indicated that they wished to be consulted on the production of this chapter of the ES. It is not clear if this has happened, but if not, this should be undertaken. Paragraph 15.7.2 of the Original Scoping Report suggested that tree renewal and replacement would be on a county-wide basis. However, it considered that tree renewal and replacement should take place within the vicinity of the Proposed Development rather than county wide.

The CPA advises that the arboricultural information included in Chapter 15 of the Original Scoping Report and the Addendum is in line with national guidelines and policy, subject to the points set out below being taken into consideration when the final documents are submitted. The comments of the County Council's Arboriculture and Woodland Officer, which are attached in Appendix 3 at the end of this Scoping Opinion include further detailed comments of the compensation strategy, to which you are referred.

The Environmental Statement must include an updated tree survey, Arboricultural Impact Assessment ("AIA"), site specific Arboricultural Method Statement ("AMS") and accompanying Tree Protection Plan ("TPP") based on the updated road layout. The AMS should stipulate ongoing site monitoring and advice by an arboricultural consultant for the duration of the construction period to ensure that retained trees are not impacted by the scheme and that newly exposed woodland edge trees are managed appropriately.

#### Chapter 16 Major Accidents and Disasters

Given the minor changes proposed within the alignment refinement the Addendum states that there will be no significant impacts on the scope for major accident and disasters. The only key change proposed will potentially be inclusion of new external influencing factors/receptors in the baseline section in line with ES scope.

Based on the information provided in the Original Scoping Report and the consultation response received from the Health and Safety Executive ("HSE"), the CPA is content that the proposed development is not of a type that would use or store hazardous substances in quantities relevant to the potential for major accident hazards, and therefore the topic area of major accidents related to such hazardous substances can be scoped out.

No justification is given for the extent of the study area used to assess the baseline conditions in the Original Scoping Report, this should be included in the ES.

The proposed development appears to cross the route of a major accident hazard pipeline and lies within the HSE Consultation Zone for National Grid's 3 Feeder Bacton/Roudham Heath gas pipeline (Transco Ref. 1709), and therefore could be vulnerable to harmful effects from a major accident at the major hazard pipeline. The ES should consider the significant effects of relevant major accident scenarios at the identified major accident hazard pipeline that could affect people who will be at the Proposed Development, and also give consideration to the potential to initiate a major accident that could affect people who will be at the Proposed Development. I draw your attention to the full consultation received from HSE.

In preparing the Original Scoping Report the Applicant has used the HSE's Land Use Planning ("LUP") web app, however it is noted that this process has not been completed, as the entries have not yet been 'continued' (past the zones identification stage) to the advice

stage. Please contact HSE's Land-use-planning Advice team [lupenquiries@hsl.gsi.gov.uk](mailto:lupenquiries@hsl.gsi.gov.uk) if you require further assistance.

The HSE advises the Applicant to liaise with the pipeline operator National Grid, and to undertake a risk assessment as early as possible to ensure the design and operations meet the requirements of relevant Health and Safety Regulations.

There is a high-pressure gas pipeline – feeder within close proximity to the Proposed Development. For information a location plan identifying the location of National Grid high pressure gas pipelines is included in the consultation response from National Grid, enclosed in this Scoping Opinion. As the design for the section of the road at the junction with the A47 is developed further National Grid recommend they be consulted.

The EA advise that to scope out the transport and pollution accidents and flood risk is acceptable providing the issues are fully addressed within Chapter 10.

### Fire

There is no change to the scope of the EIA proposed in the EIA Scoping Addendum, compared with the Original Scoping Report, in relation to Fire.

To assess the impact of the Proposed Development on emergency response times Norfolk Fire and Rescue Service ("NFRS") previously advised that they be notified of any planned or emergency road closures. They have no additional comments arising from the submission of the Addendum.

### Chapter 17 Traffic and Transport

There is no change to the scope of the EIA proposed in the EIA Scoping Addendum, compared with the Original Scoping Report, in relation to Traffic and Transport.

The Highway Authority has confirmed that:

- The proposed Transport Assessment ("TA") will cover the highway network as agreed with the local highway Authority;
- The proposed TA will include information on walking, cycling and non-sustainable modes. Information will be required that details the potential mitigation and improvements that the scheme will bring forward in this regard; and
- The proposed methodology has been agreed with the local highway authority.

Therefore, the highway authority is content with the proposed scoping information, and the CPA's comments remain as set out in the original Scoping Opinion.

The ES should clearly state and justify the study area selected for both the construction and operational phase in respect of traffic and transport.

A full TA (detailing the impact of the proposed development on the local road network and WCH routes) should form part of the subsequent planning application, the detailed scope of which should be discussed with the Highway Authority and the Public Rights of Way ("PROW") team. It is recommended that the ES should clearly set out the impacts of the

proposed development on the footpaths and any PRowWs including bridleways and byways within the vicinity and adjacent/nearby National Trails. To support the ES it is recommended a Non- Motorised User (“NMFU”) Strategy be developed identifying opportunities for new and alternative NMFU routes.

The proposed development will connect to the A47 at the junction with Wood Lane, which forms part of the A47 North Tuddenham to Easton duelling scheme that is being brought forward by National Highways, and has now been consented by the Secretary of State through the National Significant Infrastructure Project (“NSIP”) regime.

Early engagement with National Highways is encouraged to agree the methodology and assessment to be included. As part of the assessment, it will be necessary to take account of the interaction of the proposed Norwich Western Link and the A47 and identify any measures that may need mitigation. The assessment should be undertaken in accordance with Department for Transport Circular 02/2013 – The Strategic Road Network and the Delivery of Sustainable Development.

There is risk of proposed timescales for delivery of both the link road and the dualling being similar. It is therefore important the CEMP sets out how the two schemes can be delivered in tandem, including detailing the construction consequences/phasing and issues arising. An agreed mitigation strategy will be essential to any impact on the A47 can be effectively managed and delivery of both schemes can be undertaken in an effective and efficient manner. Any assessment without the dualling should also be included.

Where there is an interaction of the link road with the A47, the design should be in accordance with the requirements of the DMRB. In particular in respect to road drainage, surface water runoff has a risk of containing pollutants. Consequently, in the assessment and identification of suitable measures it should be noted that the drainage system for the link road is to be separate to that of the A47. Likewise, any effects of flooding on the A47 will need to be taken into account.

Other DRMB requirements to be referenced in the ES include the appropriate Stage One Road Safety Audit for the junction design with the A47, and A47 collision analysis (without the dualling scheme).

It is noted from the Original Scoping Report and consultation responses that pre-application discussions have taken place with the Highway Authority and National Highways. The CPA welcomes this and expects on-going discussions and agreement, where possible.

I draw the Applicants attention to the comments from the Highway Authority and National Highways England.

### Chapter 18 Cumulative Effects

Our previous comments on Cumulative Effects still apply

The Original Scoping Report does not appear to identify a study area for this assessment and nor have any specific projects been identified for consideration in this chapter of the Original Scoping Report.

The ES should clearly state and justify the selected study area. You should consult and/or agree with the relevant Planning Authorities the projects to be included / excluded from the

cumulative effects assessment. It is recommended that the list of projects is updated as appropriate during the preparation of the Planning Application.

You may wish to provide a plan identifying the locations of the projects to be considered in the ES.

Chapter 17 (Traffic and Transport) Paragraph 17.7.30 of the Original Scoping Report advises that the A47 dualling being promoted by Highway England (now National Highways) and the Food Enterprise Zone at Easton will form part of the baseline in the updated Norwich Area Transportation Strategy (“NATS”) model. It is suggested that these developments are included in the Chapter 18. Depending on when they are to be developed, the ES needs to fully assess how they interact and the cumulative effects of this.

The list is not exhaustive but a development to include when assessing the cumulative effect is the Hornsea Project Three, the underground cable, which has now been approved by the Secretary of State, is intended to cross the Proposed Development. Details of the NSIP can be found on the Planning Inspectorate (“PINS”) website.

Consideration should be given to site specific allocations within the vicinity of the scheme, that are identified in the emerging Greater Norwich Local Plan (“GNLP”), particularly the site allocations that have not been challenged. Depending on the stage of the plan process, at the time of submitting the Planning Application, appropriate weight should be afforded to the allocated sites that maybe included in the Cumulative Effects Assessment.

## **Socio Economic**

The Addendum does not propose any change to scope of the assessment in relation to Socio Economic effects. The CPA’s comments therefore remain unchanged from the original Scoping Opinion.

The Original Scoping Report appears to be deficient in information regarding the impacts of the Proposed Development on Economic Development. A study area should be identified and justified in the ES.

Given the potential for job creations during the construction phase and the number of businesses located closed to the Proposed Development and the businesses located further afield that would benefit from improved access to the northern and western areas of Norwich, the ES should include an assessment of the following:

- How the Proposed Development will support job creation and Gross Value Added (“GVA”) growth – this should include a breakdown of personnel that would be employed / number of jobs that would be created during construction phase and whether full or part time
- Opportunities for existing businesses parks and allocated employment sites
- Opportunities during the construction phase to support local supply chains development, also providing direct and indirect jobs created as a result
- How the Proposed Development will contribute to local skills
- Risk of construction delays as a result of the current Coronavirus pandemic
- Potential economic impacts of coronavirus pandemic considered– sectors impacted (e.g. Hospitality, Tourism).

The CPA would draw your attention to the comments previously provided by the Councils Business Development Manager in response to the Original Scoping Report.

### **Aerodrome Safeguarding**

Norwich Airport has advised, based on the information set out in the Addendum, that it has no aerodrome safeguarding, concerns. Nevertheless, it is recommended, as the design of the road evolves and the mitigation measures are identified, that you liaise with the Airport to assess the impacts of the Proposed Development, particularly if proposed SuDS features within the vicinity of the Airport/flight paths are likely to attract birds.

### **Non-Technical Summary**

A non-technical summary of the ES should be provided as part of the application submission. The content of which should be in accordance with Regulation 18 (3)(e) of the EIA Regulations 2017 and best practice.

### **Schedule 4 Information**

In addition to the above information, please ensure that the ES includes all information specified in Schedule 4: Information for Inclusion in Environmental Statements of the EIA Regulations which, in addition to a description of the Proposed Development covering points 1(a)-1(d), which includes (but isn't limited to), a description of reasonable alternatives, a description of the relevant aspects of the current state of the environment and an outline of the likely evolution thereof without implementation of the development, a non-technical summary of the information, and a reference list detailing sources used for the descriptions and assessments included.

### **Conclusion**

**This letter should be taken as the County Planning Authority's Scoping Opinion under the Town and County Planning (Environmental Impact Assessment) Regulations 2017 and supersedes the Original Scoping Opinion.**

If you have any queries about the content of the Opinion, do not hesitate to contact me. Please let me know if anything is incorrect. As aforementioned, in accordance with Regulation 18(4)(a) of the EIA Regulations, the ES must be based on the most recent Scoping Opinion issued, unless the Proposed Development becomes materially different, in which case you may wish to consider the need to request a new Scoping Opinion.

Yours sincerely



Nick Johnson  
Head of Planning



## **INTRODUCTION**

### **Background**

On the 11 June 2020 the County Planning Authority (CPA) received a Scoping Request from Norfolk County Council Infrastructure Delivery Team (the Applicant) under Regulation 15 of the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Norwich Western Link (the Proposed Development).

This is the Scoping Opinion (the Opinion) adopted by the CPA in respect of the Proposed Development. It is made on the basis of the information provided in the submitted Scoping Report (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant and the Opinion should be read in conjunction with the Scoping Report and consultation responses received as a result of the consultation process.

In paragraph 1.3.2 of the Scoping Report, the Applicant is of the view the Proposed Development falls within Schedule 2, 10(f) of the EIA Regulations, and in accordance with the EIA Regulations intends to provide an Environmental Statement (ES) in respect of the Proposed Development, to accompany the subsequent planning application. The Proposed Development is considered EIA development by the CPA.

In accordance with Regulation 15(6) before adopting a Scoping Opinion the CPA must take account of:

- (a) any information provided by the applicant about the proposed development;
- (b) the specific characteristics of the particular development;
- (c) the specific characteristics of development of the type concerned; and
- (d) the environmental features likely to be significantly affected by the development.

The Opinion has taken into account the requirements of the relevant EIA Regulations and guidelines regarding the preparation of an ES.

The CPA has consulted on the Scoping Report and the consultation responses received have been taken into account in adopting this Opinion. For your information, the responses are included at the end of this letter and can be found on the County Council's website via the following link <http://eplanning.norfolk.gov.uk/PlanAppDisp.aspx?AppNo=SCO/2020/0001>

The Scoping Report has been carefully considered and the Opinion is based on an Officers' professional judgement. The Opinion is without prejudice subject to the consideration of any subsequent formal planning application relating to the Proposed Development.

Regulation 15(2)(a) states that a request for a Scoping Opinion must include:

- (i) a plan sufficient to identify the land;
- (ii) a brief description of the nature and purpose of the development, including its location and technical capacity;
- (iii) an explanation of the likely significant effects of the development on the environment; and
- (iv) such other information or representations as the person making the request may wish to provide or make;

The CPA is satisfied that the Scoping Report meets this requirement.

In accordance with Regulation 18(4)(a) of the EIA Regulations, the ES that accompanies a planning application must be based on the most recent Scoping Opinion issued, unless the Proposed Development becomes materially different.



### **The County Planning Authority's Consultation**

In accordance with the EIA Regulations the CPA has consulted the consultation bodies before adopting the Opinion. The list of consultation responses received within the statutory timeframe and whose comments have been taken into account in the preparation of the Opinion is provided at the end of this letter, to which you should refer to when preparing the ES.

The submitted ES to accompany the planning application should demonstrate consideration of the points raised by the consultees. For ease, when considering the application, it is recommended that a table is provided in the ES summarising the scoping responses from the consultees and how they are, or are not, addressed in the ES.

Please note that any consultation responses received after the statutory deadline for receipt of comments have not been taken into account within this Opinion. However, any late responses received will be forwarded to you as the Applicant and uploaded to the Council's website under the planning reference: SCO/2020/0001, for consideration when preparing the ES.

### **The European Union (Withdrawal Agreement) Act 2020**

On 31 January 2020, the United Kingdom (UK) left the European Union (EU). A transition period is now in place until 31 December 2020. This provides for the relevant EU legislation relating to Planning and Environmental Assessments to be retained as UK law, until amended by Parliament. This Scoping Opinion is based on the retained law.

## **THE PROPOSED DEVELOPMENT**

### **Description of the Proposed Development**

The Applicant's description of the Proposed Development, site and its surroundings is set out in Section 2, paragraphs 2.3.1 to 2.4.7 of the Scoping Report. A Location Plan, Constraints plan and Project Layout Plan are included at Appendices A to C of the Scoping Report.

The Proposed Development comprises the construction of a dual carriage way link road from the A1067 Fakenham Road, at its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, completing an orbital route around Norwich. To facilitate the Proposed Development associated works include: viaduct crossing of the River Wensum (a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI)); wildlife crossings in the form of bat and badger underpasses; bridges at interaction with Ringland Lane, Weston Road and Breck Road; Green bridge crossings; and culvert crossing the River Tud.

Passing through arable and agricultural fields and woodland, the Proposed Development is located to the North-West of Norwich A1270 running south to the A47 at its junction with Wood Lane and Berrys Lane.

Whilst in principle the CPA has assumed the description set out in the Scoping Report is an accurate description of the Proposed Development, the potential constraints of the site and receptors. Please note paragraph 2.4.1 states the dual carriageway is 2.8 miles and at paragraph 1.2.4 states 3.9 miles. The correct distance should be set out in the ES.

It is my understanding that at this stage as the detailed design of the Proposed Development is evolving the description of the Proposed Development may not be completely confirmed. However, the Applicant will need to ensure that the description of the Proposed Development in the ES for which the subsequent planning application is made is as accurate as possible, including any proposed works required as ancillary to the Proposed Development, (whether on or off-site),

because this will form the basis of the Environmental Impact Assessment (EIA) and should be assessed as part of an integrated approach to EIA.

Subject to planning approval and all other relevant consents, it is intended to commence construction in early 2022.

### **Construction**

The CPA notes little information has been provided in the Scoping Request regarding the temporary access road and the formation of the construction compounds, paragraph 1.1.3 states these are yet to be confirmed. Nor is any information provided regarding the size and location of construction compounds. Whilst it is appreciated that this information may not be available at this stage in the evolution of the Proposed Development, this information will be required in the ES and the compounds should be encompassed within the application site boundary site. Nor does the Scoping Report make clear how the site will be accessed during construction. The Applicant should consider making this information explicit within the ES.

The CPA considers that information on construction including: construction phasing; construction methods, plant and activities associated with each phase; siting of construction compounds (including on and off site); lighting equipment/requirements; and number, movements and parking of construction vehicles (both HGVs and staff) should be clearly indicated in the ES. It should be made clear whether any materials would be arriving by road, rail or other means.

### **Alternatives**

Regulation 18(d)(c) of the EIA Regulations requires an ES to include a description of the reasonable alternatives which are relevant to the Proposed Development and its specific characteristics, and an indication of the main reasons for the chosen option, taking into account the environmental effects.

In setting out the structure of the Scoping Report, Paragraph 1.5.1 states that the proposed approach for the alternatives considered as part of the design development is set out in Chapter 3. It is not clear from Chapter 3 what the approach is.

The CPA acknowledges that Paragraph 2.1.3 advises that the Applicant has completed assessments and undertaken environmental studies on alternative routes to inform the selection of the preferred road alignment of the Proposed Development. Paragraph 3.3.1 goes on to state the scheme design maybe subject to change due to information from ongoing environmental surveys. The ES should clearly set out the rationale and justification for the Proposed Development, in response to the issues it is seeking to address, taking into account a range of traffic interventions and alternative routes as the possible solution. The ES should also include the reasonable alternative options, the justification for the preferred / chosen option, including a comparison of the environmental effects, and a description of any further issues that may lead to changes to the final alignment of the Proposed Development which the ES will examine in detail.

The Scoping Report refers to the Option Selection Report (OSR) and Strategic Outline Business Case (SOBC) and that an Outline Business Case (OBC) is to be developed alongside the ES for the Proposed Development. If this is where the information regarding the alternatives is to be set out, it should be demonstrated with clear cross referencing.

### **Flexibility**

The CPA notes that a number of elements of the Proposed Development are yet to be finalised, such as the traffic forecasts (Paragraph 6.2.8 states that finalised traffic forecasts were not available at

the time of writing the Scoping Report), detailed design, mitigation measures and whether further water quality analysis is required.

The Applicant's attention is drawn to the Rochdale Envelope principle in dealing with areas of uncertainty when preparing the ES. Case law has established an acceptable way of dealing with uncertainty in preparing and assessing projects, (particularly those prepared in an outline manner). This approach should only be used where exceptional and necessary. It is for the CPA as decision maker to agree the level of flexibility that can be permitted. Whilst this provides for an element of flexibility, the ES should assess the worst case variations, to ensure the likely significant environmental effects have been fully assessed.

During the preparation of the planning application every attempt should be made to narrow the elements of the Proposed Development to be finalised. Where this is not possible, the ES should clearly explain which elements of the Proposed Development have yet to be finalised and provide reason justification. At the time of application, any proposed scheme parameters should not be so wide-ranging as to represent effectively different schemes from that in the accompanying ES. In preparing the ES, the Applicant will need to consider whether it is possible to robustly assess a range of impacts resulting from a number of undecided parameters.

It should be clear in the application submission what is being applied for. If the Proposed Development changes substantially during the EIA process, prior to the submission of the planning application you may wish to consider the need to request a new Scoping Opinion.

### **Mitigation / Monitoring**

The CPA notes that a Construction Environmental Management Plan (CEMP), Construction Traffic Management Plan (CTMP), Materials Management Plan (MMP) and Site Waste Management Plan (SWMP) are to be produced.

The ES should identify specific mitigation measures to be delivered (rather than an outline of the measures). Where the ES relies upon mitigation measures which would be secured through management plans, it should be demonstrated (with clear cross-referencing) where each measure is set out in the management plan. Full copies of the relevant management plans should be included or appended to the submitted ES and the Applicant should also demonstrate how the measures will be secured. Where full copies are not included in the subsequent planning application, clear justification must be provided stating the reason for such approach.

The ES should identify and describe any proposed monitoring. It is suggested the Applicant agrees methods, any necessary mitigation and or/compensatory measures and monitoring regimes with the relevant consultees.

### **Planning Policy context**

In developing the Proposed Development and preparing the EIA Report, regard should be given to the relevant provisions of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and good practice guidance. The Planning Application should demonstrate compliance with the adopted Development Plan, unless materials considerations, such as Emerging Plans (depending on the stage of the plan process), National Planning Policy Guidance, and Transport Plans, indicate otherwise.

### **Topics proposed to be scoped out of the Environmental Statement**

Table 4-1 of the Scoping Report provides a list of the topic areas to be scoped out. The Applicant should seek agreement of such matters with the CPA and / or the relevant consultee(s).

To ensure topic areas haven't been overlooked during the EIA process, justification should be provided for the topic to be scoped out and why this particular approach has been taken.

### **Confidential Information**

It may be appropriate for information relating to rare / protected species or commercially sensitive information, to be kept confidential. Where documents are intended to be confidential, separate copies should be provided, clearly marked confidential, together with a statement setting out the reason the Applicant considers the information to be of a confidential nature. The CPA may be obliged to disclose information under the Freedom of Information Act 2000 and / or Environmental Information Regulations 2004. If such a request is received by the County Council, consideration will be given to the reasons provided why the information should not be disclosed.

In accordance with the General Data Protection Regulations (GDPR), the CPA will seek to minimise the publication of personal details.

### **CORONAVIRUS (COVID – 19) Survey work and data collection**

In response to the current issues relating to the Coronavirus outbreak, the CPA understands that Central Government and/or Local Authority enforced restrictions may have consequences for the ability to conduct certain surveys and obtain relevant data required for the purposes of the ES.

In determining a planning application accompanied by an ES, the CPA must in examining the environmental information, reach a reasoned conclusion on the significant effects of the Proposed Development on the environment. The CPA will also consider the advice received from consultees during the planning process.

Given the current circumstances, I strongly advise you to continue the dialogue with the relevant consultees and agree approaches/methodologies to data collection and how it is to be presented in the ES.

### **EIA Scope and Topics**

Following consultation with the statutory consultation bodies, the scope and level of detail of the information to be provided in the ES using the factors listed in Regulation 4(2) of the EIA Regulations, is set out below:

#### Chapter 5 Air Quality

In Table 5-5 - Elements Scoped In or Out of Further Assessment, proposes to scope out emissions from plant and machinery during the construction phase. The Environmental Health Officer is content that this is scoped out, however, advised that all plant and machinery used should be maintained to ensure that emissions are minimised, with particular care taken with semi static plant.

Within the scope of Air Quality, the ES should consider the impacts of the Proposed Development on Public Health and take account of the risks of air pollution, road and dust and emissions and how these can be managed or reduced during the operation of the project.

The scope of Air Quality also falls within other Chapters of the Scoping Report, information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System [www.apis.ac.uk](http://www.apis.ac.uk)

#### Chapter 6 Noise and Vibration

According to Paragraph 6.8.1 a study area is yet to be determined. The ES should clearly state and justify the study area selected.

The Scoping Report does not appear to include any baseline monitoring for the Proposed Development (complete road scheme). The ES should include noise monitoring to validate modelling and establish background levels. In addition, given the traffic noise can affect bat activity and feeding behaviour, animals such as bats should be identified as noise sensitive receptors in the ES.

#### Chapter 7 Cultural Heritage (Archaeology and Heritage)

Justification should be provided for the extent of the study area used to assess the baseline conditions in the Scoping Report. This includes the 500m study area proposed for non-designated heritage assets, as no justification for this area is given. The study area should be the appropriate to ensure that all heritage assets likely to be affected by the Proposed Development have been included and can be properly assessed.

The Proposed Development could impact on a number of designated heritage assets that are situated within the vicinity of the Proposed Development, and their settings. Therefore, Historic England would expect an assessment of the likely effects of the Proposed Development on the elements which contribute to the significance of the heritage assets and their settings, such as the potential impacts on any Conservation Areas and Grade I, II\* and II Listed Buildings and non-designated features of historic, architectural, archaeological or artistic interest. In addition, the assessment should take account of the potential impacts of associated activities and the alteration to drainage patterns. To assist in understanding the impacts of the Proposed Development, section drawings and photomontages would be useful.

Whilst the County Council's Norfolk Historic Environment Service are satisfied with information provided in the submitted Scoping Report, Historic England strongly recommend that the Applicant involves the Council's Historic Environment Team (Conservation and Archaeology Officers) and welcomes the opportunity to comment on further details of the Proposed Development.

Whilst it is noted that consultation has taken place with the County Council's Historic Environment Officer, please note that Broadland District Council wish to assess the impacts of the Proposed Development on the above ground heritage assets, their settings and proposed mitigation.

#### Chapter 8 Landscape and Visual

The proposed methodology for this topic area is appropriate and in line with GLVIA3. The baseline work undertaken and proposed is considered acceptable. Both should inform the assessment of the landscape and visual impacts, including mitigation measures and where they are to be situated.

The Scoping Report states that the study area will be agreed with the LPA. The CPA welcomes this, as does the Broadland District Council Landscape Architect, of which justification should be set out in the ES, and viewpoint locations agreed. Photomontages / visualisations to be taken from agreed viewpoint locations should be provided to demonstrate the possible visual impacts of the Proposed Development. These should show visual effects (at various intervals) on completion of the Proposed Development through to after the establishment of the landscaping scheme. The Applicant should seek to agree the methodology for, and number of required photomontages / visualisations and the intervals the photomontages / visualisation should illustrate, with the relevant consultees.

The Scoping Report proposes to scope out artificial lighting on the basis that no operational lighting is proposed other than for signage and at the junction with the A47, therefore it is recommended that construction lighting is considered as part of the overall impacts and operation lighting be kept to a minimum.

I draw the Applicants attention to Paragraph 8.8.1 which appears to be unfinished.

Whilst the Proposed Development does not fall within Breckland Council area, it maybe visible from within the boundary. I draw your attention to the comments received from the County Council's Natural Environment Team, Broadland District Council and Breckland Council, and advise the Applicant to continue the pre-application dialogue with relevant Officers.

#### Chapter 9 Biodiversity

The approach to the Biodiversity Assessment is considered acceptable. According to Natural England the Proposed Development passes over Internationally, Nationally and Local Non-Statutory designated sites, therefore the potential impacts on the sites should be addressed, as well as on county level habitats. It is noted that the protected species and habitat surveys has been agreed with Natural England.

In relation to lighting, the impacts of lighting from vehicles on bats should be assessed. In Table 8-1, it is not clear whether the lighting impact on biodiversity (namely bats) will be assessed in the ES. Consideration should be given to other bat trapping locations and the structures to be considered for hibernation surveys for bats listed in Paragraph 9.2.60, should also include underground structures including ice houses. The duration of the Vantage Point survey referred to in paragraph 9.2.64 should be clarified in the ES and the length of the survey justified. To take account of bat behaviour, consideration should be given to surveying during night and sub-optimal periods. Surveyors should be positioned to allow for comparison post construction monitoring. Generally, with regards to monitoring, the Applicant should consider how pre and post construction survey results are effectively compared.

Based on the results of the White Clawed Crayfish Survey, the EA notes that in Table 9-9 - Biodiversity Scoped in or Out of Further Assessment, of the Scoping Report it proposed to scope out this type of species. The CPA are content with this approach.

The Scoping Report should make reference to the need for good biosecurity practices to avoid the spread of non-native species during construction. Ecological Surveys should identify any invasive non-native species already present, which should then help to inform appropriate preventive measures. Given the proximity of the proposed works to the River Wensum this is important and should to be included in the ES.

Norfolk County Council adopted its Environmental Policy on 25 November 2019. Although it doesn't form part of the Development Plan, it is a material consideration when determining Planning Applications for County Council development. The Applicant is encouraged to demonstrate how the Policy has informed the Proposed Development, whether it is compliant, and a minimum of 10% Net Biodiversity Gain, inline with the pending Environment Bill. It is noted that as part of the Biodiversity Net Gain and mitigation measures additional land is likely to be required. Once the extent of the off-site mitigation and compensation measures are known, the scope of the ES should be reviewed. The additional land should be included in the application site boundary and the scope of the ES.

It is noted a number of studies are still to be completed, which will inform the baseline.

Given the current Covid-19 pandemic, officers are currently working remotely, therefore it recommended that data is also submitted as shape files and all relevant biodiversity data, including absences be submitted to Norfolk Biodiversity Information Service (NBIS).

The Applicant's attention is drawn to the consultation responses from the Councils Natural Environment Team and Natural England.

## Chapter 10 Road Drainage and the Water Environment

Paragraph 10.7.26 states that a standalone Flood Risk Assessment (FRA) will be prepared to support the ES. Please note this should cover **all sources of flooding**. Highways England note that the drainage system from the Proposed Development is separate to the A47 and expect the Applicant to consider the effects of flooding on the A47.

### Fluvial Flood Risk

The Environment Agency (EA) will continue to work with the Applicant on the FRA, which should assess the flood risk of the Proposed Development; and support the proposal to submit a 1D-2D hydraulic model which will assess the current flood risk, take account of climate change and demonstrate that the Proposed Development will not increase flood risk extents or depths elsewhere.

### Surface Water Drainage

The Scoping Report acknowledges that the Proposed Development lies within the Internal Drainage District (IDD) of the Norfolk Rivers Internal Drainage Board (IDB). Any works as part of the Proposed Development that fall within the IDD will require separate consent from the IDB. Works that effect the flow of an ordinary watercourse (outside of the IDB remit) will require consent from the Lead Local Flood Authority (LLFA). The Applicant should seek to obtain the relevant drainage consents at the earliest opportunity. This process will be separate and in addition to the planning process.

The FRA to accompany the ES should include a surface water drainage strategy to address local sources of flood risk (e.g from ordinary watercourses, surface water flow, including impacts to overland flow paths), identify how surface water drainage will be managed on site, compliance with the SuDS hierarchy, any required mitigation measures and maintenance and management plan.

It is noted from the Scoping Report that a Water Vole Survey has been carried out, on the River Wensum, but it is not clear whether other watercourses have been surveyed. The IDB recommend that a Water Vole Survey is carried out in the Boards adopted water course, and on other riparian watercourses likely to be impacted by the Proposed Development.

### Surface Water quality

Whilst the Scoping Report covers the Surface Water Quality impacts of the Proposed Development during both construction and operation, in the assessment methodology there is no mention of containment or contingency for a road traffic accident leading to a spillage. Given the reference in other parts of the Chapter, it is wondered whether the omission in Paragraph 10.4 is an error. This will need to be clarified in the ES.

The Water Framework Directive (WFD) assessment referred to in the Scoping Report should include the River Tud and highlight the two key objectives of no deterioration in waterbody status and ultimate aim of improving all waterbodies to Good status. To ensure no adverse effects on the water quality of the Wensum, The Habitats Directive assessment for the River Wensum SAC needs to include consideration of the tighter water quality targets.

### Surface Water resources

Regarding surface water resources the Scoping Report doesn't make reference to the use of water as resource during construction or operation therefore, it is presumed that no local water will be used or abstracted. This needs to be clarified in the ES and consideration should be given to the impact of water abstraction licenses, particularly abstraction points within close proximity to the Proposed Development.

Measures to deliver Biodiversity Net Gain are supported. Regarding the reference to the River Wensum Restoration Strategy (in particular at 10.3.34), the EA highlight opportunities to address changes to the River should not be overlooked, because it does not necessarily mean that there are not potential improvements to be made to the morphology of the River.

#### Groundwater

The scope for groundwater resources is generally considered appropriate and the Applicant is drawn to specific comment in the consultation response received from the EA. Paragraph 10.3.20 states that “A data request to determine any nearby licensed and unlicensed groundwater abstractions will be completed moving to ES Stage” The Broadland District Council Environmental Health Officer has requested to be consulted on this in order to assist in identifying private drinking water supplies in the vicinity.

The EA advise that shallow groundwater is likely to be present in many places along the route of the Proposed Development, which could affect the viability of using simple infiltration features, SuDS features should be in accordance with CIRIA SuDS Manual and that direct discharge of potentially hazardous substances is not permitted.

Detailed comments received from the LLFA, EA, Highways England and AW can be found in the consultation responses at the end of this letter. It is suggested that the Applicant liaises with the relevant water bodies to ensure an appropriate drainage strategy is proposed.

Anglian Water (AW) suggest the Applicant checks for AW assets in the area, using asset maps which can be found via [www.digdat.co.uk](http://www.digdat.co.uk)

#### Chapter 11 Geology and Soils

Paragraph 12.3.6 seems to suggest that the assessment of safeguarded material resources and use of minerals in construction is included in Chapter 11 of the Scoping Report. This does not appear to be case, as the assessment appears to be included in Chapter 12 – Materials Assets and Waste.

Further to the comments received from the EA, set out in Table 11-1 - Consultation Undertaken to Date, there is a safeguarded waste management facility (former Attlebridge Landfill) close to the site boundary for the Proposed Development, which has a 250m consultation zone around it that intersects part of the Northern site boundary for the Proposed Development. As a result, there is the potential for indirect impacts to the aftercare of the former waste facility that need to be assessed.

It is not clear whether paragraphs 11.3.5 and 11.3.7 of the Scoping Report are referring to licensed abstractions or all abstractions? This needs to be clearly set out in the ES.

Paragraph 11.4.2 regarding mitigation should also include validation (if required) and monitoring (if required).

Paragraphs 11.7.3 and 11.7.4 should note that CLR11 is being superseded. The most up to date guidance to follow is Land contamination: risk management guidance, see: <https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>

In light of planning policy for the protection of the best and most versatile agricultural land, it is recommended that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource.



## Chapter 12 Material Assets and Waste

The site covered by the Scoping Report is mostly underlain by a Mineral Safeguarding Area (sand and gravel).

Paragraph 12.1.2 states that Defra have been consulted and stated that Construction Demolition & Excavation (CDE) waste arisings data is only available at national level for England. Whilst this is correct in terms of waste arisings, other information on CD&E waste is available that would be relevant to the ES.

Paragraph 12.2.2 lists the Minerals and Waste Planning Authorities (WPA) in the East of England. However, for clarity and completeness it does not include the unitary authorities. These should be included in the ES

Paragraph 12.3.6 acknowledges that the Proposed Development passes through both sand and gravel and silica sand deposits and states that the scheme will not sterilise resources. However, this statement is incorrect because any location of safeguarded mineral that is built upon without prior extraction of the underlying mineral will sterilise the underlying mineral as it cannot be extracted in the future. Whilst there are other locations of that mineral in the County, the quantity of mineral that underlies the development will have been sterilised by the Proposed Development being located upon it. This paragraph refers both to safeguarded sand and gravel, and silica sand deposits. Please note that safeguarded silica sand deposits only occur close to the western boundary of Norfolk. Paragraph 12.3.6 goes on to state "...the importance of these resources and impact of the Scheme will be reported in the Geology and Soils chapter of the ES." On review of the Scoping Report it appears that Chapter 11 Geology and Soils focusses on ground contamination and does not currently refer to mineral resources either in terms of use or safeguarding or use in the project.

It is not clear from Paragraph 12.3.10 what the quantity of materials required for the construction of the Proposed Development scheme will be, or that this will be set out in the ES. Although it is noted that the Paragraph states that the sensitivity of materials needed for the Proposed Development is low. Table 12-5 - Potential design, mitigation and enhancement measures, makes reference to a Materials Management plan (MMP); this should include information on the quantity of materials (including minerals) to be used in the project.

Paragraph 12.3.12 states that there is not data available for CD&E production or recovery rates in the East of England. However, it is possible to get figures for the quantities of CD&E waste that have been recovered in the East of England (and in the individual WPA areas) from the EA's Waste Data Interrogator (WDI). Table 12-1 includes all types of waste (hazardous, non-hazardous and inert) arising from all sectors and therefore is not necessarily directly comparable to any trends in CD&E waste recovery. This information should therefore be replaced with data specifically for CD&E waste recovery from the EA's WDI.

Table 12-3 - Permitted waste recovery management sites in East of England (2018), lists the number of waste management facilities in the East of England. It does not include their capacity, the types of waste that they can accept, or whether there is sufficient capacity available arising from the construction of the Proposed Development. The EA's WDI may provide more information surrounding this particular issue.

For information, Norfolk County Council publishes annual monitoring reports which include data on waste management which may be relevant for the ES (see: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance->

[andpartnerships/policies-and-strategies/minerals-and-waste-planning-policies/annual-monitoringreports](https://www.norfolk.gov.uk/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-andpartnerships/policies-and-strategies/minerals-and-waste-planning-policies/annual-monitoringreports) ).

Norfolk County Council has also published a Waste Management Capacity Assessment which contains information on waste arisings, waste movements and the capacity at waste management facilities in Norfolk (see:

<https://www.norfolk.gov.uk//media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-andpartnerships/policies-and-strategies/minerals-and-waste-planning/preferred-optionsconsultation/waste-management-capacity-assessment-2017.pdf?la=en&hash=E85C21869C051D2E044DD52D7A57B4F83B2549F8>).

The other WPA's in the East of England are likely to publish similar information.

The Scoping Report does not appear to include information regarding the quantities of waste that are likely to arise from the project, or regarding the quantity of minerals that are likely to be needed in the project, or the quantity of minerals that are likely to be extracted as part of the project. Therefore, a Site Waster Management Plan and Material Management Plan – Minerals should be included in the ES.

With regard to Table 12-8 – Significant Criteria, please note the project area is not located on a Peat resource and safeguarding mineral resources are shown as area on maps, therefore it is not appropriate to measure the impact on mineral safeguarding in terms of sites.

Mineral Planning Authority has published standing advice on mineral safeguarding, which can be found on the Norfolk County Council website at [www.norfolk.gov.uk/nmwdf](http://www.norfolk.gov.uk/nmwdf) on the 'Adopted Policy Documents' page, and welcomes discussion, if there are any queries regarding the preparation of a Mineral Resource Assessment.

The EA advise that an appropriate waste exemption or an Environmental Permit will be required for any use of waste in the works.

Included in this Scoping Opinion is a full consultation response from the Mineral and Waste Planning Authority, and relevant contact details should you have any queries.

### Chapter 13 Climate

Whilst it is noted that the Applicant has not undertaken any consultation relating to Greenhouse Gases emission or Climate Resilience, the CPA welcomes that discussions have been held with the Norfolk County Council Sustainability Manager.

The England Biodiversity Strategy published by Defra establishes principles for the consideration of the effects of climate change. The ES should reflect these principles and identify how the Proposed Development effects on the natural environment will be influenced by climate change, the impacts greenhouse gases, climate resilience both during construction and when in operation.

### Chapter 14 Population and Health

It is noted that the Applicant has not undertaken any consultation relating to this Chapter of the Scoping Report. However, the Scoping Report states "Consultation with the Norfolk County Council and Broadland District Council may be required for the ES." The CPA welcomes the Applicant consulting with the relevant Authorities relating to this topic area, to ensure detailed assessment of the Population and Health impacts are included in the ES.

It maybe that the Applicant addresses Public Health within the Air Quality Chapter. The assessment of the impacts of the Proposed Development on Public Health should include risks of air pollution, road and dust and emissions and how these can be managed or reduced during construction and in operation.

Whilst there does not appear to be any historical or cultural Gypsy Roma Traveller Sites that would be affected by the Proposed Development. It is suggested that the when developing the final design, the Applicant considers the potential for areas to create stopping places that may become vulnerable to use, resulting in Unauthorised Encampments.

#### Chapter 15 Arboriculture

Broadland District Council Arboricultural Officer wishes to be consulted on the production of this Chapter of the ES. Paragraph 15.7.2 suggested that tree renewal and replacement would be on a county-wide basis. However, it considered that tree renewal and replacement should take place within the vicinity of the Proposed Development rather than county wide.

From an arboricultural perspective the County Council's Senior Arboriculture and Woodland Officer considers that the information provided in the Scoping Report appears to be in line with national guidelines.

The Proposed Development will result in ancient and veteran trees loss, therefore the ES should include an Arboricultural Impact Assessment (AIA), site specific Arboricultural Method Statement (AMS) including monitoring regime and Tree Protection Plan (TPP). Due to the level of tree loss the ES should include a 30 year compensation strategy based on a calculation of habitat loss and demonstrating net gain. It is recommended the Applicant considers a package of mitigation and compensatory measures.

#### Chapter 16 Major Accidents and Disasters

Based on the information provided in the Scoping Report and the consultation response received from the Health and Safety Executive (HSE), the CPA is content that the proposed development is not of a type that would use or store hazardous substances in quantities relevant to the potential for major accident hazards, and therefore the topic area of major accidents related to such hazardous substances can be scoped out.

No justification is given for the extent of the study area used to assess the baseline conditions in the Scoping Report, this should be included in the ES.

The proposed development appears to cross the route of a major accident hazard pipeline and lies within the HSE Consultation Zone for National Grid's 3 Feeder Bacton/Roudham Heath gas pipeline (Transco ref 1709), and therefore could be vulnerable to harmful effects from a major accident at the major hazard pipeline. The ES should consider the significant effects of relevant major accident scenarios at the identified major accident hazard pipeline that could affect people who will be at the Proposed Development, and also give consideration to the potential to initiate a major accident that could affect people who will be at the Proposed Development. I draw your attention to the full consultation received from HSE.

In preparing the Scoping Report the Applicant has used the HSE's LUP web app, however it is noted that this process has not been completed, as the entries have not yet been 'continued' (past the zones identification stage) to the advice stage. Please contact HSE's Land-use-planning Advice team [lupenquiries@hsl.gsi.gov.uk](mailto:lupenquiries@hsl.gsi.gov.uk) if you require further assistance.

HSE advise the Applicant to liaise with the pipeline operator National Grid, and to undertake a risk assessment as early as possible to ensure the design and operations meet the requirements of relevant Health and Safety Regulations.

There is a high-pressure gas pipeline – feeder within close proximity to the Proposed Development. For information a location plan identifying the location of National Grid high pressure gas pipelines is included in the consultation response from National Grid, enclosed in this Scoping Opinion. As the design for the section of the road at the junction with the A47 is developed further National Grid recommend they be consulted.

The EA advise that to scope out the transport and pollution accidents and flood risk is acceptable providing the issues are fully addressed within Chapter 10.

#### Fire

To assess the impact of the Proposed Development on emergency response times NFRS advise that Highways notify NFRS of planned or emergency road closures.

#### Chapter 17 Traffic and Transport

The ES should clearly state and justify the study area selected for both the construction and operational phase in respect of traffic and transport.

A full Transport Assessment (detailing the impact of the proposed development on the local road network and Walking, Cycling and Horse-Riding (WCH) routes) will form part of the subsequent planning application, the detailed scope of which should be discussed with the Highway Authority and the Public Right Of Way (PROW) team. It is recommended that the ES should clearly set out the impacts of the proposed development on the footpaths and any PROWs including bridleways and byways within the vicinity and adjacent / nearby National Trails. To support the ES it is recommended a Non- Motorised User (NMU) Strategy be developed identifying opportunities for new and alternative NMU routes.

The proposed development will connect to the A47 at the junction with Wood Lane, which forms part of the A47 North Tuddenham to Easton duelling scheme currently being developed by Highways England through the NSIP regime. Highways England agree with the methodology set out in the submitted Scoping Report and advise the Transport Assessment will need to take account of the impacts of their scheme and any necessary mitigation measures.

The Assessment should be in accordance with DfT Circular 02/2013 – The Strategic Road Network and the Delivery of Sustainable Development and be informed by the Walking Cycling and Horse-Riding Assessment Report (WCHAR).

Highways England also advise that where there is interaction between the Proposed Development and the A47, the design should be in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB). In addition, other requirements to be referenced on the ES include the appropriate Stage One Road Safety Audit for the junction design with the A47, and A47 collision analysis (without the dualling scheme). As the proposed timescales for delivery of the Proposed Development is similar to that of the proposed dualling of the A47 promoted by Highways England, the ES should clearly set out how the schemes can be delivered in tandem with an appropriate mitigation strategy.

It is noted from the submitted Scoping Report and consultation responses that pre-application discussions have taken place with the Highway Authority and Highways England. The CPA welcomes this and expects on-going discussions and agreement, where possible.

I draw the Applicants attention to the comments from the Highway Authority, Highways England and the Norfolk Council Projects Manager.

#### Chapter 18 Cumulative Effects

The Scoping Report does not appear to identify a study area for this assessment and nor have any specific projects been identified for consideration in this Chapter of the Scoping Report.

The ES should clearly state and justify the selected study area. The Applicant should consult and/or agree with the relevant Planning Authorities the projects to be included / excluded from the cumulative effects assessment. It is recommended that the list of projects is updated as appropriate during the preparation of the Planning Application.

The Applicant may wish to provide a plan identifying the locations of the projects to be considered in the ES.

Chapter 17 (Traffic and Transport) Paragraph 17.7.30 advises that the A47 dualling being promoted by Highway England and the Food Enterprise Zone at Easton will form part of the baseline in the updated NATS model. It is suggested that these developments are included in the Chapter 18. Depending on when they are to be developed, the ES needs to fully assess how they interact and the cumulative effects of this.

The list is not exhaustive but a development to include when assessing the cumulative effect is the Hornsea Project Three, the underground cable is intended to cross the Proposed Development. Details of the National Infrastructure Project (NSIP) can be found on the Planning Inspectorate (PINS) website. A decision by the Secretary of State of Business, Energy and Industrial Strategy (BEIS) is expected later this year.

Consideration should be given to site specific allocations within the vicinity of the Proposed Development, that are identified in the emerging Greater Norwich Local Plan (GNLP), particularly the site allocations that have not been challenged. Depending on the stage of the plan process, at the time of submitting the Planning Application, appropriate weight should be afforded to the allocated sites that maybe included in the Cumulative Effects Assessment.

#### **Socio Economic**

The Scoping Report appears to be deficient in information regarding the impacts of the Proposed Development on Economic Development. A study area should be identified and justified in the ES.

Given the potential for job creations during the construction phase and the number of businesses located closed to the Proposed Development and the businesses located further afield that would benefit from improved access to the Northern and Western areas of Norwich, the ES should include an assessment of the following:

- How the Proposed Development will support job creation and Gross Value Added (GVA) growth – this should include a breakdown of personnel that would be employed / number of jobs that would be created during construction phase and whether full or part time
- Opportunities for existing businesses parks and allocated employment sites
- Opportunities during the construction phase to support local supply chains development, also providing direct and indirect jobs created as a result

- How the Proposed Development will contribute to local skills
- Risk of construction delays as a result of the current Coronavirus pandemic
- Potential economic impacts of coronavirus pandemic considered– sectors impacted (e.g. Hospitality, Tourism).

I draw you attend to the comments provided by the Councils Business Development Manager.

### **Aerodrome Safeguarding**

Whilst consulted on the Scoping Report, unfortunately Norwich Airport were unable to provide comments relating to aerodrome safeguarding. It is recommended that as the design of the road evolves and the mitigation measures are identified, the Applicant liaises with the Airport to assess the impacts of the Proposed Development, particularly if proposed SuDS features within the vicinity of the Airport are likely to attract birds.

### **Non-Technical Summary**

A non-technical summary of the ES should be provided as part of the application submission. The content of which should be in accordance with Regulation 18 (3)(e) of the EIA Regulations 2017 and best practice.

### **Other issues**

The CPA received a third party representation which raises issues relating to the consideration of cycle users and the assumptions of traffic volumes given the current COVID-19 situation. For information, the response is included at the end of this letter.

### **Schedule 4 Information**

In addition to the above information, please ensure that the ES includes all information specified in Schedule 4: Information for Inclusion in Environmental Statements of the EIA Regulations which, in addition to a description of the Proposed Development covering points 1(a)-1(d), which includes (but isn't limited to), a description of reasonable alternatives, a description of the relevant aspects of the current state of the environment and an outline of the likely evolution thereof without implementation of the development, a non-technical summary of the information, and a reference list detailing sources used for the descriptions and assessments included.

### **Conclusion**

**This letter should be taken as the County Planning Authority's Scoping Opinion under the Town and County Planning (Environmental Impact Assessment) Regulations.**

If you have any queries about the content of the Opinion, do not hesitate to contact me. Please let me know if anything is incorrect. As aforementioned, in accordance with Regulation 18(4)(a) of the EIA Regulations, the ES must be based on the most recent Scoping Opinion issued, unless the Proposed Development becomes materially different, in which case you may wish to consider the need to request a new Scoping Opinion.

**Appendix 2: Consultation Responses to the Request for the Original Scoping Opinion  
Ref. SCO/2020/0001**

**From:** Lambert, Angelina  
**To:** Planning Services  
**Subject:** FW: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link  
**Date:** 27 July 2020 12:14:45

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**From:** Planning Liaison <[planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)>  
**Sent:** 22 July 2020 14:38  
**To:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>  
**Subject:** RE: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link

**WARNING:** External email, think before you click!

Dear Angelina

Thank you for your email consultation on EIA Scoping Opinion for the proposed Norwich Western Link

We have reviewed the final report and we have no comments on this application. However we would suggest that the applicant check for any Anglian Water assets in the area. The asset maps can be obtained from [WWW.digdat.co.uk](http://WWW.digdat.co.uk)

Kind Regards

Sandra

**Sandra De Olim**

Pre-Development Advisor  
Telephone: 03456066087 Option 1

**Anglian Water Services Limited**

Thorpe Wood House, Thorpe Wood, Peterborough,  
Cambridgeshire, PE3 6WT

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**From:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>  
**Sent:** 21 July 2020 18:35  
**To:** Planning Liaison <[planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)>  
**Subject:** SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link  
**Importance:** High

**\*EXTERNAL MAIL\*** - Please be aware this mail is from an external sender -  
**THINK BEFORE YOU CLICK**



Nick Johnson  
Norfolk County Council  
County Hall , Martineau Lane, Norwich, NR1 2SG

Jay Lad  
Asset Protection Assistant  
Business & Operation Support  
Gas Transmission Asset Management  
National Grid  
Warwick  
Direct Tel:  
Email: Jay.lad@nationalgrid.com

### Planning Work?

Contact us on 0800 688 588\*

Mon-Fri 8am-4pm

(\*Calls may be recorded and monitored)

E-mail: [Plantprotection@nationalgrid.com](mailto:Plantprotection@nationalgrid.com)

**Electricity Emergency Number:**

**0800 40 40 90\***

**National Gas Emergency Number:**

**0800 111 999\***

\*Available 24 hours, 7 days/week.

Calls may be recorded and monitored.

[www.nationalgrid.com](http://www.nationalgrid.com)

Date : 7/24/2020

Our Reference: EA\_GE4B\_3NWP\_024390

Your Reference: SCO/2020/0001

Dear Nick Johnson/Norfolk County Council

### **Ref: NR20 3JL Norwich Western Link**

Please find the attached Objection letter. This is being sent as we have not yet received a response to the below enquiry.

National Grid exercises its right to place a Holding Objection to the above proposal which will cross our High-Pressure Gas Pipeline – Feeder

- We would draw your attention to the Planning (Hazardous Substances) Regulations 1992, the Land Use Planning rules and PADHI (Planning Advise for Developments near Hazardous Installations) guidance published by the HSE, which may affect this development.
- To view the PADHI Document, please use the link below:  
<http://www.hse.gov.uk/landuseplanning/padhi.pdf>
- No buildings should encroach within the Easement strip of the pipeline
- No demolition shall be allowed within 150 metres of a pipeline without an assessment of the vibration levels at the pipeline. Expert advice may need to be sought which can be arranged through National Grid.

- National Grid has a Deed of Easement for each pipeline which prevents change to existing ground levels, storage of materials. It also prevents the erection of permanent / temporary buildings, or structures. If necessary National grid will take action to legally enforce the terms of the easement.
- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and National Grid's specification for Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22. You should already have received a link to download a copy of T/SP/SSW/22, from our Plant protection Team, which is also available to download from our website.
- To view the SSW22 Document, please use the link below:  
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>
- A National Grid representative will be monitoring the works to comply with SSW22.
- To download a copy of the HSE Guidance HS(G)47, please use the following link:  
<http://www.hse.gov.uk/pubns/books/hsg47.htm>
- National Grid will also need to ensure that our pipelines access is maintained during and after construction.
- Our pipelines are normally buried to a depth cover of 1.1 metres however; actual depth and position must be confirmed on site by trial hole investigation under the supervision of a National Grid representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of National Grid High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a National Grid representative. A safe working method must be agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been confirmed on site under the supervision of a National Grid representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NG supervision and guidance.

### **Pipeline Crossings**

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at locations agreed with a National Grid engineer.
- All crossing points will be fenced on both sides with a post and wire fence and with the fence returned along the easement for a distance of 6 metres.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid. National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure. The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid.
- Please be aware that written permission from National Grid is required before any works commence within the National Grid easement strip.

- A National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22.
- A Deed of Indemnity is required for any crossing of the easement including cables

### **Cables Crossing**

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A National Grid representative shall supervise any cable crossing of a pipeline.
- An impact protection slab should be laid between the cable and pipeline if the cable crossing is above the pipeline.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service must cross below the pipeline with a clearance distance of 0.6 metres.

### **All work should be carried out in accordance with British Standards policy**

- BS EN 13509:2003 - Cathodic protection measurement techniques
- BS EN 12954:2001 - Cathodic protection of buried or immersed metallic structures – General principles and application for pipelines
- BS 7361 Part 1 - Cathodic Protection Code of Practice for land and marine applications.

I have enclosed a location map to show the location of National Grid high-pressure gas pipeline(s) within the vicinity of your proposal.

Yours sincerely  
Jay Lad

Asset Protection Assistant

### **EAGLES (Electricity And Gas Location Enquiry System)**

Is now available to use simply click on the link to register [www.beforeyoudig.nationalgrid.com](http://www.beforeyoudig.nationalgrid.com), submit details of your proposed works and receive instant guidance and if appropriate maps showing the location of National Grid gas and electric apparatus.

Nick Johnson  
Norfolk County Council  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

Plant Protection  
Cadent  
Block 1; Floor 1  
Brick Kiln Street  
Hinckley  
LE10 0NA  
E-mail: [plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)  
Telephone: +44 (0)800 688588

**National Gas Emergency Number:**  
**0800 111 999\***

**National Grid Electricity Emergency Number:**  
**0800 40 40 90\***

\* Available 24 hours, 7 days/week.  
Calls may be recorded and monitored.

[www.cadentgas.com](http://www.cadentgas.com)

**Date:** 25/06/2020

**Our Ref:** EA\_GE4B\_3NWP\_024390

**Your Ref:** SCO/2020/0001

**RE: Formal Planning Application, NR20 3JL Norwich Western Link**

Thank you for your enquiry which was received on 24/06/2020.  
Please note this response and any attached map(s) are valid for 28 days.

An assessment has been carried out with respect to Cadent Gas Limited, National Grid Electricity Transmission plc's and National Grid Gas Transmission plc's apparatus. Please note it does not cover the items listed in the section "Your Responsibilities and Obligations", including gas service pipes and related apparatus.

For details of Network areas please see the Cadent website (<http://cadentgas.com/Digging-safely/Dial-before-you-dig>) or the enclosed documentation.

### **Are My Works Affected?**

**Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified.**

**Can you please inform Plant Protection, as soon as possible, the decision your authority is likely to make regarding this application.**

If the application is refused for any other reason than the presence of apparatus, we will not take any further action.

Please let us know whether Plant Protection can provide you with technical or other information that may be of assistance to you in the determination of the application.

**As your proposed activity is in close proximity to National Grid's Transmission assets we have referred your enquiry/consultation to our Asset Protection team for further detailed assessment. We request that you do not commence work or take further action with regards to your proposal until you hear from us. We will endeavour to contact you within 21 days from the date of this response. Please contact us at [assetprotection@nationalgrid.com](mailto:assetprotection@nationalgrid.com) if you have not had a response within this time frame.**

Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

## Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your scheduled activities at this location.

It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near Cadent and/or National Grid's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to Cadent Gas Limited, National Grid Electricity Transmission plc (NGET) and National Grid Gas Transmission plc (NGGT) and apparatus. This assessment does **NOT** include:

- | Cadent and/or National Grid's legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent and/or National Grid's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Plant Protection.
- | Gas service pipes and related apparatus
- | Recently installed apparatus
- | Apparatus owned by other organisations, e.g. other gas distribution operators, local electricity companies, other utilities, etc.

It is **YOUR** responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities. Further "Essential Guidance" in respect of these items can be found on either the [National Grid](#) or [Cadent](#) website.

This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to Cadent and/or National Grid's easements or wayleaves nor any planning or building regulations applications.

Cadent Gas Limited, NGGT and NGET or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you require further assistance please contact the Plant Protection team via e-mail ([click here](#)) or via the contact details at the top of this response.

Yours faithfully

Plant Protection Team

# ASSESSMENT

## Affected Apparatus

The apparatus that has been identified as being in the vicinity of your proposed works is:

- | National Gas Transmission Pipelines and associated equipment

As your proposal is in proximity to apparatus, we have referred your enquiry / consultation to the following department(s) for further assessment:

- | Land and Development Asset Protection Team (High Pressure Gas Transmission and Electricity Transmission Apparatus)

**We request that you take no further action with regards to your proposal until you hear from the above. We will contact you within 28 working days from the date of this response. Please contact us if you have not had a response within this timeframe.**

## Requirements

**BEFORE carrying out any work you must:**

- | **Ensure that no works are undertaken in the vicinity of our gas pipelines and that no heavy plant, machinery or vehicles cross the route of the pipeline until detailed consultation has taken place.**
- | Carefully read these requirements including the attached guidance documents and maps showing the location of apparatus.
- | Contact the landowner and ensure any proposed works in private land do not infringe Cadent and/or National Grid's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.
- | Ensure that all persons, including direct labour and contractors, working for you on or near Cadent and/or National Grid's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' and GS6 – 'Avoidance of danger from overhead electric power lines'. This guidance can be downloaded free of charge at <http://www.hse.gov.uk>
- | In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

# GUIDANCE

## **High Pressure Gas Pipelines Guidance:**

If working in the vicinity of a high pressure gas pipeline the following document must be followed: 'Specification for Safe Working in the Vicinity of Cadent and/or National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties' (SSW22). This can be obtained from: <http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>

## **National High Pressure Gas Pipelines Guidance:**

<http://www.nationalgrid.com/NR/rdonlyres/9934F173-04D0-48C4-BE4D-82294822D29C/51893/Above7barGasGuidance.pdf>

## **Dial Before You Dig Pipelines Guidance:**

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33969>

## Standard Guidance

### **Essential Guidance document:**

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=8589934982>

### **General Guidance document:**

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=35103>

### **Excavating Safely in the vicinity of gas pipes guidance (Credit card):**

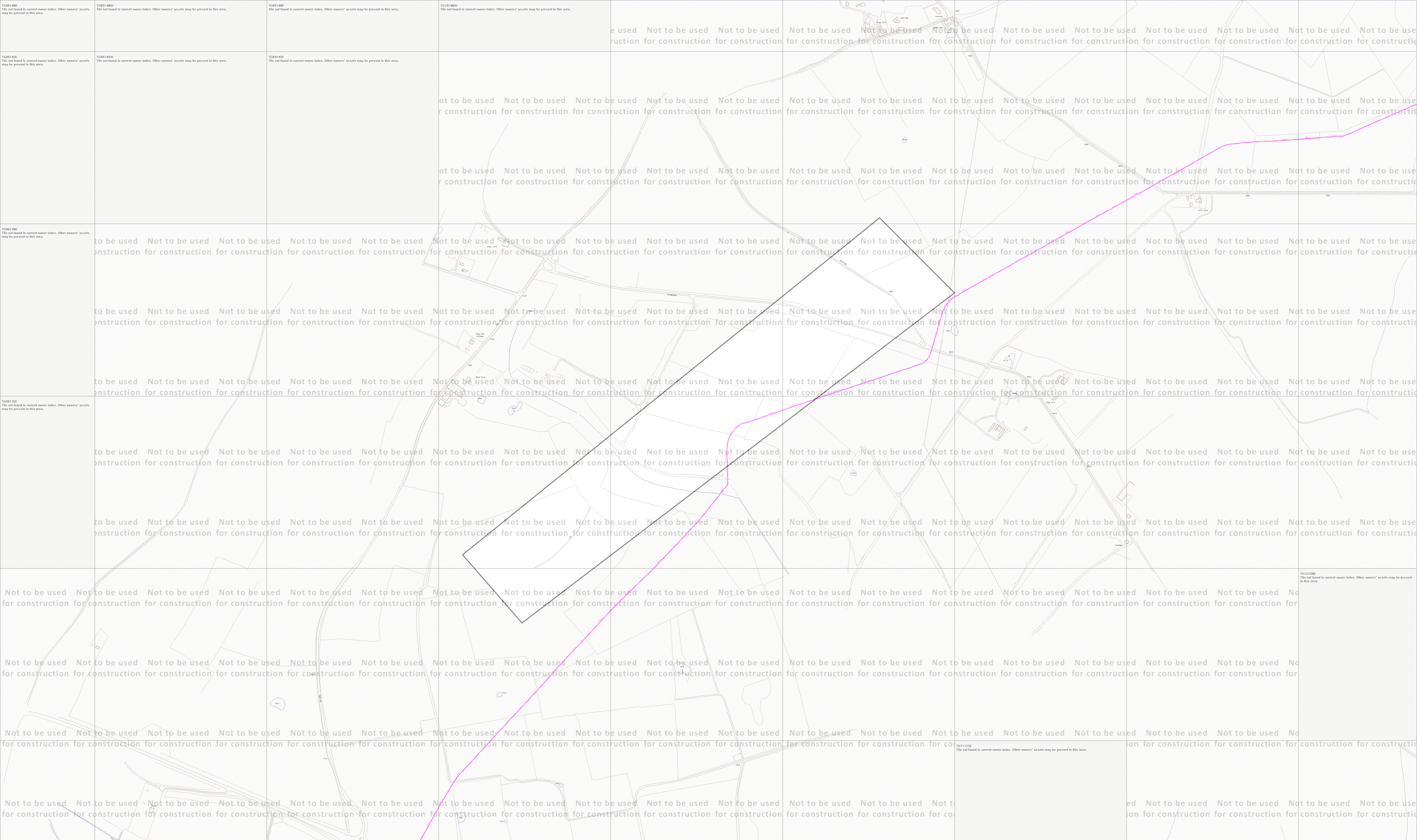
<http://www.nationalgrid.com/NR/rdonlyres/A3D37677-6641-476C-9DDA-E89949052829/44257/ExcavatingSafelyCreditCard.pdf>

### **Excavating Safely in the vicinity of electricity cables guidance (Credit card):**













<http://www.nationalgrid.com/NR/rdonlyres/35DDEC6D-D754-4BA5-AF3C-D607D05A25C2/44858/ExcavatingSafelyCreditCardelectricitycables.pdf>

Copies of all the Guidance Documents can also be downloaded from the [National Grid](#) and [Cadent](#) websites.





ID: EA\_GE4B\_3NWP\_024390 View extent: 4120m, 2440m **Do not proceed without further consultation** Map 1 of 1 (GAS)

<b>USER: James.Parker</b> <b>DATE: 25/06/2020</b> <b>DATA DATE: 24/06/2020</b> <b>REF: SCO/2020/0001</b> <b>MAP REF: TG1013</b> <b>CENTRE: 610785, 313429</b>	LP MAINS  MP MAINS  IP MAINS  LHP MAINS  NHP MAINS 	<p>This plan shows those pipes owned by Cadent Gas Limited in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.</p>	<p><b>Cadent</b> Your Gas Network</p> <p>Requested by: Norfolk County Council</p> <p>This plan is reproduced from or based on the OS map by Cadent Gas Limited, with the sanction of the controller of HM Stationery Office. Crown Copyright Reserved. Ordnance Survey Licence number 100024886</p>
	<p>0m  200m Approximate scale 1:10000 on A3 Colour Landscape</p> <p>Some examples of Plant Items:       </p>		



# ENQUIRY SUMMARY

## Received Date

24/06/2020

## Your Reference

SCO/2020/0001

## Location

Centre Point: 610785, 313429

X Extent: 1435

Y Extent: 1180

Postcode: NR20 3JL

Location Description: NR20 3JL Norwich Western Link

## Map Options

Paper Size: A3

Orientation: LANDSCAPE

Requested Scale: 10000

Actual Scale: 1:10000 (GAS)

Real World Extents: 4120m x 2440m (GAS)

## Recipients

pprsteam@cadentgas.com

## Enquirer Details

Organisation Name: Norfolk County Council

Contact Name: Nick Johnson

Email Address: MaWP@norfolk.gov.uk

Telephone: 0344 800 8020

Address: County Hall , Martineau Lane, Norwich, NR1 2SG

## Description of Works

PA Norwich Western Link: Proposal: Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL).

Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works SP

## Enquiry Type

Formal Planning Application

## Development Types

Development Type: Development for use by General Public

**From:** Lambert, Angelina  
**To:** Planning Services  
**Subject:** FW: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link  
**Date:** 21 August 2020 09:51:11

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**From:** Matthew Rooke <[matthew.rooke@broadland.gov.uk](mailto:matthew.rooke@broadland.gov.uk)>  
**Sent:** 21 August 2020 09:35  
**To:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>  
**Subject:** SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link

**WARNING:** External email, think before you click!.

Angelina

Thank you for the opportunity to comment on the submitted Scoping Opinion to feed into the Environmental Statement (ES) to accompany any future planning application. I note that my colleague in the District Council's Environmental Health department has previously commented on issues of Air Quality, Noise and Private Water Supplies. Officers for Broadland District Council and South Norfolk Council operate as a joint team and therefore the interests of both District Councils will be considered, the following environmental factors are relevant at District Council level:

- Chapter 7: Cultural Heritage – above ground,
- Chapter 8: Landscape and Visual effects
- Chapter 14: Population and Human health
- Chapter 15: Arboriculture, and
- Chapter 19: Cumulative effects

I anticipate that County Council officers will be submitting comments on their functions such as ecology and biodiversity, traffic and transport, archaeology and drainage.

Taking each of the District Councils factors in turn:

Chapter 7: Cultural Heritage – above ground.

It is noted that consultation has taken place with Norfolk County Council's Historic Environment Officer regarding the scope of the assessment for buried heritage assets and it is agreed that they are best placed to respond to buried heritage assets. However the District Councils would wish to assess the impacts of the proposals on above ground heritage assets and their setting together with any proposed mitigation.

Chapter 8: Landscape and Visual effects

It is noted that consultation has taken place with Norfolk County Council's Landscape Team to agree the location of the viewpoints for the Landscape & Visual Impact Assessment, the District Councils have a Landscape Architect who also wishes to assess the visual effects and landscape impacts of the proposals. The extent of the study area should also be agreed with the District Councils Landscape Architect in advance of the assessment. The District Councils would wish to assess the impacts of the proposals on landscape and visual effects and welcomes the opportunity to review and discuss the proposed landscape and visual mitigation proposals with the design team. Loss of vegetation should be evidenced including detailed surveys of type, quality and sizes of species and replacement planting should be identified which results in clear beneficial landscape and biodiversity enhancements.

Chapter 14: Population and Human Health

It is noted that no consultation has been undertaken to date in respect of this chapter and as stated above a colleague has previously provided comments in respect of Human Health. The likely impacts have been identified but detailed assessment of the individual impacts of the proposals on population and human health are required to be included in the ES and subsequently assessed by the District Councils.

Chapter 15: Arboriculture

In addition to Norfolk County Council's Tree Officer the District Councils have an Arboricultural Officer who requires to be consulted during the production of this chapter of the ES to provide baseline data, assessment of impact and the necessary mitigation measures required. Loss of vegetation should be evidenced including detailed surveys of type, quality and sizes of species and replacement planting should be identified which results in clear beneficial landscape and biodiversity enhancements. The statement at para. 15.7.2 is not agreed as it is considered that tree renewal and replacement should take place in the locality of the impact and not as stated in a County-wide context. Further consideration will be given to this as this chapter is developed.

#### Chapter 19: Cumulative effects

It is noted that the Highways Agency is undertaking local consultation on its proposals to dual the A47 between North Tuddenham and Easton and there is a possibility that this project and the proposed NWL will be developed either at the same time or consecutively, the ES should include details on how the two projects could interact and the wide ranging cumulative effects of this.

In addition the underground cable corridor for an offshore wind farm known as Hornsea Project Three crosses the NWL route. The details of the application have been submitted to the Planning Inspectorate (ref: EN010080) who has undertaken public examination of the proposal and although the Secretary of State for Business, Energy and Industrial Strategy has issued a statement that he is minded to approve the order, further information has been requested and a final decision is expected by the end of this year. If the offshore wind farm receives approval with a cable corridor as submitted this is a further cumulative impact which will need to be fully assessed in the ES.

In conclusion the screening report sets out the overarching issues which are to be addressed in the ES and will require expansion where I have identified and subject to other consultee responses. The District Councils welcome the opportunity to discuss and review specific aspects of the preparation of the ES and once published require the opportunity to fully assess the details and impacts contained in the ES alongside the planning application.

Regards

Matthew

**Matthew Rooke**  
**Area Team Manager**  
[matthew.rooke@broadland.gov.uk](mailto:matthew.rooke@broadland.gov.uk)

\*\*\*\*\*I'M CURRENTLY WORKING REMOTELY FROM HOME WITH ACCESS TO E-MAILS\*\*\*\*\*

**From:** Lambert, Angelina  
**To:** Planning Services FW:  
**Subject:** SCO/2020/0001 29  
**Date:** July 2020 09:59:05  
**Attachments:** [image001.png](#)

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**From:** Manthorpe, Gemma <[Gemma.Manthorpe@breckland.gov.uk](mailto:Gemma.Manthorpe@breckland.gov.uk)>  
**Sent:** 29 July 2020 08:53  
**To:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>  
**Subject:** SCO/2020/0001

**WARNING:** External email, think before you click!

Good morning,

Thank you for the opportunity to comment on this opinion, I have been through the documents submitted and would comment as follows:

#### 1.0 The Scheme

1.1 The scheme is described by the submitted details as follows:

1.2 The Scheme consists of the construction of a 3.8 mile long road connecting the A1067/A1270 junction and the A47. The junctions with the two existing roads are to be roundabout junctions, reducing congestion at these junctions. There are interactions with other side roads, which are detailed below.

1.3 . As part of the scheme the following structures are proposed:

- Viaduct crossing the River Wensum and floodplain (approx. 667m long) this will be a divided structure carrying each carriageway independently. The design shows that piled piers will be required within the floodplain;
- Wildlife crossings, including a bat underpass and badger underpass;
- Bridges at the interaction with the existing highways Ringland Lane, Weston Road and Breck Road;
- Two green bridge crossings over the highway alignment for wildlife and pedestrian access are currently proposed, however further survey work is required to identify if further mitigation will be required;
- Culvert crossing the River Tud tributary;
- The scheme will be elevated on embankments at various locations along the highway alignment.
- The topography of the surrounding area results in sections of the scheme being located on embankments and others in cuttings.

1.4 All points below should be included in the later submission and the points have been looked at into appropriate persons to comment, comments given by Breckland District Council where appropriate.

#### 2.0 Air Quality

2.1 Air quality is to be assessed by Environmental Health Officers and the report notes that discussions have been ongoing with Broadland District Council and South Norfolk District Council. Sources of NOx in relation to Breckland District Councils area is noted at page 25 of 232.

#### 3.0 Noise and Vibration

3.1 Noise and vibration is best assessed by Environmental Health Officers - report notes that discussions will be carried out and this shall form part of the Environmental Statement.

#### 4.0 Cultural Heritage

4.1 The information submitted states that consultation has taken place with Norfolk County Council

Historic Environment Officer, regarding the scope of the assessment for buried heritage assets. They are best placed to answer queries in detail.

## 5. Landscape and Visual effects

5.1 It is agreed that the study area will need to comprise the area from which the road and its associated structures and traffic is likely to be visible from, and therefore with the potential of having a significant effect. The final area to be included to be decided with the Local Planning Authority (LPA). Although the scheme does not fall within Breckland District Councils area it will be visible from within the boundary.

5.2 The mitigation measures are welcomed. The avoidance of a loss of vegetation should be evidenced by a survey of the existing types and quality. Where loss is unavoidable appropriate high quality boundary treatments are to be provided keeping, where possible, to historic boundaries and replacing hedgerows.

5.3 Screening should be demonstrated from a number of vantage points with the use of natural topography enhancement where possible and justifiable screening earthworks where necessary.

5.4 Species should be carefully considered to mitigate the impact to the landscape and this should be jointly considered with biodiversity enhancements.

## 6.0 Biodiversity

6.1 Consultations have been carried out to parties which are better placed to comment on biodiversity implications. It is noted that in combination effects must also be considered within the assessment and later submission.

## 7.0 Road Drainage and the Water Environment/Groundwater

7.1 Norfolk County Council Highways, the Lead Local Flood Authority and the Environment Agency are best placed to comment. Natural England will also have relevant input.

## 8.0 Geology and Soils

8.1 The Environment Agency are best placed to answer and consultative should also be ongoing with Councils that the development will occur within.

## 9.0 Material Assets and Waste

9.1 The submitted documents state that no consultation has been undertaken on this aspect at present. The likely significant effects at 12.5.1 are agreed with.

## 10.0 Climate

10.1 The submitted details state that discussions with the Norfolk County Council Sustainability Manager have been held to discuss the councils latest Environmental Policy which includes targets related to resource efficiency and carbon reduction.

## 11.0 Population and Health

11.1 The information submitted states that consultation with the Norfolk County Council and Broadland District Council may be required to aid this section. This section appears to pick up the salient points for expansion within later reports.

## 12.0 Arboriculture

12.1 The submitted details note the need for a joined up approach with other sections and the consultation required in relation to statutory tree protection although only Norfolk County Council is referenced as an example. Consultation with the Broadland tree officer is also recommended.

#### 13.0 Major Accidents and Disasters

13.1 It is noted that Cadent has been consulted on the scoping opinion and the HSE have been contacted as part of the scoping opinion.

#### 14.0 Traffic and Transport;

14.1 The scheme is a transport scheme and as such has been subject to consultation with relevant bodies and such consultation shall continue.

#### 15.0 Cumulative effects

15.1 The report details the combined effects during construction and operation.

#### 16.0 Conclusion

16.1 The report deals with the overarching issues and will require expansion subject to consultees responses. The consultation responses and findings in relation to visual impact are agreed.

Kind regards,

Gemma.

**Gemma Manthorpe**  
**Principal DM planner**

Breckland Council, Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE

Tel: 01362 656337

Mob: 07901 868594

E-Mail: [gemma.manthorpe@breckland.gov.uk](mailto:gemma.manthorpe@breckland.gov.uk)

Website: [www.breckland.gov.uk](http://www.breckland.gov.uk)

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**Norwich Western Link - Request for Environmental Impact Assessment**  
**Scoping Opinion:**  
**Economic Development**

**1. Introduction from ‘Environmental Impact Assessment Scoping Report’**

- 1.1 WSP has been instructed by Norfolk County Council to produce an Environmental Impact Assessment Scoping Report to be submitted to the Local Planning Authority (Norfolk County Council) to determine the scope of the Environmental Statement (ES) for the proposed Norwich Western Link road, which is a highway scheme linking the A1270 Broadland Northway from its junction with the A1067 Fakenham Road to the A47 trunk road near Honingham (hereafter referred to as the scheme location)
- 1.2 The Norwich Western Link would provide a higher standard route between the western end of Broadland Northway and the A47 and significantly improve travel between these two major roads. Traffic congestion, rat-running and delays to journeys are all significant issues on minor roads to the west of Norwich and there is strong support from the public, the business community, emergency services, local councils and MPs for a link road to be created.

**2. Contribution to Strategic Economic Priorities**

- 2.1 Norwich is a major focus for housing, employment, leisure and educational growth in the East of England. The Greater Norwich Local Plan will build on the long-established joint working arrangements for Greater Norwich, which have delivered the current Joint Core Strategy (JCS) for the area. The JCS plans for the housing and jobs needs of the area to 2026. The GNLP will ensure that these needs continue to be met to 2038.
- 2.2 The Greater Norwich area, covering the districts of Broadland, Norwich and South Norfolk, is a key engine of growth for the United Kingdom. The Joint Core Strategy for the area (JCS) aims to deliver 27,000 jobs and 37,000 homes between 2008 and 2026. Greater Norwich is one of the fastest growing areas in the country and has established itself as a leader in health and life sciences, digital creative and advanced manufacturing and engineering. The Greater Norwich City Deal, signed with government in December 2013, aims to bring an additional 13,000 jobs to the area, as well as 6,000 jobs in construction, and accelerate the delivery of 3,000 homes within the Growth Triangle.
- 2.3 The delivery of the development on this scale will significantly influence traffic flows and travel patterns in the Norwich area, and add further stress on the existing transport network. Within the NWL area, Easton / Costessey has been identified as a major growth location, with plans to accommodate 1,000 new



dwellings and enhanced local services. The Easton / Costessey area is also a prime location to accommodate some of the 1,800 units in the Norwich Policy Area that the Joint Core Strategy does not attribute to a particular settlement (SNC Site Allocations & Policies Document).

2.4 In addition to contributing to growth targets in the Greater Norwich Area, the Norwich Western Link scheme will support the New Anglia LEP Economic Recovery Plan 2020, by accelerating the delivery of integrated transport priorities and continuing as part of a portfolio of infrastructure projects which will help support and minimise the impact of the recession on the local construction sector.

2.5 The New Anglia Recovery Plan also states that existing infrastructure and services need to adapt to support people to get to work and into education given the need for social distancing. This is an opportunity to maximise environmental impact through infrastructure that provides and supports increased walking and cycling, green spaces and a shift to online services and homeworking. The Norwich Western Link Scheme will create new cycle path access and will help people get where they want to go on foot, by bike or on the bus.

### **3. Key considerations for Economic Development**

**3.1 Investment in local skills:** The scheme provides high level outcomes to support sustainable economic growth. The report should therefore demonstrate the intention for the scheme to invest in local skills, through apprenticeships or training.

**3.2 Local supply chain development:** Supporting sustainable economic growth should also include supporting local supply chains, through public procurement contracts, direct and indirect employment opportunities. The report will need to consider the economic impact on local supply chains and how local SMEs in particular will benefit from procurement opportunities during the construction phase.

**3.3 Benefits to existing businesses and business parks:** business parks must also be a key consideration. The Norwich Western Link should provide a higher standard route between the western end of Broadland Northway and the A47 and significantly improve travel between these two major roads. Traffic congestion, rat-running and delays to journeys are all significant issues on minor roads to the west of Norwich. These benefits for businesses to improve connectivity and journey times on key routes in Greater Norwich should be captured.

### **3.4 Inward Investment and Economic Growth:**

3.4.1 By improving connectivity and journey times on key routes in Greater Norwich, key business parks and employment sites become more attractive to investors.

- It is noted from press releases, that the Norwich Western Link is supported by a number of local businesses and key employment sites, including the Norfolk and Norwich University Hospital and Norwich International Airport.
- The new Food Innovation Centre is planned at the heart of the Food Enterprise Park at Easton and aims to create jobs, skills and infrastructure in the wake of the Covid-19 pandemic. The project will include a dozen 1,200sqft food-grade “incubator units”, with access to test kitchens and sensory testing facilities, to help firms making products ranging from jams to charcuterie meats products to grow, collaborate and develop new brands. Improving travel time and access to the Food Enterprise Park will benefit the site and attract more businesses to the Food Innovation Hub.
- The possibility of a new ‘Western Arc’ bus service - services connecting areas such as Thorpe Marriott, the Norfolk and Norwich University Hospital, Norwich Research Park, the University of East Anglia to Queen’s Hills, Longwater and Bowthorpe or to the airport, Hellesdon and Earlham, will enable better connectivity for local labour market to reach key employment sites, potentially reducing reliance on private vehicles.
- Investing in infrastructure improvements will be a vital part of supporting Norfolk’s economy to recover from the effects of the coronavirus pandemic, with the provision of good transport links critical to many of our major industries such as tourism, agriculture and manufacturing and engineering
- Together with the dualling of the A47 between North Tuddenham and Easton, due to get underway in early 2022, the Norwich Western Link would complete a fully dual carriageway orbital route around the city.
- The positive impact on health and quality of life, as well as making it easier for people to get to schools, colleges, health facilities and places of employment will attract more people to live and work in Norfolk and the Greater Norwich area.

## **4. Key Businesses and Business Parks**



<https://www.itv.com/news/anglia/2020-05-15/plans-for-3-8-mile-dual-carriageway-to-the-west-of-norwich-approved-by-government>

#### 4.1 Key businesses

key existing businesses who will benefit from the Norwich Western Link Scheme include:

- **Norwich Airport** - <https://www.norwichairport.co.uk/> - the NWL will make the airport more accessible for passengers travelling from the West and South West of the county and beyond bolstering passenger numbers and potentially location of new airlines and destinations.

In addition, businesses supporting the supply chain would also benefit including the hospitality industry:

- Holiday Inn
- Premier Inn
- Wide range of pubs and restaurants

Maintenance and training businesses already located at the airport would also be supported including:

- International Aviation Academy
- KLM UK Engineering
- Saxon Air Charter Ltd
- Bristow Helicopters

The NWL will also make existing associated business more likely to expand or relocate other parts of their business here and encourage new businesses to relocate

### **Business along the A1067**

Clusters of businesses along the A1067 will benefit from the NWL including:

- **Bernard Matthews** – more accessible for staff and transportation
- **First Home Improvements** - <https://www.firsthomeimprovements.co.uk/request-quote/> – more accessible for staff and transportation
- **Borg and Overstrom** <https://www.borgandoverstrom.com/en/about-us/> design and manufacturing of drinking water solutions

### **5. Tourism Industry**

There are tourism and hospitality businesses located close to the NWL that will clearly benefit including:

- **Wensum Valley Hotel, Golf and Country Club** <https://www.wensumvalleyhotel.co.uk/>
- **Roarr!** - <https://www.roardinosauradventure.co.uk/> - more accessible for visitors

The wider tourism and hospitality sector will also benefit, with businesses located either side of the NWL more accessible to the local population for day and short trips.

### **Broadland Business Park** <https://broadlandbusinesspark.co.uk/park-life/occupiers>

Broadland Business Park is at the heart of this dynamic and fast growing area to the east of Norwich. The park is expanding and offers occupiers high quality office and industrial accommodation, either in established buildings or finished to a bespoke specification. Continued investment in the business park is attracting both national and international companies and the improved transport links and accessibility offered by the NWL would make this yet more attractive to companies looking to relocate.

There are over 30 businesses currently based at the Broadland Business that would benefit from improved access to the West and North of Norwich and East Anglia including :

- Aviva
- Yodel – delivery and return services
- Lovewell Blake – Chartered Accountants

- Price Bailey
- Clarion Housing Group

### **Hurricane Way Industrial Estate**

A number of businesses will benefit from improved links to the west of the county and beyond including

- Booker Wholesale - foods
- Heatrae Sadia – Instant hot water dispensers
- East Bilney Coach Works
- Monks and Crain Norwich – industrial equipment supplier

### **Norwich Research Park**

Norwich Research Park is a business community located to the southwest of Norwich, Norfolk, in East Anglia, England close to the A11 and the A47 roads.

Set in over 230 hectares of parkland, Norwich Research Park is home to over 12,000 people, including 3,000 researchers and clinicians with an annual research spend of over £130 million.

Norwich Research Park is a partnership between the University of East Anglia, the Norfolk and Norwich University Hospital, four independent world-renowned research institutes, namely the John Innes Centre, the Quadram Institute and the Earlham Institute, (all strategically funded by the Biotechnology and Biological Sciences Research Council BBSRC) and The Sainsbury Laboratory linked to the Gatsby Charitable Foundation.

There are also a number of businesses located at the research park including Tropic Bioscience and Leaf Systems, with further development plans for the site underway,

The Norwich Western Link will reduce travel time for patients and staff to access site, enable more travel options.

## **6. Scope for the EIA report, with regards to Economic impact, should consider:**

- How the improved road network will support job creation & GVA growth. Review opportunities for growth for existing business parks and allocated employment sites.
- Procurement opportunities during the construction phase to support local supply chains development, also providing direct and indirect jobs created as a result.

- How the project will contribute towards local skills (e.g. through training, apprenticeships).
- Risk of construction delays to project milestones due to Coronavirus pandemic
- Potential economic impacts of coronavirus pandemic considered– sectors impacted (e.g. Hospitality, Tourism) - Norfolk County Council NODA data could help here).Whether this is likely to impact key employment sites for the scheme and visitor attractions nearby – short to med term analysis.

Norfolk County Council  
Planning Services

**Our ref:** AE/2020/125293/01-L01  
**Your ref:** SCO/2020/001

Via email only:  
[MaWP@norfolk.gov.uk](mailto:MaWP@norfolk.gov.uk).

**Date:** 24 July 2020

Dear Sir/Madam

**REQUEST FOR EIA SCOPING OPINION: PROPOSED NORWICH WESTERN LINK (NWL). PROPOSED LINK ROAD TO COMPRISE THE DUALLING OF THE A1067 FAKENHAM ROAD, FROM ITS EXISTING JUNCTION WITH THE A1270 BROADLAND NORTHWAY, TO A NEW JUNCTION WITH THE A47 NEAR HONINGHAM, AND ASSOCIATED WORKS**

Thank you for consulting us on the EIA Scoping Report submitted in respect of the proposed Norwich Western Link. We have reviewed the Report, referenced 70061370 and dated May 2020, and have the following comments to make specific to that document.

**9. Biodiversity**

We note that a number of studies remain to be completed to inform the baseline, and we welcome the reference to the use of Environment Agency guidance in respect of the River Habitat Survey and proposed Fish Survey. We also welcome the reference to Biodiversity Net Gain, which is an important aspect of this scheme. The water vole surveys will use standard timings and methodology, which is appropriate. We look forward to reviewing the outputs from these studies.

Regarding the results of the white clawed crayfish survey; we note that none were found and therefore the species will be scoped out. The survey result is not unexpected given the presence of non-native signal crayfish at this location.

There does not currently appear to be reference to the need for good biosecurity practices to avoid the spread of non-native species during construction via machinery, equipment and clothing. This should be included moving forward, and is especially important given the required proximity of works to the river Wensum. There are also risks associated with bringing in soil and aggregate on to the floodplain from offsite, especially if this hasn't been cleaned or screened for invasive plant species (Japanese knotweed, hogweed, Himalayan balsam).

**East Anglia area (East) - Icen House**

Cobham Road, Ipswich, Suffolk, IP3 9JD

General Enquiries: 08708 506506 Fax: 01473 724205

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*Mobile and other providers' charges may vary*

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)



The ecological surveys (river habitat and protected species surveys) should highlight any invasive non-native species already present within the area. This can be used to inform appropriate measures to prevent the further spread. Species known to be present include Himalayan balsam and the above mentioned signal crayfish.

## **10. Road Drainage and the Water Environment**

This section considers a number of issues that are relevant to the Environment Agency; fluvial flood risk, groundwater, and surface water quality and resources.

Regarding **fluvial flood risk**; we note that the application will be supported by a standalone flood risk assessment (FRA) which will assess the flood risk to the scheme. We will continue to work with the applicant on the FRA.

We support the proposal to update our 1D model of the River Wensum with a 1D-2D hydraulic model in the vicinity of the scheme to provide a better assessment of the current flood risk and the impacts of the proposed scheme, and any associated mitigation measures, on flood levels and extents.

We agree that a level for level and volume for volume compensatory flood storage should be provided if the permanent or temporary construction works will take up flood storage in the design 1% annual probability event including 35% allowance for climate change, or if those works divert flood flows. It should be ensured that the works will not increase flood risk extents or depths elsewhere.

We are pleased to see that there will be no structures in the channel or within 10m of its banks to maintain the river capacity.

Culverts should only be used if it can be shown that a bridge is not a viable option, and should be the largest culvert that can fit in the watercourse, for the shortest possible length, and it should be shown how the culvert would perform in the event of a design flood, ideally including a partial blockage of the culvert, to demonstrate that the culvert would not increase flood risk elsewhere.

The applicant will need an environmental permit for flood risk activities for all temporary and permanent structures in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert. Application forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

In respect of **groundwater** issues, in general the scoping for groundwater resources within this section of the report is appropriate and suitably characterises the hydrogeology of the area.

We would highlight that, in common with the Northern Distributor Road project, shallow groundwater is likely to be present in many places along the route. The applicant should be aware that this could affect the viability of using simple infiltration features. Also note our general sustainable drainage (SuDS) requirements included below. Direct discharges to groundwater of potentially hazardous substances would not be permissible, but are at risk of occurring given the depth to groundwater. We suggest regular liaison with us continues to ensure that an appropriate drainage strategy is proposed.



Further, more specific comments regarding groundwater are provided below:

S.10.3.19. We look forward to seeing a full assessment of the potential for impacts on resources in SPZ3 in the Environmental Statement.

S.10.3.20. For information, any request to us for groundwater abstraction site information should include a shapefile of the scheme area and any appropriate buffer distance.

S.10.4.7. Dewatering works may require both an abstraction licence and discharge consent. The applicant should contact us to discuss the requirements once the details of any dewatering proposals are known. The Environment Agency's guidance on dewatering should be referred to:

Hydrogeological impact appraisal for dewatering abstractions  
Science Report – SC040020/SR1

Table 10.4. This should include the potential for adverse impacts on groundwater abstractors and Groundwater Dependant Terrestrial Ecosystems (GWDTE). This should also be made explicit in Table 10.5. The table should include consideration of barriers to flow (including bridge piers) and impacts on water levels.

S.10.5.7. We are pleased to note that groundwater monitoring is underway; this will aid impact assessments for local groundwater receptors. Further monitoring sites may be required if any receptors are deemed to be at significant risk.

S.10.7.6. We are pleased to note that assessments will be made and mitigation measures proposed for groundwater receptors within the scheme boundary as well as those off site where a hydraulic link is deemed to occur.

#### General Sustainable Drainage Systems (SuDS) informative

1. Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.
2. Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination.
3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.
4. The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.
5. Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction).
6. SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual ([CIRIA C753](#), 2015) and the [Susdrain website](#).

For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2018), in particular Position Statements

G1 and G9 – G13 available

at: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

In respect of **surface water quality**, the information provided in the report generally appears sufficiently comprehensive and covers the water quality concerns for this scheme.

However, while section 10.4 (likely significant impacts identified during operation) includes accumulations of pollutants being washed from the road by rainfall (routine run-off), there is no mention of containment or contingency for a road traffic accident leading to a spillage. This could consist of a large quantity of a pollutant which would require containing so there will need to be a consideration of penstocks, lined ponds etc. where there is the potential for a tanker incident that could affect a watercourse.

We note that section 10.7 Proposed Assessment Methodology does refer to the consideration of accidental spillages (10.7.16) and road collisions (10.7.16). Section 10.5.13 also highlights that a “robust treatment system will be required”. It therefore appears that the omission of spillages arising from a road traffic accident in section 10.4 was made in error.

Aside from the above, the scope acknowledges risks to water quality from construction and operation and the mitigation that will be required. The HEWRAT methods in LA113 that are mentioned are suitable.

The scopes states that there will be assessments for WFD, and of any effects on the River Wensum SAC. The WFD assessment should highlight the two key objectives of no deterioration in waterbody status and ultimate aim of improving all waterbodies to Good status. The Habitats Directive assessment for the River Wensum SAC needs to include consideration of the tighter water quality targets here. There must be no adverse effects on the water quality of the Wensum. We would recommend that the River Tud is also included within the scope of the WFD assessment.

Regarding **surface water resources**, the scoping report has not included any use of water as a resource during construction or operation. Therefore, there is a presumption that no local water will be used or abstracted during construction and operation.

We would ask for the inclusion and consideration of the impact upon water abstraction licences – particularly, a number of surface water abstraction points which span lengths of the River Wensum and River Tud within close proximity to the proposed site. Any impacts on water quality, drainage, or hydrological flow caused during construction and operation may impact local and downstream licence holders and their ability to abstract.

As highlighted above, we fully support measures to deliver net gains for biodiversity as part of this scheme. Regarding the reference to the River Wensum Restoration Strategy (in particular at 10.3.34), we would highlight that whilst the historic redundant impoundments have the most significant impacts on the morphology of the river channel, opportunities to address other historic detrimental changes to the river such as dredging and straightening should not be overlooked. So while there isn't an impoundment within the vicinity of the proposed scheme, it doesn't mean that there are not potential improvements to be made to the morphology of the river at that location. These should be considered.

## **11. Geology and Soils**

It is not clear whether sections 11.3.5 and 11.3.7 are referring to licensed abstractions or all abstractions? There may be additional unlicensed abstractors that are not identified. The aquifer itself as a resource is considered to be highly vulnerable, even though it is only within a source protection zone 3.

Section 11.4.2 regarding mitigation should also include validation (if required) and monitoring (if required).

Sections 11.7.3 and 11.7.4 should note that CLR11 is being superseded. The applicant should follow our Land contamination: risk management guidance at: <https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks> as the most up to date guidance. Whilst final changes are made, this is likely to form the guidance going forward for this project.

## **12. Material Assets and Waste**

Our only comment in respect of this section is to highlight that an appropriate waste exemption or an Environmental Permit from the Environment Agency will be required for any use of waste in the works.

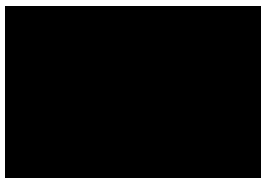
## **16. Major Accidents and Disasters**

We note that this section specifically excludes transport and pollution accidents, and flood risk. This is acceptable provided those issues continue to be fully addressed as part of the work associated with section 10 Road Drainage and the Water Environment.

We trust that this advice is useful.

Please contact me in the first instance if you would like to discuss any aspect of this response.

Yours faithfully



**MR MARTIN BARRELL**  
**Sustainable Places - Planning Specialist**

Direct dial 020 302 58450

Direct e-mail [martin.barrell@environment-agency.gov.uk](mailto:martin.barrell@environment-agency.gov.uk)

**From:** [David Humphrey](#)  
**To:** [Planning Services](#)  
**Subject:** Western Link your reference SCO/2020/0001  
**Date:** 14 July 2020 16:08:52

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**WARNING:** External email, think before you click!

Dear Angelina

I have been asked to comment on the human health aspects of the Scoping Report submitted in connection with the above. The areas I have considered are Air Quality, Noise and private drinking water supplies:-

#### 5. Air Quality

Table 5-5 scopes out emissions from plant and machinery. This is acceptable providing the contractor is required to ensure that all plant and machinery is selected and kept maintained to ensure that emissions are minimised. Particular care should be taken with semi static plant such as pumps or generators for example.

I have no other comments.

#### 6 Noise.

Para 6.3.1 makes reference to the disused RAF Attlebridge site and the report seems uncertain about its contribution to noise levels in the area. I am not aware that the current usage of this area makes a significant contribution to baseline noise levels adjacent to the proposed road but as I understand it, there is no mention made of any baseline noise monitoring for the complete road scheme in the scoping report. My view is that noise monitoring is necessary to validate modelling and establish background levels. I would look forward to receiving a monitoring proposal.

I have no other comments.

#### 10. Water

Para 10.3.20 states that a data request will be made to identify water abstraction points. I would ask that we are consulted so that we may assist the applicant to identify all private drinking water supplies in the vicinity in order that the impact of the road proposal (if any) may be assessed for each supply.

Kind regards

David Humphrey  
Environmental Health Officer,

**From:** Lambert, Angelina  
**To:** Planning Services  
**Subject:** FW: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link  
**Date:** 18 August 2020 10:25:12

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**From:** Cross, John <[john.cross](mailto:john.cross)>  
**Sent:** 18 August 2020 09:52  
**To:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>  
**Subject:** RE: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link

Good morning Angela,

Many apologies for not getting back to you – I have to confess a complete oversight by me – might be an age thing !!

I have reviewed the above planning record including the “constraints” of which there are 38 (the constraints list potential impacts).

There are no issues that I am aware of that would adversely impact upon the GRT community- the 4 pieces of common land within the constraints or within the geographical area are not used for seasonal encampments. There are also no historical or cultural GRT sites/ locations to my knowledge that would be affected by the proposed route.

The only other comment I would add – not an impact on the GRT community as such – but when the NDR was opened a section of the old A1067 – Norwich to Fakenham road was vulnerable to Travellers using it, resulting in a number of Unauthorised Encampments. So this might be worth considering in terms of ‘target hardening’ any potential creation of stopping places which Travellers may use.

If you need any further information – please let me know

Best regards – John C

**John Cross, Welfare Manager**  
Norfolk & Suffolk Gypsy Roma Traveller Service - Community & Environmental Services  
County Hall Martineau Lane Norwich NR1 2DH



Norfolk County Council

Community and Environmental  
Services  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

Angelina Lambert  
Norfolk County Council  
6th Floor  
County Hall  
Martineau Lane  
Norwich  
NR1 2DH

NCC contact number: 0344 800 8020  
Text Relay - 18001 0344 800 8020

Your Ref: SCO/2020/0001  
Date: 23 July 2020

My Ref: 0/SCO/20/0001  
Tel No.: 01603 638009  
Email: [liz.poole@norfolk.gov.uk](mailto:liz.poole@norfolk.gov.uk)

Dear Angelina,

**Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL).  
Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its  
existing junction with the A1270 Broadland Northway, to a new junction with the  
A47 near Honingham, and associated work. Norwich Western Link**

Thank you for your consultation dated 26 June 2020.

The local highway authority considers that any planning application will need to be submitted with a full Transport Assessment detailing the impact of the Norwich Western Link on the local road network.

The local highway authority will be meeting with the applicant to discuss and scope the detailed requirements of the Transport Assessment.

Yours sincerely



Major and Estate Development Team Manager  
for Executive Director for Community and Environmental Services

Please be aware it is the applicants responsibility to clarify the boundary with the public highway. Private structures such as fences or walls will not be permitted on highway land. The highway boundary may not match the applicants title plan. Please contact the highway research team at [highway.boundaries@norfolk.gov.uk](mailto:highway.boundaries@norfolk.gov.uk) for further details.

Our ref: G131136  
Your ref: SCO/2020/0001

Norfolk County Council  
Community and Environmental Services Department  
Planning Services Floor 6  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

Eric Cooper  
Operations - East  
Woodlands  
Manton Lane  
Bedford MK41 7LW

Direct Line: 07949 082328

15 July 2020

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)  
ORDER 2010**

**PLANNING APPLICATION:** SCO/2020/0001

**PROPOSAL:** Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works.

**LOCATION:** Norwich Western Link

Thank you for consulting Highways England on a formal request for a scoping opinion on the above proposed development which was received on 24 June 2020.

As you may be aware Highways England is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). As such, we have responsibilities for managing the SRN in accordance with the requirements of its licence and in general conformity with the requirements of the Highways Act 1980, and to satisfy the reasonable requirements of road safety. In respect to this proposal, the nearest trunk road is the A47, and the first point of interaction is with the proposed Wood Lane junction which forms part of the proposed A47 North Tuddenham to Easton dualling scheme.

As detailed in the accompanying Environmental Impact Assessment Scoping Report, Highways England has been in close contact with Norfolk County Council with regular meetings and exchanges of information on those matters which relate to the A47; the outcomes of which have informed the details set out in the report.

I have the following comments to make on the Scoping Report:

- 1 The applicant considers that the scheme falls under Schedule 2 of EIA Regulations 2017, and therefore an Environmental Statement will be required to support any planning application. Highways England agrees with this position.
- 2 The report references the need for a transport assessment and details in Appendix F, scoping for the assessment. These details have been discussed with Norfolk County



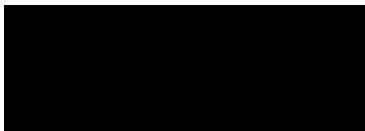
Council and we agree with the proposed methodology and assessment set out in the report. As part of the assessment, it will be necessary to take account of the interaction of the link road and the A47 and identify any measures that may need mitigation. The assessment should be undertaken in accordance with DfT Circular 02/2013 – The Strategic Road Network and the Delivery of Sustainable Development.

Whilst Highways England is currently developing the proposed A47 North Tuddenham to Easton dualling scheme with the aim of delivering the upgrade to the A47 in accordance with that set out in the Road Investment Strategy 2020-2025, it is subject to the making of a Development Consent Order. Consequently, until such times that order is made, and delivery is confirmed, there will be the need to assess the impact and mitigate the impact of the link road, with and without the proposed dualling in place.

- 3 The Transport Assessment should be informed by the Walking Cycling and Horse Riding Assessment Report (WCHAR)
- 4 The proposed timescales for delivery of both the link road and the dualling are similar. It is therefore important in the Construction Environmental Management Plan it is set out how the two schemes can be delivered in tandem, including detailing the construction consequences/phasing and issues arising. An agreed mitigation strategy will be essential to any impact on the A47 can be effectively managed and delivery of both schemes can be undertaken in an effective and efficient manner. Any assessment without the dualling should also be included.
- 5 Where there is an interaction of the link road with the A47, the design should be in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB). In particular in respect to road drainage, surface water runoff has a risk of containing pollutants. Consequently, in the assessment and identification of suitable measures it should be noted that the drainage system for the link road is to be separate to that of the A47. Likewise, any effects of flooding on the A47 will need to be taken into account.
- 6 Other DRMB requirements to be referenced in the Environmental Statement include the appropriate Stage One Road Safety Audit for the junction design with the A47, and A47 collision analysis (without the dualling scheme).

I have no other comments to make

Yours sincerely



Eric Cooper  
Spatial Planning Manager  
Email: [eric.cooper@highwaysengland.co.uk](mailto:eric.cooper@highwaysengland.co.uk)





Historic England

Mr Nick Johnson  
Norfolk County Council  
Environment, Transport, Development  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

Direct Dial: 01223 582721

Our ref: PL00704383

13 July 2020

Dear Mr Johnson

**Norwich Western Link: link road from A1067 / A1270 Junction to a new junction with the A47 near Honingham, Norfolk**

**Environmental Assessment (EIA) Scoping Opinion**

Thank you for your letter of 24 June 2020 consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

Our initial assessment shows there are a number of designated heritage assets within the vicinity of the proposed development. We would draw your attention, in particular, to the grade I and grade II\* listed parish churches of All Saints and St Andrew which fall within the remit of Historic England to advise the Council, the settings of which could be affected.

Further grade I and II\* buildings and scheduled monuments could be affected but we would also expect the Environmental Statement to consider the potential impacts on any conservation areas and grade II listed buildings and non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

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local authority Historic Environment Record ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer of the local planning authority and the archaeological staff at the County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Given the nature of the structures associated with the proposed development and the surrounding landscape character, this development has the potential to be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Given the proximity of highly graded designated heritage assets within the area we are concerned by the possible impact of the development and would the chance to comment on any assessment carried out and further details of the proposals.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,



David Eve  
Inspector of Historic Buildings and Areas  
[david.eve@HistoricEngland.org.uk](mailto:david.eve@HistoricEngland.org.uk)



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



**From:** [kathryn.deakin@hsl.gsi.gov.uk](mailto:kathryn.deakin@hsl.gsi.gov.uk) on behalf of [lupenquiries@hsl.gsi.gov.uk](mailto:lupenquiries@hsl.gsi.gov.uk)  
**To:** [Planning.Services](mailto:Planning.Services)  
**Subject:** SCO/2020/0001 - Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL).  
**Date:** 09 July 2020 16:36:22

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WARNING: External email, think before you click!.

Dear Nick Johnson, Head of Planning

Thank you for your EIA scoping query to the Health and Safety Executive (hazsubcon.CEMHD5@hse.gov.uk) dated 24 June 2020 about the proposed Norwich Western Link – proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works.

Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Regulation 4(4) - the vulnerability of the proposed development to major accidents relevant to the development.

- HSE's response is limited to our role in the land use planning system on the control of major industrial hazards involving dangerous substances.
- HSE is not responding in our regulatory role in the health and safety system.

1. Will the development store or use hazardous substances in quantities relevant to major accident hazards?

The development is not of a type that would store or use hazardous substances in quantities relevant to the potential for major accident hazards. Therefore, major accidents related to such hazardous substances do not need to be assessed in the EIA.

2. Is the development in an HSE Explosives safeguarding zone?

The development is not located within a safeguarding zone of an Explosives site licensed under the Explosives regulations 2014 or the Dangerous goods in harbour area regulations 2016.

3. Is the development in an HSE land-use-planning consultation zone and therefore vulnerable to major accidents?

The proposed development area is located within HSE's land-use-planning consultation zones for National Grid's 3 Feeder Bacton/Roudham Heath gas pipeline (Transco ref 1709).

This indicates the proposed development could be vulnerable to harmful effects from a major accident at the major hazard pipeline.

HSE would expect the environmental impact assessment to consider significant effects of relevant major accident scenarios at the identified major accident hazard pipeline that could affect people who will be at the proposed development when it is realised. This includes identifying, describing and assessing the significant effects arising from the vulnerability of the proposed development to any relevant major accidents. Details relevant to major accident scenarios, such as notification details of the major accident hazard pipeline should be obtainable from the pipeline operator.

3a. Will the development, if realised, involve the routine presence of people in HSE's planning consultation zones?

The Town and Country Planning (Development Management Procedure) (England)

Order 2015

The development if realised will involve the presence of people, and the development is located within HSE's land-use-planning consultation zones, therefore before the granting of planning permission HSE's development planning advice (see Regulations above) needs to be obtained.

It appears that HSE's development planning advice has not yet been obtained.

HSE's LUP web app has been used (reference numbers on page 207 of the Norfolk County Council Norwich Western Link EIA Scoping Report) but the entries have not yet been 'continued' (past the zones identification stage) to the advice stage.

This can be done using the web app <https://pa.hsl.gov.uk/> by retrieving the previous entries and clicking on the words 'Continue Application' which are under the heading 'State/Continue'.

HSE's Land-use-planning Advice team is available to help with queries [lupenquiries@hsl.gsi.gov.uk](mailto:lupenquiries@hsl.gsi.gov.uk)

Note: a 'does not advise against' response from HSE does not mean that the development is not vulnerable to a major accident. It means that HSE's criteria for advising against planning permission have not been reached. HSE's approach balances the principle of stabilising and not increasing number of people at risk with a pragmatic awareness of the limited land available for development in the UK. A developer would still be expected to consider vulnerability to major accidents.

4. There is potential to initiate a major accident at National Grid's 3 Feeder Bacton/Roudham Heath gas pipeline (Transco ref 1709) because the development area appears to cross the route of the major accident hazard pipeline.

HSE would expect the environmental impact assessment to consider if there is potential to initiate a major accident that could affect people who will be at the proposed development if it is realised. This consideration should include identifying, describing and assessing the significant effects arising from the vulnerability of the proposed development to any relevant major accident scenarios.

In addition, HSE recommends that the developer liaises with the pipeline operator National Grid. There are particular reasons for this:

- i) the pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline;
- ii) the standards to which the pipeline is designed and operated may restrict specific development within a certain proximity of the pipeline. Consequently there may be a need for the operator to modify the pipeline or its operation, if the development proceeds;
- iii) to establish the necessary measures which may be required to alter/upgrade the pipeline to appropriate standards.

5. General health and safety at work

HSE realises that Environmental Risk Assessments are not expected to include general health and safety at work however we take this opportunity to point out that it may be beneficial for employer(s) to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet requirements of relevant health and safety legislation as the project progresses.

I hope the above is useful.

Yours sincerely,  
Kathryn Deakin

HSE's Land Use Planning Support Team

HSE Science and Research Centre  
Harpur Hill, Buxton, Derbyshire, SK17 9JN

THE HSE LUP PHONE NUMBER IS NOT CURRENTLY MONITORED DUE TO THE COVID-19 PANDEMIC.

ALL HSE LUP TEAM MEMBERS ARE WORKING FROM HOME DURING THIS PERIOD AND WILL RESPOND TO ENQUIRIES RECEIVED AT THIS E-MAIL ADDRESS:  
lupenquiries@hsl.gsi.gov.uk .

The current COVID 19 Pandemic is making receipt of, and access to, post extremely problematic. HSE would be grateful if you could avoid sending hard copy mail wherever possible and instead send electronic versions.

Please let us know by email of any instances where this is not possible and hard copy mail needs urgent attention.

Find out how HSE is Helping Great Britain work well

For HSE's Land Use Planning Advice Terms and Conditions, please click on the following link <https://www.hsl.gov.uk/planningadvice> and then click on 'terms and conditions'.

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via e-mail

**Nick Johnson**

Principal Planner

Community and Environmental  
Services

**Norfolk County Council**

Martineau Lane

County Hall

Norwich

NCC contact number: 0344 800 8020

Textphone: 0344 800 8011

Your Ref: SCO/2020/0001

Date: 3 August 2020

My Ref:

FW2020\_0529

Tel No.:

0344 800 8020

Email:

llfa@norfolk.gov.uk

Dear Nick,

**Town and County Planning (Development Management Procedure) (England) Order 2015**

**Honingham: Norwich Western Link: Proposal: Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works**

We have reviewed the Scoping report received on 23 July 2020 and wish to make the following comments.

We strongly recommend that any EIA includes Flood Risk Assessments (FRA's) and surface water drainage strategies that address

- Local sources of flood risk, including those from ordinary watercourses, surface runoff and groundwater
- How surface water drainage will be managed on the substation sites and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems for the management of run-off are put in place.
- Post construction ground levels not disrupting current overland flow routes along and across the alignment of the proposed underground cables for land at risk of flooding.
- Temporary arrangements to maintain overland flow paths that cross the alignment of the proposed underground cables for land at risk of flooding.
- The requirement to seek consent from Norfolk County Council (NCC) for works that affect the flow in ordinary watercourses outside of the control of an IDB.

This supporting information should assess the potential for the scheme to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces would be mitigated. It should show how this will be managed to ensure that the



scheme does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (paragraph 103).

In this particular case this would include appropriate information on;

- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including “Non-statutory technical standards for sustainable drainage systems” March 2015 by Department for Environment, Food and Rural Affairs.

With particular reference to Section 10.2.3 of the EIA Scoping Report (Road Drainage and the Water Environment), we welcome that it is recognised that the scheme should not increase the risk of flooding (surface water and groundwater) to people and property elsewhere (to be confirmed by the Flood Risk Assessment), most notably through the reduction of floodplain storage. The standalone Flood Risk Assessment (FRA) should be prepared in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The FRA should assess the potential implications of the Scheme on flood risk to people and property, as well as assess the potential risk of flooding to the scheme.

We also welcome that it is proposed that the following aspects will be considered:

- Potential impacts to flood flow conveyance in land drains, watercourses and floodplain crossed by the Scheme associated with the construction of new culverts, bridges and embankments and diversion of watercourses;
- Potential impacts to the Scheme from all sources of flooding, including fluvial, surface water, groundwater, drainage systems and artificial sources;
- Potential impacts to fluvial and surface water flooding associated with an increase in impermeable surfacing and / or changes to catchment hydrology associated with the proposed surface water drainage system.

We approve of the fact that the applicant indicates that the FRA will inform the identification of any required mitigation measures. These should include drainage strategies and we recommend that appropriate SUDS features are included in the design assessment of the proposed development in accordance with policy guidelines.

Also, in section 10.5.1 a Construction Environmental Management Plan (CEMP) is referred to. The full CEMP should contain measures to protect both surface and groundwater quality, and other water resource aspects. A draft CEMP is expected to be included with the application documents.

Once the route for the road has been finalised we would expect a drainage strategy to assess and justify compliance with the SuDS hierarchy for surface water disposal location. This would include:

1. Demonstration of infiltration testing completed to BRE365 requirements or equivalent (including 3 infiltration tests in quick succession at each location tested, each location would be representative across the site and be at depths anticipated to be used on site). A description of where any infiltration is anticipated to be used in full or partially drained SuDS components within a strategy.

2. If site wide infiltration is not appropriate due to unfavourable rates, demonstration with evidence as to why there cannot be a connection made to the nearest watercourse.
3. As a final option, demonstration with evidence that Anglian Water would accept a connection to a surface water sewer.

The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development.

We note the following constraints from the scoping report and welcome these considerations that are applicable to Flood and Water Management issues.

Increased pollution of surface water and groundwater features

Increased sedimentation of surface water features

Impacts to the hydromorphological, physico-chemical and ecological quality of surface water features

SSSI and SAC designation of the River Wensum

Increased flood risk associated with temporary and permanent works

Potential impacts to catchment hydrology and flow within existing watercourses;

Temporary diversions of watercourses may need to be established prior to undertaking the works to maintain existing catchments and flow regimes;

Proximity to Source Protection Zones (SPZ 2 & 3),

Flood risk,

Other infrastructure

Further to the criteria mentioned above we note the following:

- Between Weston Road and Ringland Lane two significant overland flow paths are identified, believed to be ephemeral ordinary watercourses. These will be qualitatively assessed further within the Environmental Statement

Generally, any proposed route will likely cross watercourses within the catchments of the River Tud, and the River Wensum. There are also lengths of potentially affected watercourses in the search area that are controlled by the Norfolk Rivers IDB for which they will need to be consulted on separately, as well as ordinary watercourses.

Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse outside of the IDB areas, then the applicant is likely to need the approval of the County Council. In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning.

We would appreciate the applicant advising Norfolk County Council's Water Management team, as soon as practicable, the approximate number of crossings of Ordinary Watercourses and the required timeframes for approval. This will enable us to have adequate staffing resources in place to ensure approvals are not unduly delayed. Please be aware that it takes up to 8 weeks for a consent to be processed.



The Flood and Water management team are happy to engage in this process prior to application, and now offer a chargeable Pre-App service

We would advise the applicant that the CIRA SuDS Manual C697 (2007) has recently been updated, report C753 (2015) is now available free on the CIRIA website. We expect any information submitted after 12 March 2016 to use the 2015 SuDS Manual.

On the 19<sup>th</sup> February 2016, the Environment Agency updated the guidance on climate change allowances for peak river flow and rainfall intensity. The information for the Anglian Region and transitional arrangements for use within the planning process can be found at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. We highlight that peak river flow climate change allowances should be considered for ordinary watercourses as well as main rivers.

Please also note that The LLFA guidance has been updated, and that the advice to use FSR rainfall information if the critical storm duration is less than 1 hour has been removed. Only up to date FEH data will be accepted in the future.

Further guidance for developers can be found on our website at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

Yours sincerely,

Lucy

Lucy Perry  
Flood Risk Officer

Lead Local Flood Authority

**Disclaimer**

*We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.*

**From:** [Jeffery, Caroline](#)  
**To:** [Planning Services](#)  
**Cc:** [Drake, Richard](#); [Lambert, Angelina](#)  
**Subject:** Norwich Western Link SCO/2020/0001  
**Date:** 15 July 2020 16:33:12  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Dear Angelina,

**Re: Request for EIA Scoping Opinion for Norwich Western Link SCO/2020/0001**

This response is made without prejudice by Norfolk County Council in its capacity as the Mineral and Waste Planning Authority for Norfolk. The comments made are only regarding Chapters 11 and 12 of the Scoping Report.

**Chapter 11 Geology and Soils**

This chapter focuses on ground contamination. Any assessment of safeguarded mineral resources and use of minerals in construction appear to be included in Chapter 12 on Material Assets and Waste, although paragraph 12.3.6 states that they will be included in Chapter 11, this does not appear to be the case.

Table 11-1 There is a safeguarded waste management facility (former Attlebridge Landfill) close to the site boundary for the NWL. There is a 250 metre consultation area around this site which intersects a small part of the northern site boundary for the Norwich Western Link (NWL). There is the potential for indirect impacts to the aftercare of the former waste facility as the result of the construction works within the consultation area, this will need to be assessed as part of the application. The Norfolk Minerals and Waste Core Strategy policy CS16 'Safeguarding' is applicable to both mineral and waste safeguarding, and any future application needs to address this.

**Chapter 12 Materials Assets and Waste**

The site covered by the Scoping Report is mostly underlain by a Mineral Safeguarding Area (sand and gravel) safeguarded as part of the adopted Norfolk Minerals and Waste Core Strategy and Development Management Policies DPD.

Paragraph 12.1.2 states that Defra have been consulted and stated that CD&E waste arisings data is only available at national level for England. Whilst this is correct in terms of waste arisings, other information on CD&E waste is available that would be relevant to the ES; see our comments on Paragraph 12.3.12 and Table 12-3 below.

Paragraph 12.2.3 lists the Minerals and Waste Planning Authorities in the East of England. But it does not include the unitary authorities. Therefore, the list should be amended to read as follows: Norfolk, Suffolk, Hertfordshire, Cambridgeshire, Essex, Thurrock, Southend-on-Sea Borough, Peterborough City, Luton Borough, Bedford Borough, Central Bedfordshire.

Paragraph 12.3.6 states "...however, these deposits extend beyond the study area, and thus the scheme does not sterilise these resources." This is incorrect because any location of safeguarded mineral that is built upon without prior extraction of the underlying mineral will sterilise the underlying mineral as cannot be extracted in the future. Even though there are other locations of that mineral in the county, the quantity of mineral that underlies the development will have been sterilised by the development being located upon it. This paragraph refers both to safeguarded sand and gravel, and silica sand deposits; however, safeguarded silica sand deposits

are not found this far east in the county, and only occur close to the western boundary of Norfolk. This paragraph also states that “Further consideration and consultation with Norfolk County Council on the importance of these resources and impact of the Scheme will be reported in the Geology and Soils chapter of the ES.” However, the Geology and Soils section of the report focusses on ground contamination and does not currently refer to mineral resources either in terms of use or safeguarding or use in the project.

Paragraph 12.3.10 states the sensitivity of materials needed for the scheme is low, but it does not state what the quantity of materials needed for the construction of the scheme will be, or that this will be set out in the ES. Table 12-5 states that the Environmental Statement will include a Materials Management Plan; this should include information on the quantity of materials (including minerals) to be used in the project.

Paragraph 12.3.12 states that there is not data available for CD&E production or recovery rates in the East of England. Whilst the quantity of arisings is not available and therefore a recovery percentage is not available, it is possible to get figures for the quantities of CD&E waste that have been recovered in the East of England (and in the individual WPA areas) from the Environment Agency’s Waste Data Interrogator. Table 12-1 includes all types of waste (hazardous, non-hazardous and inert) arising from all sectors and therefore is not necessarily directly comparable to any trends in CD&E waste recovery. This information should therefore be replaced with data specifically for CD&E waste recovery from the EA’s WDI.

Table 12-3 lists the number of waste management facilities in the East of England. It does not include their capacity or the types of waste that they can accept. This table therefore does not show whether or not there is sufficient waste management capacity available for the CD&E arisings from the construction project. The Environment Agency’s Waste Data Interrogator gives figures for the quantities of waste that each site received in that year, which could at least provide a minimum capacity figure for a site. The Environment Agency’s WDI gives the permit type for the facility which may provide more information on whether the site could accept CD&E waste from a construction project. Norfolk County Council publishes annual monitoring reports which include data on waste management which may be relevant for the ES (see: <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/annual-monitoring-reports>). Norfolk County Council has also published a Waste Management Capacity Assessment which contains information on waste arisings, waste movements and the capacity at waste management facilities in Norfolk (see: <https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning/preferred-options-consultation/waste-management-capacity-assessment-2017.pdf?la=en&hash=E85C21869C051D2E044DD52D7A57B4F83B2549F8>). The other Waste Planning Authorities in the East of England are likely to publish similar information.

No information has been provided in the Scoping Report regarding the quantities of waste that are likely to arise from the project. In accordance with the information in Table 12-5 we advise that the Environmental Statement should include a Site Waste Management Plan detailing the types and quantities of waste arising from the project, how and where waste will be minimised, reused, recycled, recovered and disposed of.

No information has been provided in the Scoping Report regarding the quantity of minerals that are likely to be needed in the project, or the quantity of minerals that are likely to be extracted as part of the project. In accordance with the information in Table 12-5 we advise that the

Environmental Statement should include a Materials Management Plan – Minerals. In terms of minerals safeguarding, this document should consider the extent to which on-site materials which could be extracted during the proposed development would meet specifications for use on-site through testing and assessment. The MMP-M should quantify the amount of material which could be reused on site; and for material extracted which cannot be used on-site its movement, as far as possible by return run, to an aggregate processing plant.

Table 12-8 contains the significance criteria for materials. It states that a large significance would be if the project sterilises more than 1 mineral safeguarding site and/or peat resource. The project area is not located on a peat resource. The safeguarded mineral resources in Norfolk are shown as areas on the map; they are not shown as sites unless there is a permitted site for mineral extraction. Therefore it is not appropriate to measure the impact on mineral safeguarding in terms of sites.

The Mineral Planning Authority has published standing advice on mineral safeguarding, which can be found on the Norfolk County Council website at [www.norfolk.gov.uk/nmwdf](http://www.norfolk.gov.uk/nmwdf) on the 'Adopted Policy Documents' page. The Mineral Planning Authority would welcome discussion, if there are any queries regarding the preparation of a Mineral Resource Assessment.

Paragraph 12.9.1 explains the limitations and assumptions used for CD&E waste generation and recovery rates. Please see our comments about paragraph 12.3.12 and Table 12-3 above. In summary, we consider that more detailed information is available on the Environment Agency's WDI and information published by the WPAs which should be used in the ES.

If you have any queries, please contact Richard Drake (Senior Planner, Minerals and Waste Policy) by email at [richard.drake@norfolk.gov.uk](mailto:richard.drake@norfolk.gov.uk) or telephone 01603 222349.

Yours sincerely,

**Caroline Jeffery, Principal Planner (Minerals and Waste Policy)**

Community and Environmental Services

Tel: 01603 222193 | Dept: 0344 800 8020 |

Planning Services, County Hall, Martineau Lane, Norwich, NR1 2DH



Norfolk County Council



**In line with Government advice the Planning Service is now working remotely. Please use email to contact officers or the team in the first instance and we will get back to you.**

Campaign Logo



Nick Johnson  
Norfolk County Council  
County Hall , Martineau Lane, Norwich, NR1 2SG

Jay Lad  
Asset Protection Assistant  
Business & Operation Support  
Gas Transmission Asset Management  
National Grid  
Warwick  
Direct Tel:  
Email: Jay.lad@nationalgrid.com

**Planning Work?**

**Contact us on 0800 688 588\***

**Mon-Fri 8am-4pm**

(\*Calls may be recorded and monitored)

**E-mail: [Plantprotection@nationalgrid.com](mailto:Plantprotection@nationalgrid.com)**

**Electricity Emergency Number:**

**0800 40 40 90\***

**National Gas Emergency Number:**

**0800 111 999\***

\*Available 24 hours, 7 days/week.

Calls may be recorded and monitored.

[www.nationalgrid.com](http://www.nationalgrid.com)

Date : 9/14/2020  
Our Reference: EA\_GE4B\_3NWP\_024390  
Your Reference: SCO/2020/0001

Dear Nick Johnson/Norfolk County Council

**Ref: NR20 3JL Norwich Western Link**

**No Objection with Condition: Having received further information back from the Customer, I would be happy to issue a No Objection with Condition, the Condition being that we are consulted further on the A47 Junction when further designs are available as part of the Formal Planning Application. We would ask the Customer to raise a new enquiry in order to be able to formally respond to that.**

National Grid has No Objection to the above proposal which is in close proximity to a High-Pressure Gas Pipeline – Feeder.

I have enclosed a location map to show the location of National Grid high-pressure gas pipeline(s) within the vicinity of your proposal and associated information below.

Yours sincerely  
Jay Lad

Asset Protection Assistant

## **EAGLES (Electricity And Gas Location Enquiry System)**

Is now available to use simply click on the link to register [www.beforevoidig.nationalgrid.com](http://www.beforevoidig.nationalgrid.com), submit details of your proposed works and receive instant guidance and if appropriate maps showing the location of National Grid gas and electric apparatus.

### **PLEASE READ CAREFULLY**

- No buildings should encroach within the Easement strip of the pipeline indicated above
- No demolition shall be allowed within 150 metres of a pipeline without an assessment of the vibration levels at the pipeline. Expert advice may need to be sought which can be arranged through National Grid.
- National Grid has a Deed of Easement for each pipeline which prevents change to existing ground levels, storage of materials. It also prevents the erection of permanent / temporary buildings, or structures. If necessary National grid will take action to legally enforce the terms of the easement.
- We would draw your attention to the Planning (Hazardous Substances) Regulations 1992, the Land Use Planning rules and PADHI (Planning Advice for Developments near Hazardous Installations) guidance published by the HSE, which may affect this development.
  
- To view the PADHI Document, please use the link below:  
<http://www.hse.gov.uk/landuseplanning/padhi.pdf>
  
- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and National Grid's specification for Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22. You should already have received a link to download a copy of T/SP/SSW/22, from our Plant protection Team, which is also available to download from our website.
  
- To view the SSW22 Document, please use the link below:  
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>
  
- A National Grid representative will be monitoring the works to comply with SSW22.
  
- To download a copy of the HSE Guidance HS(G)47, please use the following link:  
<http://www.hse.gov.uk/pubns/books/hsg47.htm>
  
- National Grid will also need to ensure that our pipelines access is maintained during and after construction.
  
- Our pipelines are normally buried to a depth cover of 1.1 metres however; actual depth and position must be confirmed on site by trial hole investigation under the supervision of a National Grid representative. Ground cover above our pipelines should not be reduced or increased.
  
- If any excavations are planned within 3 metres of National Grid High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a National Grid representative. A safe working method must be agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
  
- Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been confirmed on site under the supervision of a National

Grid representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NG supervision and guidance.

### **Pipeline Crossings**

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at locations agreed with a National Grid engineer.
- All crossing points will be fenced on both sides with a post and wire fence and with the fence returned along the easement for a distance of 6 metres.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid. National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure. The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid.
- Please be aware that written permission from National Grid is required before any works commence within the National Grid easement strip.
- A National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22.
- A Deed of Indemnity is required for any crossing of the easement including cables

### **Cables Crossing**

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A National Grid representative shall supervise any cable crossing of a pipeline.
- An impact protection slab should be laid between the cable and pipeline if the cable crossing is above the pipeline.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service must cross below the pipeline with a clearance distance of 0.6 metres.

### **All work should be carried out in accordance with British Standards policy**

- BS EN 13509:2003 - Cathodic protection measurement techniques
- BS EN 12954:2001 - Cathodic protection of buried or immersed metallic structures – General principles and application for pipelines
- BS 7361 Part 1 - Cathodic Protection Code of Practice for land and marine applications
- National Grid Management Procedures





Date: 07 July 2020  
Our ref: 320677  
Your ref: SCO/2020/0001



**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Mr Nick Johnson

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017):** Norwich Western Link (NWL) link road to comprise dualling of A1067 Fakenham Road, from its existing junction with A1270 Broadland Northway, to new junction with A47 near Honingham, and associated works, Norwich Western Link, A1067  
**Location:** Fakenham Road, A1270 Broadland Northway

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 24 June 2020 which we received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Perdeep Maan on [Perdeep.maan@naturalengland.org.uk](mailto:Perdeep.maan@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Perdeep Maan

[Click here to enter text.](#)

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<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from

<http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>



## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### **2. Biodiversity and Geology**

Natural England strongly encourages the LPA to seek biodiversity net gains for this development, especially given its scale and nature. To help calculate this we refer to the biodiversity metric 2.0 available [here](#).

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

#### **2.2 Internationally and Nationally Designated Sites**

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites. Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

### **Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)**

The development site is [Click here to enter text](#). the following designated nature conservation site(s):

- [Click here to enter text](#).
- Further information on the SSSI and its special interest features can be found at [www.magic.gov](http://www.magic.gov). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within [Click here to enter text](#). and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.
- - European site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

### **2.3 Regionally and Locally Important Sites**

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

### **2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)**

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

## **2.5 Habitats and Species of Principal Importance**

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

## **2.6 Contacts for Local Records**

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

## **3. Designated Landscapes and Landscape Character**

### **Nationally Designated Landscapes**

As the development site is within/adjacent to [Click here to enter text.](#), consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for [Click here to enter text.](#)

### **Landscape and visual impacts**

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies

pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

### **Heritage Landscapes**

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm).

### **4. Access and Recreation**

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

### **Rights of Way, Access land, Coastal access and National Trails**

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby [Click here to enter text](#). National Trail. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public



rights of way within or adjacent to the proposed site that should be maintained or enhanced.

## **5. Soil and Agricultural Land Quality**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.

As identified in the NPPF new sites or extensions to new sites for peat extraction should not be granted permission by Local Planning Authorities or proposed in development.

## **6. Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

## **7. Climate Change Adaptation**

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 174), which should be demonstrated through the ES.

## **8. Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Date: 12 October 2020  
Our ref: 327970  
Your ref: SCO/2020/0001



**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Angelina Lambert

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017):** Norwich Western Link (NWL) link road to comprise dualling of A1067 Fakenham Road, from its existing junction with A1270 Broadland Northway, to new junction with A47 near Honingham, and associated works, Norwich Western Link, A1067  
**Location:** Fakenham Road, A1270 Broadland Northway

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 24 June 2020 which we received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Perdeep Maan on [Perdeep.maan@naturalengland.org.uk](mailto:Perdeep.maan@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Perdeep Maan  
Sussex and Kent

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<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>



## **Annex A – Advice related to EIA Scoping Requirements**

### **1. General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

### **2. Biodiversity and Geology**

Natural England strongly encourages the LPA to seek biodiversity net gains for this development, especially given its scale and nature. To help calculate this we refer to the biodiversity metric 2.0 available [here](#).

#### **2.1 Ecological Aspects of an Environmental Statement**

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

## **2.2 Internationally and Nationally Designated Sites**

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites. Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

### **Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)**

The development site passes over the following designated nature conservation site:

- The River Wensum SSSI and Alderford Common
- Further information on the SSSI and its special interest features can be found at [www.magic.gov](http://www.magic.gov). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.
- - European site conservation objectives are available on our internet site <http://publications.naturalengland.org.uk/category/6490068894089216>

## **2.3 Regionally and Locally Important Sites**

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

## **2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)**

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly

surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

## **2.5 Habitats and Species of Principal Importance**

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

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Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

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Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

## **Rights of Way, Access land, Coastal access and National Trails**

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the adjacent/nearby National Trails. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

## **4. Soil and Agricultural Land Quality**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.

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## **6. Climate Change Adaptation**

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 174), which should be demonstrated through the ES.

## **7. Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;

- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.



## Natural Environment Team

To: Planning Services

Name:

Ref: SCO/2020/0001

Date: 14/07/20

Title: Norwich Western Link: Proposal: Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works: John Wetton

Summary

Informative

### Arboriculture

As Section 15 of the EIA Scoping report states, I have already given informal pre-app advice without prejudice to the scheme sponsor based on a preliminary tree survey, report and documentation regarding ancient and veteran tree losses. This advice was purely from an arboricultural perspective, without knowledge of bat survey data. The documents I reviewed and the arboricultural information in Chapter 15 of the EIA Scoping report appear to be in line with national guidelines and policy providing the points below are taken into consideration when the final documents are submitted.

My pre-app advice accepted that if the planning authority deems that the scheme demonstrates wholly exceptional circumstances, (as per GOV.UK standing advice on protecting ancient woodland, ancient trees and veteran trees from development), then the removal of veteran and ancient trees may not lead to the application being refused on arboricultural grounds. As well as ancient and veteran trees, the scheme will result in the loss of many Category A and B trees (as per BS:58737 categorisation methodology), some of which have been considered as notable trees in the landscape by the arboricultural consultants who carried out the initial survey.

The Environmental Statement must include an updated tree survey, Arboricultural Impact Assessment, site specific Arboricultural Method Statement (AMS) and accompanying Tree Protection Plan once the red line boundary is finalised. The AMS should stipulate ongoing site monitoring and advice by an arboricultural consultant for the duration of the construction period to ensure that retained trees are not impacted by the scheme and that newly exposed woodland edge trees are managed appropriately.



Due to the extent of tree and woodland loss to accommodate this road scheme, the Environmental Statement should include a 30-year compensation strategy in accordance with GOV.UK standing advice on protecting ancient woodland, ancient trees and veteran trees from development. The strategy will need to incorporate the land outside the red line application boundary and be based on a calculation of habitat loss and demonstrating net gain (which is mentioned in sections 2.4.3, 10.6.1 and 15.5.1 of the EIA Scoping Report). Mitigation for tree and woodland loss is part of the wider landscape mitigation that will be required for the scheme, and it should be the quality and resilience of the resulting landscape, taking all habitats into account, (rather than a specific number of replacement trees) that will dictate whether the mitigation is acceptable.

The government recommends a number of measures that should be included in a compensation strategy and the developer should consider including the following, along with the associated methodology:-

- Relocating felled ancient and veteran trees into nearby ancient woodland
- Planting of new woodlands, hedgerows with trees, individual and tree groups as part of the wider landscape mitigation
- 30-year management plans for newly planted trees and woodlands including initial maintenance schedules to ensure establishment
- Connecting woodland and ancient and veteran trees separated by development with green bridges
- Planting and managing individual trees to become veteran and ancient trees in future
- Securing management agreements with adjacent landowners to provide or assist with woodland management to improve tree resilience and biodiversity
- Providing management schedules for existing veteran and ancient trees / woodlands nearby
- Extending existing woodland and ancient woodland through natural regeneration / rewilding
- Selective veteranisation of specific trees

Anne Crotty, Senior Arboriculture and Woodland Officer

#### Ecology

With regards to the NWL, I am acting on behalf of the planning authority. These comments are intended as informal pre-application advice and are made without prejudice.

The scoping request is accompanied by a Scoping Report (WSP, May 2020). Ecological issues are addressed within Chapter 9 but also fall within the scope of other chapters.

Section 2.4.3 (extent of the site) notes that additional land outside the current red line boundary will likely be required for off-site compensatory habitat creation as part of the Biodiversity Net Gain and protected species mitigation requirements. While the report notes that *'it is highly unlikely that the provision of Biodiversity Net Gain and compensatory habitats will affect the scope of the ES, as these issues are already fully addressed within the scope of the proposed ES'*. The scope of the ES should be reviewed once the extent of off-site compensatory habitat creation and mitigation requirements has been established.

With regards Table 4.1. the ES should justify why elements have been scoped out. It is not clear if lighting impacts on biodiversity (e.g. bats) will be assessed in the EIA. Impacts of lighting (from street lights and vehicles) on bats should be assessed.

6.3.4 Noise sensitive receptors should also include animals such as bats as there is a wealth of research which indicates that traffic noise (ultrasonic and audible) affects bat activity and feeding behaviour.

The broad approach set out in Chapter 9 is considered acceptable and the scope of the protected species and habitat surveys has been agreed with Natural England. Survey buffers are based on the line of the proposed Scheme and radio tracking has concentrated on the known barbastelle colony at ROAR. While the maternity colony is highly significant concentrating effort here biases data in that it only represents use during the core period, by female bats, and does not represent use at other times of year - consideration should be given to other trapping locations.

Surveys should adhere to best practice guidelines and be undertaken by appropriately licensed and experienced ecologists. Any deviations from best practice guidelines should be justified, and evidence based.

9.2.60 should also include all underground structures including ice houses.

6.2.64 states that VP surveys will last for a minimum of two or three hours. It should be clear if it is 2 or 3 hours, and the length of survey justified. The Vantage Point surveys at sunset are designed to establish the use of the feature by barbastelles but will potentially miss bats using the linear feature at other times of the night. The presence of human surveyors may also affect barbastelle activity. Consideration should be given to surveying throughout the night and during sub-optimal periods as bat behaviour may be significantly different during sub-optimal periods compared to optimal periods. Surveyors should be positioned either side of the proposed breach (rather than in the middle of it) to allow for comparison with any post-construction monitoring.



9.2.78 Please note the settings on camera traps for badgers is important to ensure animals are not missed. See <https://www.conservationevidence.com/reference/download/2436>

9.4. We acknowledge the mitigation strategy is still being developed and will be informed by pending ecological surveys. It is acknowledged that the mitigation hierarchy will be adhered to and biodiversity net-gain demonstrated. The applicant is encouraged, in line with the pending Environment Bill, to demonstrate a minimum 10% net biodiversity gain. Norfolk County Council's Environment Policy applies to this proposal.

When designing the mitigation strategy, a distinction should be made between 'use' and 'effectiveness' and be based on best available evidence.

Consideration should also be made with regards to any monitoring strategy and how post-construction monitoring survey results can be compared effectively against pre-construction surveys. Use of bat detection dogs for post-construction monitoring of bats killed by passing vehicles should be considered.

9.6.1 Where survey results indicate significant populations of animals are present, irrespective of any statutory designation (or otherwise), the significance of any effects should be identified and addressed.

The LPA would request that data is also submitted as shape files – due to COVID there are currently no options for printing documents and viewing reports on computers has its limitations.

All relevant biodiversity data, including absences, should be submitted to Norfolk Biodiversity Information Service, in accordance with CIEEM guidelines (2016).

Catherine Dew, County Ecologist

Landscape

Not Consulted



## Natural Environment Team

To: Planning Services

Name:

Ref: SCO/2020/0001

Date: 30/07/20

Title: Norwich Western Link: Proposal: Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works: John Wetton

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As Section 15 of the EIA Scoping report states, I have already given informal pre-app advice without prejudice to the scheme sponsor based on a preliminary tree survey, report and documentation regarding ancient and veteran tree losses. This advice was purely from an arboricultural perspective, without knowledge of bat survey data. The documents I reviewed and the arboricultural information in Chapter 15 of the EIA Scoping report appear to be in line with national guidelines and policy providing the points below are taken into consideration when the final documents are submitted.

My pre-app advice accepted that if the planning authority deems that the scheme demonstrates wholly exceptional circumstances, (as per GOV.UK standing advice on protecting ancient woodland, ancient trees and veteran trees from development), then the removal of veteran and ancient trees may not lead to the application being refused on arboricultural grounds. As well as ancient and veteran trees, the scheme will result in the loss of many Category A and B trees (as per BS:58737 categorisation methodology), some of which have been considered as notable trees in the landscape by the arboricultural consultants who carried out the initial survey.

The Environmental Statement must include an updated tree survey, Arboricultural Impact Assessment, site specific Arboricultural Method Statement (AMS) and accompanying Tree Protection Plan once the red line boundary is finalised. The AMS should stipulate ongoing site monitoring and advice by an arboricultural consultant for the duration of the construction period to ensure that retained trees are not impacted by the scheme and that newly exposed woodland edge trees are managed appropriately.

Due to the extent of tree and woodland loss to accommodate this road scheme, the Environmental Statement should include a 30-year compensation strategy in accordance with GOV.UK standing advice on protecting ancient woodland, ancient trees and veteran trees from development. The strategy will need to incorporate the land outside the red line application boundary and be based on a calculation of habitat loss and demonstrating net gain (which is mentioned in sections 2.4.3, 10.6.1 and 15.5.1 of the EIA Scoping Report). Mitigation for tree and woodland loss is part of the wider landscape mitigation that will be required for the scheme, and it should be the quality and resilience of the resulting landscape, taking all habitats into account, (rather than a specific number of replacement trees) that will dictate whether the mitigation is acceptable.

The government recommends a number of measures that should be included in a compensation strategy and the developer should consider including the following, along with the associated methodology:-

- Relocating felled ancient and veteran trees into nearby ancient woodland
- Planting of new woodlands, hedgerows with trees, individual and tree groups as part of the wider landscape mitigation
- 30-year management plans for newly planted trees and woodlands including initial maintenance schedules to ensure establishment
- Connecting woodland and ancient and veteran trees separated by development with green bridges
- Planting and managing individual trees to become veteran and ancient trees in future
- Securing management agreements with adjacent landowners to provide or assist with woodland management to improve tree resilience and biodiversity
- Providing management schedules for existing veteran and ancient trees / woodlands nearby
- Extending existing woodland and ancient woodland through natural regeneration / rewilding
- Selective veteranisation of specific trees

Anne Crotty, Senior Arboriculture and Woodland Officer

#### Ecology

With regards to the NWL, I am acting on behalf of the planning authority. These comments are intended as informal pre-application advice and are made without prejudice.

The scoping request is accompanied by a Scoping Report (WSP, May 2020). Ecological issues are addressed within Chapter 9 but also fall within the scope of other chapters.

Section 2.4.3 (extent of the site) notes that additional land outside the current red line boundary will likely be required for off-site compensatory habitat creation as part of the Biodiversity Net Gain and protected species mitigation requirements. While the report notes that *'it is highly unlikely that the provision of Biodiversity Net Gain and compensatory habitats will affect the scope of the ES, as these issues are already fully addressed within the scope of the proposed ES'*. The scope of the ES should be reviewed once the extent of off-site compensatory habitat creation and mitigation requirements has been established.

With regards Table 4.1. the ES should justify why elements have been scoped out. It is not clear if lighting impacts on biodiversity (e.g. bats) will be assessed in the EIA. Impacts of lighting (from street lights and vehicles) on bats should be assessed.

6.3.4 Noise sensitive receptors should also include animals such as bats as there is a wealth of research which indicates that traffic noise (ultrasonic and audible) affects bat activity and feeding behaviour.

The broad approach set out in Chapter 9 is considered acceptable and the scope of the protected species and habitat surveys has been agreed with Natural England. Survey buffers are based on the line of the proposed Scheme and radio tracking has concentrated on the known barbastelle colony at ROAR. While the maternity colony is highly significant concentrating effort here biases data in that it only represents use during the core period, by female bats, and does not represent use at other times of year - consideration should be given to other trapping locations.

Surveys should adhere to best practice guidelines and be undertaken by appropriately licensed and experienced ecologists. Any deviations from best practice guidelines should be justified, and evidence based.

9.2.60 should also include all underground structures including ice houses.

6.2.64 states that VP surveys will last for a minimum of two or three hours. It should be clear if it is 2 or 3 hours, and the length of survey justified. The Vantage Point surveys at sunset are designed to establish the use of the feature by barbastelles but will potentially miss bats using the linear feature at other times of the night. The presence of human surveyors may also affect barbastelle activity. Consideration should be given to surveying throughout the night and during sub-optimal periods as bat behaviour may be significantly different during sub-optimal periods compared to optimal periods. Surveyors should be positioned either side of the proposed breach (rather than in the middle of it) to allow for comparison with any post-construction monitoring.

9.2.78 Please note the settings on camera traps for badgers is important to ensure animals are not missed. See <https://www.conservationevidence.com/reference/download/2436>

9.4. We acknowledge the mitigation strategy is still being developed and will be informed by pending ecological surveys. It is acknowledged that the mitigation hierarchy will be adhered to and biodiversity net-gain demonstrated. The applicant is encouraged, in line with the pending Environment Bill, to demonstrate a minimum 10% net biodiversity gain. Norfolk County Council's Environment Policy applies to this proposal.

When designing the mitigation strategy, a distinction should be made between 'use' and 'effectiveness' and be based on best available evidence.

Consideration should also be made with regards to any monitoring strategy and how post-construction monitoring survey results can be compared effectively against pre-construction surveys. Use of bat detection dogs for post-construction monitoring of bats killed by passing vehicles should be considered.

9.6.1 Where survey results indicate significant populations of animals are present, irrespective of any statutory designation (or otherwise), the significance of any effects should be identified and addressed.

The LPA would request that data is also submitted as shape files – due to COVID there are currently no options for printing documents and viewing reports on computers has its limitations.

All relevant biodiversity data, including absences, should be submitted to Norfolk Biodiversity Information Service, in accordance with CIEEM guidelines (2016).

Catherine Dew, County Ecologist

#### Landscape

The scoping request is accompanied by a Scoping Report (WSP, May 2020). Ecological issues are addressed within Chapter 8 but also fall within the scope of other chapters.

As stated in 8.1.1 we have been involved with earlier discussions regarding viewpoint locations and have been present in design group meetings.

The study area has been suitably determined for the preliminary (Zone of Theoretical Visibility) ZTV and will be refined as necessary following field work and consultation. The Landscape and Visual Impact Assessment (LVIA) study area will be determined and agreed with the LPA.

Table 8.1 – Elements Scoped in or Out of Further Assessment.

The elements scoped out have been suitably justified and we would broadly agree with the conclusions drawn. The consideration of lighting would be the only element we would have some reservations on, however if the construction lighting is considered as part of the overall impacts, and operational lighting is restricted to minimal lighting which only serves to light a specific element such as signage the impacts should be minimal.

The methodology proposed is suitable and follows current guidance, namely GLVIA3. The baseline work already undertaken and proposed to take place covers broadly acceptable content and should inform a thorough assessment. The proposed mitigation appears suitable, and the assessment should inform what this mitigation planting/screening is and where it is situated.

8.8.1 appears to be an unfinished section

Emily Smith, Green Infrastructure and Landscape Officer



**From:** Lambert, Angelina  
**To:** Planning Services  
**Subject:** FW: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link  
**Date:** 18 August 2020 12:51:11

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**From:** Dromey, Richard <[Richard.Dromey@fire.norfolk.gov.uk](mailto:Richard.Dromey@fire.norfolk.gov.uk)>  
**Sent:** 18 August 2020 12:12  
**To:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>  
**Subject:** RE: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link

**WARNING:** External email, think before you click!

Hi Angelina

I did try to call you but appreciate that you are busy.

Overall once the NWL is completed it will improve our response times to some locations.

Highways currently inform us of road closures in advance where they are planned, I believe this is about six weeks' notice or if it is for a emergency repair then they will let us know with immediate effect. I am not exactly sure what the legal time period of notification is however Highways will know this as they adhere to their notification responsibilities for all the emergency services.

Thanks Rich

---

**From:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>  
**Sent:** 18 August 2020 11:48  
**To:** Dromey, Richard <[Richard.Dromey@fire.norfolk.gov.uk](mailto:Richard.Dromey@fire.norfolk.gov.uk)>  
**Subject:** RE: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link

Hi Richard, following my conversation with Stephen Maxwell this morning, the information I am seeking to obtain via the consultation is relating to how the proposed Norwich Western Link (NWL) could impact on current response times/emergency preparedness during construction, should the proposed NWL be granted planning permission. For example, I understand it is likely NFRS will want to receive information on road/junction closures. What format should this information be in and how frequent would NFRS want to receive the updates?

If you have any queries, please let me know.

Regards

**Angelina Lambert, Principal Planner**

Planning Services

Tel: 01603 223806

Floor 6, County Hall, Martineau Lane, Norwich, NR1 2DH

In line with Government advice the Planning Service is now working remotely. Please use email to contact officers or the team in the first instance and we will get back to you.

**From:** Lambert, Angelina  
**To:** Planning Services  
**Subject:** FW: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link  
**Date:** 18 August 2020 14:36:11

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**From:** Water Officer <[Water.Officer@fire.norfolk.gov.uk](mailto:Water.Officer@fire.norfolk.gov.uk)>  
**Sent:** 22 July 2020 09:13  
**To:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>  
**Subject:** RE: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link

**WARNING:** External email, think before you click!

Dear Angelina,

In respect to this consultation and fire hydrant provision only – other NFRS colleagues may make comments on fire appliance access, safety etc.

We would not expect any water undertakers to be laying water mains along the length of the proposed roadway and therefore we would not expect provision of fire hydrants on this project.

However where new residential or industrial developments are subsequently proposed (along the proposed route) we would then be looking to request planning conditions to ensure adequate fire hydrant coverage for these developments as they go through the planning process.

For future contact (reference fire hydrant provision) please can you ensure that all emails are sent to [water.officer@fire.norfolk.gov.uk](mailto:water.officer@fire.norfolk.gov.uk) – Trish Bond retired in August last year and her email address is no longer monitored.

Kind Regards

**Tim Allison**  
**Water Resources & Planning Manager**  
Tel: 0300 1231261 | Dept: 0300 1231165  
Wymondham Fire Station, London Road, Wymondham, NR18 9AW



**From:** Percival, John  
**To:** Planning Services  
**Subject:** FW: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link  
**Date:** 22 July 2020 12:47:15

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**From:** Percival, John  
**Sent:** 22 July 2020 12:40  
**To:** Lambert, Angelina <angelina.lambert@norfolk.gov.uk>  
**Subject:** SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link

**Our Ref CNF48395**

Dear Angelina,

**SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link**

Thank you for directly consulting Norfolk County Council Environment Service historic environment strategy and advice team regarding the above-mentioned EIA scoping opinion and apologies for the delay in getting back to you.

The scoping report incorporates the advice we have previously made to the applicants archaeological consultants and we have no further comments to make.

If you have any queries, please don't hesitate to contact me.

Regards

John Percival

**John Percival, Historic Environment Senior Officer (Strategy and Advice)**

Community and Environmental Services

Tel: 01362 869275 | Dept: 01362 869278 | Mobile: 07775 697616

Union House, Gressenhall, Dereham, Norfolk NR20 4DR

**Please Note I will be working from home for the foreseeable future but remain contactable by landline, mobile phone and email**

**We now have a general mailbox for historic environment strategy and advice. Please send all new site/application consultations, existing casework enquires where you are unclear who our case officer is, and reports for review to [hep@norfolk.gov.uk](mailto:hep@norfolk.gov.uk)**

Norfolk County Council introduced *Standards for Development-led Archaeological Projects in Norfolk* and a new historic environment strategy and advice charging schedule on 1 May 2018. Please visit <https://www.norfolk.gov.uk/libraries-local-history-and-archives/archaeology-and-historic-environment/planning-and-the-historic-environment> for copies.

---

**From:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>  
**Sent:** 21 July 2020 17:34  
**To:** CES Developer Services <[developer.services@norfolk.gov.uk](mailto:developer.services@norfolk.gov.uk)>; Historic Environment Planning <[hep@norfolk.gov.uk](mailto:hep@norfolk.gov.uk)>; Allen, Dominic <[dominic.allen@norfolk.gov.uk](mailto:dominic.allen@norfolk.gov.uk)>; Willner, Roberta <[roberta.willner@norfolk.gov.uk](mailto:roberta.willner@norfolk.gov.uk)>; Shreeve, Phil <[phil.shreeve@norfolk.gov.uk](mailto:phil.shreeve@norfolk.gov.uk)>; Cross, John <[john.cross@norfolk.gov.uk](mailto:john.cross@norfolk.gov.uk)>; Auger, Mike <[mike.auger@norfolk.gov.uk](mailto:mike.auger@norfolk.gov.uk)>  
**Cc:** Poole, Liz <[liz.poole@norfolk.gov.uk](mailto:liz.poole@norfolk.gov.uk)>  
**Subject:** SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link  
**Importance:** High

Dear all

I refer to the above application.

According to my planning records a response to the consultation sent on 24 June 2020 is outstanding (26 June to Ec Dev). The consultation period expired on 17 July 2020 and I have not received a request for an extension of time to provide the County Planning Authority with a response.

I appreciate in the current situation Officers may be balancing differing work patterns and other responsibilities, however given the nature and scale of the proposed development, it is imperative that thorough advice is provided that will inform the applicants submitted Environmental Statement (ES). Therefore, I would be grateful if you can confirm 1) whether you intend to respond and 2) by which date you intend to provide a consultation response, so I can gauge the likely date when I will receive consultation responses and the length of time I will need to negotiate with the applicant for an extension of time to adopt a Scoping Opinion.

For information, details of the Scoping request can be found via the following link.

<http://eplanning.norfolk.gov.uk/PlanAppDisp.aspx?AppNo=SCO/2020/0001>

If you have any queries, do not hesitate to contact me.

Regards

**Angelina Lambert, Principal Planner**

Planning Services

Tel: 01603 223806

Floor 6, County Hall, Martineau Lane, Norwich, NR1 2DH

**In line with Government advice the Planning Service is now working remotely. Please use email to contact officers or the team in the first instance and we will get back to you.**

**From:** Lambert, Angelina  
**To:** Planning Services  
**Subject:** FW: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link  
**Date:** 27 July 2020 15:53:59

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**From:** Safeguarding <[Safeguarding@norwichairport.co.uk](mailto:Safeguarding@norwichairport.co.uk)>  
**Sent:** 27 July 2020 15:52  
**To:** Lambert, Angelina <[angelina.lambert@norfolk.gov.uk](mailto:angelina.lambert@norfolk.gov.uk)>; Safeguarding <[Safeguarding@norwichairport.co.uk](mailto:Safeguarding@norwichairport.co.uk)>  
**Subject:** RE: SCO/2020/0001 - Request for EIA Scoping Opinion for the proposed Norwich Western Link

**WARNING:** External email, think before you click!

Dear Angelina,

As per our conversation this morning, Norwich Airport supports the proposed Western Link, however at this stage of the process there is insufficient information for me to be able to provide an aerodrome safeguarding response.

I look forward to seeing more detailed plans of this development once they are made available.

Kind regards

Steve

**Steven Taylor**  
**Deputy Airfield Operations Manager + Safeguarding Officer**  
**Tel: 01603 420694**  
**Mobile: 07990 553023**

Email: [steven.taylor@norwichairport.co.uk](mailto:steven.taylor@norwichairport.co.uk)

Our Ref: 20\_02756\_P  
Your Ref: SCO/2020/0001

15/07/2020

Dear Sir/Madam

**RE: Norwich Western Link: Proposal: Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works**

Thank you for your consultation on the above site, received on 24/06/2020. We have reviewed the request as submitted and wish to make the following comments.

Parts of the site is lies within the Internal Drainage District (IDD) of the Norfolk Rivers Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. A copy of the Board's Byelaws can be accessed on our website ([https://www.wlma.org.uk/uploads/NRIDB\\_Byelaws.pdf](https://www.wlma.org.uk/uploads/NRIDB_Byelaws.pdf)), along with maps of the IDD ([https://www.wlma.org.uk/uploads/179-NRIDB\\_Index.pdf](https://www.wlma.org.uk/uploads/179-NRIDB_Index.pdf)). These maps also show which watercourses have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB.

We recommend that any EIA includes or planning application for development is accompanied by a flood risk assessment (FRA) / surface water drainage strategy to address local sources of flood risk (e.g from ordinary watercourses, surface water flow) and identify how surface water drainage will be managed on site.

This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (paragraph 163).

In order to avoid conflict between the planning process and the Board's regulatory regime and consenting process please be aware of the following:

- Regardless of whether the site is within a Member Board's IDD, if the proposals include works to alter a watercourse (including culverting for access) consent is required under Section 23 of the Land Drainage Act. If the site is within an IDD the relevant IDB is the consenting authority for these works. If outside an IDD, the County Council (Lead Local Flood Authority) is the consenting authority.



John Carrick (Chairman) Gordon Bambridge (Vice-Chairman)

Phil Camamile (Chief Executive)



Cert No. GB11990

Cert No. GB11991

- If a surface water (or treated foul water) discharge is proposed to a watercourse within an IDD (either directly or indirectly), then the proposed development will require a land drainage consent in line with that Internal Drainage Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board's [charging policy](#).
- If the proposals include works within 9m of a Board adopted watercourse, consent is required under byelaw 10. (no works within 9 metres of the edge of drainage or flood risk management infrastructure).

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.

From an environmental perspective, ff the work is likely to impact on a Board adopted watercourse the Board would recommend that watercourse is viewed in a similar way to that of the river Wensum SAC. Due to the close vicinity to the River Wensum, many of the designated features within the SAC may also be present within the IDB drain and lie directly upstream of the European site.

The Board would also recommend that a water vole survey is carried out in the Board adopted watercourse and any other riparian watercourses likely to be impacted by the project, within the IDD. We note from the EIA scoping report that a water vole survey has only been carried out on the River Wensum but there is no mention of other watercourses being surveyed.

It is the applicant's responsibility to ensure no loss of protected species or habitat as a result of the works which may require an environmental survey. Specialist advice should be sought from a qualified ecologist to screen the proposed works for the presence of protected species. Results of this screening should be provided to the Board to evidence that this has been fully complied with. Where the qualified ecologist recommends further survey work and/or mitigation, their recommendations should be implemented.

Kind Regards,

Jess

Jessica Nobbs  
Senior Sustainable Development Officer  
Water Management Alliance

**Appendix 3: Consultation Responses to the Request for Scoping Opinion Ref. SCO/2022/0001**



Reference Number:

3CM/2022/0018/CM

DISTRICT COUNCIL REG 3

TOWN AND COUNTRY PLANNING ACT 1990

TOWN AND COUNTRY PLANNING GENERAL REGULATIONS 1992 (as amended)(or any Order or Statutory Instrument Revoking or Re-enacting those Orders)

Development by the County Council

Norfolk County Council  
Community and Environmental Service Dept  
Planning Services Floor 6  
Country Hall  
Norwich  
NR1 2SG

Date of Decision: 18th August 2022

**Applicant:** Norfolk County Council

**Location:** EAST TUDDENHAM A1067 Fakenham Road

**Reference:** 3CM/2022/0018/CM

**Proposal:** SCO/2022/0001 Proposed link road to comprise the dualling of the A1067 From its Existing Junction with the A1270 Broadland Northway to a new junction with the A47 near Honingham and Associated works

Breckland Council has considered the proposal and has **NO OBJECTIONS**

1. With regards to your recent consultation request for an EIA Scoping Opinion on application reference SCO/2022/0001, please note Breckland Council have no comments but would request you consider consultee responses with regards to the environmental impacts of the development, especially with regards to ecology, arboriculture and highways and their potential environmental impacts.

**Signed:**

**Mr Robert Walker Deputy Chief Executive**

[planning@breckland.gov.uk](mailto:planning@breckland.gov.uk)

Elizabeth House, Walpole Loke, Dereham, Norfolk, NR19 1EE

Telephone 01362 656870 [www.breckland.gov.uk](http://www.breckland.gov.uk)

Norfolk County Council  
Community and Environmental Services

**Our ref:** AE/2020/125293/02-L01  
**Your ref:** SCO/2022/0001

Via email only:  
[MaWP@norfolk.gov.uk](mailto:MaWP@norfolk.gov.uk).

**Date:** 17 August 2022

Dear Sir/Madam

**REQUEST FOR EIA SCOPING OPINION: PROPOSED NORWICH WESTERN LINK (NWL). PROPOSED LINK ROAD TO COMPRISE THE DUALLING OF THE A1067 FAKENHAM ROAD, FROM ITS EXISTING JUNCTION WITH THE A1270 BROADLAND NORTHWAY, TO A NEW JUNCTION WITH THE A47 NEAR HONINGHAM, AND ASSOCIATED WORKS**

Thank you for consulting us on the EIA Scoping Addendum for this project (document dated July 2022). We have reviewed the submitted document and our comments are below.

We note that Table 2-1 of the EIA Scoping Addendum provides comments on the potential changes to the 2020 EIA Scoping Report resulting from the alignment refinement. For items within our remit, we would agree with the conclusion that the re-alignment of the northern section of the Scheme will not require changes to the ES scope.

On that basis, the comments in our previous Scoping opinion response, including those relating to specific sections of the May 2020 EIA Scoping Report document, remain valid and should be taken into consideration. That response was provided on 24 July 2020, under reference AE/2020/125293/01-L01.

In respect of water resources, we would highlight that the Scoping document identified some nearby abstractions. We expect that the full ES will account for all nearby abstractions which could be impacted by the scheme's construction or operation phases and account for the impacts on them. We would recommend that abstraction licence data held is updated by contacting our Customers and Engagement team with a summary of the information required and providing a shapefile of the route (and a deemed appropriate buffer distance). The team can be contacted via: [Enquiries\\_EastAnglia@environment-agency.gov.uk](mailto:Enquiries_EastAnglia@environment-agency.gov.uk)

**East Anglia area (East) - Icen House**

Cobham Road, Ipswich, Suffolk, IP3 9JD

General Enquiries: 08708 506506 Fax: 01473 724205

*Weekday Daytime calls cost 8p plus up to 6p per minute from BT Weekend Unlimited.*

*Mobile and other providers' charges may vary*

Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)

Website: [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)



We would also like to re-iterate that we would expect to see containment and mitigation measures in place to contain a potential spillage from the road caused by, for example, a road traffic collision involving a tanker, not just the treatment and mitigation of ongoing contaminants from road use. Emergency containment such as use of penstocks should be included to prevent any pollution incident reaching the rivers or tributaries.

Finally, we note section 3.15.1 states that "Habitat creation measures identified in Section 3.2.1 will not result in changes to flood risk and do not require further consideration in the Flood Risk Assessment". This position should be kept under review should further measures be considered which may affect flood flows or storage.

Yours faithfully



**MR MARTIN BARRELL**  
**Sustainable Places - Planning Specialist**

Direct dial 020 302 58450

Direct e-mail [martin.barrell@environment-agency.gov.uk](mailto:martin.barrell@environment-agency.gov.uk)

**From:** [Alison Old](#)  
**To:** [Andrew Sierakowski](#)  
**Subject:** Re: Scoping Opinion Request SCO/2022/0001 Norwich Western Link  
**Date:** 12 September 2022 10:05:09

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**WARNING:** External email, think before you click!

Sorry Andrew.

[Redacted]

**Air Quality**

Scoping document sets out methodology for Air Quality Assessment in accordance with current best practice.

The EIA should include consideration and discussion around the 2 new legally binding air quality targets which are to be brought forward by October 2022 as set out in the Environment Act 2021.

**Noise**

The noise and vibration section should include an assessment of the potential effects of noise on tranquillity and on the character of potentially noise sensitive areas as applicable.

kind regards

Alison

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[Redacted signature block]

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Planning Officer  
Norfolk County Council  
6th Floor  
County Hall  
Martineau Lane  
Norwich  
NR1 2DH

NCC contact number: 0344 800 8020  
Text Relay - 18001 0344 800 8020

Your Ref: SCO/2022/0001  
Date: 28 July 2022

My Ref: 0/SCO/22/0001  
Tel No.: 01603 638009  
Email: [liz.poole@norfolk.gov.uk](mailto:liz.poole@norfolk.gov.uk)

Dear Andrew,

**Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL).  
Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its  
existing junction with the A1270 Broadland Northway, to a new junction with the  
A47 near Honingham, and associated works. Norwich Western Link**

Thank you for consulting the local highway authority regarding the above scoping opinion.  
I have reviewed the information supplied and have the following comments:

- The proposed TA will cover the highway network as agreed with the local highway authority.
- The proposed TA will include information on walking, cycling and non sustainable modes. Information will be required that details the potential mitigation and improvements that the scheme will bring forward in this regard.
- The proposed methodology has been agreed with the local highway authority.

The highway authority is content with the proposed scoping information. If you have any further queries, please do not hesitate to contact me.

Yours sincerely



Major and Estate Development Team Manager  
for Executive Director for Community and Environmental Services

Please be aware it is the applicants responsibility to clarify the boundary with the public highway. Private structures such as fences or walls will not be permitted on highway land. The highway boundary may not match the applicants title plan. Please contact the highway research team at [highway.boundaries@norfolk.gov.uk](mailto:highway.boundaries@norfolk.gov.uk) for further details.



Historic England

Mr Nick Johnson  
Norfolk County Council  
Environment, Transport, Development  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

Direct Dial: 01223 582720

Our ref: PL00783602

9 August 2022

Dear Mr Johnson

**Norwich Western Link: Proposed link road to comprise the dualling of the A1067 Fakenham Road from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, Norfolk.**

### **Environmental Assessment (EIA) Scoping Opinion**

Thank you for your letter of 22 July 2022 consulting us about the above EIA Scoping Report Addendum. We were previously consulted in June 2020, and this advice remains relevant.

The Addendum relates to the development of the scheme since adoption of the Scoping Opinion in 2020. Changes to the scheme include route realignment of the northern section of the Scheme, east of Ringland Lane to the A1067.

The realigned route is closer to Ringland and the Grade I Church of St Peter. The realignment brings the route adjacent to the Grade II listed 17<sup>th</sup>-century threshing barn at Low Farm, encompassing the designated heritage asset on three sides. There could be potential for significant adverse effects during construction and operation phases, and in line with the NPPF we would expect the Environmental Statement to contain a thorough assessment of likely effects and mitigation strategy.

As we have previously advised, given the nature of the structures associated with the proposed development and the surrounding landscape character, this development has the potential to be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself.

We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. The assessment should also take account of the potential impact which



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associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

We would expect the Environmental Statement to consider the potential impacts on designated heritage assets as well as non-designated heritage assets of historic, architectural, archaeological, or artistic interest as these can also be of national importance and make an important contribution to the character and distinctiveness of an area and its sense of place.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Celia Wignall  
Inspector of Historic Buildings and Areas  
[celia.wignall@historicengland.org.uk](mailto:celia.wignall@historicengland.org.uk)



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*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*

**via e-mail**

Nick Johnson  
Planning Services, Floor 6  
**Norfolk County Council**  
County Hall  
Martineau Lane  
Norwich  
Norfolk  
NR1 2SG

NCC contact number: 0344 800 8020  
Textphone: 0344 800 8011

Your Ref: SCO/2022/0001  
Date: 2 August 2022  
NCC Member: Greg Peck

My Ref: FW2022\_0684  
Tel No.: 0344 800 8020  
Email: llfa@norfolk.gov.uk

Dear Mr Johnson,

**Town and County Planning (Development Management Procedure) (England) Order 2015**

**Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL).  
Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its  
existing junction with the A1270 Broadland Northway, to a new junction with the  
A47 near Honingham, and associated works**

Thank you for your consultation on the above site, received on 19 July 2022. We have reviewed the request as submitted. The LLFA previously provided a scoping opinion letter reference FW2020\_0529 on 3<sup>rd</sup> August 2020. On review of the updated information associated with the reviewed route alignment submitted, the response in this letter remains appropriate.

The LLFA notes that since 2020, various changes and updates have occurred in the applicable policy, regulation and legislation in relation to flood risk and the water environment. The LLFA would expect these changes to be reflected and included in the EIA. The LLFA has also updated the LLFA Developer Guidance recently. Further guidance for developers can be found on our website at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>

Yours sincerely,

Sarah

**Sarah Luff**  
Strategic Flood Risk Planning Officer

Lead Local Flood Authority

**Disclaimer**

*We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.*



Andrew Sierakowski  
Norfolk County Council  
Community and Environmental  
Services Department  
Planning Services Floor 6  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

Emma Wood  
Spatial Planning  
National Highways  
Woodlands  
Manton Lane  
Bedford  
MK41 7LW

09<sup>th</sup> August 2022

Dear Sir/Madam

**PLANNING APPLICATION:** SCO/2022/0001

**PROPOSAL:** Norwich Western Link: Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works

Thank you for your correspondence, received 19th July 2022, notifying National Highways of the above pre-application. I have been unable to access the planning portal to review the information and details provided; and so in lieu of this please find the following comments; which have partially been provided in a previous consultation response.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.



In respect to this proposal, the nearest trunk road is the A47, and the first point of interaction is with the proposed Wood Lane junction which forms part of the proposed A47 North Tuddenham to Easton dualling scheme. National Highways have been working closely with Norfolk County Council with regular meetings and exchanges of information on those matters which relate to the A47 in relation to this proposed scheme.

A Transport Assessment (TA) will need to be submitted as part of any subsequent application. Early engagement with National Highways is encouraged to agree the methodology and assessment to be included. As part of the assessment, it will be necessary to take account of the interaction of the link road and the A47 and identify any measures that may need mitigation. The assessment should be undertaken in accordance with DfT Circular 02/2013 – The Strategic Road Network and the Delivery of Sustainable Development.

National Highways are particularly supportive of sustainable transport schemes as part of new development and so will be keen to see the cycle and pedestrian strategy at application stage; the TA should also be informed by a Walking Cycling and Horse Riding Assessment Report (WCHAR).

National Highways are currently awaiting the decision of the Secretary of State in the making of the Development Consent Order for the proposed A47 North Tuddenham to Easton dualling scheme, in accordance with the proposal set out in the Road Investment Strategy 2020-2025. Consequently, until such times that order is made, and delivery is confirmed, there will be the need to assess the impact and mitigate the impact of the link road, with and without the proposed dualling in place.

There is risk of proposed timescales for delivery of both the link road and the dualling being similar. It is therefore important the Construction Environmental Management Plan sets out how the two schemes can be delivered in tandem, including detailing the construction consequences/phasing and issues arising. An agreed mitigation strategy will be essential to any impact on the A47 can be effectively managed and delivery of both schemes can be undertaken in an effective and efficient manner. Any assessment without the dualling should also be included.

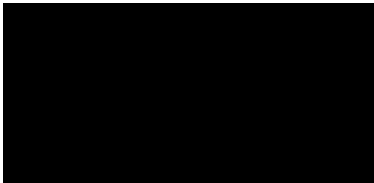
Where there is an interaction of the link road with the A47, the design should be in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB). In particular in respect to road drainage, surface water runoff has a risk of containing pollutants. Consequently, in the assessment and identification of suitable measures it should be noted that the drainage system for the link road is to be

separate to that of the A47. Likewise, any effects of flooding on the A47 will need to be taken into account.

Other DRMB requirements to be referenced in the Environmental Statement include the appropriate Stage One Road Safety Audit for the junction design with the A47, and A47 collision analysis (without the dualling scheme).

Please contact me if you require any further information.

Yours Sincerely



**From:** [Lawman, Alice](#)  
**To:** [Sierakowski, Andrew](#)  
**Cc:** [Milburn, Kelly](#)  
**Subject:** RE: Scoping Opinion Request SCO/2022/0001 Norwich Western Link  
**Date:** 22 September 2022 14:46:06

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**WARNING:** External email, think before you click!

Good afternoon Andrew,

Apologies for the delay in responding. I can confirm I have seen the EIA Scoping Addendum, dated July 2022, and can confirm that our comments remain unchanged from our previous response issued August 2022.

Kind regards

Alice

**Alice Lawman** MRTPI

**Spatial Planner**

Operations (East) | National Highways  
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Date: 01 September 2022  
Our ref: 404223  
Your ref: SCO/2022/000



[MaWP@norfolk.gov.uk](mailto:MaWP@norfolk.gov.uk)

Norfolk County Council  
**BY EMAIL ONLY**

Consultations  
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T 0300 060 900

Dear Sir or Madam,

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL)  
Location: Junction with the A1270 Broadland Northway, to a new junction with the A47**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 12 August 2022 ,received on 12 August 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Julian Clarke  
Consultations Team

## Annex A – Natural England Advice on EIA Scoping

### General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

### Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

## Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at [www.magic.gov.uk](http://www.magic.gov.uk).

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

## Biodiversity and Geodiversity

### General principles

The [National Planning Policy Framework](#) (paragraphs 174-175 and 179-182) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to have regard to conserving biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

### Designated nature conservation sites

#### International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**:

- **River Wesum Special Area of Conservation (SAC)**

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>

The ES should thoroughly assess the potential for the proposal to affect nationally and internationally designated sites of nature conservation importance, including marine sites where relevant. European sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). In addition paragraph 181 of the National Planning Policy Framework (NPPF) requires that potential SPAs, possible SAC, listed or proposed Ramsar sites, and any site identified or required as compensatory measures for adverse effects on habitat (European) sites, potential

SPAs, possible SACs and listed or proposed Ramsar sites have the same protection as classified sites (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017 are defined as 'habitats sites' in the NPPF). Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically.

Should a likely significant effect on a European/Internationally designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process. Further guidance is set out in Planning Practice Guidance on appropriate assessment

<https://www.gov.uk/guidance/appropriate-assessment>

This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.

### **Nationally designated sites**

The development site is within or may impact on the following **Site of Special Scientific Interest**:

- **River Wensum Site Of Special Scientific Interest (SSSI)**
- **Alderford Common Site Of Special Scientific Interest (SSSI)**

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 180 of the NPPF. Further information on the SSSI and its special interest features can be found at [www.magic.gov](http://www.magic.gov).

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportals](#).

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

### **Regionally and Locally Important Sites**

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

## Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

### District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

### Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present



- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

### **Ancient Woodland, ancient and veteran trees**

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

### **Biodiversity net gain**

Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

The ES should use an appropriate biodiversity metric such as [Biodiversity Metric 3.0](#) together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

### **Landscape and visual impacts**

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

### **Heritage Landscapes**

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm).

### **Connecting People with nature**

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

### **Soils and Agricultural Land Quality**

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 174 and

175 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see [www.magic.gov.uk](http://www.magic.gov.uk).

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

## **Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)<sup>[1]</sup>. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO<sub>x</sub> and SO<sub>2</sub> against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

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<sup>[1]</sup> [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

## Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.

## Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store

and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

### **Contribution to local environmental initiatives and priorities**

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

**From:** [Jeffery, Caroline](#)  
**To:** [Planning Services](#)  
**Subject:** SCO/2022/0001 Request for EIA Scoping Opinion Norwich Western Link  
**Date:** 11 August 2022 18:14:01

---

**Ref: SCO/2022/0001**

**Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works**

This response is made without prejudice by Norfolk County Council in its capacity as the Mineral and Waste Planning Authority for Norfolk.

Our response dated 15/07/2020 to the EIA Scoping Report dated May 2020 still stands and the alignment refinement does not affect those comments.

We have no additional comments to make regarding the EIA Scoping Addendum dated July 2022.

Kind regards

**Caroline Jeffery, Principal Planner (Minerals and Waste Policy)**

Community and Environmental Services

Tel: 01603 222193 | Dept: 0344 800 8020 |

Planning Services, County Hall, Martineau Lane, Norwich, NR1 2DH



## Natural Environment Team

To: Planning Services  
Name: Andrew Sierakowski  
Ref: SCO/2022/0001

Date: 9<sup>th</sup> August 2022

Title: Town and Country Planning Act 1990 Town and Country Planning (Environmental Impact Assessment) Regulations 2017 : Norwich Western Link: Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works: Highways, Transport & Waste

### Summary

Informative

### Arboriculture

The arboricultural information in Chapter 15 of the EIA Scoping report and the EIA Scoping addendum appear to be in line with national guidelines and policy, providing the points below are taken into consideration when the final documents are submitted.

Referencing Section 1.2.6 and Section 3 of the EIA Scoping addendum, I wish to reiterate my previous comments that the Environmental Statement should include a 30-year compensation strategy in accordance with GOV.UK standing advice on protecting ancient woodland, ancient and veteran trees from development. The compensation strategy should aim to retain a percentage of veteran habitat and sufficient land to achieve this.

I wish to highlight that in preapplication discussions, it was stated that compensation should include relocation of a percentage of veteran trees and the soil around them; the trunks or reduced trees to be buried sufficiently to ensure their stability, so that their essential habitat for microorganisms and invertebrates is retained. The translocated soil microbiome will enable successful establishment of new trees planted around the veteran hulks which can provide the future veteran habitat by management proposed in the compensation strategy. The suggestion was that this could be achieved as part of a parkland or meadow habitat creation.

As stated previously, due to the extent of tree and woodland loss to accommodate this road scheme, the strategy may need to consider incorporating land outside the red line application boundary (as per Section 3.1 of the EIA Scoping addendum) and be based on a calculation of habitat loss and demonstrating net gain (as per sections 2.4.3, 10.6.1 and 15.5.1 of the EIA Scoping Report). Mitigation for tree and woodland loss is part of the wider landscape mitigation that will be required for



the scheme, and it should be the quality and resilience of the resulting local landscape, taking all habitats into account, (rather than a specific number of replacement trees) that will dictate whether the mitigation is acceptable.

The government recommends a number of measures that should be included in a compensation strategy and the developer should consider including the following, along with the associated methodology:-

- Relocating felled ancient and veteran trees into nearby ancient woodland
- Planting of new woodlands, hedgerows with trees, individual and tree groups as part of the wider landscape mitigation
- 30-year management plans for newly planted trees and woodlands including initial maintenance schedules to ensure establishment
- Connecting woodland and ancient and veteran trees separated by development with green bridges
- Planting and managing individual trees to become veteran and ancient trees in future
- Securing management agreements with adjacent landowners to provide or assist with woodland management to improve tree resilience and biodiversity
- Providing management schedules for existing veteran and ancient trees / woodlands nearby
- Extending existing woodland and ancient woodland through natural regeneration / rewilding
- Selective veteranisation of specific trees

The Environmental Statement must include an updated tree survey, Arboricultural Impact Assessment, site specific Arboricultural Method Statement (AMS) and accompanying Tree Protection Plan based on the updated road layout. The AMS should stipulate ongoing site monitoring and advice by an arboricultural consultant for the duration of the construction period to ensure that retained trees are not impacted by the scheme and that newly exposed woodland edge trees are managed appropriately.

#### Ecology

Thank you for your consultation on the above scoping opinion.

#### **EIA Scoping Addendum (WSP, July 2022):**

Confirmation that the delivery of biodiversity net gain is now a scheme objective is welcomed (section 1.2.2). It is also noted in section 1.2.3 that the alignment refinement has been “*driven by an improved understanding of environmental conditions on site and an approach to look to design out impacts*”. Additionally, it is noted in section 1.2.6 that now the off-site habitat creation requirements are better defined, it is anticipated that land identified within the indicative red line boundary would be sufficient to deliver BNG and ecological mitigation measures. However,



should further land be required, this will be included in the red line boundary of the anticipated planning application.

The Alignment Refinement Impact Scoping Review, as summarised in Table 2-1, appears acceptable regarding the various ecology topics, however it is important to note that in relation to Primrose Grove CWS and Ancient Woodland, the new proposed alignment is now closer to this ancient woodland; it therefore important that all potential impacts are fully assessed in the ES.

I am satisfied that section 3 of the document sets out an acceptable approach, in relation to ecology, as to how the ES will consider the implications, should additional mitigation and compensation measures outside of the Scoping Report Site Boundary be required.

It should be noted that barn owl mitigation may require relatively distant off-site mitigation/ compensation measures to be delivered, and that appropriate S106 agreements or similar may be necessary, where these measures fall significantly beyond the application red line boundary.

**Biodiversity Net Gain:**

The approach set out in section 3.7.3 appears acceptable, and the commitment to achieving 10% in welcomed. However, on-site BNG delivery should always be the preferred option (which is reflected in the weighting within the Defra metric), with local off-site delivery the next option; the use of habitat banks (which could result in BNG delivery outside the county or region) should be considered as a 'last resort'.

Regarding habitat creation (particularly woodland/ tree planting), it is advised that this is carried out at the earliest opportunity, and that those habitats proposed for removal are retained for as long as possible.

It is also important to note that a 10% BNG is considered to be a minimum figure in the Environment Act, and that the delivery of a higher percentage should be sought wherever possible, with for example, a number of English local authorities setting a figure of 20% BNG within their relevant local plans or policies.

It should also be noted that whilst the Defra metric v.3.1 is currently the most up to date version, it is anticipated that a 'final version' of the metric will be released ahead of the implementation of mandatory BNG, and therefore whichever is the most up to date version of the metric at the point of the planning application being submitted, should be used.

**Appendix A (EIA Scoping Report, WSP May 2020):**

The broad approach set out in Chapter 9 is considered acceptable, noting the scope of the protected species and habitat surveys has been agreed with Natural England. Ongoing liaison with Natural England is advised.

Surveys should adhere to best practice guidelines and be undertaken by appropriately licensed and experienced ecologists. Any deviations from best practice guidelines should be justified, and evidence based. The results of all surveys should be presented in a clear, concise manner within the ES.

The bat hibernation structures identified in section 9.2.60 should include all potentially suitable underground structures, including ice houses.

Section 6.2.64 states that Vantage Point (VP) surveys will last for a minimum of two or three hours; It should be clear whether it is 2 or 3 hours, and the length of survey justified. The VP surveys at sunset are designed to establish the use of the feature by barbastelle bats but will potentially miss bats using the linear feature at other times of the night. The presence of human surveyors may also affect barbastelle activity. Consideration should be given to surveying throughout the night and during sub-optimal periods, as bat behaviour may be significantly different during sub-optimal periods compared to optimal periods. Surveyors should be positioned either side of the proposed breach (rather than in the middle of it) to allow for comparison with any post-construction monitoring.

Regarding section 9.2.78, please note the settings on camera traps for badgers is important to ensure animals are not missed. See <https://www.conservationevidence.com/reference/download/2436>

The approach set out in Table 9-9 (Biodiversity Scoped in or Out of Further Assessment) appears broadly acceptable. However, it will be important to ensure that impacts scoped out of other chapters, relating to lighting and noise, are adequately cross-referenced with the ecology chapter to ensure a consistent approach to these topics.

Noting in section 9.4.11 the proposed production of a Construction Environmental Management Plan and Habitat and Species Environmental Management Plan (or similar), it will be important to ensure pre-construction surveys are carefully designed so as to enable an effective post-construction monitoring strategy to be developed. Use of bat detection dogs for post-construction monitoring of bats killed by passing vehicles should be considered.

All relevant biodiversity data, including absences, should be submitted to Norfolk Biodiversity Information Service, in accordance with CIEEM guidelines.

**Habitat Regulations Assessment:**

It is noted in Table 9-1 that Natural England has previously highlighted the requirement for an HRA to be carried out and it was agreed that notwithstanding HRA caselaw, mitigation should be included within the outline design.

The proposed approach set out in section 9.6.13-17 appears acceptable, noting the limitations and assumptions identified in section 9.7.

It is important that the applicant provides adequate information to enable the LPA to carry out the HRA.

#### Landscape

Thank you for your consultation on the Addendum report in relation to the Scoping Report for the Proposed Norwich Western Link (NWL). These comments are made at an officer level in relation to the full document dated July 2022.

Confirmation that the delivery of biodiversity net gain is now a scheme objective is welcomed as well as the provision of further information about offsite ecological mitigation and compensation areas. Whilst this is not directly related to the Landscape and Visual impacts of the scheme, it is recognised that there is overlap when it comes to wider context of protecting, enhancing and adding to the surrounding landscape in ways which may either prevent, minimise or become to overcome some of the landscape and visual impacts. Paragraph 3.10.2 notes that planting will be designed to avoid impacts on landscape character and views, but the potential to improve and enhance through way of planting should not be overlooked. Where woodland or tree planting habitat creation is proposed, this should be done as early as possible to potentially offer some screening of views and to increase the landscape features in the area. Where areas are proposed for removal, this should be done as late in the process as possible.

In respect of the new alignment, this does not fundamentally change the scope or approach to landscape and visual assessments and impacts. I understand that the proposed infrastructure including the viaduct and embankments will remain fundamentally the same, albeit in a slightly adjusted location. The types of effects and types of receptors are unlikely to be different, but viewpoints should be reviewed to ensure they meet the requirements posed by the new alignment and any differences in height or massing of the proposed structures.

#### **Appendix A:**

As stated in 8.1.1 we have been involved with earlier discussions in 2020 regarding viewpoint locations and have been present in past design group meetings by way of pre-app discussions. Considering the revised alignment, there may be a need to slightly adjust the location of viewpoints where the view may now be changed either by the location, or the height/massing of infrastructure. We would be happy to be involved in further discussions regarding and movement of viewpoints.

Similarly, the ZTV may require minor amendments to reflect the new alignment. Although it is noted the realignment is still relatively close to the original proposed footprint, there may be a need to slightly change the study area for the ZTV and

Landscape Character Assessment. However, this may be details which can be confirmed through refinement and work with stakeholders as discussed in paragraph 8.2.2. Otherwise the methodology for defining the study area has been suitably determined for the preliminary (Zone of Theoretical Visibility) ZTV and will be refined as necessary following field work and consultation. The Landscape and Visual Impact Assessment (LVIA) study area will need to be determined and agreed with the LPA.

Table 8-1 – Elements Scoped in or Out of Further Assessment.

The elements scoped out have been suitably justified and we would broadly agree with the conclusions drawn. The consideration of lighting would be the only element we would have some reservations on, however if the construction lighting is considered as part of the overall impacts, and operational lighting is restricted to minimal lighting which only serves to light a specific element such as signage the impacts should be minimal.

The opportunities for enhancing the environment are suitable, we would like to see this considered in light of the LVIA and in conjunction with Biodiversity Net Gain enhancements and a suitable Arboriculture Compensation strategy, including the translocation of veteran trees and how this can be used to enhance the landscape and visual context of the development.

The methodology proposed is suitable and follows current guidance, namely GLVIA3. The baseline work already undertaken and proposed to take place covers broadly acceptable content and should inform a thorough assessment. We would support further discussions as per 8.7.3 to refine character areas and viewpoint locations. We note the limitations and assumptions included.

8.8.1 appears to be an unfinished section.

**From:** Fire - Water Officer  
**Sent:** 29 July 2022 16:46  
**To:** Planning Services  
**Subject:** Subject SCO/2022/0001 Norwich Western Link

**Categories:** BSA

Thank you for the request to consult on this EIA.

Norfolk Fire & Rescue Service have no comments to make, from an Environmental Impact scoping perspective, in regard to provision of firefighting water supplies.

Kind Regards

**Tim Allison**  
**Water Resources & Planning Manager**

Direct Tel: 0300 1231261

[tim.allison@norfolk.gov.uk](mailto:tim.allison@norfolk.gov.uk)

Dept Tel: 0300 1231165

[FireWaterOfficer@norfolk.gov.uk](mailto:FireWaterOfficer@norfolk.gov.uk)

Wymondham Fire Station, London Road, Wymondham, NR18 9AW



Norfolk Fire & Rescue Service



Norfolk County Council



What will you do this year to help Norfolk's children and young people Flourish?



**From:** Percival, John  
**Sent:** 28 July 2022 12:08  
**To:** Sierakowski, Andrew  
**Cc:** Planning Services  
**Subject:** SCO/2022/0001 Norwich Western Link - Request for EIA Scoping Opinion - Historic Environment - Below Ground Archaeology

**Categories:** BSA

**Our Ref** CNF48395

Dear Andrew,

**SCO/2022/0001 Norwich Western Link - Request for EIA Scoping Opinion - Historic Environment - Below Ground Archaeology**

Thank you for directly consulting Norfolk County Council Environment Service historic environment strategy and advice team regarding the above-mentioned EIA scoping opinion.

Our previous comments given on 22/07/2020 still stand. The scoping report incorporates the advice we have previously made to the applicants archaeological Consultants.

The realignment of the road has had a minor positive effect in that it has removed from the redline boundary an area of relatively high archaeological potential immediately west of Attlebridge Hall has been removed from the redline boundary.

Whilst the content of Chapter 7 of the May 2020 EIA Scoping report remains valid the baseline information in relation to below-ground archaeology has changed since then. Geophysical survey has been undertaken and archaeological trial trenching is nearing completion. Areas for potential further archaeological mitigation have been discussed.

The archaeological desk-based assessment which will form an appendix to the ES will need to be updated or have an addenda added to reflect the results of the geophysical survey and emerging results of the trial trenching.

If you have any queries please don't hesitate to contact me.

Regards

John Percival

**John Percival, Historic Environment Senior Officer (Strategy and Advice)**

Community and Environmental Services

Tel: 01362 869275 | Mobile: 07775 697616

County Hall, Martineau Lane, Norwich, Norfolk NR1 2SG

**Please Note I work in a flexible hybrid pattern but remain contactable by landline, mobile phone and email**



Norfolk County Council





**We now have a general mailbox for historic environment strategy and advice. Please send all new site/application consultations, existing casework enquires where you are unclear who our case officer is, and reports for review to [hep@norfolk.gov.uk](mailto:hep@norfolk.gov.uk)**

Norfolk County Council introduced *Standards for Development-led Archaeological Projects in Norfolk* on 1 May 2018. Please visit <https://www.norfolk.gov.uk/libraries-local-history-and-archives/archaeology-and-historic-environment/planning-and-the-historic-environment> for copies.





Norwich Airport Limited  
FAO: Airport Safeguarding  
Amsterdam Way  
Norwich. NR6 6JA  
Email: [safeguarding@norwichairport.co.uk](mailto:safeguarding@norwichairport.co.uk)  
[www.norwichairport.co.uk](http://www.norwichairport.co.uk)

Date: 01 August 2022

Your Ref: SCO/2022/0001  
Our Ref: NIA 03022

**Norwich Western Link: Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works: Highways, Transport & Waste**

Dear Planning Dept. Norfolk County Council,

I refer to your email dated 19 July 2022 in which you seek our comments on the title NCC Planning Consultation Request – SCO/2022/0001.

The Environmental Impact Assessment (EIA) has been considered, and we find that provided the development it is in accordance with the EIA, Norwich Airport would offer no aerodrome safeguarding objections.

Yours Sincerely

Safeguarding Officer





**Norfolk County Council**

Community and Environmental Services  
County Hall  
Martineau Lane  
Norwich  
NR1 2SG

**via e-mail**

Nick Johnson  
Planning Services  
Norfolk County Council  
County Hall  
Martineau Lane  
Norwich  
Norfolk  
NR1 2SG

NCC contact number: 0344 800 8020  
Text relay no.: 18001 0344 800 8020

Your Ref: SCO/2022/0001  
Date: 12 August 2022

My Ref: JL2022NWL  
Tel No.: 0344 800 8020  
Email: [phplanning@norfolk.gov.uk](mailto:phplanning@norfolk.gov.uk)

Dear Mr Johnson

**Town and County Planning Act 1990**

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017:  
Norwich Western Link: Request for EIA Scoping Opinion: Proposed Norwich  
Western Link (NWL). Proposed link road to comprise the dualling of the A1067  
Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a  
new junction with the A47 near Honingham, and associated works: Highways,  
Transport & Waste**

Thank you for the opportunity to comment on the above. My comments are specifically  
focused on the following chapters – Air Quality and Population and Human Health.

**Air Quality**

The Scoping Opinion clearly sets out the process for thorough air quality assessments as  
per industry standard guidelines and practice.

*Continued.../*

As you will be aware, the air pollution-human health landscape is changing, not least with the outcome of the inquest into the death of Ella Adoo-Kissi-Debrah (December 2020), and the reiteration from expert witnesses that air pollution is a public health risk regardless of legal threshold limits.

With this in mind, Public Health suggests that the proposals for Norwich Western Link give consideration to Public Health England's 2019 "net health gain" principles<sup>1</sup> which, if adopted, intend to deliver an overall benefit to people's health. In effect this means that any new development should be clean by design, incorporating interventions into design to reduce emissions, exposure to pollutants and contribute to better air quality management; applicable irrespective of air quality assessments.

Public Health recommends that these principles are considered in addition to standard methodologies.

The scoping document provided to us for review contains the current targets regarding particulate matter. We note the Environment Bill 2021 introduces a legally binding duty on the government to bring forward at least two new air quality targets by October 2022, which we would expect to see reflected in the EIA.

### **Population and Human Health**

We note that the guidance used to evaluate the effects of the proposal on population and human health is the Design Manual for Roads and Bridges. We note that this guidance focuses on quantitative indicators and would encourage the project promoters to work with stakeholders and members of the public to take into account their views. We would seek to ensure that an assessment of the health impact of the proposal demonstrate it has:

1. robustly considered *health inequalities* and demonstrate an understanding of how health inequalities apply in the context of the proposal;
2. clearly and appropriately identified vulnerable populations as part of the HIA process;
3. utilised relevant local health profiles and other appropriate community data, preferably down to electoral ward level where possible;
4. robustly considered the *wider determinants of health*, and demonstrated an understanding of what these are in the context of the proposal and wider communities;
5. been balanced in its findings.

Public Health would welcome further consultation on the detail of the health impact assessment process.

I trust this is helpful, and am more than happy to discuss any part of the above response.

Kind regards

**Jane Locke**  
**Prevention Policy Manager (Places)**  
**Public Health Norfolk**

---

<sup>1</sup> [Improving outdoor air quality and health: review of interventions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/improving-outdoor-air-quality-and-health)

**From:** [Cook, Richard](#)  
**To:** [Planning Services](#)  
**Subject:** SCO/2022/0001 Norwich Western Link  
**Date:** 22 July 2022 15:36:23  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Thank you for your email

I have no comments to make with regards to Emergency planning issues related to this Request for EIA Scoping Opinion.

Kind regards

Richard

**Richard Cook, Head of Resilience**

Community & Environmental Services

Tel: 01603 222014 | Dept: 01603 222016

County Hall, Martineau Lane, Norwich. Nr1 2DH



Campaign Logo



**From:** [Planning Department](#)  
**To:** [Planning Services](#)  
**Cc:** [Annetts, Mark](#)  
**Subject:** RE: Subject SCO/2022/0001 Norwich Western Link  
**Date:** 02 September 2022 12:19:00

**NB: Attachment uploaded separately on system.**

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**WARNING:** External email, think before you click!.

Our Ref: 22\_06914\_P  
Your Ref: SCO/2022/0001

**RE: Norwich Western Link: Request for EIA Scoping Opinion: Proposed Norwich Western Link (NWL). Proposed link road to comprise the dualling of the A1067 Fakenham Road, from its existing junction with the A1270 Broadland Northway, to a new junction with the A47 near Honingham, and associated works: Highways, Transport & Waste**

Good Afternoon,

Thank you for your consultation on the Environmental Impact Assessment (EIA) scoping opinion request for the proposals above. Having reviewed the updated documents, we would like to refer you to our comments previous submitted on behalf of the Norfolk Rivers Internal Drainage Board dated 15/07/2020 (Our Ref: 20\_02756\_P), which still apply. Please find attached copy of the Board's previous comments for your reference.

Kind Regards,

**Will Chandler BSc (Hons), MCIWEM**  
Sustainable Development Officer  
Water Management Alliance  
m: 07826 940760 | dd: 01553 819630 | [William.Chandler@wlma.org.uk](mailto:William.Chandler@wlma.org.uk)

Registered office: Pierpoint House, 28 Horsley's Fields, King's Lynn, Norfolk, PE30 5DD  
t: 01553 819600 | e: [info@wlma.org.uk](mailto:info@wlma.org.uk) | [www.wlma.org.uk](http://www.wlma.org.uk)

WMA members: [Broads Drainage Board](#), [East Suffolk Drainage Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#), [Waveney, Lower Yare and Lothingland IDB](#) in association with [Pevensey and Cuckmere Water Level Management Board](#)

Your feedback is valuable to us, as we continually review and work to improve our services. So, if you have any suggestions, recommendations, questions, compliments or complaints, please complete one of our online forms: [Feedback Form](#) | [Complaint Form](#)

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[REDACTED]

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**From:** Allen, Dominic  
**Sent:** 08 September 2022 15:14  
**To:** [REDACTED]  
**Cc:** Sierakowski, Andrew  
**Subject:** Subject SCO/2022/0001 - Request for EIA Scoping Opinion: Proposed Norwich Western Link - Climate

[REDACTED]

**Subject SCO/2022/0001 - Request for EIA Scoping Opinion: Proposed Norwich Western Link – Climate**

Section 13: Climate

Having not provided a consultation response on the previous Scoping Report (2020), the Addendum relating to the realignment provides the opportunity to do so, so I thank you for that. The 'EIA Scoping Addendum' 2022 states (table on page 6) in the section relating to Greenhouse Gas emissions, it 'does not change the approach to the GHG assessment set out in the Scoping Report'. Therefore, comments applied here relate equally to both reports, given section 13: Climate - is unchanged.

13.1.5

This section refers to the approach to assessment, however, the reference to NCC's Environmental Policy here frames the policy context around NCC's climate change policy targets and would have no direct bearing on any assessment methodology, other than how this scheme contributes to a commitment to net zero, which any assessment process would be expected to demonstrate.

Other contributions to this section would include the Standard PAS 2080 (which mirrors the approach set out in the DMRB LA114 guidance). This is actually mentioned at the head of table 13.2, so should be included here for clarity. In addition, WebTAG guidance (which is referenced later on in this climate section) should be listed also. Given the comments made relating to government's 'Decarbonising Transport Plan' below (see 13.7.2) is it fair to assume that this too would form part of any assessment and captured in this section?

13.4.1 – Table 13-1

Is it worth revisiting this data to reflect the latest reports on regional and national emissions trends to reset the tone for the baseline for the ES?

13.7.2

Where does the government's forecasting within the Decarbonising Transport Plan (July 2021) sit within the modelling for this scheme? This has been applied to recent modelling (60 year forecast) for the Lower Thames Crossing (National Highways press release, 18 July 2022). This shows significant carbon reduction with regard to transport emissions taken out of the wider transport network, due to the impact of that

particular scheme. This very well may be addressed as part of work envisaged to address 'end user emissions' as part of operational use (ref. in tables 13-2 & 13-3) going forward, particularly if looking beyond direct users of the scheme. However, given that the Decarbonising Transport Plan was published since the previous Scoping Document was made available, due reference should be made of it, and perhaps an acknowledgement to embrace any related modelling approaches that have subsequently emerged, to get the broadest picture of how this scheme will contribute to emissions reduction scenarios, particularly with regard to end user emissions. One assumes this may be demonstrated at the next stage by applying the approach outlined through the DMRB (as referenced in 13.4.5) to underpin any projections supporting an emissions reduction narrative.

#### 13.9.4

In the section on 'significance', with regard to national carbon budgets, this will inevitably show the relative insignificance of the scheme in relation to the UK at large, which could give the impression of overlooking the significance of the scheme locally. Therefore, as part of the assessment process, an indication of how it contributes to meeting local carbon targets, including within the context of the Local Transport Plan, given the breadth of scope outlined in the 'Transport Assessment Scoping Statement', should be included; insofar as the scheme contributes to alleviating emissions across the network.

#### Climate Resilience

The longer-term impact of climate change is clearly outlined. It is noted that appropriate mitigation measures will be in place to reflect the impact probability of the climate variables stated, insofar as they affect the scheme, so nothing to add to this.

Regards,

Dominic Allen

**Dominic Allen, Sustainability Manager**

Community & Environmental Services

Tel: 01603 224463

County Hall, Martineau Lane, Norwich. NR1 2DH



**Norfolk County Council**

