

SALHOUSE PARISH COUNCIL

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25th March 2013

**INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2009 SI 2263 (as amended) (the EIA Regulations)
PROPOSED NORWICH NORTHERN DISTRIBUTOR ROAD (the project)
PROPOSAL BY NORFOLK COUNTY COUNCIL (the applicant)**

I refer to your letter dated 25th February 2013 inviting comments around the above project and the impact that we believe this project will have on the surrounding area around Salhouse a parish adjacent to Rackheath. In particular we would highlight the following:

The NDR EIA Scoping Report begins by stating:

1.1.1.2 The NDR is considered to be a Nationally Significant Infrastructure Project under The Planning Act 2008, Part 3, Section 22. 2b. in that "the highway is to be constructed for a purpose connected with a highway for which the Secretary of State is (or will be) the highway authority"

Salhouse Parish Council would advise the Planning Inspectorate that the NNDR is not a Nationally Significant Infrastructure Project as it is not a highway proposed to be constructed for a purpose connected with a highway for which the Secretary of State is (or will be) the highway authority. It therefore does not fall under Section 22.2(b) of the Planning Act 2008.

Meanwhile, given that the Secretary of State has indicated that he will not consider responses to the EIA draft Scoping Report after 25th March, Salhouse PC wishes to comment on the draft Scoping Report as currently submitted.

We have no confidence in the EIA Scoping Report as a neutral piece of work. The report has been prepared by Mott MacDonalds who have a strong interest in seeing the road built as they have a long standing contract as transport consultant to Norfolk County Council and they undertake all the technical work on the Norwich Area Transportation Strategy (NATS). The NATS is based on a NDR and their report makes every effort to highlight the beneficial effects of a NDR, whilst either playing down or omitting the negative impacts.

Cultural Heritage (Chapter 5)

The opening paragraph says that the EIA will also investigate the possibility of beneficial effects at a distance, for example as a result of the consequent reduction of traffic flows from historic environments.

However, the Scoping Report fails to say that negative impacts will be investigated as a consequence of the increase in traffic flows on the historic environment.

For example, the line of the NDR crosses the C874 Plumstead Road a short distance from Thorpe End Garden Village Conservation Area and the NDR traffic model shows a traffic increase of around 50% on the C874 through the Conservation Area.

However, the impact of increased traffic on this particular conservation area is not mentioned in the Scoping Report and neither is the general possibility of an increase in traffic flows, with detrimental effects on the historic landscape.

Landscape (Chapter 6)

The EIA must consider the environmental impacts of a proposed **A47 to A1067 link road** as NCC view the link road as being integral to the development of three quarters NDR in addressing traffic wanting to cross the river and in reducing the impacts of traffic on the NW suburbs.

In 2005, Norfolk County Council decided not to pursue the western section of a NDR between the A47 and A1067 Fakenham Road on environmental grounds. A road in this location would have crossed the River Wensum Special Area of Conservation (SAC). The County Council concluded that it would be unlikely to mitigate the impacts this part of the route would have on the SAC and adopted a three quarters NDR route terminating at A1067 Fakenham Road.

In place of the missing western section, the County consulted in 2007 on plans for a link road between the A47 and A1067 for dealing with traffic. Norfolk County Council Cabinet (29 Jan 2008) resolved to carry out further investigations into Option 1 and a combination of Options 1 and 3.

Geology and Soils (Chapter 8)

The Scoping Report states:

“There are no protected geological sites within the footprint of the Scheme”.
(8.1.1.3)

“Direct and indirect impacts on geology and geomorphology may occur during construction processes. This may lead to issues such as the cutting through important geological exposures and creating new exposures, it is anticipated that these will be recorded to increase the geological knowledge of Norfolk”. (8.1.2.1)

We would like to see a definite statement that geological logging of the route will be carried out as we fully expect works to reveal valuable information in this part of the Norwich Policy Area.

Unlike archaeology and biodiversity there is no statutory obligation that road building is monitored or logged for geology, and so valuable geological information is frequently lost in the course of development. If they have not already been approached, we recommend that the developer works with Norfolk Geological Partnership (NGP).

The NGP can designate geological local sites (called County Geodiversity Sites (CGS)) in Norfolk, but sites can only be designated as CGS on the known value of their geodiversity. Very little is yet known about the geodiversity of the NDR road line.

Effects on All Travellers (Chapter 11)

The EIA should also examine the effects on all travellers including on non-motorised users on those parts of the local highway network which are predicted to see an increase in vehicular road traffic as a result of a NDR, for example the predicted increase on the road network;

- in north and north-east Norwich (B1149 Holt Road, B1150 North Walsham Road, A1151 Wroxham Road; C283 Salhouse Road, C874 Plumstead Road East).
- in other parts of Norwich eg South-East City such as Long John Hill.

The Scoping Report should also examine the effects of predicted traffic rises in this areas on residents and different aspects of the environment under the relevant topic specific chapters.

Socio Economic Effects (Community and Private Assets Chapter 12)

We note with concern the marked difference between the economic objectives contained in Norfolk County Council's Development Pool Best and Final Bid (Sept 2011) and the EIA Scoping Document

The Development Pool bid includes the following economic objective:

“To deliver economic growth.

10,000 new homes and 12,000 new jobs are directly dependent on the implementation of Postwick Hub and the NDR. The NDR will directly link strategic employment sites, Norwich International Airport and major housing growth areas to the trunk road. The new road will provide strategic access to large parts of north and north-east Norfolk, including its essential tourism centres directly facilitating access to employment as well as improving employers' access to labour markets.”

The Department for Transport gave Programme Entry to a half NDR route between A47 East and A140 and £89M in provisional funding on the basis of this objectives and others presented in the bid document.

However, the NDR EIA Scoping Report has changed the Development Bid economic objectives to read:

2.1.1.6 “Therefore the primary objective of the NDR is to provide the step-change in transport infrastructure needed:

- *To facilitate the housing and economic growth associated with the Joint Core Strategy (JCS) through implementation of the NDR, which is recognised within the JCS as central to the delivery of significant increases in both housing and employment;*

- *To preserve and enhance the city centre by removal of through traffic, and through the congestion-relieving effect of the NDR, to promote implementation of planned future sustainable transport provision, including widespread walking, cycling and public transport measures;*
- *To deliver quality-of-life benefits through reduction of congestion on strategic routes to the north of the city and associated relief of detrimental rat running, reducing noise, air pollution and accidents for communities in these suburbs of Norwich and in outlying villages; and,*
- *To enable the planned growth areas to be designed without the need to accommodate extraneous through traffic.*

The direct references to a NDR supporting 10,000 new dwellings, 12,000 new jobs and linking strategic employment sites, Norwich Airport and housing growth areas have been removed as has the reference to the provision of strategic access to large parts of north and north-east Norfolk, including its essential tourism centres directly facilitating access to employment as well as improving employers' access to labour markets. Instead, the Scoping Report refers to "economic growth associated with the Joint Core Strategy", a smaller area relating to the Norwich Policy Area.

The NDR outlined in the Scoping Report should be assessed on the basis for which it received Programme Entry and provisional funding.

The Scoping Report assumes that the economic impacts of a NDR are all positive and that the road would create employment gains.

However, we are concerned that a NDR would result in job losses, in particular:

- Norwich city centre. The development of Broadland Business Park at Postwick, with easier car parking, has attracted major employment from the city centre to the out of town site (eg Aviva and Bartrams).
- the Regeneration area of Great Yarmouth, situated fifteen miles away at the eastern end of the A47. There is a danger that people living in Great Yarmouth could commute along the A47 to new jobs on land opened up by NDR.
- faster access to north and north-east Norfolk as a result of a NDR could adversely affect existing employment in the market towns and villages by encouraging rural residents to drive to new facilities along the NDR. For example, relocation of the Norfolk and Norwich Hospital on land opened up by the A47 southern bypass, led to major job losses

The developer has claimed elsewhere that the construction of 10,000 dwellings and business development (such as a business park at Norwich Airport on the line of a NDR) in north-east Norwich is dependent upon construction of a NDR. The Greater Norwich Development Partnership has allocated 7,000 rising to 10,000 dwellings on either side of the NDR route. The EIA should assess the impacts of consequential land use changes expected directly as a result of a NDR.

Climate Change (Chapter 14)

The chapter on climate change is particularly weak. We disagree with the developer's proposed approach. The developer is not proposing to evaluate the impact that the scheme itself would have on climatic factors, instead, the developer is intending to evaluate the impact that the adaptation and

mitigation measures integrated into the scheme would have, which of course since they are mitigation measures would likely result in a positive assessment.

It is generally understood that, in accordance with the EIA directive, the promoter must evaluate the impact the development or scheme itself would have on climatic factors (i.e. increasing carbon emissions) and not just the mitigation/ adaptation measures. The developer has not provided any compelling evidence within the scoping report to justifying the scoping out of this requirement.

Climate Change is a very serious threat to social, economic and environmental standards both globally and locally, and has triggered the strongest possible response in the UK with a unique Act of Parliament aimed directly at eliminating these threats. The proposed NDR generates additional carbon emissions and would make an incremental change to the UK carbon balance sheet, and the level of future global carbon emissions in the wrong direction. This is against current national and local policies including the UK Climate Change Act 2008, the National Planning Policy Framework (NPPF), the 2011 Department for Transport White Paper (“Creating Growth, Cutting Carbon. Making Sustainable Local Transport Happen”) and the UK Committee on Climate Change June 2010 (2nd) Progress Report, and the Norfolk Local Transport Plan (LTP3).

Since it appears that the developers will have carbon emissions information available at the time of writing the ES, this information should be provided in the ES within the climate change chapter.

5. Cumulative Impacts (Chapter 15)

We are especially concerned about the cumulative environmental impacts that a NDR and associated development would bring. The EIA must examine the full cumulative effects of NDR and various developments related directly to it:

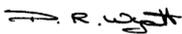
- A NDR would create a third orbital ring road around Norwich (in combination with A47 Southern Bypass):
- Either involving a three quarters NDR, with a A47- A1067 link road
- Or a complete outer orbital by extending the route to A47 West. We are already seeing strong pressure from within Norfolk County Council and from some members of the public, in particular from residents living in north-west Norwich. Crossing of the River Wensum, either in place of or in addition to building an A47 to A1067 link road, would have a serious detrimental impact on the River Wensum Special Area of Conservation.
- Development which is directly linked to a NDR includes:
 - 10,000 dwellings in NE Norwich either side of a NDR;
 - Proposed Business Park at Norwich Airport on line of NDR.
 - Proposed Broadland Gate Business Park at Postwick
- Cumulative impacts include:
- Impact on travel patterns: plans for strategic housing in NE Norwich linked to major employment allocation at Broadland Business Park and to SW of City via a NDR and A47 Southern Bypass would encourage orbital travel which is difficult to serve by non-car means.

- Impact on dispersal of land uses and facilities.
- Impact on employment in city centre and on the weaker economies of Great Yarmouth and market towns
- Impact on the A47 between Norwich and Great Yarmouth. Additional car commuting along the corridor would increase pressure for duelling.
- Serious impact on the emission of greenhouse gases and climate change arising from a NDR and linked development.
- Possibility of flooding through the removal of natural soak ways as land is covered for the proposed NDR and the JCS housing in the NEGT.
- Impact on traffic levels through Salhouse caused by road closures elsewhere and in particular, the lack of an intersection at Thorpe End.
- The environmental impact on the sensitive area known as 'The Springs' adjacent to the Wroxham Road.

We emphasise that it is the opinion of Salhouse Parish Council that the NDR is not a Nationally Significant Infrastructure Project and therefore it does not fall under S22.2(b) of the Planning Act 2008. Accordingly, the documents should be returned to Norfolk County Council. However, we have also made some outline comments on the EIA due to the deadline given.

We look forward to hearing the outcome of the Secretary of State's consideration of our comments.

Yours sincerely,



Mrs D Wyatt
Clerk to Salhouse Parish Council