

Department for Transport  
By e-mail to Planning Inspectorate:

A47NorthTuddenhamtoEaston@planninginspectorate.gov.uk

Tel:

8 July 2022

F.A.O. Rachel Dominey, Senior Planning Officer

Dear Ms Dominey,

**A47 North Tuddenham to Easton dualling scheme TR 010038 - Ecological concerns**

Further to my e-mail to you of 15 June, I offer more information regarding ecological issues, and add detail to the e-mail sent to you recently by Andrew Cawdron.

**I Natural England** has replied to your request of 1 June. I note that:

- a) NE seeks reassurance that (bat crossing) survey methodology and any further mitigation . . . will be appropriate . . . .  
I assume that the LEMP will be updated to reflect these measures; I suggest this needs to be completed and approved by NE before a decision is made, to accord with the requirements of EIA regulations
- b) Letters Of No Impediment are still awaited from Natural England for bats. As above, I suggest these need to be in place before a decision can be made. The effect on bats is reckoned to be Large Adverse (APP-947 para 8.12.5).
- c) Great crested newts; "Following further survey work . . . some further clarification is required . . ." As above, this surely needs to be resolved before a decision is made on the road.
- d) NE state that the River Tud flows into the Wensum downstream of the Wensum SAC, but I point out again that further downstream of that confluence, the Yare joins the Wensum and then flows into the Broads SAC, which is also a RAMSAR site. Therefore the quality of the water in the Tud can have an impact on that site. Also, Norwich's water supply is taken mainly from the River Wensum after that confluence.
- e) As NE's reply to your 1 June questions has been so late in arriving, please will you grant us an extension of time to respond to its content after further consideration? This would be much appreciated.

**II Outstanding reports**

There is a number of surveys, other than those mentioned above, which have been requested, but which appear not to have been carried out, or reported upon:

Natural England's biodiversity Metric 2.0 "to produce a plan for a measurable net gain". *Botanical Survey Report (APP-096)*

I also refer you to the report from Norfolk Wildlife Trust (REP4-045) which includes a recommendation to work to DEFRA Biodiversity Metric 3.0, which it considers would increase the monitoring period for various habitats, and require the creation of more habitats.

NWT also recommend an assessment of the effect of the scheme on the nearby super-colony of the highly-protected Barbastelle bats.

In addition, as I stated in my e-mail of 15 June, an aquatic macrophyte survey needs to be done, as this is an important chalk river (see III, below).

**III Importance of the river Tud.** As mentioned above, the Tud is a chalk river, recognised as one of only 200 globally. Chalk rivers provide the ideal habitat for rare and endangered birds, mammals insects, fish, amphibians and plants, including Annex 1 habitats and Annex 2 species, such as:

**Kingfisher** UK population has reduced 50% over last 30 years. Seen on the Tud.

**Brook Lamprey** An ancient fish. Populations have been in decline and is now endangered.

Found in the Tud

**Bullhead** found throughout the length of the Tud. (see APP-099)

**Barbastelle Bat** Rarest mammal in UK & Europe, now endangered. The Norfolk breeding colony frequents the Tud and Wensum Rivers hunting for insects at night.

**Wolverine** Facing the most serious decline of any wild mammal in UK, now endangered

**Waterdropwort** Disappearing from rivers

**Watercrowfoot** Disappearing from rivers – abundant in the Tud

The Highways England (National Highways) design team have not undertaken the surveys necessary to record and evaluate adequately this particular part of the Tud Valley (mainly an aquatic macrophyte survey) and so they have not recognized that it is a chalk stream. This would have highlighted its significance, both nationally and in terms of its relationship to the whole of the Broadland Catchment.

#### **IV Consideration of alternatives**

##### **Guidance note from NNNPS**

**4.26** *EIA Directive requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects.*

The proposed road follows the course of the River Tud so closely that it will destroy the tranquility of the valley and spoil the view from the network of ancient footpaths that run along this river, and which connect villages and hamlets. (Hockering footpath FP7 is to be severed and Church Lane East Tuddenham is to be closed. This latter provides access to East Tuddenham footpaths from north of the A47). At present people can enjoy the healthy outdoor recreational activity of walking that this area offers. Depriving local people and tourists of this area would greatly decrease the intrinsic and economic value of this part of Norfolk in the future.

Alternative routes have been suggested by local people since the four offered in the initial consultation, but they have not been considered, let alone environmental impact assessment carried out on them.

The Secretary of State should pause this road-building program because the Applicant has failed to provide accurate ecological information, and as a result not acknowledged the significance of this river in their design, and not investigated options for avoiding inevitable damage to it. In fact, the route chosen is not exactly one of the four initially consulted upon; it has been moved CLOSER to the river Tud, and therefore puts the river under greater threat.

## **V Cumulative effects**

### **Guidance note from NNNPS**

*4.17 Examining Authority should consider how significant cumulative effects and the interrelationship between effects might as a whole affect the environment, even though they may be acceptable when considered on an individual basis with mitigation measures in place.*

There are three other schemes being promoted in the area (A47 Blofield , Thickthorn Junction and Norwich Western Link). There is no evidence that the cumulative effects of these schemes, particularly upon creatures which use the rivers as foraging routes, has been assessed.

## **VI Traffic modelling**

I included a detailed summary of my analysis of traffic modelling in my e-mail of 15 June. I must state that throughout the examination my submissions and valid questions have generally been ignored, and not engaged with by the Applicant; neither have they been throughout the development of the project. Now Bryan Robinson and Dr Boswell have exposed significant new issues and inconsistencies with the traffic modelling, highlighted by work on carbon emissions (see emails from each dated 8 July 2022).

It is essential that these queries and anomalies be re-examined, and this can only be achieved by a fresh consultation by the DfT, and I strongly request that this further consultation is launched, with a reasonable timescale to ensure that the queries can be properly resolved; this will probably mean delaying the decision date.

## **VI Landscape and visual**

(from APP-046)

It is noted that 8 of the 20 viewpoints chosen are sensitive to the scheme, and many of those will experience moderate to significant adverse effect at year 1.

*7.10.4. Some tree removal would be required as part of the construction operations, however this would be relatively limited in the context of the 9km scheme. The tree survey (Appendix 7.6) (TR010038/APP/6.3) identifies that the Proposed Scheme would require the likely removal of:*

- *256 of the existing 605 individual trees identified within the site which have the potential to be impacted*
- *66 of the 246 groups of trees identified within the site*
- *27 of the 104 hedgerows identified within the site*
- *In addition, 63 tree groups and*

*42 hedgerows would require partial removal to varying extents (refer to Appendix 7.6 for exact details) (TR010038/APP/6.3)*

The imposition of a 4-lane highway, on an embankment, plus removal of the features listed above will inevitably lead to a massive change in landscape, especially near the River Tud, and it is



impossible to believe the report's assertion that at year 15 the effect will be, in most cases, minor.

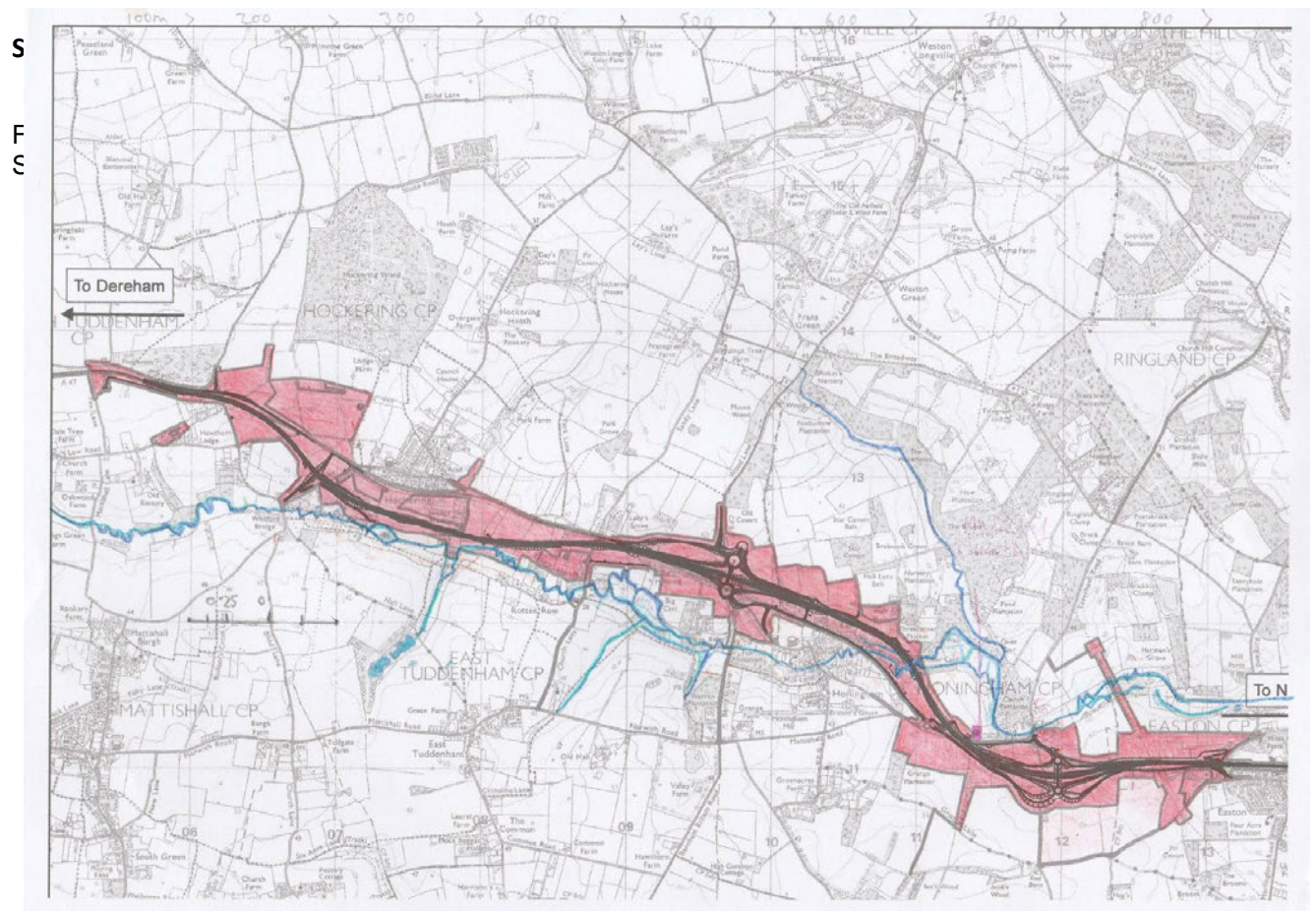


Fig 3. Proposed route of A47NT-E running parallel to the River Tud. Red area is the construction zone and Blue meandering line represents the river. Note the river runs through or next to the construction zone in 5 places and it is also crossed by a major bridge, along this 9km section of road.

The construction of a new dual carriage way will irreparably alter the existing landscape. The massive scale of this development will scrape away all the soil and level an area 9km long at an average width of 0.5km. Where the dual carriageway bridges over existing roads it will be a minimum of 7m high and require embankments.



Fig 4. Water crowfoot and water cress beds on the River Tud, Honingham

## VII Conclusion

I have little doubt that the Secretary of State would risk making an illegal decision, were he to permit this road scheme to proceed with these breaches of Environmental guidelines, and I again encourage him to defer this decision.

Thank you.

Yours faithfully,

Richard Hawker    IP20028320