

A47 Blofield to North Burlingham Dualling

Scheme Number: TR010040

Volume 9

9.12 Applicant's Response to Norfolk County Council's Local Impact Report

The Infrastructure Planning (Examination Procedure) Rules 2010
Rule 8(1)(c)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009

August 2021

Deadline 3

Infrastructure Planning

Planning Act 2008

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(Applications: Prescribed Forms and
Procedure) Regulations 2009**

A47 Blofield to North Burlingham Dualling
Development Consent Order 202[x]

**APPLICANT'S RESPONSE TO NORFOLK COUNTY COUNCIL'S
LOCAL IMPACT REPORT**

Regulation Number:	Rule 8(1)(c)
Planning Inspectorate Scheme Reference	TR010040
Application Document Reference	9.12
BIM Document Reference	HE551490-GTY-LSI-000-RP-TX-30056
Author:	A47 Blofield to North Burlingham Dualling Project Team, Highways England

Version	Date	Status of Version
Rev 0	August 2021	Deadline 3

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1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 Blofield to North Burlingham scheme was submitted on 30 December 2020 and accepted for examination on 27 January 2021.
- 1.1.2 The purpose of this document is to set out Highways England's (the Applicant) response to the Norfolk County Council Local Impact Report (**REP1-070**).

2 RESPONSE TO LOCAL IMPACT REPORT

Reference	Local Impact Report	Applicant's Response
1.1. – 1.5	<p><u>Introduction</u></p> <p>1.1. This report sets out Norfolk County Council's position with regard to the submitted Development Consent Order (DCO) application made under section 56 of the Planning Act (2008).</p> <p>1.2. The County Council is a statutory consultee given that the proposed development is a Nationally Significant Infrastructure Project (NSIP) under the above Act and is located:</p> <p>(a) Between the existing A47 alignment at Yarmouth Road, Blofield, continuing parallel to the south of the A47, re-joining the existing A47 alignment with the B1140 South Walsham Road / White House Lane. (See Appendix 1, location plan)</p> <p>1.3. The principal role of the County Council in responding to the above proposed dualling application, is in respect of the Authority's statutory role as:</p> <ul style="list-style-type: none"> • Highways Authority; • Minerals and Waste Planning Authority; • Lead Local Flood Authority; and • Public Health responsibilities. <p>1.4. In addition, the County Council have an advisory environmental role and economic development function, which has also fed into the response to the DCO application.</p> <p>The issues raised below simply relate the County Council's statutory and advisory functions.</p>	No response required
2.1-2.2	<p><u>Background</u></p> <p>2.1. This is a Development Consent Order (DCO) application for dualling</p>	No response required

Reference	Local Impact Report	Applicant's Response
	<p>part of the A47, between Blofield and Burlingham, which will be determined by the Secretary of State. The application is defined as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008.</p> <p>2.2. The County Council responded to the pre-application (Section 42 Consultation) version of this proposal in October 2018. At that time the Council supported the principle of dualling the A47 between Blofield to Burlingham, subject to a number of detailed issues and comments being resolved with Highways England.</p>	
3.1-3.2	<p><u>The Proposal – Development Consent Order Application</u></p> <p>3.1. The County Council has assessed the proposal on the following basis:</p> <p>3.2 The proposal comprises 2.6km of new dual carriageway on the A47, with de-trunking of the existing A47 section between Blofield and North Burlingham.</p> <p>The new dual carriageway departs from the existing alignment of the A47 at Yarmouth Road, Blofield, and continues parallel to the south of the existing A47, crossing over Lingwood Road and Lingwood Lane (which will both be stopped up) before re-joining the existing A47 alignment east of the existing junction with the B1140 South Walsham Road / White House Lane. As the proposed scheme is offline, traffic will be able to continue to use the existing A47 as works progress on the main dualling section.</p> <p>Once the scheme is opened, it would form part of the A47 trunk road and the wider strategic road network. It would be managed by Highways England. The de-trunked A47 and new side roads would become the responsibility of Norfolk County Council.</p> <p>A. <u>New / Amended Junctions Comprise:</u></p>	No response required

Reference	Local Impact Report	Applicant's Response
	<ul style="list-style-type: none"> Yarmouth Road, Blofield, to be re-aligned with gap in the central reservation closed to right turning vehicles. A new overbridge to the east across the proposed A47 dual carriageway will connect Yarmouth Road with the existing A47 <p>Existing staggered crossroads at B1140 to be replaced by a new compact grade separated junction including B1140 overbridge.</p> <p>B. <u>New Walking, Cycling and Horse-riding Amenity</u></p> <ul style="list-style-type: none"> Existing A47 to be detrunked and serve as local access road with a new shared footway / cycleway on the north side of the carriageway B1140 junction includes footway and cycleway provision across the bridge. The new footway / cycleway provision will connect with existing footways at the eastern extents of North Burlingham and lead over the overbridge via a crossing at the de-trunked A47. South of the B1140 junction the footway / cycleway connects with a new footway / pedestrian link. Cyclists travelling south would re-join the local road network at this point. New Public Right of Way (PRoW) footpath connecting from Blofield to the B1140 junction. This route connects with existing north / south permissive routes and footpath Burlingham FP3. This consists of an unbound footpath running east to west, starting on the footway of the Access Road which provides a link to the Blofield Overbridge: <ul style="list-style-type: none"> Adjacent to the proposed agricultural access track passing Lingwood Road to FP3 Adjacent to the agricultural access track and then the maintenance track from FP3 to permissive Burlingham Woodland Walks Adjacent to the existing Burlingham Trails Network (bridleway) 	

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	<p>to Lingwood Lane with a short diversion of approximately 50m round the proposed soakaway</p> <p>A new footpath from Lingwood Lane to the B1140</p> <p>C. <u>Drainage</u></p> <ul style="list-style-type: none"> The new carriageway will drain to filter drains and discharge to an infiltration basin located to the south of the new Blofield Overbridge and to frequent soakaways across the Proposed Scheme, providing treatment of the surface water run-off and maintaining greenfield discharge rates. Additional spillage containment at the discharge points will be provided where required. Proposed drainage systems include: <ul style="list-style-type: none"> Kerbed sections of the mainline will be drained utilising gullies or a combined kerb and gulley system, discharging to the filter drains or carrier drains in the verges Filter drains will be provided at the toe of any cuttings along the mainline. The filter drains will collect run-off from the slopes or carriageway. Central reserve drainage will be provided where the road is in superelevation. Toe drains, where required, draining embankments greater than 1.5m in height, will drain via ditches to soakaways or along existing surface water pathways. Side road links to the new carriageway will drain to soakaways. Where the existing A47 is de-trunked and will link into the proposed new alignment at the B1140 junction, the existing drainage will remain in place where possible with some realignment. This existing drainage system will be maintained through the junction, collected and diverted back into the existing drainage at the western tie in. Natural overland drainage and existing ditches / streams between 	

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	<p>the existing A47 and the proposed new mainline will be intercepted by new ditches and conveyed along the natural drainage paths as far as possible. This will involve pipe crossings of the proposed new mainline</p> <ul style="list-style-type: none"> • Realignment of existing drainage on the existing A47 and new gullies and / or combined kerb drainage units which will tie-in to the new drainage networks and to existing drainage where possible as a result of the new footway provision. <p>An existing ditch will be culverted to allow access to a field west of the existing road on the B1140, which provides access to the White House (Coach house).</p> <p>D. <u>Additional details:</u></p> <ul style="list-style-type: none"> • Provision of new drainage systems including an attenuation pond and retention of existing drainage systems where possible. • New boundary fencing, safety barriers and signage. • Streetlighting of the B1140 junction including along the A47 mainline within the extents of the junction, lighting of the overbridge and the junctions to the north and south of the bridge. Lighting of the Yarmouth Road junction comprising columns on the verge of the approach and exit on the A47 westbound carriageway. These extend down Yarmouth Road adjacent to the eastbound carriageway and a single lighting column adjacent to the eastbound carriageway of Waterlow. • Stopping-up direct access from High Noon Lane to the improved A47, providing a link to the existing detrunked A47. • General improvements to the surrounding local junctions and accesses at the Sparrow Hall properties. • Realigning Waterlow, Blofield, to tie in with the new bridge. 	

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	Access to North Burlingham provided by a new junction, providing two-way access.	
4.1-4.2	<p><u>Local Impacts</u></p> <p>4.1. This section of the report assesses the Environmental Statement (ES) and other supporting documentation in respect of the County Council's key functions and sets out the Authority's proposed response / comments.</p> <p>4.2. Overview</p> <p>The proposal is outlined in Section 3 and shown in Appendix A. In summary, the proposal is to dual the single carriageway section of the A47 from Blofield to Burlingham including a grade-separated junction at the B1140 (to South Walsham and Cantley) junction.</p>	No response required
4.2.1	<p><u>Overview Comments</u></p> <p>The principle of dualling the A47 is fully supported. This has been a longstanding objective of the county council. The county council leads the A47 Alliance, which has been campaigning for full dualling of the A47 from Lowestoft to the A1 at Peterborough with appropriate grade-separation. The current proposals largely meet this aspiration, providing a dual-carriageway standard A47.</p> <p>However, whilst the proposals include a grade-separated junction at the B1140, which is welcomed due to the casualty record at this junction and its role in serving HGV movements to Cantley, the proposals include only a limited movement junction at Blofield.</p> <p>Norfolk County Council's principal concern with the scheme relates to the lack of provision proposed for non-motorised users wishing to cross the A47 in the middle of the proposal, in the vicinity of North Burlingham. The A47 has historically been a barrier to connectivity between the two settlements of Burlingham and Lingwood, in an area where permissive</p>	<p>The Applicant notes the support in principle for the Scheme from Norfolk County Council and the recognition the Scheme forms part of a wider group of projects providing a dual carriageway standard A47.</p> <p>The Scheme Design Report (REP1-046) sets out the justification for the junction at Yarmouth Road and details the options considered. An all-movements junction was discounted due to the low use of the existing junction arrangement in the forecast future years do-minimum scenario with the strategic traffic model.</p> <p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Appendix A to the Applicant's Response to Relevant Representations (REP1-060).</p>

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	paths and the Public Rights of Way network are all popular. The county council has consistently pressed the applicant, Highways England, to provide a connection and considers that a suitable facility, in the form of an overbridge, should form part of the scheme proposals. More detail is provided later in our representation.	
4.3	<p><u>Detrunking</u></p> <p>Following completion of the scheme, those parts of the existing A47 that would no longer form part of the trunk road network, for example, the existing single carriageway section at North Burlingham which would be superseded by the new dual carriageway to the south, would be detrunked. Responsibility for ongoing management and maintenance would fall to Norfolk County Council as the local highways authority. To date Highways England has had very limited discussion with us about which parts of the existing A47 provision are proposed to be taken on by Norfolk County Council following the improvement scheme, or what their current condition is.</p> <p>Whilst the county council would receive additional maintenance funding through the national grant agreement formula (due to the additional road length being maintained) this is not likely to be of any significance. It would not be sufficient to bring roads or structures up to standard (if they require this). To date we have not been provided with data indicating what assets might require attention in the short to medium term.</p>	No response required
4.3.1	<p><u>Detrunking Comments</u></p> <p>No agreement has been made to accept any current Highways England assets and we will not do so until an agreement process including exchange of data and provision of funding regarding assets which may require attention in the short to medium term has been completed.</p> <p>The agreement should be based on the condition and number of the assets to generate either a sum of funding to be transferred to Norfolk County Council, or the asset brought up to an as new or good condition. The county council would expect to receive a commuted sum, agreed with</p>	<p>The Applicant will work with Norfolk County Council to settle and conclude a detrunking agreement for the areas of highway that will no longer form part of the strategic road network, as well as new highway areas that would become the responsibility of the local highway authority.</p> <p>The Applicant confirms that the "Access Road" and "B1140 White House Lane" as denoted on the Classification of Roads Plans (APP-015) are proposed to be unclassified roads.</p> <p>The Applicant confirms that the "Infiltration Basin" will be the responsibility of Highways England.</p>

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	<p>Highways England, for future maintenance of transferred assets.</p> <p>The county council is in agreement that the B1140 remains as a B class road, with the majority of other roads classed as C roads. We would, however, suggest two of the small cul de sac sections being U class rather than C class roads; these are located south of the new A47 where they realign for the over bridge and the access to the lagoon near Blofield.</p> <p>In reference to the lagoon near Blofield, this will be the responsibility of Highways England. We have suggested the need to engage with Norfolk County Farms as the farms track is on their land, indicating a private farm track with a PROW for pedestrians could be a viable route forward.</p> <p>For slopes and verges, clear indication is required, with demarcation possibly necessary, to confirm ownership for ongoing maintenance requirements. Clear numbering / labelling of signs posts for instance at a junction would be beneficial to help facilitate who is responsible for assets in the future. Trees will be retained near the cycle path; clarity is needed whether it is proposed that these will be NCC, Highways England or private owner boundary trees.</p>	<p>The Applicant has been engaging with Norfolk County Farms (NCF) in relation to the "Agricultural Access Track" and has agreed some minor modifications, as shown on updated the General Arrangement Plans (previously REP1-005, resubmitted at Deadline 3 (TR010040/APP/2.6 Rev 2)), and that NCF will retain responsibility for the track. The responsibility of the PROW is still in discussion.</p> <p>The Applicant is continuing to engage with Norfolk County Council in respect of assets to be adopted and will continue to do so until agreed by both parties.</p>
4.4	<p><u>Highways Impacts</u></p> <p>The Transport Assessment (TA) assesses the impact of the proposal on the strategic and local highway network with respect to traffic congestion and road safety for motorised transport. The analysis indicates that the forecasted local and regional traffic growth will cause the existing A47 single carriageway section to be over capacity. This will in turn create an increase in delays along the section. It states, however, that the scheme provides the required capacity improvements to allow for the forecasted traffic growth.</p> <p>The TA notes that the existing at-grade roundabout junction at Brundall (Cucumber Lane, west of Blofield) is operating at capacity. It sets out that additional pressure will be placed on the operation of the roundabout due to the proposed dual carriageway improvement. This causes an increase</p>	No response required

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	<p>in delay along the A47 eastbound and westbound approach arms in the AM and PM 14 peaks at some point in the future. There is no information about delays on local roads.</p> <p>The TA notes that this matter has been discussed between Highways England and council officers. In these discussions, Highways England have suggested full-time signalisation of the roundabout although this is not referenced in the assessment. The TA also notes that "to prevent adverse impacts to the committed programme [for Blofield to Burlingham delivery] Highways England envisage any potential congestion relief schemes taken forward will need to be progressed independently." That is, they are not proposing any measures as part of the A47 improvement and there is therefore no commitment to a scheme.</p>	
4.4.1	<p><u>Highways Impacts Comments</u></p> <p>The Transport Assessment sets out projected changes to traffic patterns and therefore the likely impacts on local roads and communities. Based on this assessment, we are satisfied that the extent of the impacts does not warrant further mitigation beyond that which is being proposed.</p> <p>At the A47 / Cucumber Lane junction at Brundall, Highways England have discussed taking forward a separate proposal, at a later date yet to be confirmed, encompassing traffic signals at this roundabout in order to accommodate peak-time traffic flows. We do not consider that this provides sufficient commitment to mitigation that has been identified as being needed. In addition, the county council does not support the solution that has been mooted by Highways England (signalisation of the roundabout junction) as it will lead to delays on the trunk and local road network throughout the day. We would like to have assurance that an appropriate solution can be identified and agreed; about the timing of its delivery; and commitment to its funding. We consider that Highways England should commit to monitoring to ascertain whether, and at what point in time, a scheme at this junction is required.</p> <p>The county council would also expect there to be minimum disruption on the local highway network during the A47 dualling construction period and</p>	<p>The Applicant acknowledges NCC comments with respect to traffic impacts and mitigation.</p> <p>As stated in the Transport Assessment section 9.6.5 (REP1-044) the Applicant envisages that any potential congestion relief schemes taken forward will need to be progressed independently.</p> <p>As the majority of the construction activities are offline the Applicant anticipates minimal disruption to the local highway network. Norfolk County Council will be kept informed as to any planned traffic management that may impact on their network such as a full road closure of the A47, which would be necessary to construct the final tie ins at each end of the scheme.</p>

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	would want to work with Highways England, or its contractors, on managing traffic during the works.	
4.5	<p><u>Socio-Economic Issues</u></p> <p>There are potentially significant economic benefits arising from the dualling proposal in terms of:</p> <ul style="list-style-type: none"> • Local employment creation • Business sectors affected by construction <p>Productivity benefits to businesses, and other wider economic benefits, arising from the dualling.</p>	No response required
4.5.1	<p><u>Socio-Economic Issues Comments</u></p> <p>The county council would certainly want to see opportunities for inclusive growth and social mobility included in the socio-economic opportunities for Norfolk. We would be willing to work with Highways England or the appropriate agency to support this.</p> <p>The county council will continue to work proactively with Highways England to encourage apprenticeships, work experience and internships being included at an appropriate stage in the project.</p> <p>Productivity and other wider economic benefits will arise from the completed schemes. These include journey time savings and reliability improvements, benefitting businesses. These are to be welcomed.</p>	<p>The Applicant agrees with NCC regarding productivity and wider economic benefits arising from the scheme and is grateful to NCC for welcoming these positive benefits</p> <p>The Applicant and Galliford Try, as the Principal Contractor, will explore opportunities to encourage direct and indirect local employment, proportionate to the scale and timescale of the project.</p>
4.6	<p><u>Environmental Issues</u></p> <p>An Environmental Statement (ES) has been prepared to accompany the DCO Application. This sets out a description of the proposed scheme and the reasonable alternatives considered in the development of the design, the environmental setting, potential impacts and the likely significant effects of the Proposed Scheme on local communities and the environment, and the measures proposed to mitigate these effects.</p>	No response required

Reference	Local Impact Report	Applicant's Response
	The Environmental Statement: Non-Technical Summary provides a summary of the ES in non-technical language. The following sections consider each of the issues in the non-technical summary in turn.	
4.7	<p><u>Air Quality</u></p> <p>The assessment concluded that effects will not be significant and that in its operation the scheme is not predicted to affect compliance with the European Union Directive on ambient air quality.</p> <p>With no significant effects predicted, no mitigation is proposed.</p>	No response required
4.7.1	<p><u>Air Quality Comments</u></p> <p>The county council supports improvements to air quality and would want to see continued monitoring including in operation of the scheme following construction</p>	The Applicant will continue to discuss this with NCC with a view to addressing it in the Statement of Common Ground (REP1-055)
4.8	<p><u>Cultural Heritage</u></p> <p>Cultural heritage includes archaeology, historic buildings / structures and historic landscapes including parks and gardens.</p> <p>The Environmental Statement: Non-Technical Summary sets out that there will be both beneficial and adverse impacts, but that potential adverse impacts have been reduced or eliminated through the design and mitigation. A programme of archaeological recording and publishing is proposed to mitigate adverse impacts where they could not be avoided.</p> <p>It notes positive impacts as being:</p> <ul style="list-style-type: none"> Setting of the Grade I listed St Andrew's Church in North Burlingham, due to moving the A47 traffic further away and maintaining/providing an appropriate density of planted screening <p>Planned conservation of two mileposts and a guidepost along the route of the existing A47, which Highways England will also propose for listing by</p>	No response required

Reference	Local Impact Report	Applicant's Response
	Historic England.	
4.8.2	<p><u>Cultural Heritage Comments</u> <u>Archaeology</u></p> <p>A significant amount of archaeological investigations has already been undertaken in association with the scheme. Geophysical surveys and archaeological trial trenching have been carried out within almost all of the 'redline' area of the proposed scheme.</p> <p>Following a review of reports on the geophysical survey and trial trenching the county council agreed an outline scope for post-consent archaeological mitigation with Highways England's archaeological consultant at the end of November last year.</p> <p>We welcome any opportunities for enhancement of cultural heritage in the North Burlingham area as set out on page six of the Environmental Statement: Non-Technical Summary.</p>	<p>The Applicant notes the Norfolk County Council's acknowledgement of the surveys undertaken.</p> <p>Enhancement measures proposed relating to cultural heritage as a result of the assessment are reported in the ES Chapter 6: Cultural Heritage (previously REP1-022, resubmitted at Deadline 3 (TR010040/APP/6.1 Rev 2)). Enhancement measures to be carried forward by the Principal Contractor are included in the Environmental Management Plan (EMP (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/6.1 Rev 3))), including CH1, 2, 3 and 8 in Table 3-1: Record of Environmental Actions and Commitments.</p>
4.8.3	<p><u>Arboriculture</u></p> <p>At the time of writing, this topic is included within one of the documents that is inaccessible and marked 'confidential' and the response has been prepared in the absence of sight of this report.</p> <p>It is expected that all trees that require removal due to the impact of the scheme have been identified in this document and appropriate tree protection plans and method statements produced to safeguard trees that are suitable for retention. Considerations to elements such as lighting, sight lines (to junctions, signage and cameras etc), under and over ground utility installation, construction compounds and drainage</p>	<p>Trees identified for removal have been identified and are presented in ES Appendix 7.7 Arboricultural Impact Assessment (REP1-036). This includes root protection areas and retention buffers to safeguard trees from the proposed works.</p> <p>The existing vegetation to be retained is also presented in the Masterplan (REP1-041). The Environmental Management Plan (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/7.7 Rev 3))) includes the requirement to retain trees (L2 within the REAC).</p> <p>Trees identified by BS5837 are shown in the Arboricultural Impact Assessment Plan presented in the ES Appendix 7.7 Arboricultural Impact Assessment (REP1-036).</p>

Reference	Local Impact Report	Applicant's Response
	<p>will be appropriately considered at this stage. It is expected that this document will highlight how the scheme has identified and retained high quality trees where appropriate and that all of the arboricultural impacts feed into the landscaping scheme to clearly demonstrate net gain is achieved.</p> <p>The arboricultural assessments and recommendations outlined above should be in accordance with British Standard 5837 2012: Trees in relation to design, demolition and construction.</p>	A complete BS5837 arboricultural assessment is proposed prior to construction.
4.9	<p><u>Landscape</u></p> <p>The Environmental Statement: Non-Technical Summary sets out that the study area lies within the Broadland District Council Landscape Character Assessment 'Blofield Tributary Farmland' and 'Freethorpe Plateau Farmland' Landscape Character Areas. It notes that, during construction, there would be a loss of existing trees and hedgerows and a change to the existing agricultural land use.</p> <p>During the initial stages of operation, the scheme, including the road and structures, would be visible but a planting plan has been designed to mitigate and enhance landscape and visual features of the Proposed Scheme. It states that, once the tree and hedgerow planting is established, the visibility of the Proposed Scheme and associated landscape features would revert to a state comparable to that of the existing situation.</p>	No response required
4.9.1	<p><u>Landscape Comments</u></p> <p>From the information that is currently available, overall, the methodology is sound and uses appropriate guidance to inform the process. The identification of receptors and their sensitivities appears appropriate.</p> <p>Paragraph 7.9.7 (of Chapter 7 of the Environmental Statement: Landscape and Visual Effects) details the proposed mitigation during construction, this appears appropriate, although officers have been unable</p>	<p>The Applicant notes Norfolk County Council's acknowledgement of methodology of the assessment.</p> <p>The location of bunds and storage mounds will be considered at the detailed design stage. Environmental considerations and monitoring requirements for storage of material during construction is included in the first iteration of the EMP (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/7.7 Rev 3)) as part of the REAC, including G6, G11, CH4, GS1 and M1.</p>

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	<p>to identify any mapping where bunds and storage mounds are shown.</p> <p>Paragraph 7.9.8 details mitigation during operation, and this is additionally shown on TR010040/APP/6.8. It would be beneficial to have further details of the proposed planting included, such as species mix, seed mix etc...</p> <p>Paragraph 7.10.4 onwards details vegetation removal, but more detail is assumed to be in the arboriculture survey, which is currently unavailable. The council would want to see this demonstrated graphically so that the overall impacts can be seen.</p> <p>The effects on receptors during construction appears to have been considered sufficiently, and the identification that for many of these the effects will be moderately and largely adverse is noted. We also broadly agree with the conclusions drawn regarding effects during operation, the effects would be much more adverse immediately following completion, and for some time afterwards, but would decrease to negligible when planting matures (demonstrated from a fifteen-year perspective).</p> <p>The impacts of lighting both from introduced lighting, and those of elevated headlights are concerning, and would largely still be noticeable for many years into the operation of the road. The impact on overall light pollution and an increase in the lighting of the sky should also be considered. Whilst not a particularly noted area of dark sky, this scheme has the potential to increase the overall areas light pollution considerably.</p> <p>There is potential for development of the Community Woodland as part of the wider landscaping scheme to not only offer benefits to the landscape from a biodiversity perspective, but also from a health and wellbeing perspective offering local access to green space where the shortened route to Burlingham Woods has been severed.</p>	<p>An indicative species list is included as part of the Masterplan (REP1-041). Specific heights/species are included as a requirement where necessary for mitigation identified in the Environmental Statement. This is noted in the REAC of the EMP (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/7.7 Rev 3)).</p> <p>ES Appendix 7.7 provides the Arboricultural Impact Assessment (REP1-036).</p> <p>The Applicant notes Norfolk County Council's acknowledgement of conclusions of the assessment for operational effects.</p> <p>Through ensuring lighting design complies with British Standards and Institution of Lighting Professional's GN01:2021 guidance, obtrusive light with the potential to affect Dark Skies and other sensitive features, such as ecologically sensitive receptors will be limited in accordance with Environmental Zone criteria. The purpose of Environmental Zone criteria is to ensure the potential for obtrusive light (light pollution) to occur is restricted, through placing maximum limits on light spill, upward light and glare. Additionally, DMRB places limits on the maximum permitted light source intensity at critical angles from the luminaire, the purpose of this is to further reduce the potential for adverse levels of upward light from the luminaires to contribute towards sky glow.</p> <p>The Applicant has recently secured additional funding to review potential biodiversity opportunities around the scheme. The Applicant will work with NCC to develop a feasibility study to assess the biodiversity opportunities of the Lingwood Community Woodlands (LCW).</p>

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4.10	<p><u>Biodiversity</u></p> <p>The Environmental Statement Non-Technical Summary notes that there are valuable habitats and species of nature conservation importance that could be adversely affected by the proposed scheme and that, although avoidance of impacting trees and hedgerows was a key consideration throughout the design stage, there will be small areas of these habitats that will need to be lost.</p> <p>The summary states that mitigation measures have been identified to safeguard the conservation status of wildlife populations through both the construction and operational phases. It goes on to say that careful design in combination with mitigation measures during construction and operation will reduce identified effects on receptors and habitats. It is possible to compensate for the permanent loss of young trees within Lingwood Wood Community Woodland by replacement woodland planting.</p> <p>There will be a net gain of more biodiverse grasslands with the introduction of species-rich and marshy, wet grassland.</p> <p>The risk to bats is set out as significant due to the presence of barbastelle bats, which are a European protected species and nationally important.</p> <p>All other residual effects after mitigation are not considered significant, although the report notes that – due to Covid – it was not possible to complete surveys for great-crested newts.</p>	No response required
4.10.1	<p><u>Biodiversity Comments</u></p> <p>As stated in the council's previous response to the Section 42 consultation (September 2018), we would wish to see the original reports before we are able to say if we agree or disagree with the assessments made.</p> <p>At this stage, we broadly agree with the scope of the ecology work but we are not able to make comment</p>	<p>Biodiversity chapter and associated appendices have been submitted as part of the Environmental Statement and are available on the pINS website for review.</p> <p>The ES Chapter 8: Biodiversity (REP1-024) is supported by the following appendices:</p> <ul style="list-style-type: none"> Appendix 8.1: Legislation and policy framework (APP-086) Appendix 8.2: DMRB biodiversity evaluation assessment methodology (APP-087) Appendix 8.3: 2018 Bat survey report (APP-088)

Reference	Local Impact Report	Applicant's Response
	<p>There are some key concerns regarding the limitations of some of the protected species surveys, and the intention to 'complete surveys prior to construction.'</p> <p>The Environmental Statement Non-Technical Summary states that "It was not possible to complete surveys due to COVID-19 restrictions during the survey window. These will be completed prior to construction."</p> <p>The extant government circular on planning and biodiversity (Circular 06/2005) makes it explicit that "the presence or absence of protected species, and the extent to which they could be affected by a proposed development, should be 19established before planning permission is granted, since otherwise all material considerations might not have been considered in making the decision." Paragraph 116 of the same circular also states: "When dealing with cases where a European Protected Species may be affected, a planning authority has a statutory duty under Regulation 3(4) to have regard to the requirements of the Habitats Directive in the exercises of its functions.</p> <p>Further the Directive's provisions are clearly relevant in reaching planning decisions, and these should be made in a manner which takes them fully into account ...".</p>	<ul style="list-style-type: none"> • Appendix 8.4: 2018 Breeding bird survey report (APP-089) • Appendix 8.5: Wintering bird survey report (APP-090) • Appendix 8.6: Confidential Badger survey report (APP-091) • Appendix 8.7: Terrestrial invertebrate report (APP-092) • Appendix 8.8: Great crested newt survey report (APP-093) • Appendix 8.9: Reptile survey report (APP-094) • Appendix 8.10: 2020 Bat survey report (APP-095) • Appendix 8.11: Bat Activity crossing point survey report (APP-096) • Appendix 8.12: 2020 Breeding bird and barn owl survey report (APP-097) • Appendix 8.13: Botanical survey report (APP-098) <p>Large scale ecology surveys of this type frequently encounter obstacles (access restrictions, weather, technical failures among others) that mean they have limitations, and the COVID-19 pandemic enhanced these restrictions. However, the long duration of these projects allows for significant re-survey to occur and is in fact required for European Protected Species licensing to ensure that the data submitted for licensing is as up to date as possible.</p> <p>The level of survey data collected, while acknowledging limitations, is sufficient to assess the potential impacts on the ecological receptors including European protected species.</p> <p>Further ecology surveys and the presence of an Ecological Clerk of Works on site are included, where relevant, in the REAC of the EMP (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/7.7 Rev 3)) and will be required prior to construction.</p>
4.10.2	<p><u>Bats</u></p> <p>We have recently downloaded the bats information from the PINS website which was previously marked confidential and will review this and provide comments regarding the level of assessment that has taken place for bats, in particular for barbastelle bats.</p>	<p>The Zone of Influence (ZoI) relates to the predicted impact zone of the scheme for the proposed works. This was set according to the standards set out in DMRB LA108 and CIEEM EcIA guidance (CIEEM 2018).</p> <p>The project may overlap with the Core Sustenance Zone (CSZ) of bat roosts (both known and unknown) and potential impacts on these are</p>

Reference	Local Impact Report	Applicant's Response
	<p>The risk to bats is significant due to the presence of barbastelle bats, which are protected under the Conservation of Habitats and Species Regulations 2017 and nationally important.</p> <p>The Bat Conservation Trust (BCT) www.bats.org.uk, has evidenced the Core Sustainance Zone (CSZ) for barbastelle bats to be 6km in radius. However, from the information seen in the Environmental Statement, barbastelle bats have only been considered at a 2km radius, based on results of the Norfolk Biodiversity Information Service Data Search and subsequent surveys. No reference to CSZs was found in the relevant sections; Chapter 8 Biodiversity or Chapter 6.4 Environmental Statement Non-Technical Summary.</p> <p>A (CSZ) refers to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost.</p> <p>The scheme might not therefore provide adequate assessment on the level of bat use in the area.</p> <p>Other issues such as Lighting Schemes, mitigation for reptiles, amphibians, mammals, birds will be commented on once the relevant reports are available.</p>	<p>assessed through the impact assessment process including impacts on foraging and commuting habitat (this assessment included extensive bat activity and crossing point surveys). This information determines the level of potential impact on bats (of all species) that have been recorded as present on site and in the surrounding habitat (regardless of known CSZ's of individual roosts).</p> <p>The risk to bats is acknowledged within the ES Chapter 8: Biodiversity (REP1-024) resulting in the Moderate adverse residual impact assigned to bats. The level of assessment is considered adequate for the purpose of the EIA process.</p>
4.10.3	<p><u>Lingwood Community Woodland</u></p> <p>Lingwood Community Woodland is on land owned by Norfolk County Council / County Farm Estate.</p> <p>It would be expected that the Norfolk County Council Environmental Policy 2019 be considered. Four key aims of the Environmental Policy are:</p> <ul style="list-style-type: none"> • Recovering nature and enhancing the beauty of landscapes • Connecting people with the environment to improve health and wellbeing 	<p>ES Chapter 7 Landscape and Visual (APP-045) presents the findings of the Landscape and Visual Impact Assessment (LVIA) including baseline conditions, the potential impacts of the Scheme upon surrounding landscape and visual receptors and identification of appropriate mitigation.</p> <p>The overarching mitigation principles embedded in the Proposed Scheme design (which address strategic and policy derived objectives and location specific screening and integration functions) include: -</p> <ul style="list-style-type: none"> • Protection and enhancement of the landscape character and sense of place by: <ul style="list-style-type: none"> o retaining the pervading sense of openness where this is

Reference	Local Impact Report	Applicant's Response
	<ul style="list-style-type: none"> Using and managing land sustainably Increasing resource efficiency and reducing pollution and waste. <p>Detail of the planting plan could not be found. We would expect to see a design for the layout and species mix of the replacement and additional woodland planting. The replacement and additional woodland should consider the need for rides (linear trackways designed for access) for walking and access for management and open glades.</p> <p>There is an opportunity to enhance biodiversity with features such as a suitable wildflower mix, mixed species understory with standard trees, areas of hazel coppice, Norfolk variety fruit trees, and benches for walkers to rest or watch wildlife</p> <p>There is an opportunity to develop the community woodland as a habitat for wildlife and also as a destination for local people that will experience a longer walking distance to Burlingham Woods as a direct result of dualling the road at this location (see also Sections 4.14 and 4.14.1 dealing with provision for walking and cycling).</p>	<p>consistent with a balanced preference for visual screening</p> <ul style="list-style-type: none"> o integrating Proposed Scheme infrastructure (notably elevated overbridges) through appropriate use of planting to contribute to visual screening o reinforcing existing plantation character with woodland planting where this is consistent with the surroundings o reinforcing existing field boundaries with individual trees and hedgerows where the field pattern is a notable component of the landscape o including for translocation and reinstatement of important hedgerows o providing an appropriate Blofield 'gateway' semi-ornamental landscape treatment at the A47 junction with Yarmouth Road o retaining or replacing and reinforcing existing vegetation where this contributes to the distinctive qualities of the landscape, including a notable line of poplar trees on the north-eastern edge of Blofield o selecting plant and grass species appropriate to the locality to maintain consistency with the appearance of the area <ul style="list-style-type: none"> Protection of views of 'community importance' associated with the eastern landscape setting of Blofield. This would be achieved through a range of proposed landscape treatments including woodland, hedgerows and individual trees to integrate the Proposed Scheme without detriment to the general visual outlook. <p>A layout of existing/replacement planting (including woodland) is presented in the Masterplan (REP1-041). An indicative species list is also included as part of the Masterplan. Specific heights/species are included as a requirement where necessary for mitigation identified in the Environmental Statement. This is noted in the REAC of the EMP (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/7.7 Rev 3)).</p> <p>A Walking, Cycling, Horse-riding Assessment and Review (WCHR) process has been undertaken as part of the Scheme and is summarised in ES Chapter 12 Population and Human Health (REP1-030). The scheme creates new footpaths and cycle tracks, improving public access to the countryside</p>

Reference	Local Impact Report	Applicant's Response
		<p>The area within the Order Limits is the land required to construct and operate the Scheme. Land required temporarily for construction will be returned to its former use and measures are included within the REAC to protect agricultural soils (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/7.7 Rev 3)).</p> <p>The Scheme aims to avoid the creation of waste followed by, recycling, recovery and disposal to landfill as per the internationally recognised waste hierarchy, (see ES Appendix 10.3 Outline SWMP (REP1-038). The EMP (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/7.7 Rev 3)) describes the environmental mitigation measures that would be implemented during construction including measures to minimise waste:</p> <ul style="list-style-type: none"> • re-using waste generated on-site • use of site-won or recycled material assets • use of material logistics planning to manage responsible local resourcing of material assets minimal ordering of materials, appropriate segregation and storage-site by waste type, to <p>The Applicant has recently secured additional funding to review potential biodiversity opportunities around the scheme. The Applicant will work with NCC to develop a feasibility study to assess the biodiversity opportunities of the Lingwood Community Woodlands (LCW).</p>
4.11	<p><u>Geology and Soils</u></p> <p>No designated geological sites are located in the study area. To the north and south of the proposed A47 dual carriageway the land is predominantly agricultural and much of this is used for arable production.</p> <p>The proposed scheme would result in a significant effect on agricultural soils due to the amount of farmland required. Mitigation measures will be implemented during construction and controlled through the Soil Management Plan to ensure that where agricultural soils exist within any temporary construction areas, they are protected and restored to their previous condition.</p>	No response required

Reference	Local Impact Report	Applicant's Response
4.11.1	<p><u>Geology and Soils Comments</u></p> <p>No comments in respect of this particular topic in the submission.</p>	The Applicant acknowledges this response.
4.12	<p><u>Material Assets and Waste</u></p> <p>The assessment concludes that residual effects will be slight adverse and not significant. Overall, the materials used are predicted to include over 40% of recycled material and over 85% of the material generated will be re-used or recycled.</p> <p>The comments set out below relate to Norfolk County Council in its capacity as the Minerals and Waste Planning Authority. Where they refer to paragraphs, this is in respect to the Environmental Statement Appendix 10.4 – Mineral Impact Assessment.</p>	No response required
4.12.1	<p><u>Material Assets and Waste Comments</u></p> <p>The Mineral Planning Authority (MPA) welcomes the inclusion of a Mineral Impact Assessment as part of the proposed scheme. The MPA agrees with the summary of mineral resources within the scheme and the constraints which are outlined in paragraph 10.4.6 (of the Mineral Impact Assessment). The MPA also agrees with the assessment of reuse suitability of site-won materials as outlined paragraphs 10.6.5-10.6.7. The MPA notes that an estimate of 22,400m³ of site won material is likely to be extracted during the construction phase, in paragraph 10.6.8.</p> <p>The MPA recognises that this an estimate and that a full assessment of the reuse potential of material will be required as it is excavated.</p> <p>Paragraph 10.6.9 states that the scheme has a significant earthworks material deficit, and therefore any opportunity to reuse the excavated</p> <p>In conclusion, the MPA considers that the Mineral Impact Assessment appropriately assesses the safeguarded mineral resources for the</p>	<p>The Applicant is grateful to Norfolk County Council for its indication that mineral safeguarding has been addressed</p> <p>The Environmental Statement includes Appendix 10.4: Minerals Impact Assessment (APP-103). The EMP (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/7.7 Rev 3)) includes Annex B.3 Materials Management Plan (MMP).</p>

Reference	Local Impact Report	Applicant's Response
	<p>proposed scheme and contains an appropriate strategy for identifying suitable material for reuse in the construction phases of the scheme. material will be taken.</p> <p>Norfolk County Council, in its capacity as the Mineral Planning Authority, considers that if the scheme is required to follow the strategy outlined in the Mineral Impact Assessment this will effectively address mineral safeguarding issues relating to resource sterilisation</p>	
4.13	<p><u>Noise and Vibration</u></p> <p>The Environmental Statement Non-Technical Summary notes that there will be sensitive receptors, such as residential homes, near to the proposal, and that receptors that are close to the A47 are already exposed to relatively high noise levels due to road traffic.</p> <p>The assessment concludes that:</p> <ul style="list-style-type: none"> • Significant effects from construction noise are unlikely • Significant effects from potential construction vibration impacts are unlikely • Providing that the anticipated vehicle movements and routes are restricted as described, potential significant effects from construction traffic are unlikely. <p>Due to the expected traffic re-routeing brought about by the scheme:</p> <ul style="list-style-type: none"> • Significant beneficial noise effects are predicted at seventeen residential receptors along Strumpshaw Road (Brundall), Stone Road and Wood Lane <p>Significant adverse noise effects are predicted at 18 dwellings on the B1140 (High Road) between the Cock Tavern and the junction with Sandy Lane; and at 37 dwellings on Yarmouth Road between the junction with the A47 and the crossroads with Doctors Road / Danesbower Lane. It notes that the absolute road traffic noise level at opening year will be comparable to local B roads in the vicinity in and around Blofield.</p>	No response required

Reference	Local Impact Report	Applicant's Response
4.13.1	<p><u>Noise and Vibration Comments</u></p> <p>The county council would expect disruption to be kept to a minimum during the A47 dualling construction period and would want to work with Highways England, or its contractors, on managing traffic during the works.</p>	<p>The Applicant acknowledges the points raised by Norfolk County Council and will continue to work with Norfolk County Council throughout the construction period.</p> <p>The EMP (previously REP1-048, resubmitted at Deadline 3 (TR010040/APP/7.7 Rev 3)) includes Annex B.5 Construction Noise and Dust Management Plan, and Annex B.6 Construction Communication Strategy.</p>
4.14	<p>Population and Human Health</p> <p>The Environmental Statement Non-Technical Summary notes that the main communities include Blofield, Burlingham and Acle with the majority of the community facilities located in Blofield. The surrounding area is predominantly arable with some areas of woodland used by the community.</p> <p>The assessment concludes that, during construction:</p> <ul style="list-style-type: none"> ▪ Access along the local road network might be temporarily disrupted whilst traffic management measures are in place, resulting in longer journey times and a degree of temporary severance ▪ Walkers, cyclists and horse-riders (WCH) would also experience temporary diversions of footpaths, with some increases in journey length. ▪ There would be some adverse amenity effects for human health, specifically in terms of noise, dust and visual intrusion ▪ There would be temporary loss of agricultural holdings. These are likely to experience disruption to farming operations. In some cases, access to farmyards and fields would be temporarily severed. <p>Permanent impacts would include:</p> <ul style="list-style-type: none"> • Users of footpath Burlingham FP3 are anticipated to experience significant residual adverse effects as a result of a section of the footpath being lost • Changes in severance for private property and housing, community land, community facilities, development land and businesses in the 	<p>No response required</p>

Reference	Local Impact Report	Applicant's Response
	<p>communities of Blofield with South Walsham, Burlingham and Acle.</p> <ul style="list-style-type: none"> • Access arrangements to some private properties and businesses would change • Permanent agricultural land-take is required together with land-take from the allotment gardens car park in Blofield, although alternative parking would be provided. <p>The document Walking, Cycling and Horse riding Review summarises the position with respect to crossing facilities between Lingwood and Burlingham as "In summary there is insufficient evidence to support the case for a new grade separated crossing of the new A47...As such [a new bridge] will not be taken forward as part of the scheme.</p> <p>Alternative funding...may, however, be available via CIL [Community Infrastructure Levy] as indicated in the GNIP [Greater Norwich Infrastructure Plan]."</p> <p>It should be noted that there were some inconsistencies in the material submitted to the Planning Inspectorate, for example, the plans appear to show a cycle track over the proposed bridges and beyond, whereas ES Figure 12.2 suggests there would be a shared cycle track and footway. Highways England 23has been requested by the Planning Inspectorate to ensure that there is consistency.</p>	
4.14.1	<p><u>Population and Human Health Comments</u></p> <p>In summary:</p> <ul style="list-style-type: none"> • Additional and new non-motorised travel, commuting and longer-distance recreation choices have been created with the cycle lane along the northern side and a footpath along the southern side of the new highway • Local, on-the-doorstep, short distance welfare recreation choices, however, will be further limited by the current alignment: <ul style="list-style-type: none"> • Burlingham Footpath 3 (FP3) is to be severed and no crossing point provided: • North/south non-motorised user (NMU) movement is already restricted by the A47, but the dual carriageway will be a 	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Appendix A to the Applicant's Response to Relevant Representations (REP1-060).</p> <p>The Scheme includes the provision of the North Burlingham Junction, which incorporates pedestrian and cyclist facilities to facilitate safe north south movements across the A47 thereby reducing the severance effect. The Applicant considers that the North Burlingham Junction is located in the right place to both provide for connectivity and remove a difficult existing junction.</p> <p>Although Burlingham FP3 will be diverted, a new public footpath running</p>

Reference	Local Impact Report	Applicant's Response
	<p>complete barrier (there is no crossing provision)</p> <ul style="list-style-type: none"> The proposal doesn't discourage use of cars to access local points of interest and recreation The concerns the county council raised previously, in discussion with Highways England and the Section 42 consultation, have not been addressed. Whilst NMUs will be able to travel north-south via the new cycle and footpaths, at the road junctions either end of the scheme, this is a significant east-west increase in distance alongside a busy dual carriageway and so only suited to some recreation (eg running/cycling) choices while limiting others (dog-walking, welfare walking/cycling) Linkages between the Parishes of Lingwood and Burlingham would effectively be severed. <p>To address these concerns, the council feels that it is imperative that in addition to all the NMU provision proposed:</p> <ul style="list-style-type: none"> A bridge should be installed on the alignment of FP3 to enable NMU north-south movement across the A47 keeping local connectivity and continuity. This should be a green bridge to add to the ecological mitigation measures necessary for this scheme and further enhance tangible well-being measures The new footpath proposed along the southern boundary of the new highway should be of a higher status than footpath, ie a multi-user path so that it links with the proposals for the north side provision, again enabling NMU connectivity and continuity and so further widening choice and opportunity. It seems at odds to segregate and limit usage when the infrastructure is already going in All new cycle and footpath provision must tie in with footways and safe crossing points at all junctions to ensure NMU traffic does not meet 'dead ends' or have to utilise the highway at busy junctions or slip roads. <p>As set out in the Walking, Cycling and Horse-riding Review, Highways England is suggesting that the cost of this provision could be met locally from CIL. However, as the crossing is considered to be directly related to</p>	<p>east west and to the south of the new A47 alignment will provide onward connections to pedestrian and cyclist facilities provided at both the Blofield Overbridge and the North Burlingham Junction. These facilities will provide for the safe north south crossing movements across the A47 thereby reducing any severance effect. The Applicant's assessment indicates that Burlingham FP3 is used primarily for recreational walking trips and is not a practical route for utility walking trips due to the quality of the footpath and the walking distances between North Burlingham and local facilities and amenities in Lingwood. The additional walking distances required to access the crossing facilities at the North Burlingham Junction from Burlingham FP3 are unlikely to deter recreational trip makers.</p> <p>Local, on-the-doorstep, short distance welfare and recreation choices will be increased by the provision of the new public footpath running east west and to the south of the new A47 and the new shared footway / cycle track running between east west along the former A47.</p> <p>Linkages between the Parishes of Lingwood and Burlingham will not be severed due to the provision of the crossing facilities at the Blofield Overbridge and the North Burlingham Junction.</p> <p>The Applicant considers that the concerns raised as part of the Section 42 Consultation in connection with non-motorised users have been appropriately addressed.</p> <p>The Applicant considers that there is no requirement for an additional overbridge for NMU on the alignment of Burlingham FP3 due to the provision of the new public footpath and the pedestrian and cyclist facilities provided at the North Burlingham Junction.</p> <p>Burlingham FP3 is a public footpath so cannot be used legally by cyclists and equestrians. The proposed new footpath will have the same legal status of Burlingham FP3 and will ensure that users do not meet a 'dead end' where the footpath is diverted. All existing cycle trips between Lingwood and North Burlingham and between other destinations north and south of the A47 are required to make use of the local highways and cross the A47 at the existing at-grade junctions. Cyclists facilities will be</p>

Reference	Local Impact Report	Applicant's Response
	<p>the dual carriageway scheme, the council would expect Highways England to deliver it.</p> <p>There is an agreed, clear and concise process within Greater Norwich for CIL allocation and this would need to be followed should CIL be sought for this scheme. However, Greater Norwich has receipted circa £26m CIL in total since 2014, most of which is already allocated, and the first £4m in each forthcoming year is already pre committed (£2m NDR and £2m education). It is very unlikely therefore that there would be sufficient CIL available to fund a bridge, and funding for it would need to compete with other projects including Long Stratton Bypass, East Norwich and projects in the North East Growth Triangle.</p> <p>As a point of detail, the GNIP reports infrastructure delivery, but there are no funding commitments within it. The five-year Infrastructure Investment Plan is where CIL commitments are made.</p>	<p>incorporated at the North Burlingham Junction to facilitate the safe north south movements across the A47 and the new shared footway / cycle track along the northern frontage of the former A47 will facilitate east west cycle movements between Blofield and North Burlingham. As such, there is no requirement for the proposed new public footpath to be of higher status.</p> <p>The Council's comments with respect to use of CIL are noted.</p>
4.14.2	<p>As this is a major issue, it is suggested that the response expands on the summary above, repeating the comments made previously in response to the Section 42 consultation; as follows:</p> <p>The A47 has historically been a barrier in public access separating the two settlements of Burlingham and Lingwood. Burlingham Woods, north of the A47, associated permissive paths and the Public Rights of Way network are all popular with pedestrians and dog walkers. The surveys conducted by Highways England (in advance of the Section 42 consultation and in recognition of the concerns of the county council) support this, with 90 users having walked along Burlingham FP1 one Sunday. Other days in the Highways England survey showed consistently high use. However, it was noted that very few users, and on most days no-one, would choose to cross the A47. Usage (according to the Highways England PEIR Report) of the Public Rights of Way network south of the A47 was recorded as low.</p> <p>Two close settlements having such a huge contrast in usage indicates that the A47 is likely to be acting as a substantial barrier to walkers.</p>	<p>Burlingham FP1 is a promoted circular walk and is one of the recommended starting points for the Burlingham Woodland Walks (as indicated in the map and guide), which commence at its southern end in the St Andrew and St Peter Church car park. The mobility access paths forming part of the network also commence at this location. The car park can only accommodate a small number of vehicles but on street parking for users is available on Main Road in North Burlingham. Mobility access and ample car parking therefore make this an attractive starting point. The other recommended starting points are the health centre / library car park in Acle and the Fairhaven Garden Trust car park in South Walsham, both of which lie to the north of the A47. Most of the Burlingham Woodland Walks network and the majority of the key features are located to the north of the A47 in an area comprising North Burlingham, Burlingham Green, Town Green, South Walsham and Acle. By contrast, very few key features are located to the south of the A47 in the area between North Burlingham and Lingwood. The fact that very few users of Burlingham FP1 chose to continue south across the A47 is therefore not entirely down to the severance effect of the A47. It may simply be that Burlingham FP3 and permissive routes to the south of the A47 are not seen as attractive enough for most visitors to the area. This reflected in the survey results.</p>

Reference	Local Impact Report	Applicant's Response
	<p>The A47 Dualling Scheme has the opportunity to change this and with the right improvements can significantly enhance the Rights of Way network in this area.</p> <p>Whilst a footway has been proposed along with access across both road junctions, which in theory provide north south connections, the proposal (comprising a footway running parallel to the road) is not considered to be perceived as safe and attractive for families and dog walkers. This scheme could offer significant benefit for users if, wherever possible, a multi-user path was provided set back from the road rather than alongside the road. Some screening could also be used to further enhance the route, this would be more attractive for families with pushchairs, cyclists and dog walkers who are all looking to access the woods to the north.</p> <p>The most important improvement Highways England have the opportunity to make is installing a footbridge across the A47 connecting Burlingham FP1 and FP3 (these footpaths run north-south at the eastern end of the settlement of Burlingham; on either side of the A47) and ultimately providing a safe off-road 25link connecting the parish of Burlingham but furthermore offering links to South Walsham in the north and Strumpshaw in the south.</p> <p>The alternative (to a new crossing of the A47 at Burlingham) is walking considerably further to gain access at the proposed road bridges (west and east of Burlingham, both some 1500m from FP1 and FP3). This route will not be considered safe or appealing to families, cyclists or dog walkers.</p> <p>In summary, a new bridge would provide a much-needed missing link in the network, will offer a safe route for all users, and ultimately connects rural paths bringing two communities together.</p> <p>Related to the above, previous funding bids were submitted to Highways England to create a Burlingham-Lingwood walking and cycling link. This aims to create a walking and cycling bridge across the A47 south of</p>	<p>The Scheme includes the provision of the North Burlingham Junction, which incorporates pedestrian and cyclist facilities to facilitate safe north south movements across the A47 thereby reducing any severance effect. The Applicant considers that the North Burlingham Junction is located in the right place to both provide for connectivity and remove a difficult existing junction.</p> <p>The new shared footway / cycle track along the northern frontage of the former A47 will improve accessibility for pedestrians and cyclists between Blofield and North Burlingham and the proposed form of the infrastructure is proportionate to likely future user activity in the area. The volumes, HGV content and speeds on the former A47 will be much reduced as part of the Scheme making this new infrastructure attractive to users. As such, there is no requirement to provide an additional offline multi-user route.</p> <p>The Scheme includes the provision of the North Burlingham Junction, which incorporates pedestrian and cyclist facilities to facilitate safe north south movements across the A47 thereby reducing any severance effect. The Applicant considers that the North Burlingham Junction is located in the right place to both provide for connectivity and remove a difficult existing junction. The Applicant considers that there is no requirement for an additional overbridge to provide a connection between Burlingham FP1 and FP3 due to the lack of need for such a facility. Users of Burlingham FP1 do not choose to cross the A47 as Burlingham FP3 and permissive routes to the south of the A47 are not seen as attractive enough for most visitors to the Burlingham Woodland Walks.</p> <p>The Applicant's assessment indicates that Burlingham FP3 is used primarily for recreational walking trips and is not a practical route for utility walking trips due to the quality of the footpath and the walking distances between North Burlingham and local facilities and amenities in Lingwood. The additional walking distances required to access the crossing facilities at the North Burlingham Junction from Burlingham FP3 are unlikely to deter recreational trip makers.</p> <p>The Applicant considers that the Scheme provides reasonable new and improved infrastructure for pedestrians and cyclists which improves accessibility and is proportionate to likely future user activity in the area. In</p>

Reference	Local Impact Report	Applicant's Response
	<p>Burlingham Woods to provide connection between Lingwood, Lingwood Station and the Burlingham estate trails network to the south and Burlingham Woodlands and businesses to the north of the A47.</p> <p>Burlingham Woods forms part of Norfolk County Council's Trails network and provides important connections between local settlements and a number of amenity spaces in this part of Norfolk. The scale of planned housing growth in east Broadland has led to a new focus on enhancing and expanding the core of Burlingham Woods at the heart of the Burlingham estate, to provide new green open space, connections and facilities for the wider population.</p> <p>This connection could encourage greater use of Burlingham Woods, the woods and estate green space is considered key in relieving pressure on the most sensitive designated Broad's sits in the vicinity. It would also encourage residents south of the A47 in Lingwood and surrounding areas to use the Burlingham Woods trail to the north. The proposal is complementary to a wider ongoing project by Norfolk County Council, Broadland District Council and the University of East Anglia to expand the area and offering at Burlingham Woods.</p>	<p>combination with the existing facilities, the proposed pedestrian and cycling infrastructure would provide improved and safe connections between Blofield and North Burlingham and between Lingwood and North Burlingham. In addition, the two grade separated crossing points proposed at the Blofield Overbridge and at the North Burlingham Junction address the existing severance issues by removing the A47 as a barrier to non-motorised users thereby mitigating the environmental and social impacts of the Scheme and correcting an historic problem.</p>
4.15	<p><u>Road Drainage and the Water Environment</u></p> <p>The non-technical summary lists the key surface water receptors within the study area as local minor watercourses, drainage ditches and ponds. It states that the new carriageway will discharge surface water to an infiltration basin and trenches, designed to attenuate a 1 in 100-year storm event (plus a 20% climate change allowance) in line with guidance. The proposed scheme design incorporates treatment of road drainage prior to discharge to groundwater. Where a direct connection to existing surface water pathways is not possible, clean water soakaways are proposed.</p> <p>Mitigation, in the form of a replacement pond, is required for the loss of the pond near to Lingwood Road.</p>	No response required

Reference	Local Impact Report	Applicant's Response
	<p>No significant adverse effects on the water environment are predicted during construction or operation of the proposed scheme, subject to the mitigation measures included</p>	
4.15.1	<p><u>Road Drainage and the Water Environment Comments</u></p> <p>The Lead Local Flood Authority (LLFA) team has been in contact with Highways England's project design team providing initial reviews of the flood risk assessment and drainage strategy.</p> <p>The drainage strategy has been developed in accordance with the Design Manual for roads and Bridges (DMRB) guidance, as have those for the other A47 schemes in Norfolk. The design guidance provided by DMRB is derived from a variety of planning policies, regulations, legislation and directives applicable in England, some of which have been updated.</p> <p>DMRB LA113 in section 2.13 and section 4.3 in DMRB CG 501 state all schemes designs shall include the latest climate change allowances in accordance with relevant national legislation requirements. The climate change allowances applied within the proposed drainage strategy have been superseded. The most recent guidance was updated in July 2020, although the updating of the peak rainfall allowances occurred previously in December 2019. The LLFA considers that the presence of the road structures footprint would be expected to last into the 2080s epoch (2070 to 2115) within the climate change guidance. This means the DMRB CG 501 advice in relation to the application of climate change is no longer in line with the current DMRB guidance. This has been addressed in the other schemes although it has not been raised as a point until now on this scheme.</p> <p>The proposed drainage design should apply the latest climate change allowances and would lead to the application of a 40% allowance to the drainage design rather than the 20% currently reported. As the scheme has tested the drainage design with the 40% climate change allowance, we are aware there is capacity available within the attenuation features for</p>	<p>The Applicant can confirm that the detailed design of the drainage systems will be in accordance with DMRB CG 501 – Design of Highway Drainage Systems (as set out in ES Appendix 13.2 Drainage Strategy (APP-110)). Section 5.3 confirms that an allowance for 40% climate change is required.</p>

Reference	Local Impact Report	Applicant's Response
	this allowance.	
4.16	<p><u>Climate</u></p> <p>The construction, operation and use of the proposed scheme is predicted to increase carbon emissions. The Environmental Statement Non-Technical Summary states that guidance on gauging the significance of carbon emissions in EIA is evolving, but that a definitive assessment of materiality is not possible.</p> <p>The non-technical summary also sets out that the vulnerability of the proposal to projected changes in climate during operation has been assessed, and it has been deemed resilient. Therefore, no significant effects as a result of climate change are anticipated.</p>	No response required
4.16.1	<p><u>Climate Comments</u></p> <p>Norfolk County Council adopted its Environmental Policy at the end of 2019. This included a commitment to move towards carbon neutrality across all 27 sectors by 2030. Emissions from the trunk road network would be included within this. In order to help meet the commitment in its environmental policies the council would want Highways England to commit to undertaking work across the trunk road network to understand in more detail the carbon emissions arising from use of this network and how these might be mitigated.</p> <p>The county council would want to work closely with Highways England to identify measures to reduce carbon emissions on the trunk road network, eg by installation of Electric Vehicle charging points to encourage electric vehicles, and understand how these will be brought forward, their impact on emissions reduction and how they dovetail with measures that local partners are taking on the local transport network and across other sectors.</p>	<p>Information on carbon emissions relating to the Proposed Scheme is provided in the ES Chapter 14: Climate (REP2-002).</p> <p>The Applicant has recently secured additional funding to review potential environmental opportunities around the scheme. The Applicant will work with NCC to develop potential feasibility study to assess the implementation of such opportunities.</p>

Reference	Local Impact Report	Applicant's Response
4.17	<p><u>Public Health Comments</u></p> <p>The county council makes the following general comments in respect of its role as having public health responsibilities:</p> <ul style="list-style-type: none"> • Welcome reductions in driver stress for both general well-being and accident reduction potential • Easier and safer access across the A47 for pedestrian, cycling and equine modes of transport would be welcomed. The council would want to ensure where possible that severed access for these non-motorised users where existing routes are cut off is still easy to reach and does not make physical activity and access to existing paths and networks more difficult • Severing of existing routes should as far as possible not result in increased traffic through villages and residential areas • Residents currently or likely to be affected by noise, vibration and potential increased pollution are screened for impact and potential mitigating action • Highways England should give consideration to the possible impacts on agricultural and allotment lands through increased NOx and associated ozone generation. 	<p>Highways England aims to improve the traffic flow, reducing journey times on the route, increasing the route safety and resilience, and improving the environment.</p> <p>Impacts on non-motorised users are considered in ES Chapter 12: Population and Human Health (REP1-030). Mitigation and enhancement measures for safer crossing points and diversions for existing routes are included in the design and shown on General Arrangement Drawings (TR010040/APP/2.6 Rev 2).</p> <p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Appendix A to the Applicant's Response to Relevant Representations (REP1-060).</p> <p>ES Chapter 11: Noise and Vibration (REP1-028) considers potential impacts of the Scheme. The approach to this assessment follows the Scoping Report (February 2018) and subsequent agreed Scoping Opinion (March 2018) (APP-116), in combination with DMRB LA 111.</p> <p>As per DMRB LA105, nitrogen sensitivity is only assessed on designated sites with nitrogen sensitivity.</p>
4.18	<p><u>Discharge of Requirements</u></p> <p>As part of the application process there will be a need for a series of planning requirements (akin to planning conditions) attached to the final consent (Development Consent Order) covering a range of detailed matters. In the event that the DCO is granted by the Secretary of State these requirements will ultimately need to be discharged as the development progresses. The discharge of conditions is normally undertaken by the determining authority (ie local planning authority) for non-NSIP schemes. For NSIP schemes there is the potential for the discharge of the requirements to be undertaken by either the district councils and/or the county council.</p>	No response required

Reference	Local Impact Report	Applicant's Response
4.18.1	<p><u>Discharge of Requirements Comments</u></p> <p>There are ongoing discussions with the applicant and the District Councils affected by this scheme as to how best the discharge of requirements should be undertaken. One option might be that there is a single "lead" Authority discharging the requirements. An alternative option would be that each local authority discharge those requirements within their respective area / statutory remit. It is understood that the applicant is prepared to fund the above "discharging" work given the significant resource implication</p>	<p>The Applicant is continuing discussions with Norfolk County Council and Broadland District Council regarding the draft Requirements as set out in the dDCO (previously APP-016, resubmitted at Deadline 3 (TR010040/APP/3.1 Rev 2)).</p> <p>As the application is for a highway scheme the dDCO (TR010040/APP/3.1 Rev 2) Schedule 2 includes for the Requirements to be discharged by the Secretary of State following consultation with the appropriate body for the particular requirement.</p>
5.0	<p><u>Conclusion</u></p> <p>Norfolk County Council fully supports the principle of dualling the A47 between Blofield and Burlingham subject to:</p> <ul style="list-style-type: none"> (a) The implementation of appropriate highway, historic environment, and surface water conditions / requirements being resolved through the DCO process (b) The detailed comments set out in this report being addressed through the DCO process. <p>The County Council continues to work with Highways England, as evidenced in our Statement of Common Ground, in order to resolve the above issues.</p>	<p>The Applicant notes the support for the Scheme from Norfolk County Council subject to the comments being addressed in this report through the DCO process.</p>