
The Norfolk County Council (Norwich Northern Distributor Road (A1067 to A47(T))) Order

Applicant's comment on Written Representations by The Open Space Society

Planning Act 2008

Infrastructure Planning

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

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Introduction

This document provides the Applicant's responses in respect of selected issues raised by The Open Space Society in their Written Representation to the Examining Authority dated 30 June 2014. The Written Representation covers many issues. Some of these have been addressed elsewhere (including the Applicant's comments on Relevant Representations, and the Applicant's comments on other Written Representations). Therefore a limited selection of issues raised have been extracted and comments provided.

The points have been responded to where possible in the order they were raised. Each issue, or in some cases a summary of it, is shown in italics.

Applicant's comment on Written Representations

Representation

1.1. *The proposed NDR development would create significant, permanent environmental damage. It would have an extremely large, permanent, and gravely adverse impact on the Norfolk countryside. Landscape impacts would be considerable, and severe.*

Applicant's comment

- 1.1.1. The effects on; Landscape, Air Quality, Noise, Light, Water and Drainage, Ecology, Agricultural Land, Carbon and the Community are presented within the Environmental Statement (ES) (Document Ref. 6.1). The ES presents the findings of the Environmental Impact Assessment (EIA) and details the effects of the Scheme, both adverse and beneficial.
- 1.1.2. An overall view of the results of the EIA is presented in the Non-Technical Summary (Document Ref. 6.3) in which Section 16 provides a Summary of Effects. The detailed analyses and assessments are presented within Volume 1 of the ES (Document Ref. 6.1). The technical reports that support these assessments can be found in Volume 2 of the ES (Document Ref. 6.2).
- 1.1.3. The proposed Scheme incorporates measures to prevent, reduce and where possible offset environmental impacts from the earliest stage of the project. Specific details of the proposed mitigation measures are included in the individual topic sections of the ES. The proposed measures were designed according to statutory and non-statutory guidance and the Design Manual for Roads and Bridges (DMRB) to provide proposals that are proportionate to the significance of the relevant effect. Such mitigation measures are set out in the requirements in the draft Development Consent Order (DCO) and NCC is committed to delivering them as an integral part of the proposed Scheme.

- 1.1.4. In addition the Habitats Regulations Assessment (HRA) has considered any potential effects on protected sites and species. This has been undertaken in consultation with Natural England (NE) and the Environment Agency (EA) who have the responsibility for the protection of the Wensum Special Area of Conservation (SAC). This can be found in Volume 11: Chapter 17 of the ES (Document Ref 6.2). HRA, After consultation NE and the EA required clarification and further details on the mitigation required to prevent silt entering the Wensum via the existing road network at the western extent of the Scheme. An addendum is still in draft form and is being reviewed by NE and the EA this will be made public as soon as the Statutory Bodies have finished the review of the data submitted. It is anticipated this document will be finalised by Mid July 2014.

Representation

- 1.2. *The amount of land which would be taken by the proposed development would be very considerable indeed, including good quality agricultural land and parkland, and would result in the loss of some 6,000 established trees, with their associated landscape contributions and habitats, which it would take years and decades to replace.*

Applicant's comment

- 1.2.1. The routing of the road was based on factors including the importance of maintaining the coverage of the "best and most versatile" agricultural land to the north of Norwich. This is the land which falls within the land classification categories 1, 2 and 3a according to the Agricultural Land Classification (ALC) of England and Wales. The route was selected to avoid all grade 1 agricultural land, but it was not possible to avoid lands of the lesser "best and most versatile" grades. Therefore, within the scheme footprint (i.e. the DCO boundary) there are 168.30 ha of grade 2 and 114.20 ha of grade 3a agricultural land, and there are no areas of grade 1 agricultural land. As described in the Environmental Statement (Doc Ref 6.2, Chapter 13), 142.3

ha of grade 2 and 99.95 ha of grade 3b agricultural land will be permanently lost to the scheme.

- 1.2.2. This was recognised as a major adverse and significant impact on agricultural land as a national resource, but was considered unavoidable. This assessment should be considered in relation to current farming practices and the benefits arising from a potential increase in biodiversity from intensively farmed land lost to habitat creation.
- 1.2.3. Temporary effects that were identified for individual farm businesses were temporary land-take during construction and severance of fields and irrigation systems. This land will be fully restored to agricultural use once construction is completed and the mitigation put in place for construction is similar to mitigation for the operational phase of the Scheme.
- 1.2.4. The route has been selected to reduce the tree loss as much as possible. More than 30,000 new trees will be planted as part of the Scheme. The numbers of trees to be planted relative to those lost is 5.5 to1, therefore the new planting and habitat creation will provide adequate mitigation and compensation.

Representation

1.3. *The proposed road would also generate significant levels of noise pollution in the countryside, as well as air pollution and having adverse impacts upon protected wildlife species. It would wholly fail to accord with Norfolk's character, and would have a lasting, and very adverse affect upon it.*

Applicant's comment

1.3.1. Refer to para 1.1.1 to 1.1.4 above.

Representation

1.4. *The proposed development would interfere with a large number of rural public rights of way, and other quiet highways, which currently have a high amenity value. Diversions would have an adverse impact upon public enjoyment of these ways, and the proposed new road itself would interfere with current use of these existing routes to an unacceptable extent, as well as destroying the public's general ability to enjoy this part of the Norfolk countryside.*

Applicant's comment

- 1.4.1. In the majority of instances where a public right of way has been severed an alternative diverted route has been provided. For example alternatives have been provided where the NDR severs the following routes, as shown on the General Arrangement (GA) Plans (Document Ref. 2.6):
- Attlebridge Restricted Byway No 3 (GA Plan Sheet 1 of 12)
 - Drayton Restricted Byway No 6 (GA Plan Sheet 3 of 12)
 - Horsford Restricted Byway No 7 (GA Plan Sheet 4 of 12)
 - Postwick Footpath No 2 (GA Plan Sheet 12 of 12).
- 1.4.2. There are two public rights of way, as detailed below, that are substantially removed by the proposals but similarly new alternative bridleways have been provided in their place:
- Spixworth Bridleway No 1 (GA Plan Sheet 7 of 12),
 - Gt/ Lt Plumstead Footpath No 5 (GA Plan Sheet 11 of 12).
- 1.4.3. In addition where the NDR severs Marriott's Way and Horsford Restricted Byway No 5 a bridge over the NDR has been provided.

- 1.4.4. Volume 1, Chapter 13 of The ES (Document Ref. 6.1), overall, the assessment presented within this ES concludes that once the Scheme is operational, there would be a Moderate Beneficial and therefore significant impact for All Travellers. This is as a result of reduced traffic and congestion on radial routes in the suburban area and on inappropriate routes that are currently used by orbital traffic movements, improved amenity for Non Motorised Users (NMUs) and relief from existing severance within and between communities and facilities caused by existing high traffic levels.