

*From:*  
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Planning and Policy (CEPP)

A47NTE Registration: **20028338**

For Proc Deadline **PD B**

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Planning Inspector Adrian Hunter  
Examining Authority (ExA),  
A47 North Tuddenham to Easton  
Examination,  
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By submission at  
<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/a47-north-tuddenham-to-easton/?ipcsection=submission>

**Aug 8<sup>th</sup> 2021**

Dear Inspector Hunter,

**Relationship between the NWL and the A47 scheme  
A47 North Tuddenham to Easton Examination**

I apologise for not being able to attend the recent PM1 due to being on holiday. I am writing as I request you consider this letter, and I can speak to the issues at the PM2 on August 12<sup>th</sup> if it would be helpful.

As you are aware, the Norwich Western Link (NWL) would connect with the A47 North Tuddenham to Easton dualling (“A47NTE”) scheme. The close proximity, and physical connection, of these projects raises the issue of where the NWL should be raised under the Principal Issues.

CEPP respectfully suggest that the NWL, along with the A47NTE, should be considered under these topics:

1. *Biodiversity, Ecology and the Natural Environment.*
  - A. The River Wensum Special Area of Conservation (SAC) is closely proximal to the A47NTE scheme and would also be directly impacted by the NWL. Examination of the baseline assessment, and assessment of individual impacts of each scheme and their in-combination impact is required ie: under *the approach to assessment, including baseline conditions and surveys, and implications for European / International sites and their qualifying features, including in-combination assessment.*
  - B. Norfolk County Council (NCC) have identified a near-by a nationally significant breeding colony of barbastelle bats, which would qualify for SSSI or SAC status. They reported this in a draft response, accepted by a NCC committee meeting, on the A47/A11 Thickthorn Junction scheme ([http://bit.ly/NCC\\_PlanDeleg\\_June2021](http://bit.ly/NCC_PlanDeleg_June2021), PDF page 85) in which it is stated:

*“Please also note that Dr Charlotte Packman has been undertaking radio tracking surveys of the barbastelles in the NWL area. She should also be contacted for data. It is believed that there is a nationally significant breeding barbastelle colony of over 150 bats in this area. While this colony is not afforded SSSI or SAC status it would otherwise qualify as such. The Planning Inspectorate a public body, has a duty under Part 3, Section 40 of the Natural Environment and Rural Communities Act 2006, to have regard ...to the purpose of conserving biodiversity, to consider impacts of the road scheme on this colony.”*

The A47NTE would run much closer to this breeding colony of these European protected bats than the A47/A11 Thickthorn scheme and is within the core sustenance zone of the bats. The baseline assessment, and assessment of individual impacts of each scheme and their in-combination impact is required, and under (Principal Issue sub-section) *effects on protected species and species of conservation concern and their habitats, including bats, breeding birds, migratory birds, wintering birds, barn owl, terrestrial and aquatic invertebrates (including white-clawed crayfish), great crested newt, otter, water vole, reptiles, badgers and other notable species.*

## 2. Climate Change

CEPP previously wrote to you to request that that *cumulative carbon emissions* are included under the “Climate Change” principal issue heading, and we understand that this was discussed at the PM1, and you await the views of the Applicant. We have also previously said in our relevant representation (RR) “*L. Carbon emissions need to be cumulatively assessed \*both\* locally within the Norwich area (in combination effects with the six other possible schemes identified above), and nationally with up to 100 other schemes planned by Government, including under RIS2.*”. We also note that the EIA regulations impose a general duty to consider cumulative impacts over all the environmental factors listed at Section 4 (4)<sup>1</sup>.

As well as the other schemes in the local area (we identified those proposed for construction in the Government’s 4<sup>th</sup> carbon budget period in our previous letter), the NWL needs special consideration with A47NTE scheme for these reasons:

- A. the EIA Regulations requirement to understand the environmental impact, and carbon emissions of each scheme **in isolation**.
- B. the EIA Regulations requirement for a **cumulative** impact assessment (CIA) of carbon across both schemes.
- C. CEPP are concerned that the amalgamation of the schemes within their respective traffic models (ie the NWL is always modelled as already existing with the A47NTE modelling, and the A47 scheme is similarly always present within the NWL models) may facilitate a carbon accounting transfer, or export, of emissions between the schemes which is not clear, understood, or transparent. This does not comply with

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<sup>1</sup> The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, <https://www.legislation.gov.uk/uksi/2017/572/schedule/4/paragraph/4/made>

the Environmental Impact Assessment (EIA) regulations requirement to assess the carbon emissions of each scheme **in isolation**

- D. CEPP also note that NCC has chosen to adopt a different NATS model (base year 2019) to that used by Highway England (base year 2015). And that by choosing to apply a 2019 base-year modelling NCC claims a 30% reduction in vehicle km in their model study area compared to a previous study with a 2015 base-year modelling. Further the profiles of traffic growth are inconsistent, being opposite in the two different modelling exercises. As the study areas for the NWL and the A47NTE overlap, an explanation is required and is relevant to the A47NTE which still uses the 2015 base-year modelling. An explanation is required from NCC as to why these significant differences are observed between the models run at different base years. *Simply, how have 30% of vehicle km been lost in the modelling? And how has the relative traffic growth been switched from year-on-year increasing with an NWL in a 2015 base year model run to year-on-year decreasing with an NWL in a 2019 base year model run?*
- E. Overall, the failure of NCC and Highway England to use the same transport modelling for the NWL (ie: NATS base year 2019) as that used by Highways England (HE) (ie: NATS base year 2015) for the A49NTE makes it impossible to carry out a meaningful and safe CIA, and this needs to be resolved.
- F. There are further issues pertaining to the traffic modelling, and consequential carbon emission figures, which CEPP will document in our Written Representation. Our WR will also provide a full explanation of the above points which are currently just forward references.

In summary, examination of the baseline assessment, and assessment of individual impacts of each scheme and their in-combination impact is required for carbon emissions, and this should be raised under *Climate Change* and wherever cumulative carbon emissions are covered (either under *Climate Change* as requested, or under *Scope of Development and Environmental Impact Assessment: Cumulative and in-combination effects on, and with, other major projects and proposals*).

These issues also clearly relate to the *Transportation and Traffic* principal issue.

### 3. *Air Quality and Emissions*

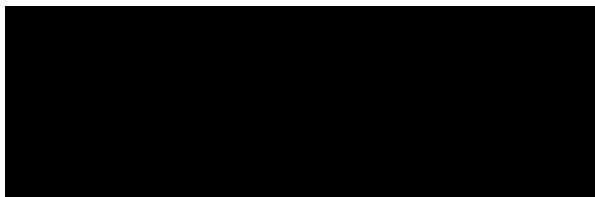
The proximity and connection of the NWL and A47NTE schemes, and the overlap of their study areas requires that a baseline assessment, and assessment of individual impacts of each scheme and their in-combination impact is required for Air Quality and air pollutant emissions. This is supported by the EIA regulations imposition of a general duty to consider cumulative impacts over all the environmental factors listed at Section 4 (4)<sup>2</sup>.

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<sup>2</sup> The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, <https://www.legislation.gov.uk/ukxi/2017/572/schedule/4/paragraph/4/made>

I appreciate your consideration of these matters.

Yours sincerely



Dr Andrew Boswell for Climate Emergency Planning and Policy (CEPP)

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