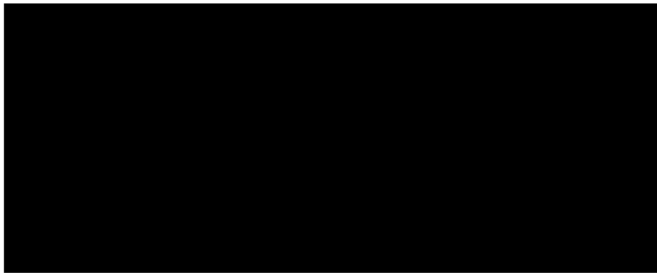


From:

David Pett - Solicitor advising Stop Wensum Link

A47NTE Registration: **20028338**

For Proc Deadline **PD B**



Planning Inspector Adrian Hunter
Examining Authority (ExA),
A47 North Tuddenham to Easton Examination,
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol, BS1 6PN

By submission at <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/a47-north-tuddenham-to-easton/?ipcsection=submission>

Aug 8th 2021

Dear Inspector Hunter,

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

I am a member of the Stop the Wensum Link campaign group (SWL) , and also act as their legal advisor.

I have seen and wish to adopt the arguments advanced by Dr Boswell in his letter to you of even date.

In short SWL consider there is a need for the following issues to be considered as part of the examination process:

Cumulative Impact

The A47NTE scheme (Scheme) will impact significantly on the River Tud which as you are aware flows into the River Wensum Special Area of Conservation (SAC). To consider the Scheme in isolation of the NWL project and other infrastructure projects taking place in the immediate area would fail in our submission to ensure the availability of full, complete and informed baseline conditions and surveys. This in turn would compromise the ability of the examiner to consider the implications for European / International sites and their qualifying features, including in-combination assessment.

This is also of particular relevance in relation to the presence of the super colony of rare and highly protected barbastelle bats to which Dr Boswell refers. Their presence has a conversational value equal to that required for SSSI and SAC status (see (<http://bit.ly/NCC PlanDeleg June2021>, PDF page 85). The colony serves as an essential foraging hub for colonies of these bats based in other nearby areas of Norfolk. There is no doubt that the Scheme and other local based

schemes will negatively impact on maintenance of the population of the species concerned at a favourable conservation status in their natural range. This needs to be fully investigated and considered.

Climate Change

I adopt Dr Boswell's well informed assertions here and support his concern about the adequacy of the baseline assessment, the assessment of the individual impacts of each scheme and their in-combination impact in relation to carbon emissions.

The schemes including the NWL need to be considered as a whole and not in isolation. A failure to include such an assessment as part of the Examination would inevitably result in the production of misleading and unreliable data. The public need to be able to view the impacts of these projects in the round and not in part.

Air Quality and Emissions

The above submissions apply equally here. As Dr Boswell highlights 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) (The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, <https://www.legislation.gov.uk/uksi/2017/572/schedule/4/paragraph/4/made>)

Your sincerely

David Pett

Solicitor