

*Via National Infrastructure Planning  
On-line portal*

**Our ref:** AE/2022/126831/01-L01  
20028349

**Your ref:** TR010038

**Date:** 8 February 2022

Dear Sir/Madam

**APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING  
DEVELOPMENT CONSENT FOR THE A47 NORTH TUDDENHAM TO EASTON  
PROJECT**

**DEADLINE 9 SUBMISSION**

We had previously raised concerns that the impact of the scheme on the ecology of the River Tud and two tributaries had not been fully assessed, particularly the effect of shading caused by the proposed River Tud bridge crossing. We requested that the Applicant provide further information to demonstrate that appropriate measures could be provided to mitigate the effects on the River Tud and the Oak Farm and Hockering tributaries, as a result of shading and the permanent loss of riparian habitat. We have been in discussion with the Applicant on how this should be achieved.

On 20 January 2022, the Applicant provided us with a copy of the River Tud - River Condition Assessment (RCA) Baseline Report, prepared by Norfolk Rivers Ecology Ltd and dated 20/01/22. We reviewed the RCA and have confirmed to the Applicant that we are satisfied with the survey methods, the results at this stage and with the river restoration proposals.

The RCA confirms that there will be adverse impacts on these watercourses but identifies appropriate restoration techniques to provide mitigation and a small amount of net-gain.

The report highlights that the condition of the Tud will deteriorate from 'Fairly good' to 'Fairly poor/Poor', because of shading and its impacts on ecology and geomorphology. The proposed restoration of the Gypsy Lane – Church Lane reach will result in a 'Net Gain' in credits to offset this deterioration and will contribute credits to offset the net loss due to the impacts of culverting on Rickwood Farm ('Oak Farm') and Hockering tributaries.

We encourage the Applicant to seek to secure as much overall net gain as possible

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given the irreversible and permanent impacts that the crossings and culverts will have on the River Tud. There are also opportunities beyond the scope of the study which could be considered during the detailed design and included in the Landscape and Ecology Management Plan.

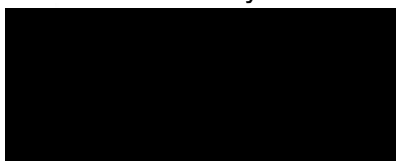
The Report recommends that a further Water Framework Directive (WFD) assessment is completed to study the potential effects of the proposed mitigation and improvement works. The WFD assessment should pick up on the impacts of shading, and also add weight to the restoration proposals which are in line with WFD mitigation measures for the River Tud. We would agree that the further WFD assessment should be prepared as the mitigation develops.

The detailed design of the mitigation and enhancement measures is proposed to be included as part of the Landscape and Ecology Management Plan, which will form Annex B.5 of the Environmental Management Plan. The Environment Agency are a named consultee in respect of Requirement 4: Environmental Management Plan.

We also note that the updated Environmental Management Plan (Document 7.4) submitted by the Applicant at Deadline 7 [REP7-036] (Tracked), includes a specific reference to the RCA within Table 3.1 (Record of Environmental Actions and Commitments). BD12 states that "Mitigation and enhancement recommendations for the River Tud to be agreed with the Environment Agency and informed by the river condition survey carried out in October to December 2021". And: "Landscape and Ecology Management Plan to be developed in consultation with the Local Authority Biodiversity Officer and Environment Agency".

We are therefore satisfied that we will be able to review and comment on the final designs for the restoration techniques and look forward to working with the Applicant on the implementation of the measures.

Yours faithfully



**MR MARTIN BARRELL**  
**Sustainable Places - Planning Specialist**

