

LOCAL IMPACT REPORT
BROADLAND DISTRICT COUNCIL

APPLICATION BY: Highways England for an Order Granting Development Consent for the A47 Blofield to North Burlingham project

PLANNING INSPECTORATE REF: TR010040

District Council Ref: 20210720

Deadline 1 – 6th July 2021

Introduction

1. This Local Impact Report (LIR) has been prepared by Broadland District Council in accordance with the advice and requirements set out in the Planning Act 2008 (as amended) as, 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.
2. In preparing this LIR the local authority has had regard to the DCLG's Guidance for the examination of applications for development consent (2015) and the Planning Inspectorate's Advice Note One, Local Impact Reports (2012).

Details of the proposal

3. The scheme proposes to upgrade a section of the A47 from single carriageway to dual carriageway between the villages of Blofield and North Burlingham. The scheme will largely be constructed to the south of the existing carriageway and will pass predominantly through open agricultural land/countryside within proximity of a number of existing buildings, including residential dwellings, along the route.
4. Alterations will be undertaken at the western end of the scheme to the existing junction with Yarmouth Road through the closure of a central reservation and prohibition of right hand turns from Yarmouth Road east onto the A47. Left hand turns from Yarmouth road west onto the A47 will be retained but alterations made to allow vehicles to gain more speed before joining the A47.
5. At the eastern end of the scheme the existing junctions with the B1140 will be changed from at grade to grade separated with slip roads eastbound and westbound and allow traffic heading north-south and south-north to avoid the need to cross multiple lanes of traffic.
6. The scheme is entirely within the administrative area of Broadland District Council. The scheme passes through the parishes of Blofield, Lingwood and Burlingham, Beighton (incorporating Moulton St Mary) and Acle.

Relevant Development Proposals

7. There are no other planning applications or other proposals in the district which are directly relevant to the proposal.

Policy Framework

8. The Development Plan comprises the following documents:

- Joint Core Strategy for Broadland, Norwich and South Norfolk 2011 (amendments adopted 2014) (JCS)
- Broadland Development Management DPD 2015 (DM DPD)
- Broadland District Council Growth Triangle Area Action Plan 2016 (GT AAP)
- Site Allocations DPD 2016 (SA DPD)
- Acle Neighbourhood Plan (2015)
- Blofield Neighbourhood Plan (2016)

Also relevant is the Broadland Landscape Character Assessment SPD 2013

9. The following policies are considered to be particularly relevant to the proposals:

JCS

- Policy 1 – Addressing climate change and protecting environmental assets
- Policy 2 – Promoting good design
- Policy 5 – The economy
- Policy 6 – Access and transportation
- Policy 7 – Supporting communities

DM DPD

- Policy GC1 – Presumption in favour of sustainable development
- Policy GC2 – Location of new development
- Policy GC4 – Design
- Policy EN1 – Biodiversity and habitats
- Policy EN2 – Landscape
- Policy EN4 – Pollution
- Policy TS2 – Travel plans and transport assessments
- Policy TS3 – Highway safety
- Policy CSU5 – Surface water drainage

GT AAP

- No directly relevant policies

SA DPD

- No directly relevant policies

Acle Neighbourhood Plan

- Policy 5 – Improving links to the countryside and surrounding villages

Blofield Neighbourhood Plan

- No directly relevant policies

10. Other material considerations include the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
11. Also of relevance is the emerging Greater Norwich Local Plan (GNLP) The Plan which covers BDC, Norwich City and South Norfolk Councils is being prepared. The Regulation 19 consultation closed on 22nd March 2021 and is due to be submitted to the Secretary of State for Examination anticipated to be undertaken between November and December 2021. It is expected that the GNLP would be adopted in Autumn 2022. However, given the stage of preparation it carries only very limited weight in decision making.
12. A statement of compliance or otherwise with the above development plan policies is provided as appendix 1 to the LIR.

Impacts of the Proposal

13. The current route of the A47 between Blofield and North Burlingham results in frequent delays and high levels of slow moving traffic particularly, but not limited, to peak hours due to the single width of the existing carriageway. With planned growth within the existing and emerging Development Plan it is anticipated that these issues would be exacerbated due to the increase in vehicular traffic using the strategic highway network.
14. The Council strongly supports the principle of the proposed scheme on the basis of the potential economic benefits which may result. These benefits, in combination with the wider programme of A47 improvements being proposed by Highways England (and as listed in the Council's Relevant Representation), are considered to include:
 - help to boost the economic prosperity of a large part of the East of England and contribute to national economic growth.
 - Shorter and more reliable journey times along the road and onwards to the Midlands.
 - Reduce delay, congestion and inefficiency.
 - Attracting more customers for businesses and attracting new businesses.
 - Supporting existing businesses to grow and become more productive and profitable.
 - Allowing businesses to invest with confidence.
 - Encouraging more visitors to the region.
 - Creating more jobs.
15. The importance of these economic benefits are increased in the light of the COVID19 pandemic and the need to support the economy as part of the post pandemic recovery.
16. The importance of this scheme is reflected in the existing development plan. Policy 6 of the JCS seeks to enhance the transport system in order to develop the role of Norwich as a Regional Transport Node. This is to be achieved by, amongst other things, "promoting improvements to the A47". The need to deliver improvements to the strategic highway network is echoed in the emerging GNLP, which supports strategic infrastructure improvements that support the growth needs of the area. The emerging GNLP, in Policy

4 (Strategic Infrastructure), specifically refers to improvements to the A47 between Blofield to North Burlingham as one of the schemes that will help the plan achieve its aims.

17. Consequently, the Council consider that there are significant economic benefits associated with the scheme and are supportive of the proposals in principle. The Council would however like to take this opportunity to highlight the following matters to the Examining Authority:

Heritage

18. In accordance with paragraph 193 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. In accordance with paragraph 197 of the NPPF the effect of an application on the significance of non-designated heritage assets also needs to be taken into account in determining the application.
19. Broadland District Council is satisfied that through the assessment of the Zone of Visual Influence (ZVI) and Zone of Theoretical Visibility (ZTV), as well as assessment of potential noise impact, potential heritage assets affected have been covered, and this includes identification of non-designated heritage assets. Generally the Council would have more concerns with regard to long term and operational impacts rather than temporary impacts from construction, as (apart from road sign and milepost) assets will not be directly physically impacted upon and construction impact is temporary. It is however good to see that Poplars Farm buildings will be monitored for vibration damage etc from construction however the Council is surprised that this is not also the case with nearby Oaklands.
20. With regard to heritage, the Environmental Statement is considered to be comprehensive and reasonable in its assumptions, and a positive approach in terms of seeking appropriate levels of mitigation where required to reduce the level of harm where possible. It is however noted that even with mitigation there are assets where there will be slight adverse impact.
21. Due to the urbanising affect, there is also negligible to potentially slight adverse impact on the two historic churches, Owl Barn and house next to Owl Barn – although this is mainly due to their higher significance and the relatively very low impact in terms of setting the analysis comes out as higher impact in the matrix than for example non-designated heritage assets which are considered to be of lower heritage value and significance.
22. In terms of permanent impact on the setting of heritage assets the most affected assets in terms of setting will be the non-designated heritage assets of Poplar Farm and Oaklands (former Rectory to St Andrew) which will be in very close proximity to the new road. In the categorising used in the Cultural Heritage chapter (APP-044) (para 6.4.14) non-designated heritage assets have relatively low value in terms of significance, and

therefore overall significance of effect usually comes out quite low even if there does appear to be quite a significant degree of adverse harm to the setting when assessing the setting. This is the case with Poplars Farm where major adverse impact (reduced to moderate with mitigation) is identified and Oaklands where there is moderate harm, and where the bypass is directly to the north. It is worth noting that moderate is only second to major in the possible degrees of impact in the report i.e. no change, negligible, minor, moderate or major (para 6.4.15). There is an error on the table on p28 (Row 2) of APP-044 where presumably it is meant to have The Old Post Office to the left column and low in value/sensitivity column to the right. For Beighton House the impact is identified as being negligible to possibly at worst slight adverse, whereas the Old Post Office it is considered slight beneficial as the dual carriageway will be further away.

23. In terms of impact the proximity of the road will increase impact on Poplars Farm and loss of rural context, however there are numerous barns to the north and the principal elevation of the farmhouse is facing south. Mitigation is proposed in terms of increased vegetation as screening. Similar, Oaklands will be disconnected from its church which it was the rectory for, however the existing road already severed connection to some extent being such a busy thoroughfare, and there is plenty of documentary heritage to show the link. Also, it now has a relatively enclosed setting with high hedges around it and is not particularly open to surrounding views. Beighton House will be less affected as it already fronts towards a dual carriageway, but the junction will have the effect of further urbanising the setting, whereas the setting of the Old Post Office should improve with the road being further away, so the scheme would be considered beneficial.
24. The Council consider that it is good to see the milestones identified and protected (confirmed in Row 1 page 25 of APP-044), and the intention to conserve these in situ, which is important as their positioning is part of their significance in terms of indicating distances between towns along the road. It is proposed for the guidepost to be refurbished and relocated (Row 1 page 26 of APP-044) which is acceptable as its position should reflect route marking and it would lose its sense and meaning if kept in its existing position. These are most at risk of harm during the construction phase so it is welcome that appropriate measures are being undertaken to ensure they are preserved, and indeed enhanced through conservation/restoration.
25. The former parkland to Burlingham Hall is identified as non-designated heritage asset, and a small part of the former parkland to the south east will be developed upon altering the boundary definition of the former extent of the park. It is noted that this has already been altered in terms of character with loss of the corner plantation and the subdivision of the land with new field divisions. The map in the appendix does not however show the full extent of historic park as it was at the turn of the century, although it is described in para 6.7.26-28 of APP-044 as being to that extent in manner – which is a bit confusing – map should show full extent of historic park or it could indicate the former area of park now which has now lost its character.
26. In terms of the listed assets, Owl Barn and the house at Owl's Barn are not greatly affected and the setting of the two churches will be improved with the road being further away and planting which will reduce noise. Permanent impact is therefore negligible to slight adverse due to the general urbanising affect (para 6.8.12 of APP-044)

Social

27. Whilst the proposal has the potential for economic benefits, which in turn are likely to have positive social impacts, the Council have identified in their Relevant Representation the potential impact on routes for walking, cycling and horse riding.
28. The A47 acts as a constraint to north-south movement by non motorised users. Within the locality of the scheme are a series of public rights of way and permissive paths which provide access to the countryside for informal recreation.
29. Burlingham Woodland Walks, have been developed on land owned by Norfolk County Council since the 1990s and pass through a landscape of old and new woodland and orchards and farmland interspersed by hedgerows within and around North and South Burlingham, Lingwood, Strumpshaw, Beighton and Acle. These walks can be accessed by residents of Lingwood (south of the A47) by crossing the A47 using Burlingham FP3. The proposed scheme would sever Burlingham FP3 and instead redirect users east towards the proposed B1140 crossing.
30. Burlingham Woodland Walks are a County Council initiative which is supported by Broadland District Council. Access to high quality green infrastructure supports growth in the district by providing an alternative to visiting the Broads thereby reducing pressure on European and International sites. Consequently the District Council are highly supportive of ensuring easy access by local residents to green infrastructure.
31. To support the delivery of green infrastructure in the District in the short, medium and long term, Broadland District Council has had prepared, on its behalf, the East Broadland Green Infrastructure Project Plan (See appendix 2 of the LIR). The plan is intended to support the future growth of the region by proposing green infrastructure projects with the capacity to accommodate future developments. Project 5 of the plan "A47 Safe Foot and Cycling Crossing" seeks to deliver a safe foot and cycle crossing over the A47 between Lingwood and North Burlingham. This will provide a vital link between the settlements and the Burlingham Trails to the north and south of the A47. The project plan identifies that the A47 dualling plans would increase the severance of the A47 and that a new crossing would provide a way to integrate communities on both sides of the road
32. The Project Plan identifies the opportunities that the crossing would provide which include an enhancement of the Burlingham Trails network increasing enjoyment for residents with the potential to form a new green corridor.
33. As identified by the Council previously, the proposed scheme severs Burlingham FP3 and redirects users to the proposed B1140 crossing. Whilst the inclusion of walking and cycling facilities at this junction is welcomed, the severance of Burlingham FP3 results in a significant detour which could be avoided through the inclusion of a footbridge across the proposed A47. If delivered as a green bridge there would be additional ecological connectivity, also supported by Project 5 of the East Broadland Green Infrastructure Project Plan

34. The Council note that this is an issue raised by Norfolk County Council, Lingwood Parish Council and Strumphaw Parish Council in their Relevant Representations (RR-002, RR-05 and RR-06) and Broadland District Council are supportive of their views on this issue.
35. Broadland District Council has also previously made comments about the potential for the inclusion of cycling and pedestrian routes between North Burlingham and Acle. Whilst it is noted that Highways England have identified that these are outside of the scope of the scheme, Broadland District Council would wish to reiterate that their inclusion would be welcomed on the basis that it would create sustainable access for those in North Burlingham to a greater range of shops and services in Acle, and provide enhanced access for residents in the locality to access Burlingham Woods Walks in accordance with policy 5 of the Acle Neighbourhood Plan.

Consideration of the draft order

36. With regards to the Draft Development Consent Order, the Council in general terms does not wish to raise any concerns, however the Council wishes to reserve its position at this stage pending further progress of the examination and discussions with the Applicant.

Appendix 1 - A definitive list of relevant development plan policies and reasons for conformity or otherwise

Document	Policy	Comments
Joint Core Strategy for Broadland, Norwich and South Norfolk (2011), Amendments adopted 2014.	Policy 1 – Addressing climate change and protecting environmental assets	Policy 1 covers a broad spectrum off issues relating to climate change and environmental assets. Overall compliance with this policy will need to be undertaken through the examination process but the Council raise no in principle issues in respect of compliance with it.
	Policy 2 – Promoting good design	The design, siting and use materials of the Scheme is intrinsically related to its function and design opportunities are considered limited. However it is noted that landscaping is used as mitigation to soften some of the impacts of the development (for example on landscape or the setting of heritage assets) and the route of the scheme has had regard

		<p>to local constraints to try and minimise these impacts. Consequently it is considered that there is no conflict with Policy 2. In response to ExA Questions 1.10.8 Broadland District Council would welcome a requirement within the dDCO for the detailed design of the proposed bridges to be undertaken in consultation with BDC and / or subject to design review by Highway England's Strategic Design Panel.</p>
	Policy 5 – The economy	<p>The Scheme, for reasons set out in the Local Impact Report, is considered to result in economic benefits. It is considered that the scheme complies with policy 5.</p>
	Policy 6 – Access and transportation	<p>Policy 6 includes reference to the promotion of improvements to the A47. The supporting text identifies that these improvements relate more specifically to improvements to reduce the significant stretches that remain single carriageway. The scheme is considered to comply with this policy 6 in principle.</p>
	Policy 7 – Supporting communities	<p>Policy 7 seeks to enhance quality of life and well being of communities. Included within this is the promotion of healthier lifestyles by maximising access by walking and cycling and providing opportunities for social interaction and greater access to green space and the countryside. As detailed within the LIR, the scheme severs Burlingham FP3 and the proposed solution results in a significant detour. This could be mitigated through the provision of a footbridge at FP3 over the proposed route</p>

		of the A47. Whilst the scheme therefore provides access to local green infrastructure networks, this could be better maximised (in accordance with policy 7) through the inclusion of a footbridge.
Broadland Development Management DPD 2015	Policy GC1 – Presumption in favour of sustainable development	This policy reflects the presumption in favour of sustainable development of the NPPF. The precise application of this policy is to be undertaken when consideration of compliance or otherwise with the development plan and material considerations have been assessed through the examination process.
	Policy GC2 – Location of new development	The scheme is outside of the settlement limit defined on the policies map. Policy GC2 states that outside of settlement limits development which does not result in any significant adverse impact will be permitted where it accords with a specific allocation and/or policy of the development plan. In this respect, policy 6 of the JCS, which seeks to promote improvements to the A47 to reduce the significant stretches that remain single carriageway, is of particular relevance. The Council therefore considers that the scheme complies with policy GC2 subject to the examination process finding no significant adverse impact.
	Policy GC4 – Design	Policy GC4 covers a broad range of issues that proposals should pay adequate regard to. The Council has the following observations using the numbering of policy GC4: i) Whilst the scheme will impact on the

		<p>environment, character and appearance of the area, the route of the scheme has been designed to reduce these and where adverse impacts would result mitigation in the form of landscaping is proposed to avoid significant impacts.</p> <p>ii) Given the nature of the scheme it is difficult to reinforce local distinctiveness, however the comments made under (i) are considered relevant here.</p> <p>iii) N/A</p> <p>iv) The application has considered the impact of development on amenity of existing residents and mitigation will be secured to avoid significant adverse impacts.</p> <p>v) The Council consider that the scheme utilises the site area effectively.</p> <p>vi) The Council note that provision is made for a range of transport modes including enhanced pedestrian and cycle routes.</p> <p>vii) The Council raise no issue in respect</p>
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		<p>of the safety of the environment and crime prevention.</p> <p>viii) The Project provides links into existing infrastructure, however the severance of Burlingham FP3 could be mitigated through the provision of a footbridge rather than the proposed detour to the eastern end of the scheme.</p> <p>ix) N/A</p> <p>x) The Council note that the ExA has requested further work on climate change is undertaken as part of the ES.</p>
	<p>Policy EN1 – Biodiversity and habitats</p>	<p>Whilst the scheme will have impacts on biodiversity and habitats, the route of the scheme has had regard to constraints and mitigation for adverse impacts can be secured. In addition, the Council consider that there are clear benefits of the scheme which weigh in favour of the scheme in the application of this policy.</p>
	<p>Policy EN2 – Landscape</p>	<p>Whilst the project will have adverse impact on the character and appearance of the area through the urbanisation of existing countryside, these impacts can be reduced through mitigation in the form of new landscaping. Subject to a suitable mitigation scheme (and no objections are raised in principle to what is being proposed in this respect) and</p>

		its long term management and maintenance, the Council consider that the scheme would comply with EN2 in the context of this as a nationally significant infrastructure project.
	Policy EN4 – Pollution	The Council raise no issues in principle in respect of this policy subject to suitable mitigation being secured in the DCO to ensure that there is no significant impact upon amenity, human health or the natural environment.
	Policy TS2 – Travel plans and transport assessments	The Council raise no issues in respect of this policy subject to Norfolk County Council (as local highway authority) being satisfied through the examination process.
	Policy TS3 – Highway safety	The Council raise no issues in respect of this policy subject to Norfolk County Council (as local highway authority) being satisfied through the examination process.
	Policy CSU5 – Surface water drainage	The Council raise no issues in respect of this policy subject to the lead local flood authority being satisfied through the examination process.
Broadland District Council Site Allocations DPD 2016	No relevant policies	N/A
Broadland District Council Growth Triangle Area Action Plan 2016	No relevant policies	N/A
Acle Neighbourhood Plan	Policy 5 – Improving links to the countryside and surrounding villages	The policy seeks to improve pedestrian links to the countryside and surrounding villages. Broadland District Council has also previously made comments about the potential for the inclusion of cycling and pedestrian routes between North Burlingham and Acle. Whilst it is noted that Highways England have identified that these are outside of the scope of the scheme, Broadland District

		Council would wish to reiterate that their inclusion would be welcomed on the basis that it would create sustainable access for those in North Burlingham to a greater range of shops and services in Acle and provide enhanced access for residents in the locality to access Burlingham Woods Walks in accordance with policy 5 of the Neighbourhood Plan.
Blofield Neighbourhood Plan	No relevant policies	N/A

Appendix 2 - East Broadland Green Infrastructure Project Plan

Attached as a separate PDF