



GREAT YARMOUTH
BOROUGH COUNCIL

Planning and Growth

Town Hall, Hall Plain
Great Yarmouth
Norfolk, NR30 2QF

Customer Contact Centre

Tel: (01493) 856100

Fax: (01493) 846110

Email: enquiries@great-yarmouth.gov.uk

Website: www.great-yarmouth.gov.uk

Direct Line: (01493) 846688

Email: adam.nicholls@great-yarmouth.gov.uk

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8th June 2018

Dear Ms Shoesmith,

Great Yarmouth Third River Crossing – EIA Scoping Consultation

Thank you for your letter of 6th April 2018 inviting Great Yarmouth Borough Council to respond to the above application. Please accept my apologies that the Council did not respond by the original deadline of 4th May 2018; I am grateful that you have agreed to accept a late submission.

The Council has worked closely with the applicant, Norfolk County Council, and its consultant partners, for several years on the Third River Crossing project. There has therefore been considerable ongoing engagement on a range of issues and topics throughout this period. As a result, the Council is broadly satisfied with the content of the Scoping Report and there are no serious omissions or flaws within it. Clearly, however, the Council will want to comment in detail on the full EIA, alongside the other application documents, at the appropriate time.

The Council does have a few points of detail to make. Firstly, paragraph 6.14.9 (page 107) includes a list of other “schemes” that might need to be assessed for potential cumulative environmental effects. Observations on these are as follows:

- The two Enterprise Zones in Great Yarmouth are not development schemes themselves. They offer various benefits to encourage growing and new port and energy & logistics businesses to locate within the Zone, but specific planning proposals need to be taken through and considered in the normal way (this is covered in more detail below);
- Great Yarmouth has two Local Development Orders in place, which cover broadly the same areas as the two Enterprise Zones (the South Denes LDO extends more widely than the EZ). The LDOs (see <https://www.great-yarmouth.gov.uk/article/2492/Local-Development-Orders-LDOs> for more detail) grant planning permission (subject to conditions) for certain types of developments which fall within the provisions of the LDO. These include particular development types (such as ship-building) within certain parameters (such as building height). The LDOs can therefore allow some potentially significant developments to take place without express planning permission needing to be granted, and this potential should be reflected in the EIA;
- The Great Yarmouth Tidal Barrier appears to have been included in error. The Council believes what is really being referred to here is Epoch 2 of the Great Yarmouth Flood Defence Improvements, which is being led by the Environment Agency;

- Stage 1 of the CEA (Cumulative Effects Assessment) requires identification of projects that occurred in the past, present or likely to occur in the foreseeable future. On this basis, the list of “schemes” should also include the following:
 - The proposed 10 ha extension to Beacon Business Park, Gorleston (which is allocated in the Great Yarmouth Core Strategy 2015);
 - Great Yarmouth Energy Park (which is covered by the LDO) – see <https://www.great-yarmouth.co.uk/business/energy-park.aspx>;
 - Various proposed junction improvements to the A47 being progressed by Highways England – Gapton Hall, Harfreys and Vauxhall (all in Yarmouth), with other A47 improvements further west (Burlingham-Blofield dualling, Thickthorn junction improvements and Easton-North Tuddenham dualling) also considered;
 - East Anglia Array Windfarm;
 - Consent for roughly 1,000 residential dwellings at Beacon Park, which are under construction;
 - The proposed North Lowestoft Garden Village (Draft Allocation in the Waveney Local Plan, c. 1,300 dwellings, 8ha employment land, anticipated delivery 2026-2044);
 - Proposed leisure developments south of Pleasure Beach, Great Yarmouth, which include a new hotel, restaurant and car parking (under construction), and an outline permission for a proposed casino plus cinema, bars & restaurants etc;
 - Clearly this list will need to be kept under review there is always potential for significant further development to come forward on unallocated sites in the coming 6-12 months.

Secondly, comments on environmental matters are as follows:

Air Quality

- Concerning Paragraph 6.2.5 - GYBC has updated its monitoring programme for air quality. Due to implementing changes to the monitoring programme Great Yarmouth Borough Council did not undertake any automatic (continuous) monitoring at any site during 2017. The automatic urban background monitoring site in Gorleston was decommissioned in Oct 2016. A new automatic monitoring site was set up in December 2017 in Fenner Road, South Denes. This monitors a wider range of pollutants (PM₁₀; PM_{2.5}; PM₁ and nitrogen oxides) and data is available from January 2018. Other monitoring sites across the Borough (for nitrogen dioxide, using diffusion tubes) have been reviewed and a revised programme took effect from January 2018;
- During the construction phase, as well as the impact on local air quality from the construction activities, there is likely to be a significant impact on various parts of the Borough from additional traffic using official diversion routes and also unofficial “rat running”. The nitrogen dioxide concentration in areas either side of the Haven Bridge are currently high (albeit just within guideline values) given the present traffic density and congestion. Any increase in traffic congestion at that location will clearly adversely impact air quality in that locality in particular;
- The particulate levels especially PM₁₀ and PM_{2.5} in the study area and across the Borough could also be affected by industrial developments in the wider South Denes area – not just from traffic contributions but from industrial plant defendant on the type of industry.

Noise

- Given that construction is taking place on both sides of the river and that sound/noise transfer across water has different characteristics to that over land, this should be specifically addressed in the modelling and impact assessment.

Light pollution

- The document appears to be silent on the topic of light pollution effects, which could be particularly significant during the construction phase. There could be some significant, albeit localised, effects on some residential areas as a result of lighting introduced for construction or security purposes. Some assessment of this should be made, with any appropriate mitigation measures identified.

I hope this response is helpful, but do please contact me if any clarifications are sought. The Council will continue to engage as the Third River Crossing project progresses.

Yours sincerely,



Adam Nicholls
Head of Planning and Growth