



West Winch Housing Access Road

Environmental Statement Chapter 1 Appendix 1.2 – EIA Scoping Opinion Part 1 of 2

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1 Introduction

1.1.1 This document provided by Norfolk County Planning Authority, under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It has been undertaken as a result of a request for such received on 22 March 2021 from Norfolk County Council. If you require this document in a more accessible format please contact westwinchhar@norfolk.gov.uk.

SCOPING OPINION:

Proposed West Winch Housing Access Road

Norfolk County Council Reference: SCO/2021/0001

**Adopted by Norfolk County Planning Authority pursuant to the
Town and Country Planning (Environmental Impact Assessment)
Regulations 2017: Regulation 15 Scoping Opinions of the Local
Planning Authority.**

Norfolk County Council – County Planning Authority

Scoping Opinion

Housing Access Road – West Winch

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1. INTRODUCTION

The European Union (Withdrawal Agreement) Act 2020

On 31 January 2020, the United Kingdom (UK) left the European Union (EU). A transition period is now in place until 31 December 2020. This provides for the relevant EU legislation relating to Planning and Environmental Assessments to be retained as UK law, until amended by Parliament. This Scoping Opinion is based on the retained law.

Background

On 22 March 2021, the County Planning Authority (CPA) received a scoping request from Norfolk County Council (the Applicant) under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed West Winch Housing Access Road (the scheme).

This document is the Scoping Opinion (the Opinion) provided by the County Planning Authority respect of the scheme. It is made on the basis of the information provided in the Applicant's report entitled West Winch Housing Access Road, Environmental Impact Assessment - Scoping Report. This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.

Under the provisions of Regulation 5 the EIA Regulations, the applicant has not requested a screening opinion, as it is their view that the scheme is an Environmental Impact Assessment (EIA) development. It is their intention to submit an Environmental Statement with the application.

This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.

The County Planning Authority has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement.

This Opinion should not be construed as implying that the County Planning Authority agrees with the information or comments provided by the Applicant in their request for an opinion. In particular, comments from the County Planning Authority in this Opinion are without prejudice to any later decisions taken (e.g. on submission of the application).

Regulation 15(2) of the EIA Regulations states that a request for a scoping opinion must include:

- (i) a plan sufficient to identify the land;
- (ii) a brief description of the nature and purpose of the development, including its location and technical capacity;

- (iii) an explanation of the likely significant effects of the development on the environment; and
- (iv) such other information or representations as the person making the request may wish to provide or make;

The County Planning Authority considers that this has been provided in the Applicant's Scoping Report. The County Planning Authority is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.

Consultation

In accordance with Regulation 15(4) of the EIA Regulations the County Planning Authority has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the County Planning Authority is provided at Appendix 1. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in preparing their ES.

The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.

COVID 19, survey work and data collection

In response to the current issues relating to the Coronavirus outbreak, the CPA understands that Central Government and/or Local Authority enforced restrictions may have consequences for the ability to conduct certain surveys and obtain relevant data required for the purposes of the ES.

In determining a planning application accompanied by an ES, the CPA must in examining the environmental information, reach a reasoned conclusion on the significant effects of the Project/Scheme on the environment. The CPA will also consider the advice received from consultees during the planning process.

Given the current circumstances, the applicant is advised to continue dialogue with the relevant consultees and agree approaches/methodologies to data collection and how it is to be presented in the ES.

2. THE SCHEME

Introduction

The following is a summary of the information on the Project and the Scheme and the surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Scheme and the potential receptors/ resources.

Description of the Project

The scope of the project is considered to be set out in policy E2.1 (West Winch Growth Area Strategic Policy) of the Borough Council of King's Lynn and West Norfolk, Site Allocations and Development Management Policies Plan (2016) and emerging policy E2.1 (West Winch Growth Area Strategic Policy) of the Borough Council of King's Lynn and West Norfolk, Local Plan Review 2019.

At this point in time aside from the planning applications currently being considered by the Borough Council in the project area, there is little realistic or reasonable prospect of having a detailed understanding of the wider urban growth area project as set out in policy E2.1. The ES should acknowledge the reality that it is part of a broader project and assess the road alongside the other elements of the growth area on that basis. However, a pragmatic approach to the information required in the ES is considered appropriate. Rather than an "all or nothing" approach, a more pragmatic approach is recommended which should be based on what can reasonably be known on submission. The ES should explain and justify the pragmatic approach adopted.

Description of the Scheme

The proposed scope of works for this element of the project is outlined below:

- 3.5km of new single lane Housing Access Road designed for a 60 miles per hour (60 mph) speed limit;
- A new roundabout junction between the WWHAR and the A47 trunk road providing access to the planned Hardwick Green development;
- A new roundabout junction between the WWHAR and the A10 at the southern end of the WWHAR;
- Intermediate access junctions on the WWHAR to provide access to the residential allocation area;
- Treatment of local roads which will be severed by the WWHAR, including a new road over bridge with shared footway and cycleway on Rectory Lane to cross over the proposed WWHAR and the permanent stopping up of Chequers Lane for vehicular traffic. A new foot/cycle bridge is to be constructed over Chequers Lane to maintain access to pedestrians over WWHAR;
- Modification of the Hardwick Interchange to accommodate additional housing traffic plus a re-orientation of trips through the junction;
- Dualling of the A47 (to the north of the existing highway alignment) between the WWHAR and the A10/A47 Hardwick Interchange junction; ▪ Temporary working areas for road construction including haul routes. The largest of the compounds will be located to the north at the new roundabout on the A47 with a further compound located to the south west of the new overbridge off Rectory Lane; and

- Two sets of National Grid gas main diversion works including construction compounds and temporary access and working areas.

The scheme also proposes the modification of the existing highway network on the existing alignment and the A10 to introduce traffic calming measures. This is required in order to divert the majority of traffic flow away from the A10, once the scheme is constructed, reducing the residual vehicular traffic on the A10. At this stage measures for traffic calming are likely to include:

- New signalised pedestrian crossing;
- Splitter islands;
- Removal of central white lining;
- Visual narrowing of the carriageway;
- Build outs (to create alternating give way movements); and
- A short section of the A10 in the centre of West Winch to be reduced to 20mph to create a 'high street' environment).

A new roundabout junction is to be created for the connection of the A10 to the WWHAR.

It is anticipated that the dualled section of the A47 as well as the approaches to the Hardwick Interchange and new roundabout junction between the WWHAR and the A47 would be lit. No other scheme lighting is currently proposed.

The scheme requires the diversion of the National Grid Feeders 2 and 4 high pressure gas pipelines

County Planning Authority's Comments

The description of the Scheme provided in the Scoping Report is brief and limited to the likely main components of the scheme, based on the current preferred option for the design. The County Planning Authority expects more detail to be presented within the ES, including detailed descriptions of all works for which planning permission is sought, supported by clear figures.

Details of components such as signage, lighting, drainage features, landscaping and environmental mitigation features have not been specified in the Scoping Report and this information should be provided in the ES.

The nature and quantity of materials and natural resources used (including water, land, soil and biodiversity features) should be identified and an assessment made of the anticipated impacts where significant effects are likely to occur.

No description has been provided relating to the construction of the Scheme, and as such, it is unclear if construction has been fully considered within the Scoping Report. The County Planning Authority expects details of the construction phase of the Scheme to be provided and assessed within the ES, including but not limited to:

- the description of the construction period;
- construction methods (e.g. piling method);
- staging/phasing of the development;

- location of construction activities, including a clear description of all works;
- location of any temporary structures or areas required (such as construction compounds and temporary closures of Public Rights of Ways (PRoWs)), including likely dimensions and duration of use; and
- description of the construction traffic route.

Alternatives

The EIA Regulations require that the Applicant provide “A description of the reasonable alternatives,” (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

The County Planning Authority acknowledges the assessment of alternatives carried out by the Applicant to date, which is summarised in Section 2 of the scoping report. Section 2 indicates that the option assessment undertaken to date has been limited by the Local Plan allocation. In this regard the County Planning Authority considers it reasonable to expect that alternatives to the Project were considered by the Local Planning Authority at the plan making stage. Therefore, it would be reasonable for the ES to include only a brief overview of the work carried out at that stage.

Turning to the alternative options for the Scheme itself, provided in the scoping report, these are very limited and do not appear to have taken into consideration the effects of the Scheme on the environment. The County Planning Authority recommends that the ES includes a discrete chapter for alternatives. This chapter should provide details of the reasonable alternatives studied (including high-level) and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

Flexibility

In terms of the Project (as set out in in policy E2.1 (West Winch Growth Area Strategic Policy) of the Borough Council of King’s Lynn and West Norfolk, Site Allocations and Development Management Policies Plan (2016) and emerging policy E2.1 (West Winch Growth Area Strategic Policy) of the Borough Council of King’s Lynn and West Norfolk, Local Plan Review 2019), a pragmatic approach to the information required in the ES is considered necessary, as set out above. The ES should explain and justify the pragmatic approach adopted.

In terms of the Scheme, the Scoping Report states at Section 2.2 that the scheme design is continuing to be refined. It is not clear from the Scoping Report whether the Applicant intends to include flexibility in any application.

The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Scheme have yet to be finalised and provide the reasons. At the time of application, any of the parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be clearly defined in the ES. Where flexibility is sought, the ES should set out the parameters that would apply for all components of the Scheme, where applicable, setting out clearly any proposed limits of deviation. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of

undecided parameters. The description of the Scheme in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 18 of the EIA Regulations.

It should be noted that if the Scheme materially changes from the Scheme presented in the Scoping Report, prior to submission of the application, the Applicant may wish to consider requesting a new scoping opinion (also, see comments from the Borough Council of King's Lynn & West Norfolk 12th dated May 2021).

3. ES APPROACH

Introduction

This section contains the County Planning Authority's specific comments on the scope and level of detail of information to be provided in the Applicant's ES.

Aspects/matters are not scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by the County Planning Authority. The ES should be based on the Scoping Opinion in so far as the Scheme remains materially the same as the Scheme described in the Applicant's Scoping Report.

Scope of Assessment

General

It is recommended that in order to assist the decision-making process, the Applicant uses tables:

- to demonstrate how the assessment has taken account of this Opinion, in terms of the Project and the Scheme;
- to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
- to set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures; and
- to describe any remedial measures that are identified as being necessary following monitoring.

Evidence

The ES should contain the timescales upon which the surveys that underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES, or in each aspect chapter.

It should be clear within the ES where professional judgement has been applied. The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and Emissions

The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the

construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

Mitigation

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured.

Reference List

A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

4. Aspect Based Scoping Tables

Air Quality

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	Change in dust and PM10 concentrations at receptors beyond 200m from the site boundary (construction).	Changes beyond 200m from the site boundary are unlikely to give rise to significant impacts.	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>
	Change of NO2, PM10 and PM2.5 concentrations at receptors beyond 200m from the affected road network associated with construction and operational traffic.	This is a SSSI identified with a geological interest. No sensitive features have been identified with respect to air quality.	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>

ID	Para	Points	Comments
	3.3.2 to 3.3.9	Baseline	<p>The Scoping Report states that background concentrations of pollutants in terms of the highest annual mean NO2, PM10 & PM2.5 concentrations for 2019 were obtained from roadside monitoring points. These points should be shown on a figure or plan within the ES or associated Technical Appendix to the ES and the figures provided. The baseline data used must be the most up to date, but must also be representative, and not be impacted by the COVID-19 pandemic and subsequent lockdowns.</p> <p>The information included within Section 3.3.6 is incorrect (highlighted by the EHO). The highest annual mean PM10 concentration for 2019 was recorded at the Self's Field monitoring</p>

ID	Para	Points	Comments
			<p>site in Stoke Ferry (Site-ID CM4). Moreover, the Borough Council currently monitor NO2 concentrations within West Winch using a diffusion tube (Site 73). This monitoring data should be included, with data collected at this site used to inform baseline air quality.</p>
	3.3.10 to 3.3.13	Sensitive receptors	<p>Justification for selecting the 200m sensitivity distance will be required, along with justification for the selection of the limited number of receptors and for any non-selection of receptors within the area. It is recommended that the applicant consults the Borough Council on the location of the sensitive receptors to be included with the operational and construction air quality assessments prior to the competition of the EIA.</p> <p>Planning applications for future developments which will introduce new sensitive receptors with the potential to be impacted by the project in the opening year should be considered (as included within Table 13-1).</p>
	3.4.1 to 3.4.3	Mitigation	<p>The Scoping Report states that mitigation measures will be secured through the CEMP. The mitigation measures and CEMP should be detailed in the ES and be suitably secured.</p> <p>The CEMP section of the ES should include mitigation measures from within Chapter 8 of EPUK and IAQM Guidance on the Assessment of Dust from Demolition and Construction (2014). Additionally, dust impacts from all construction compounds included within the scheme and ground moving activities related to the National Grid gas main diversion works should be included with the assessment of construction dust impacts and covered by the CEMP.</p>
	3.7.1 & 3.7.2	Methodology Construction Phase	<p>The Scoping Report states a qualitative assessment of construction dust impacts will be undertaken. The scope, methodology and results of this should be fully reported in the ES and should be accompanied by relevant plans and figures.</p> <p>The Borough Council should be consulted on the assessment of construction traffic data once the data becomes available.</p>

ID	Para	Points	Comments
	3.7.3 to 3.7.9	Methodology Operation Phase	<p>Regarding operational phase mitigation, a Transport Assessment for the development should be completed and sustainable transport methods included within the operation mitigation measures in line with the Borough Council's Air Quality Action Plan (AQAP).</p> <p>The Scoping Report sets out how available traffic model data will be assessed using DMRB LA 105 scoping criteria to determine if an air quality assessment is required based on changes between do-something traffic compared to do-minimum and determine the 'affected road network' (ARN). However, this methodology does not follow the recognised guidance. Due to the prominence of existing and proposed receptors to the project, it is believed that the screening criteria from Institute of Environmental Protection UK and the Institute of Air Quality Management (EPUK and IAQM) Planning for Air Quality Guidance should be utilised to determine if air quality impacts can be scoped out based on projected LDV and HDV movements from the scheme, rather than a lesser standard.</p> <p>A detailed assessment will be completed to determine the impacts on local air quality and receptors in the opening year of the scheme and will be undertaken using ADMSRoads dispersion modelling software. Scenarios to be modelled include Base Year (2018) and Opening Year (2026) Do-Minimum and Do-Something. The base year should be representative of normal traffic movements and air pollution emissions, and not be influenced by the COVID-19 pandemic. Additionally, the addition of the Design Year Do Minimum and Do Something scenarios should be included as previously stated within the Combined Screening and Scoping Report published in June 2019, in order to assess the worst-case air quality impacts from the development. Moreover, the most up to date meteorological data from Marham should be utilised.</p> <p>DMRB LA 105 guidance is set to be used to determine the impact and significance of air quality effects on sensitive receptors during the construction and operational phases, and compliance with EU limit values. However, the EPUK and IAQM significance criteria is also required to be utilised within the EIA to assess changes in air quality from scheme traffic as previously stated within the Combined Screening and Scoping Report published in June 2019.</p>

ID	Para	Points	Comments
			The impacts on the Air Quality Management Areas (AQMAS) within King's Lynn; Town Centre and Gaywood AQMAS, from both the construction and operational phases should be scoped into the EIA. Additionally, operational emissions generated by vehicular traffic from the proposed housing developments served by the access road (included within Table 13-1) need to be scoped into the AQA.

ARCHAEOLOGY AND HERITAGE

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	Construction effects (other built heritage assets)	Construction phase activities are short-term and temporary. The impacts from the phases of construction activities are not considered to be a significant change and have therefore been scoped out.	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>
	Operational effects (buried heritage assets)	Operational (completed development) impacts are expected to represent insignificant environmental effects for buried heritage assets on the basis that once the proposed development has been completed, no further ground disturbance would occur and consequently there would be no additional impacts or resulting environmental effects.	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	<p>Cumulative effects (buried heritage assets)</p>	<p>An assessment of cumulative effects has been scoped out. Cumulative effects are 'elevated' effects which occur where the combined effect of the scheme with other proposed schemes in the vicinity, on a discrete and significant shared heritage asset/resource, is more severe than that reported at the site. This is on the basis that for intangible and deeply buried heritage assets it is not feasible to quantify accurately the nature of the resource across the assessment study area, which would enable the identification of a cumulative impact and potential elevated effect.</p>	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>

ID	Para	Points	Comments
	Section 4	General	<p>The potential for impacts on buried archaeological resources are noted. Where relevant, the ES should take into account guidance contained in Historic England's guidance documents "Preserving Archaeological Remains" and note Historic England's revised Good Practice Advice note 3 "The Setting of Heritage Assets."</p>

ID	Para	Points	Comments
	4.1.1	Study Area	The assessment should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.
	4.3.6 , 4.8.2 & 4.8.4	Fieldwork	The Scoping Report states that fieldwork will be required. The scope and methodology of this and of any further archaeological investigations undertaken to inform the impact assessment should be detailed in the ES and/or associated Technical Appendix. The Applicant should also seek agreement with Norfolk Historic Environment Team regarding any intrusive archaeological surveys.
	4.7.1 to 4.7.3	Methodology	It is strongly recommended that you involve the Conservation Officer of the local planning authority and the archaeological staff at the County Council in the development of the assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.
	4.7.1 to 4.7.3	Methodology	The methodology to assign significance described in the Scoping Report is acknowledged. The ES must make clear in each case whether any residual effect is deemed to be “significant” or “not significant.” Also, where professional judgement has been used to determine significance this should be stated.
	4.7.1 to 4.7.3	Methodology	The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground

ID	Para	Points	Comments
			archaeological remains and deposits and can also lead to subsidence of buildings and monuments.

BIODIVERSITY

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	Impacts on European / Ramsar sites (Habitats Regulation Assessment (noise)).	The nearest site, Roydon Common Ramsar site, is located approximately 6.1km to the east of the scheme. Impacts to this site are not expected to arise from the scheme.	Table 5-7 of the ES scoping report scopes out construction and operation impacts on European / Ramsar sites (Habitats Regulation Assessment) (noise), however this only appears to be in relation to noise and other statutory designated sites are not included within this table. Further consideration and justification is required if this matter is to be scoped out?

ID	Para	Points	Comments
	Section 5	General	<p>Surveys should adhere to best practice guidelines and be undertaken by appropriately licensed and experienced ecologists. Any deviations from best practice guidelines should be justified, and evidence based.</p> <p>The Environmental Statement should clearly set out any likely significant effects on internationally, nationally and locally designated sites of ecological conservation importance, on protected species, and on habitats and other species identified as being of principal importance for the conservation of biodiversity.</p> <p>It is noted that the phase 1 habitat survey is not yet complete due to access issues and it is not clear from the information provided if surveys for protected and priority species have commenced.</p>

ID	Para	Points	Comments
	Section 5	General	<p>Recent ecological surveys have been carried out by WSP and Hopkins Homes. To avoid duplication and potential inconsistent results, the Borough Council consider that there has been agreement between consultants to share information including survey results. This approach should also include the applicant's for application reference 18/02289/OM).</p> <p>There is no reference made to consultation with the Borough Council's Arboricultural Officer.</p>
	Section 5.4	Net Gain	<p>The proposed use of the most recent Defra Biodiversity Metric in section 5.4.2 of the ES scoping report to demonstrate a net gain for biodiversity is supported. The applicant is encouraged, in line with the pending Environment Bill, to demonstrate a minimum 10% net biodiversity gain. Norfolk County Council's Environmental Policy applies to this proposal.</p> <p>Suitable mitigation and a compensation strategy should be incorporated into an overall landscape masterplan and should any off site compensation be required (as stated in section 5.4.3), it should be accompanied by at least a 15 year management plan in line with the management requirements for the landscaping within the red line boundary. Consideration should be given to providing above and below ground space within the development to allow large stature trees to grow to their mature dimensions.</p>
	Section 5.5	Mitigation	<p>It is acknowledged that the mitigation strategy is still being developed and will be informed by pending ecological surveys. The mitigation hierarchy should be adhered to, for example options to avoid potential impacts on Sheep's Course Wood CWS must be explored. The ES should also show how the proposals have taken advantage of opportunities to conserve and enhance biodiversity interests.</p>
	Section 5	General - Bats	<p>The Scoping Report states that "defined Surveys Areas for individual ecological features have been informed by published guidance on likely ZOIs". There is little justification of the chosen study areas (Zone of Influence) for each species. The Scoping Report states the survey area for bats is "all trees within the scheme and up to 25m from the scheme boundary and all buildings within 50m of the scheme boundary that are considered likely to impacted by the proposals."</p> <p>It should be noted that the Core Sustenance Zones for bats varies between species, for example, the CSZ for Barbastelle bats is 6km away and there is moderate confidence in zone</p>

ID	Para	Points	Comments
			<p>size. The report highlights that there is woodland, grassland, hedgerows and ponds suitable for foraging and commuting bat activity. It should also be noted that the River Nar SSSI appears to be well connected to the site.</p> <p>It is not clear if the habitats are low, medium or high suitability habitats for bats. If the habitats are medium or high the static detectors must also be deployed in April and October in accordance with best practice guidance (Collins; 2016). Detector locations should be assigned to cover all habitats represented in the survey area that could be impacted by the proposed activities. From the information provided it is not possible to determine if ten static detectors will be sufficient and the proposed locations for static detectors have not been provided. It is recommended that infra-red/thermal imaging equipment is used when undertaking emergence surveys of structures to obtain more accurate population counts. The report refers to hibernation surveys on trees. The potential for structures to support hibernating bats must also be considered and hibernation surveys undertaken of structures considered to have potential to support hibernating bats.</p>
	Section 5	General - Badgers	<p>The Scoping Report states that “if a badger sett is identified within or immediately adjacent to areas proposed for construction, sett closure may be necessary.” It should be noted that sett entrances must be monitored for four weeks to determine if they are active in accordance with Natural England’s standing advice.</p>
	Section 5	General – Great Crested Newts	<p>Section 5.1.5 states “a European Protected Species Mitigation Licence (EPSML) will likely be required to preserve the favourable conservation status of this species.” The full impacts on great crested newts as a result of this development and neighbouring developments in combination should be assessed. It should be noted that District Level Licencing for great crested newts is available in Norfolk.</p>
	Section 5	General - Otters	<p>Otter Section 5.1.4 highlights that the proposed defined survey area for otter is “within the scheme boundary but extended to nearby ponds where directly connected”. It is not clear why ponds only are within the survey area and not all watercourses. However, it is noted that further clarification is provided on page 41 and upstream and downstream of watercourses crossed by the preferred route will be surveyed. The survey area is a little vague.</p>

ID	Para	Points	Comments
	Section 5	General – Invertebrates	With regards to Table 5-3 the ES should justify why elements have been scoped out. It is noted that aquatic invertebrate surveys are not proposed, however justification for not carrying out these surveys has not been provided. All relevant biodiversity data, including absences, should be submitted to Norfolk Biodiversity Information Service, in accordance with CIEEM guidelines (2016).
	Para 5.3.13 to 17	Arboriculture	<p>The requirements set out in section 5.3.13 – 5.3.17 of the Scoping Report are acceptable in terms of highlighting the arboricultural information required to support the Environmental Statement. A considerable number of trees and woodland will be lost to facilitate the development, however the commitment to biodiversity net gain (BNG) as set out in section 5.4 and the enhancement measures in section 6.6.1 are noted.</p> <p>There is terminology noted in the Scoping report, regarding the root protection areas (RPAs) of trees to be retained, that may cause confusion. For example, section 6.4.3 states “All existing trees and shrubs not affected by the construction of the permanent works would be fenced off with a suitable type of temporary fencing in accordance with British Standard (BS) 5837. Fencing would extend to the drip line of the tree canopies (unless otherwise agreed by an arboriculture advisor)”. And section 6.8.1 states “For the purposes of assessing construction stage effects, temporary stockpiles of topsoil will be stored to a maximum height of 2m, stacked no closer than canopy spread of boundary vegetation i.e. out with the tree canopy areas.” However, the area to be protected should always be in line with BS5837 and extend to the edge of the RPA. It would be acceptable, if the ES stated that the tree protection barrier fencing should extend to the edge of the RPA (or the canopy extent, if this is greater) as per the Tree Protection Plan.</p>

LANDSCAPE AND VISUAL

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	Townscape Assessment	Predicted neutral impact, based on the scheme's positioning east of the settlement of West Winch, visually screened by the built environment and tree and hedgerow cover.	<p>This proposal would require a full justification.</p> <p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may change its view and request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>

ID	Para	Points	Comments
	Section 6	General	Chapter 6 covers the main scope of Landscape and Visual content, but by nature of the topic other chapters are also relevant.
	Section 6	General (PRoW)	<p>The 2km extent of the study area laid out in 6.3 Baseline Conditions is appropriate for PRoW and other NMU access and provision and agree at this stage that all such known facilities have been identified, including PRoW, National Trails, designated trails, Cycle Routes and Access Land. However, any public access rights not currently recorded on the Definitive Map and Statement needs to be taken into consideration as there is the potential of additional PRoW being affected by this scheme. The baseline data review should include a regular review of NCC's Register of Definitive Map modifications applications as these are received and added on an ongoing basis and so may bring forward any additional PRoW that may be affected and so impact the scheme design.</p> <p>The landscape mitigation plan should include a phasing plan and suggested routing for the temporary and permanent diversions of PRoW to maintain continuity of access throughout the scheme and ensure diversion routes are in-keeping with the landscape character.</p>

ID	Para	Points	Comments
			<p>Although the PRoW team broadly agree with the listed potential effects (6.5) on PRoW and Access Land, they would like to see consideration given to the historic origins of PRoW in the ES and their interconnection with landscape character to recognise their relevance to the history of the landscape so that likely significant effects are assessed not just from the context of visual amenity impact on users. This would then inform and influence appropriate diversion (temporary and permanent) routes to be broadly in keeping and acceptable. Historic maps are to be reviewed (table 4-1) for historic environment baseline data and so it may be more appropriate to make reference to the historical relevance of PRoW as part of the assessment of potential effects on heritage assets.</p> <p>It is suggested that an additional viewpoint is included on North Runcton BR4 looking north towards Rectory Lane as the view for users travelling north on this PRoW will be significantly altered in perpetuity due to the construction of the overbridge embankment. Even if no viewpoint is included here, the impact of this visual change to this PRoW should be assessed to identify mitigation measures required as part of the permanent diversion of this PRoW.</p> <p>Some clarification of terms is needed as it is unclear what is meant by or what is seen as the difference between Public Rights of Way (PRoW) and Countryside Rights of Way (CRoW) as listed in 6.7.8.</p> <p>The Assessment assumption (6.8.1, point 4) that “...PRoW will be closed for the duration of construction until such time as any diversion can be opened in its place” implies that temporary diversion routes are not considered a priority. The assumption should be that an alternative route should always be sought for a temporary closure order (TTRO) and the PRoW only be “closed” if none is viable, and that the closure should be for as short a timeframe as possible and not automatically for the duration of construction.</p>
	Para 6.1.1	Study Area	<p>The 2km study area shown in Appendix E and mentioned in paragraph 6.1.1 is considered suitable to assess the Landscape and Visual Impacts of the scheme.</p> <p>The ES should explain how the consultation with KLWNBC and the studies have informed the decisions taken with regards to the assessment. It should be clear how the study area has been</p>

ID	Para	Points	Comments
			defined with reference to the desk studies and site visits, and how the visual envelope has been used to identify sensitive receptors for inclusion in the assessment.
	Para 6.3.1 to 6.3.10	Baseline Conditions	<p>Agreement with the Baseline Conditions laid out in section 6.3. The proposed baseline data collection is suitable, and the inclusion of consultation with the Borough Council of Kings Lynn and West Norfolk (BCKLWN) during this stage of the assessment and review stages is acknowledged.</p> <p>The ES should make clear whether National Character Areas have been considered in the ES baseline and assessment of impacts, where they are deemed relevant to the Proposed Development.</p>
	Section 6.4	Mitigation Measures	The Mitigation Measures for during construction and to protect soil quality are a good initial scope for mitigation. We would expect more measures to be identified through the assessment, and details to be confirmed and committed to. All should be included as part of full landscape plans. If significant impacts are assessed within the construction phase it may be necessary to consider advanced planting to minimise some of the visual impacts of both construction and operation phases.
	Section 6.5	Significant Effects	<p>The initial identified significant effects are acknowledged, it is expected these will be fully explored and assessed as part of the Landscape and Visual Impact Assessment (LVIA).</p> <p>The ES should assess the all impacts of the Proposed Development that are likely to give rise to significant effects. Effects should be assessed during both the operational and construction phases of the development. Consideration should also be given to likely significant effects at the point of opening and effects in the longer term. Where relevant, the ES should include both positive and negative effects.</p>
	Section 6.7	Assessment Methodology	The methodology proposed in section 6.7 Proposed Assessment Methodology is acceptable and suitable guidance is being used to undertake the assessment. The statement made in paragraph 6.7.8 is acknowledged, that there are expected to be a number of potential significant effects due to landscape and land uses in the area.

ID	Para	Points	Comments
			<p>It is acknowledged that the viewpoints have been agreed with BCKLWN and that there is no intention for these to be amended at this stage. The locations chosen are acceptable and that these will be checked on site to confirm that baseline photography is still suitable and up to date.</p> <p>The ES and/or accompanying appendices must include a detailed description of the methodology applied to the assessment. The Applicant is reminded to ensure that the relevant chapter in the ES makes clear in each case whether any residual effect is deemed to be “significant” or “not significant.” Where professional judgement has been used to determine significance this should be stated. The ES should also document agreements reached with KLWNBC with regards to the assessment methodology and justify the approach taken, should the chosen approach differ.</p>

NOISE AND VIBRATION

ID	Applicant’s Proposed Matters to Scope Out	Justification	Comments
	<p>Vibration (operational)</p>	<p>Operational vibration is scoped out of the assessment methodology as a maintained road surface will be free of irregularities as part of project design and under general maintenance, so operational vibration will not have the potential to lead to significant adverse effects. This is the recommendation in DMRB LA 111.</p>	<p>Accepted. It is agreed that a maintained road surface will be free of irregularities as part of the project design and through general maintenance.</p>

ID	Para	Points	Comments
	Section 7.1	Study Area	<p>The ES should clearly describe the extent of the study area and it should be shown on a plan within the ES.</p> <p>The Applicant should ensure that the study area is sufficient to encompass all sensitive receptors which may experience significant effects from the Scheme, including sensitive ecological receptors.</p>
	Section 7.3	Baseline	<p>The results of the completed surveys climate should be fully reported in the ES and/or in an associated Technical Appendix.</p> <p>The working hours for construction, including any out of hours or night-time working, should be clearly stated and taken into account within the assessment of noise impacts.</p>
	Section 7.4	Mitigation	<p>This section details a number of best practice noise mitigation techniques including training of site personnel, effective community liaison and Best Practicable Means (BPM) as defined in the Control of Pollution Act 1974. It also details specific mitigation measures to reduce noise and/or vibration impacts, including using specific construction methodologies or equipment which reduce noise and/or vibration, using temporary barriers to provide noise screening, restricting certain activities to less sensitive time periods and noise insulation or temporary rehousing. On page 69 in 7.4.2. it advises that best practice mitigation to control noise and vibration from construction works and plant during the construction phase will be set out in the scheme CEMP and implemented by the contractors undertaking the works, this is welcomed.</p>
	7.5.4	Likely Significant Effects (construction)	<p>The tying in of the scheme to the A10 has been identified, where sensitive receptors are located close to potential construction works, has the potential for significant noise and vibration effects at these receptors, as well as the dwellings located closest to the scheme on Chequers Lane and Rectory Lane, therefore we would welcome full assessment of the impacts and the use of best practical means.</p>

ID	Para	Points	Comments
	7.5.5 & .7.5.6	Likely Significant Effects (operation)	<p>It is noted that the scheme has the potential to produce adverse significant noise effects during the operational stage particularly in the more rural areas (near Chequers Lane and Rectory Lane), where road traffic is not currently a dominant noise source. Here the increase in noise level from traffic using the scheme may be significant. Where the road is elevated via bridging, we trust that consideration will be given to the impact of traffic noise at an elevated height, particularly as this could be wind-borne. The extent of operational effects will be dependent on both the change in noise level and the absolute noise level at a sensitive receptor.</p> <p>Section 7.5.6. identifies the instances where significant effects are most likely to occur, and also includes beneficial effects for dwellings on the A10 between the Hardwick Interchange and new roundabout at the junction with Gravel Hill Lane due to the diversion of traffic from existing roads onto the new route. It is welcomed that a 3D digital noise model of the scheme and existing highway network will be created using CadnaA noise modelling software to predict the levels of road traffic noise at the existing noise sensitive receptors within the study area, as well as a surrounding area sufficient in size to ensure that robust noise predictions can be undertaken.</p>
	Section 7.7	Assessment Methodology	<p>The ES should clearly explain the methodology adopted for the assessment along with the method used to identify the receptors and study areas, ensuring that a robust assessment is carried out.</p> <p>The Applicant should seek to obtain agreement with relevant consultation bodies, including Norfolk County Council (NCC) and BCKLWN in respect of the assessment methodology.</p>
	7.7.14 to 7.7.24	Assessment Methodology (operation)	<p>It is noted that road traffic noise predictions within the noise model will be undertaken in accordance with the Calculation of Road Traffic Noise (CRTN)55, following any additional procedures or modifications defined in DMRB LA 111. It is recognised that at this point it is not possible to identify the specific type and location of mitigation measures that may be appropriate once the scheme is complete and the new roads are in operation, as stated on page 69 in section 7.4.3, but the noise mitigation options are welcomed (which could comprise</p>

ID	Para	Points	Comments
			noise barriers, earth bunding, low noise surfacing or speed limits) and that these will be considered at all locations where significant effects are identified.
	7.8.1	Assessment Assumptions & Limitations	<p>The absence of a fixed/final masterplan with building layouts is acknowledged, section 7.8.1. refers, for the inclusion of up to 4000 future dwellings proposed within the West Winch Growth Area makes it unfeasible to identify specific future sensitive receptors in the operational noise modelling. It is appreciated that comments will be provided on the likely noise levels across the residential development parcels and that this will be based on noise model contours and using available parameter plans. It is noted that noise mitigation should be considered as part of the respective planning applications for these dwellings - we believe that the ongoing design of the West Winch Growth Area masterplan and subsequent planning applications will take the WWHAR into account within their development proposals. It is welcomed that if any specific mitigation for the West Winch Growth Area has been confirmed at the time of the preparation of the Environmental Statement, this will be incorporated into the noise assessment. It is recommended that the applicant works closely with BCKLWN on this point prior to submission to ensure that the ES takes account of the masterplan currently in production.</p>
	Section 7	Vibration (general)	<p>It is welcomed that a preliminary assessment of temporary construction noise and vibration impacts will be undertaken in accordance with LA 111, drawing on the guidance contained in BS 5228:2009+A1:201454. It is pleasing to note in section 7.7.10. that the construction vibration baseline will be assumed to be zero in the absence of significant vibration sources prior to the construction of the scheme, and also that the document considers it very unlikely any vibration levels would be sufficiently high to result in building damage; therefore, only human response to vibration effects will be considered.</p> <p>The Scoping Report does not provide any detailed information regarding the type of construction activities for the Scheme which may produce vibration. The ES should describe activities which may result in vibration and the methodology applied to identify and assess significant impacts of vibration on sensitive receptors, including human and ecological receptors, where significant effects are likely to occur.</p>

WATER ENVIRONMENT

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	Alteration to hydromorphological regime	Lack of main watercourses within close proximity to the scheme with only field drains identified within this report.	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>
	Detailed WFD assessment	Lack of main watercourses within close proximity to the scheme with only field drains identified within this report.	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>

ID	Para	Points	Comments
	Section 8.1	Study Area	A study area of 1km either side of the route alignment is described. The ES must clearly justify and define the chosen study area.
		General Points	<p>It is strongly recommended that any Environmental Statement includes, or any planning application for development is accompanied by a flood risk assessment (FRA) / surface water drainage strategy that contains evidence of;</p> <ul style="list-style-type: none"> ▪ Assessment of all sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development and any mitigation needed

ID	Para	Points	Comments
			<ul style="list-style-type: none"> ▪ how surface water drainage from the development will be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place ▪ how any phasing of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development. This would include phasing strategies and information to show how the road development drainage would be delivered (and integrate with the housing areas if being designed to serve the residential areas too).
		General Points	This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (paragraph 163 and 165).
	8.3.26	Flood Risk	It is agreed that the majority of the scheme falls within Flood Zone 1. A small portion of the site around the Hardwick Interchange borders Flood Zone 3. A Flood Risk Assessment should be undertaken and submitted as part of the full planning application to assess this further. Please consult the EA upon submission of the detailed Flood Risk Assessment and they will provide our bespoke comments.
	8.4.3	Mitigation Measures	Any Sustainable Drainage Systems (SuDS) proposals shall be in accordance with appropriate standards and local guidance including Non-statutory technical standards for sustainable drainage systems (2015), BS8582:2013 and NCCs local SuDS Guidance. It is expected that space for SuDS should not be an issue (at a strategic level) in such a large development, and it is expected that shallow surface structures with multifunctional benefits will be included, and a detailed viability report submitted to justify why if this could not be achieved.

ID	Para	Points	Comments
			<p>At least one feasible proposal for the disposal of surface water drainage should be demonstrated and evidenced by the inclusion of appropriate information. It is important that the SuDS principles and hierarchies have been followed in terms of:</p> <ul style="list-style-type: none"> ▪ surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration (generally greater than 2m below ground level), ▪ the SuDS components used within the management train (source, site and regional control) in relation to water quality and quantity. ▪ identifying multifunctional benefits including amenity and biodiversity <p>The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.</p>
	8.4.1, 8.7.2 and 11.14.1	Pollution Control	Suggest that there is a bespoke document/section within the ES focusing on management of flood risk and drainage during the construction stage (also known as a Construction Surface Water Management Plan) which looks at temporary surface water systems and pollution control during construction.
	8.7.14 to 8.7.17	Significance Criteria	The use of DMRB guidance to assign significance is acknowledged. However, the ES will also need to make clear in each case whether any residual effect is deemed to be "significant." Where professional judgement has been used to determine significance, this should be stated.

GEOLOGY AND SOILS

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments

	Potential effect on slope stability	No significant slopes were noted during the walkover.	A level survey with contours would be able to confirm this.
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ID	Para	Points	Comments
	Section 9	General	It is agreed that the potential impact on controlled waters receptors should be scoped in. If site investigations confirm that the former use(s) is potentially contaminative and could pose a risk to the water environment, appropriate risk assessments should be included in the ES. The Department of Environment (DoE) Industry Profiles provide information on the processes, materials and waste associated with individual industries with regard to land contamination.
	Section 9.1	Study Area	<p>The ES should clearly set out the study area applied, in relation to the Scheme.</p> <p>The Scoping Report indicates a radial study area of 500m around the scheme (based on professional judgement). The County Planning Authority advises that the study area for the assessment must be based on the potential geographical extent of the anticipated impacts and justified accordingly.</p>
	Section 9.3	Baseline	<p>The results of the ground investigations (2020) should be fully reported in the ES, by way of an appendix if appropriate, where this information has been used to inform the assessment of environmental effects.</p> <p>The proposed ground investigations should also include consideration of the available minerals resource to determine whether any onsite material extracted as part of the construction of the Scheme could be suitable for reuse.</p> <p>Paragraph 9.3.20 correctly notes that the geology beneath the scheme is safeguarded mineral resource and that silica sand resources in Norfolk are considered to be of national importance. The site is also partially underlain by the Mineral Safeguarding Area for sand and gravel (this is noted in paragraph 10.2.2). Paragraph 9.3.22 states that a targeted ground investigation will be carried out through the design stage for environmental, engineering and construction purposes. The purpose of any additional investigation will include confirming the mineral</p>

ID	Para	Points	Comments
			resource. The information recorded from the ground investigation will be reported in a Ground Investigation Report. The County Planning Team (Policy) in their response have provided details about need for Mineral Safeguarding Assessment to be included in the ES.
	Section 9.4	Mitigation Measures	<p>This section does not appear to include any measures to prevent the unnecessary sterilisation of safeguarded mineral resources.</p> <p>The ES should clearly set out where mitigation has been applied to the assessment and the implications for residual effects. The ES must demonstrate how any mitigation measures on which the assessment has relied will be secured.</p>
	Section 9.5	Likely Significant Effects	<p>The ES should take into account interrelationships between the environmental aspects, information and assessments contained within the Geology and Soils will also be applicable to other chapters such as the Water Environment chapter. The County Planning Authority expects to see cross-referencing between the Geology and Soils and relevant aspect chapters in the ES, as appropriate.</p> <p>This section states that following mitigation it is considered that there would be no significant effects on mineral resources. However, no information has been provided in this chapter to explain what action would be taken to prevent the unnecessary sterilisation of safeguarded mineral resources.</p>
	Section 9.7	Assessment Methodology	The ES should clearly describe the assessment methodology applied and state whether residual effects are significant. Where professional judgement has been used in the assessment, this should also be stated in the ES.
	Section 9.7	Proposed Significance Criteria	This section only refers to assessing the risk from land contamination in paragraph 9.7.3 and does appear to consider the sterilisation of mineral resources.
	Section 9.9		It is agreed that mineral resources should be scoped into the assessment. However, this assessment needs to include the potential sterilisation of mineral resources as well as the contamination of mineral resources.

ID	Para	Points	Comments
			<p>Therefore, we advise that a Mineral Safeguarding Assessment should be submitted as part of the Environmental Statement. For Mineral Safeguarding Assessments intrusive site investigations are required; the results of these investigations would need to be assessed and include particle size distribution testing. Testing will need to take place of samples taken during these investigations to determine the suitability of the mineral for industrial purposes. The mineral assessment will provide an estimate of the mineral resource quality and quantity, and the proportion that is likely to be workable prior to the proposed permanent development.</p> <p>If a viable aggregate mineral resource occurs on the site, the applicant should use a Materials Management Plan, to ascertain the quantities of aggregate which could be obtained from groundworks, sustainable drainage systems etc, and then reused in the construction phase of the scheme. The assessment of the results of the Particle Size Distribution testing should refer to material class types in Table 6/1 of the Manual of Contract Documents for Highway Works: vol. 1: Specification for Highway Works Series 600, in order to identify potential suitability for use in the construction phases.</p> <p>There may be opportunities on restoration for areas in which mineral has been extracted to form part of sustainable drainage systems, areas for recreation/open space, and/or renewable energy schemes, such as ground source heat pumps as part of the wider West Winch Growth Area development.</p>

MATERIALS AND WASTE

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	Material resources required (operation)	The quantity of material resources required, during the operational phase (for example routine maintenance and	The County Planning Authority accepts that material consumption during operation is unlikely to generate significant effects and is content that this matter can be scoped out of the assessment.

		repairs) is considered negligible and is not expected to have significant adverse effects.	
	Waste generation (operation)	The quantity of waste generated during the operational phase (e.g. routine maintenance and repairs) is considered negligible and not expected to have significant adverse effects.	The County Planning Authority accepts that waste generation during operation is unlikely to generate significant effects and is content that this matter can be scoped out of the assessment.

ID	Para	Points	Comments
	Section 10.2	Consultation	Consultation with the Minerals Planning Authority and the Waste Authority is welcomed. It is also recommended that the applicant consults the local silica sand operator, Sibelco.
	Section 10.3	Baseline	The Scoping Report states that the current consumption of material resources within the site and the current anticipated site waste arisings are deemed to be negligible. However, the Scoping Report does not provide any more detailed information to support these statements. The ES must include the baseline information on which the assessment is based presented in the ES, with estimated quantities, where available.

CLIMATE

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	Disposal of waste A5 (construction)	Emissions from the disposal of waste are unlikely to be large.	The statutory consultees have not raised any concern with the applicant's proposal in this regard.

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
			<p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>
	<p>Land use, land use change and forestry A5 (construction)</p>	<p>Emissions from the disposal of biomass, are not expected to be material as the scheme area is currently agricultural land.</p>	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>
	<p>Maintenance, repair and refurbishment B2, B3 & B5 (operation)</p>	<p>The scheme is considered to require infrequent, if any, maintenance, repair and refurbishment, therefore subsequent emissions sources are not considered to be large.</p>	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>
	<p>Land use, land use change and forestry B8 (operation)</p>	<p>The reduction in carbon sequestration due to the scheme is not considered to be material as the scheme area is currently agricultural land.</p>	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>
	<p>Decommissioning process C1 (operation end of life)</p>	<p>Expected timescales for decommissioning are so far into</p>	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p>

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
		the future that there is insufficient certainty about the likelihood, type or scale of emissions activity to determine their likely magnitude, even if they take place at all. As such these emissions sources will not be considered.	During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.
	Construction Sea level rise Storm surge and storm tide Change in annual average precipitation Change in annual average temperature Solar radiation Soil moisture Runoff Soil stability	Assessed as low vulnerability.	The statutory consultees have not raised any concern with the applicant's proposal in this regard. During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.
	Operation Solar radiation	Assessed as low vulnerability.	The statutory consultees have not raised any concern with the applicant's proposal in this regard. During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.

ID	Para	Points	Comments
	Section 11.4	Baseline	The assessment of potential impacts of climate change should use the latest UK Climate Projections. This should include the anticipated UKCP18 projections, where available and appropriate.
	Section 11.6	Likely Significant Effects	<p>The Scoping Report states that the magnitude of emissions associated with the scheme will not be quantified until the ES is produced, and as such the impact of the scheme on the climate is not currently known.</p> <p>The Applicant must ensure the assessment of the magnitude of emissions provided in the ES is well informed. In particular the ES should establish the quantities of materials and emissions from the construction process. Any limitations in the process of obtaining information/data should be clearly stated, together with how this may affect the results of the assessment.</p>
	11.8	Assessment Methodology	The Scoping Report states that emissions calculations will be completed within Highway England's carbon tool. The ES should clearly explain the calculation tool used for the impact assessment and provide a justification for its selection.
	11.14.1	General (Mitigation)	This para includes climate mitigation measures for the construction and operation of the scheme. These measures are welcomed as many of these will also reduce impacts on residential amenity, such as ensuring site compound drainage has sufficient capacity to cope with heavy rainfall events, storage of chemicals, hazardous materials and plant on high ground or protecting these with bunds/barriers, covering spoil and material heaps during periods of high rainfall or high winds, spraying these during dry periods to reduce dust and regularly inspecting these (especially during and following extreme weather events), reviewing wind speed/direction before commencing work at height and adjusting activities/scheduling daily working times to account for weather conditions.

POPULATION AND HEALTH

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	Agricultural land holdings Construction and Operation	BCKLWN and their legal advisors are currently undertaking liaison with those who own/lease agricultural land holdings within the scheme boundary thus any further assessment is scoped out of the EIA process.	<p>The statutory consultees have not raised any concern with the applicant's proposal in this regard.</p> <p>During the application process and following a full consultation, the County Planning Authority may request further information under regulation 25 of the EIA regulations, particularly, if there is a change in circumstances after further advice has been received.</p>

ID	Para	Points	Comments
	Section 12	General (PRoW)	<p>The PRoW team agree that the 1km extent of the study area for the effects of the scheme on NMU is appropriate and are pleased to see it is acknowledged with reference to Chapter 6, of NMU facilities outside this parameter but in close proximity to the scheme.</p> <p>The potential effects on registered common land and open access land could potentially be very significant although this scoping document considers otherwise (12.5.3) and so the effects should be fully considered in the ES, particularly to what extent the scheme will have to inhibit (or enhance) access to these areas and consider appropriate mitigation in terms of additional resources or facilities or access routes to them. Emerging research and documentation on the importance of such locally accessible amenities on health and wellbeing and recreation behavioural change over this last year should be reviewed in this context.</p> <p>The sections (12.5.6 -12.5.9) on potential effects on NMUs do not consider equestrian users despite the acknowledgement of this in the opening paragraphs of this chapter (12.1.2) and in 12.7.3 of the assessment methodology. The two main PRoW that will be impacted by this scheme are a bridleway (BR) and a restricted byway (RB) over which the higher rights are for equestrian use. It is essential therefore that the assessment of potential effects, and</p>

			<p>mitigation, on equestrian use should be fully acknowledge and assessed, particularly as temporary and permanent diversions on these PRoW will be needed.</p> <p>It is welcomed that additional NMU facilities have already been identified and are being incorporated into the scheme with the new overbridges on Rectory Lane and Chequers Lane. Both should include provision, including an appropriate surface, for horses as both the BR and RB join Rectory Lane just east of the new overbridge and the RB joins Chequers Lane. It should not be presumed that because cycles can use bridleways that a cycling suitable surface is automatically suitable for horses. Consideration should be given for the provision of a green bridge at Chequers Lane to mitigate the visual impact of it on NMU alongside the associated ecological benefits.</p> <p>The PRoW Team agrees with the identified potential effects during the construction and operational phases on NMU use and mitigation measures on the PRoW that will be affected during construction must include properly planned and designed temporary diversion routes.</p> <p>The ES chapter providing an assessment of the NMU proposals should take into consideration that NMU usage may be either for travel and transport or recreational use and so both aspects should be considered as part of the assessment, provision for which may need to be different. Opportunity for new provision, other than the overbridges, should also be assessed to provide links with the NMU provision of the new housing areas.</p> <p>It would be preferable that the Land Use and Accessibility assessment (12.7.3) widens the survey area from 500m to 1km for PRoW and non-designated routes to tie with baseline data survey area, and chapter 6. This should help identify potential WCH (NMU) routes that any new provision could link to. Any frequency data of NMU levels of usage of routes cannot be used in isolation to provide conclusions on impact or mitigation without interpretation by data on factors affecting prevention and motivation.</p>
	Section 12.1	Study Area	<p>The Scoping Report identifies that the study areas for each Population and Health element have been identified using professional judgement based on experience on similar road schemes. The ES should clearly explain the selected study areas and justify the judgements made and any deviation from any recognised methodology.</p>

	Section 12.2	Consultation	The Applicant is advised to consult the BCKLWN, the local Parish Councils and any other relevant local community groups to assist in identifying receptors that may be affected by the Scheme.

ASSESSMENT OF CUMULATIVE EFFECTS

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	N/A		

ID	Para	Points	Comments
	13.2.7	Consultation	The Applicant should consult with BCKLWN regarding the projects to be included within the cumulative effects assessment.
	Table 13-1	Assessment Methodology	<p>The Scoping Report identifies other developments for consideration, the ES should justify the developments that have been identified for inclusion and for exclusion.</p> <p>The applicant should ensure that along with the developments listed within Table 13-1 other land allocations within the Borough Council's Site Allocations and Development Management Policies Plan and policy E2.1 West Winch Growth Area Strategic, are also assessed. Additionally, committed developments and development allocations within the Borough Council's Local Plan should be considered in the assessment as stated within Section 13.2.5 of the Combined Screening and Scoping Report published in June 2019.</p> <p>20/00724/FM, Committee resolution to approve subject to s106 agreement, 15th April 2020.</p>

MAJOR ACCIDENTS AND DISASTERS

ID	Applicant's Proposed Matters to Scope Out	Justification	Comments
	N/A		

ID	Para	Points	Comments
	14.2	Study Area	The Scoping Report indicates that the study area for major events has been developed based on professional judgement. The County Planning Authority advises that the study area for the assessment must be based on the potential geographical extent of the anticipated impacts and justified accordingly.

General Advice

Natural England

The County Planning Authority would like to draw your attention to some key points of advice, presented in the annex to a letter received from Natural England, dated 30th March 2021 (ref: 348069). Natural England have provided general advice of what they would expect the final Environmental Statement (ES) to include. All necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017.

Regulation 25

Regulation 25 of the EIA Regulations allows the County Planning Authority, when dealing with a planning application which is supported by an ES, to request "further information" if the County Planning Authority is of the opinion that supplementary additional information is required to allow a reasoned conclusion on the likely significant effects of the development proposed to be reached. The County Planning Authority must notify the applicant in writing, and the applicant must provide that additional information for further consultation.

Noise

The Borough Council raises concern regarding the approach taken. "Road noise and associated mitigation impacts on land take for the overall master plan and could ultimately reduce housing numbers and impact viability (see comments in Appendix 2).

APPENDIX 1:

CONSULTATION BODIES FORMALLY CONSULTED

Consultee
Borough Council of King's Lynn and West Norfolk - Planning
Borough Council of King's Lynn and West Norfolk - EHO
Borough Council of King's Lynn and West Norfolk - Community Safety & Neighbourhood Nuisance Team
Highways England
Environment Agency
Natural England
Anglian Water Services Limited
HSE
Historic England
Cadent Gas/National Grid
Water Management Alliances
Norfolk Fire Service - Water Department
Highway Authority (NCC)
Local Flood Authority (NCC)

NON-PRESCRIBED CONSULTEES

Consultee
Norfolk County Councillor - Clenchwarton & King's Lynn South
Norfolk County Councillor - Gayton & Nar Valley
North Runcton Parish Council
Historic Environment Strategy and Advice Team (NCC)
Ecologist (NCC)
Green Infrastructure & Landscape Officer (NCC)
Arboriculture & Landscape Team Leader (NCC)
Public Rights of Way (NCC)
Minerals and Waste Local Development Framework (NCC)

Appendix 2:

Respondents to the Consultation and Comments.

CONSULTATION BODIES

Consultee	Response Received
Anglian Water Services Limited	
Borough Council of King's Lynn and West Norfolk - Planning	R
Borough Council of King's Lynn and West Norfolk - Community Safety & Neighbourhood Nuisance Team	R
Cadent Gas/National Grid	R
Environment Agency	R
Highway Authority (NCC)	R
Highways England	R
Historic England	R
HSE Chemicals, Explosives and Microbiological Hazards Division	R
Local Flood Authority (NCC)	R
Natural England	R
Norfolk Fire Service	R
Water Management Alliances	R

NON-PRESCRIBED CONSULTEES

Consultee	Response Received
Arboriculture & Landscape Team Leader (NCC)	R
Ecologist (NCC)	R
Green Infrastructure & Landscape Officer (NCC)	R
Historic Environment Strategy and Advice Team (NCC)	
Minerals and Waste Local Development Framework (NCC)	R
Norfolk County Councillor - Clenchwarton & King's Lynn South	R
Norfolk County Councillor - Gayton & Nar Valley	
North Runcton Parish Council	
Public Rights of Way (NCC)	R

Our ref: WWHAR Scoping Report
Please ask for: Hannah Wood-Handy
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Borough Council of
**King's Lynn &
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Assistant Director Environment and Planning

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Norwich
NR1 2SG

FAO Neil Campbell

12 May 2021

Dear Sir

**West Winch: West Winch and North Runcton: West Winch Housing Access Road:
WSP (SCO/2021/0001)**

I refer to your letter and attachments dated 25 March 2021. I also refer to the Borough Council's response dated 10th September 2019 (which appear to have been incorporated into the updated Scoping Report) and additional consultation response from Environmental Health dated 15th April 2021 which I do not propose to rehearse in this note.

Both the County and Borough Council's have committed to ensuring that road and housing are seen as a combined project and not separate entities. The WWHAR and the West Winch/North Runcton Master plan area are intrinsically linked and it is clear that there are still various workstreams that will affect both the design and alignment of the road and the finalised master plan design. Until such work is finalised e.g. alternative alignments, junction strategies, lower design speeds, limiting land take, reviewing surface water drainage strategy, review of noise and associated land take, the impacts of the scheme cannot be accurately reflected or mitigated. Therefore, I would suggest that there is a great probability that the Scoping Report will need to be re-issued with the aforementioned outstanding work streams in mind.

In terms of specific comments on the current document:

Biodiversity

Recent ecology surveys have been undertaken by both WSP and Hopkins Homes representatives. To avoid duplication and potential inconsistent results, it has been

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Chief Executive – Lorraine Gore

agreed that a consistent approach is required to surveying between consultants including information sharing. This approach needs to be taken with Metacre (18/02289/OM) also.

There is no reference made to consultation with the Borough Council's Arboricultural Officer

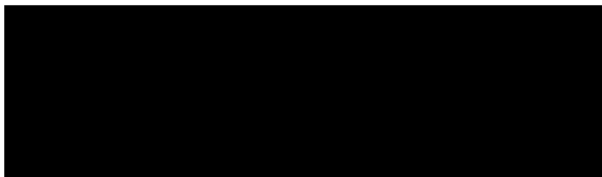
Noise

The Council has raised legitimate concerns regarding the approach taken. Road Noise and associated mitigation impacts on land take for the overall master plan area and could ultimately reduce housing numbers and impact viability. The County Council and Borough Council are committed to working together as outlined above to find appropriate solutions that will satisfy all parties.

Cumulative impact – committed development

20/00724/FM – Committee resolution to approve subject to S106 - 15th April 2020.

Yours faithfully



Stuart Ashworth

Enc.

From: [Evalyn Drake](#)
To: [Planning Services](#)
Cc: [Suzi Pimlott](#); [REDACTED]
Subject: SCO/2021/0001
Date: 15 April 2021 15:29:17

WARNING: External email, think before you click!

Dear Nick,

My Ref: 21/01883

Your Ref: SCO/2021/0001

West Winch: West Winch and North Runcton: West Winch Housing Access Road: WSP

Please find below the comments from the Environmental Quality Team and the Community Safety and Neighbourhood Nuisance Team at the Borough Council of King's Lynn and West Norfolk, in response to the formal request made for a Scoping Opinion and the publication of the 'West Winch Housing Access Road, Environmental Impact Assessment – Scoping Report' dated March 2021.

Lighting

It is noted in LIGHTING ASSESSMENT, section 1.2.4. on page 4 that a lighting assessment and a lighting strategy is to be completed to inform the scheme design. This lighting strategy will be provided as part of the package of planning application documents and will be referenced by the landscape, ecology and climate teams in preparing their assessments. This is welcomed.

Dust

Best practice mitigation will be required to control dust and emissions from construction works and plant during the construction phase. On page 13 in AIR QUALITY, Section 3.4.2. it states these measures will be set out in the Construction Environmental Management Plan (CEMP) and implemented by the contractors undertaking the works. We welcome that a dust assessment will identify sensitive receptors within 200m of indicative worksite areas to inform the requirements for dust mitigation measures, as contained in section 3.7.1 within PROPOSED ASSESSMENT METHODOLOGY CONSTRUCTION, to ensure that there are no impacts from wind-blown dust deposits on properties.

For the operational phase of the WWHAR, or as soon as possible following construction of each element, we welcome the slope stabilisation measures including the use of vegetation (drought resistant species) to bind soils and reduce dust blow.

Air Quality

The EIA-Scoping Report includes a section on air quality, including emissions from both the construction and operational phases of the development.

Section 3.3.1 details the baseline data with BCKLWN air quality information included. This should be the most recent data available. However, the baseline data used must be representative, and not be impacted by the COVID-19 pandemic and subsequent

lockdowns.

The information included within Section 3.3.6 is incorrect. The highest annual mean PM₁₀ concentration for 2019 was recorded at the Self's Field monitoring site in Stoke Ferry (Site-ID CM4). Moreover, the Borough Council currently monitor NO₂ concentrations within West Winch using a diffusion tube (Site 73). This monitoring data should be included, with data collected at this site used to inform baseline air quality.

Sections 3.3.10-3.3.12 detail the sensitive receptors to be included. We welcome the inclusion of receptors which are representative of 'worst-case' exposure. Planning applications for future developments which will introduce new sensitive receptors with the potential to be impacted by the project in the opening year should be considered (as included within Table 13-1).

As stated in Section 3.4.2, best practice mitigation will be required to control dust and emissions from the construction phase, with measures set out in a Construction Environmental Management Plan (CEMP). To ensure local residents are not negatively impacted by dust in the construction phase, we recommend the CEMP be required by condition, and should include mitigation measures included within Chapter 8 of EPUK and IAQM Guidance on the Assessment of Dust from Demolition and Construction (2014). Additionally, dust impacts from all construction compounds included within the scheme and ground moving activities related to the National Grid gas main diversion works should be included with the assessment of construction dust impacts and covered by the CEMP.

Regarding operational phase mitigation, we recommend that a Transport Assessment for the development should be completed and sustainable transport methods included within the operation mitigation measures in line with the Borough Council's Air Quality Action Plan (AQAP).

Section 3.7 details the proposed assessment methodology. Concerning the construction phase, the assessment will identify sensitive receptors within 200m of the indicative worksite areas and inform dust mitigation measures in line with DMRB LA 105 methodology. The Borough Council will be consulted on the assessment of construction traffic data once the data becomes available.

Regarding the operational phase, available traffic model data will be assessed using DMRB LA 105 scoping criteria to determine if an air quality assessment is required based on changes between do-something traffic compared to do-minimum, and determine the 'affected road network' (ARN). However, this methodology does not follow the recognised guidance. Due to the prominence of existing and proposed receptors to the project, we believe the screening criteria from Institute of Environmental Protection UK and the Institute of Air Quality Management (EPUK and IAQM) Planning for Air Quality Guidance should be utilised to determine if air quality impacts can be scoped out based on projected LDV and HDV movements from the scheme, rather than a lesser standard. This should be required by condition.

A detailed assessment will be completed to determine the impacts on local air quality and receptors in the opening year of the scheme and will be undertaken using ADMS-Roads dispersion modelling software. Scenarios to be modelled include Base Year (2018) and Opening Year (2026) Do-Minimum and Do-Something. The base year should be representative of normal traffic movements and air pollution emissions, and not be influenced by the COVID-19 pandemic. Additionally, the addition of the Design Year Do Minimum and Do Something scenarios should be included as previously stated

within the Combined Screening and Scoping Report published in June 2019, in order to assess the worst-case air quality impacts from the development. Moreover, the most up to date meteorological data from Marham should be utilised.

DMRB LA 105 guidance will be used to determine the impact and significance of air quality effects on sensitive receptors during the construction and operational phases, and compliance with EU limit values. However, we also require EPUK and IAQM significance criteria to also be utilised within the EIA to assess changes in air quality from scheme traffic as previously stated within the Combined Screening and Scoping Report published in June 2019.

We require the impacts on the Air Quality Management Areas (AQMA) within King's Lynn; Town Centre and Gaywood AQMA, from both the construction and operational phases to be scoped into the EIA. Additionally, operational emissions generated by vehicular traffic from the proposed housing developments served by the access road (included within Table 13-1) need to be scoped into the AQA.

Lastly, we request consultation on the location of the sensitive receptors to be included with the operational and construction air quality assessments prior to the competition of the EIA.

Sustainable Transport

NPPF states (paragraph 110) that applications for development should:

i) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

and

ii) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles.

Paragraph 111 of NPPF requires that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that likely impacts of the proposal can be assessed.

Therefore, whilst we welcome the addition of a cycleway and footway over Rectory Lane and Chequers Lane, we believe a Travel Plan should be included and referenced as a mitigation measure within the EIA, with regards to reducing the impacts of air pollution and encouraging active transport. This should include details of cycle and pedestrian provisions to be included within the West Winch Housing Access project and Hardwick Junction Improvements, in order to facilitate the linking of current sustainable transport provisions with future housing developments in the vicinity of the access road. Additionally, the inclusion of a strategic integrated cycle network is required to comply with both the NPPF statement above and Measure 18 of the AQAP.

The developer should also be aware of the work currently being undertaken by the King's Lynn Local Cycling and Walking Infrastructure Plan (LCWIP), which aims to appraise and improve the current cycling and walking network, with the West Winch area included within the project's focus. It is vital that the project provides suitable provision and direct access from the new residential developments to the already

present cycling and walking network, to encourage the use of active transport, and achieve subsequent positive impacts on air quality and carbon dioxide emissions. This should be required by condition.

Climate Change

NPPF states an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, mitigating & adapting to climate change, including moving to a low carbon economy.

We note that the Environmental Impact Assessment - Scoping Report includes a section on climate change which is comprehensive. Section 11 considers the scheme's impact on climate, and its vulnerability to climate change during the construction and operational phases, and any potential significant effects resulting from that.

We welcome the inclusion of the Greenhouse Gas (GHG) assessment. The baseline scenario should be generated using GHG emissions which are borough specific and available via the National Atmospheric Emissions Inventory. Table 10-8 includes transport emission data for King's Lynn and West Norfolk for 2018. Whilst this is currently the most up to date data available, 2019 data will be released in the summer. 2019 data should therefore be utilised in the baseline scenario if possible.

It is not clear in Table 10-11 whether operational emissions from vehicular traffic from the planned housing developments served by the access road (included within Table 13-1) are included within the assessment. As with air quality, these emissions need to be scoped in.

Furthermore, a Travel Plan should be produced and included in the EIA as an operational mitigation measure. This should detail the active transport measures to be included within the scheme design and illustrate how active transport will mitigate GHG emissions from the road during its operational phase, as outlined and conditioned within the previous section of this response.

Contaminated Land

We have reviewed the Scoping report with regards to potential impact on human health. Section 9 of the Scoping report covers Geology and Soils and discusses the site plus land within a 500m radius. The Scoping Report refers to earlier Preliminary Risk Assessment and Ground Conditions appraisal reports by WSP dated June 2019 & Jan 2021 (referring to site investigation works carried out in 2020).

The Scoping Report takes account of the expected and observed superficial and bedrock geology and considers migration and exposure pathways including groundwater and surface water. A number of potential contamination sources are highlighted from the preliminary risk assessment. A generic quantitative risk assessment based on soil and water samples taken in 2020 is reported to show no exceedance of the human health Assessment Criteria for the proposed land use.

Analysis of water samples is recorded to be above water quality standards; however, this is reported to represent general background concentrations. The Environment Agency may wish to comment further on this and on appropriate assessment criteria for controlled waters risk assessment at this site.

The report proposes additional investigation to confirm the mineral resources, the presence or absence of contamination, to determine the classification of material for future re-use or off-site disposal, and for engineering/design. The report proposes to

report this in in a Ground Investigation Report (GIR), including an updated Generic Quantitative Risk Assessment.

Risk descriptors are included based on those in current guidance and relevant receptors are scoped in for human health. The Scoping report provides an acceptable approach to assessing risk to human health from contamination. As further work is proposed to further quantify the risks, we recommend that the further work be required by condition.

Drainage

Page 85, WATER ENVIRONMENT 8.4.3. identifies that the increase in surface water run-off created by the increase in impermeable area should be mitigated through the use of Sustainable Drainage Systems (SuDS) and that the design is likely to feature attenuation ponds and soakaway drainage where practicable. On page 131 under 'Operation' it identifies that drainage infrastructure and road surfacing will be designed to take account of projected changes in rainfall, and includes that a series of detention basins to slow down the movement of surface water will be used. Once in the operational phase, the regular clearing and maintenance of all drainage infrastructure to prevent blockages will be required. We are obviously keen to ensure that there will be no impact on residents and businesses from surface water run-off or changes to existing drainage systems or underground water tables (due to deep excavation) etc.

We agree to the proposed Water Environment elements scoped in and out of further assessment as identified in Table 8-3, section 8.9 FACTORS AND ELEMENTS SCOPED IN AND OUT OF FURTHER ASSESSMENT on pages 91 and 92.

Construction Phase

It is noted in LANDSCAPE AND VISUAL, 6.4.2., page 55 that a number of mitigation measures would be implemented during the construction phase of the works. This will include the retention of existing established vegetation where appropriate, using temporary soil mounds within the construction compounds which will aid screening of noise, dust and light from construction activities, keeping the construction programme to the minimum practicable time, delaying clearance of land for construction to as close as possible to works commencing, reseeding and planting as soon as practicable after sections of work are complete, keeping construction sites tidy (e.g. free of litter and debris), avoiding work during the hours of darkness (as far as is practicable) and using directed lighting where necessary to minimise light pollution/glare and keeping lighting levels to a minimum when required for security and safety. All these measures are welcomed by the CSNN Team to limit impacts on residents. The document also states that plant and material storage areas will be appropriately sited (where possible) to minimise their landscape and visual impact. We would ask that these areas are also appropriately separated from residential dwellings to mitigate impacts from their use.

Noise

Page 68, 7.4 MITIGATION MEASURES details a number of best practice noise mitigation techniques including training of site personnel, effective community liaison and Best Practicable Means (BPM) as defined in the Control of Pollution Act 1974. It also details specific mitigation measures to reduce noise and/or vibration impacts, including using specific construction methodologies or equipment which reduce noise and/or vibration, using temporary barriers to provide noise screening, restricting certain activities to less sensitive time periods and noise insulation or temporary rehousing. On page 69 in 7.4.2. it advises that best practice mitigation to control noise and vibration from construction works and plant during the construction phase will be set out in the

scheme CEMP and implemented by the contractors undertaking the works. We welcome this.

Section 7.5.4. on page 69 identifies that the tying in of the scheme to the A10, where sensitive receptors are located close to potential construction works, has the potential for significant noise and vibration effects at these receptors, as well as the dwellings located closest to the scheme on Chequers Lane and Rectory Lane, therefore we would welcome full assessment of the impacts and the use of BPM.

We know the scheme has the potential to produce adverse significant noise effects during the operational stage (as detailed on page 70 in OPERATION 7.5.5.), particularly in the more rural areas (near Chequers Lane and Rectory Lane), where road traffic is not currently a dominant noise source. Here the increase in noise level from traffic using the scheme may be significant. Where the road is elevated via bridging, we trust that consideration will be given to the impact of traffic noise at an elevated height, particularly as this could be wind-borne. The extent of operational effects will be dependent on both the change in noise level and the absolute noise level at a sensitive receptor. Section 7.5.6. identifies the instances where significant effects are most likely to occur, and also includes beneficial effects for dwellings on the A10 between the Hardwick Interchange and new roundabout at the junction with Gravel Hill Lane due to the diversion of traffic from existing roads onto the new route. We welcome that a 3D digital noise model of the scheme and existing highway network will be created using CadnaA noise modelling software to predict the levels of road traffic noise at the existing noise sensitive receptors within the study area, as well as a surrounding area sufficient in size to ensure that robust noise predictions can be undertaken - Page 73 OPERATIONAL NOISE 7.7.14. refers – and that road traffic noise predictions within the noise model will be undertaken in accordance with the Calculation of Road Traffic Noise (CRTN)⁵⁵, following any additional procedures or modifications defined in DMRB LA 111. We recognise that at this point it is not possible to identify the specific type and location of mitigation measures that may be appropriate once the scheme is complete and the new roads are in operation, as stated on page 69 in section 7.4.3, but we welcome that noise mitigation options (which could comprise noise barriers, earth bunding, low noise surfacing or speed limits) will be considered at all locations where significant effects are identified.

We acknowledge that the absence of a fixed/final masterplan with building layouts, section 7.8.1. refers, for the inclusion of up to 4000 future dwellings proposed within the West Winch Growth Area makes it unfeasible to identify specific future sensitive receptors in the operational noise modelling. We appreciate that comments will be provided on the likely noise levels across the residential development parcels, based on noise model contours and using parameter plans available in online planning documentation. Noise mitigation should be considered as part of the respective planning applications for these dwellings - we believe that the ongoing design of the West Winch Growth Area masterplan and subsequent planning applications take the WWHAR into account within their development proposals. We welcome that if any specific mitigation for the West Winch Growth Area has been confirmed at the time of the preparation of the Environmental Statement for this scheme, this will be incorporated into the noise assessment.

We welcome the scoping in of construction and operational noise as per 7.9 FACTORS AND ELEMENTS SCOPED IN AND OUT OF FURTHER ASSESSMENT, Table 7-10 – Noise and vibration elements scoped in and out.

Vibration

We welcome that a preliminary assessment of temporary construction noise and vibration impacts will be undertaken in accordance with LA 111, drawing on the guidance contained in BS 5228:2009+A1:201454 - Page 71 section CONSTRUCTION 7.7.2. refers. It is pleasing to note in section 7.7.10. that the construction vibration baseline will be assumed to be zero in the absence of significant vibration sources prior to the construction of the scheme, and also that the document considers it very unlikely any vibration levels would be sufficiently high to result in building damage; therefore only human response to vibration effects will be considered.

We welcome scoping in of construction and operational noise and construction vibrations, and acknowledge operational vibration being scoped out of the assessment methodology (as a maintained road surface will be free of irregularities as part of the project design and through general maintenance) as per Table 7-10 entitled 'Noise and vibration elements scoped in and out', in section 7.9.

Mitigation Measures

Page 130, section 11.14.1., includes climate mitigation measures for the construction and operation of the scheme. From the CSNN Team perspective these are greatly welcomed as many of these will also reduce impacts on residential amenity, such as ensuring site compound drainage has sufficient capacity to cope with heavy rainfall events, storage of chemicals, hazardous materials and plant on high ground or protecting these with bunds/barriers, covering spoil and material heaps during periods of high rainfall or high winds, spraying these during dry periods to reduce dust and regularly inspecting these (especially during and following extreme weather events), reviewing wind speed/direction before commencing work at height and adjusting activities/scheduling daily working times to account for weather conditions.

Cumulative Developments

We very much welcome the assessment of the cumulative effects of other projects (section 13.2.6. states these will include projects under construction, permitted applications not yet implemented, submitted applications likely to be determined prior to the determination of the scheme and all undetermined appeals against refusals) within the immediate area and wider district of King's Lynn, as outlined on pages 153 and 154 in section 13.2.3 and shown within Table 13-1 on pages 154 to 157. This will be undertaken in accordance with the requirements of the EIA Regulations 2017 and section 13.2.4. advises that a high-level review of planning applications submitted to the BCKLWN in the last 6 years will be undertaken in order to identify potential projects that could give rise to in-combination interaction with the scheme. In terms of both the construction and operational phases, as per section 13.2.5., we welcome that the study will include other schemes with concurrent demolition, construction or operational phases, and which are in proximity to, or are likely to result in environmental effects which could act in synergy with effects arising from this scheme.

The assessment of cumulative effects is discussed within Section 13. We are keen to ensure that the cumulative effects of the developments listed within Table 13-1 and other land allocations within the Borough Council's Site Allocations and Development Management Policies Plan, policy E2.1 West Winch Growth Area Strategic, are assessed for impacts upon air quality and climate change within the road's operational phase in future years. Additionally, committed developments and development allocations within the Borough Council's Local Plan should be considered in the assessment as stated within Section 13.2.5 of the Combined Screening and Scoping

Report published in June 2019.

Kind regards,

Evalyn Drake *BSc (Hons) MSc*
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0800 111 999*

National Grid Electricity Emergency Number:
0800 40 40 90*

* Available 24 hours, 7 days/week.
Calls may be recorded and monitored.

www.cadentgas.com

Date: 26/03/2021

Our Ref: EA_GE2B_3NWP_028679

Your Ref: SCO/2021/0001 pt.2 (JP)

RE: Formal Planning Application, PE33 OFB West Winch and North Runcton

Thank you for your enquiry which was received on 26/03/2021.
Please note this response and any attached map(s) are valid for 28 days.

An assessment has been carried out with respect to Cadent Gas Limited, National Grid Electricity Transmission plc's and National Grid Gas Transmission plc's apparatus. Please note it does not cover the items listed in the section "Your Responsibilities and Obligations", including gas service pipes and related apparatus.

For details of Network areas please see the Cadent website (<http://cadentgas.com/Digging-safely/Dial-before-you-dig>) or the enclosed documentation.

Are My Works Affected?

Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified.

Can you please inform Plant Protection, as soon as possible, the decision your authority is likely to make regarding this application.

If the application is refused for any other reason than the presence of apparatus, we will not take any further action.

Please let us know whether Plant Protection can provide you with technical or other information that may be of assistance to you in the determination of the application.

As your proposed activity is in close proximity to National Grid's Transmission assets we have referred your enquiry/consultation to our Asset Protection team for further detailed assessment. We request that you do not commence work or take further action with regards to your proposal until you hear from us. We will endeavour to contact you within 21 days from the date of this response. Please contact us at assetprotection@nationalgrid.com if you have not had a response within this time frame.

Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your scheduled activities at this location.

It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near Cadent and/or National Grid's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to Cadent Gas Limited, National Grid Electricity Transmission plc (NGET) and National Grid Gas Transmission plc (NGGT) and apparatus. This assessment does **NOT** include:

- | Cadent and/or National Grid's legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent and/or National Grid's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Plant Protection.
- | Gas service pipes and related apparatus
- | Recently installed apparatus
- | Apparatus owned by other organisations, e.g. other gas distribution operators, local electricity companies, other utilities, etc.

It is **YOUR** responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities. Further "Essential Guidance" in respect of these items can be found on either the [National Grid](#) or [Cadent](#) website.

This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to Cadent and/or National Grid's easements or wayleaves nor any planning or building regulations applications.

Cadent Gas Limited, NGGT and NGET or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you require further assistance please contact the Plant Protection team via e-mail ([click here](#)) or via the contact details at the top of this response.

Yours faithfully

Plant Protection Team

ASSESSMENT

Affected Apparatus

The apparatus that has been identified as being in the vicinity of your proposed works is:

- | National Gas Transmission Pipelines and associated equipment

As your proposal is in proximity to apparatus, we have referred your enquiry / consultation to the following department(s) for further assessment:

- | Land and Development Asset Protection Team (High Pressure Gas Transmission and Electricity Transmission Apparatus)

We request that you take no further action with regards to your proposal until you hear from the above. We will contact you within 28 working days from the date of this response. Please contact us if you have not had a response within this timeframe.

Requirements

BEFORE carrying out any work you must:

- | **Ensure that no works are undertaken in the vicinity of our gas pipelines and that no heavy plant, machinery or vehicles cross the route of the pipeline until detailed consultation has taken place.**
- | Carefully read these requirements including the attached guidance documents and maps showing the location of apparatus.
- | Contact the landowner and ensure any proposed works in private land do not infringe Cadent and/or National Grid's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.
- | Ensure that all persons, including direct labour and contractors, working for you on or near Cadent and/or National Grid's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' and GS6 – 'Avoidance of danger from overhead electric power lines'. This guidance can be downloaded free of charge at <http://www.hse.gov.uk>
- | In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

GUIDANCE

High Pressure Gas Pipelines Guidance:

If working in the vicinity of a high pressure gas pipeline the following document must be followed: 'Specification for Safe Working in the Vicinity of Cadent and/or National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties' (SSW22). This can be obtained from: <http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>

National High Pressure Gas Pipelines Guidance:

<http://www.nationalgrid.com/NR/rdonlyres/9934F173-04D0-48C4-BE4D-82294822D29C/51893/Above7barGasGuidance.pdf>

Dial Before You Dig Pipelines Guidance:

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33969>

Standard Guidance

Essential Guidance document:

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=8589934982>

General Guidance document:

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=35103>

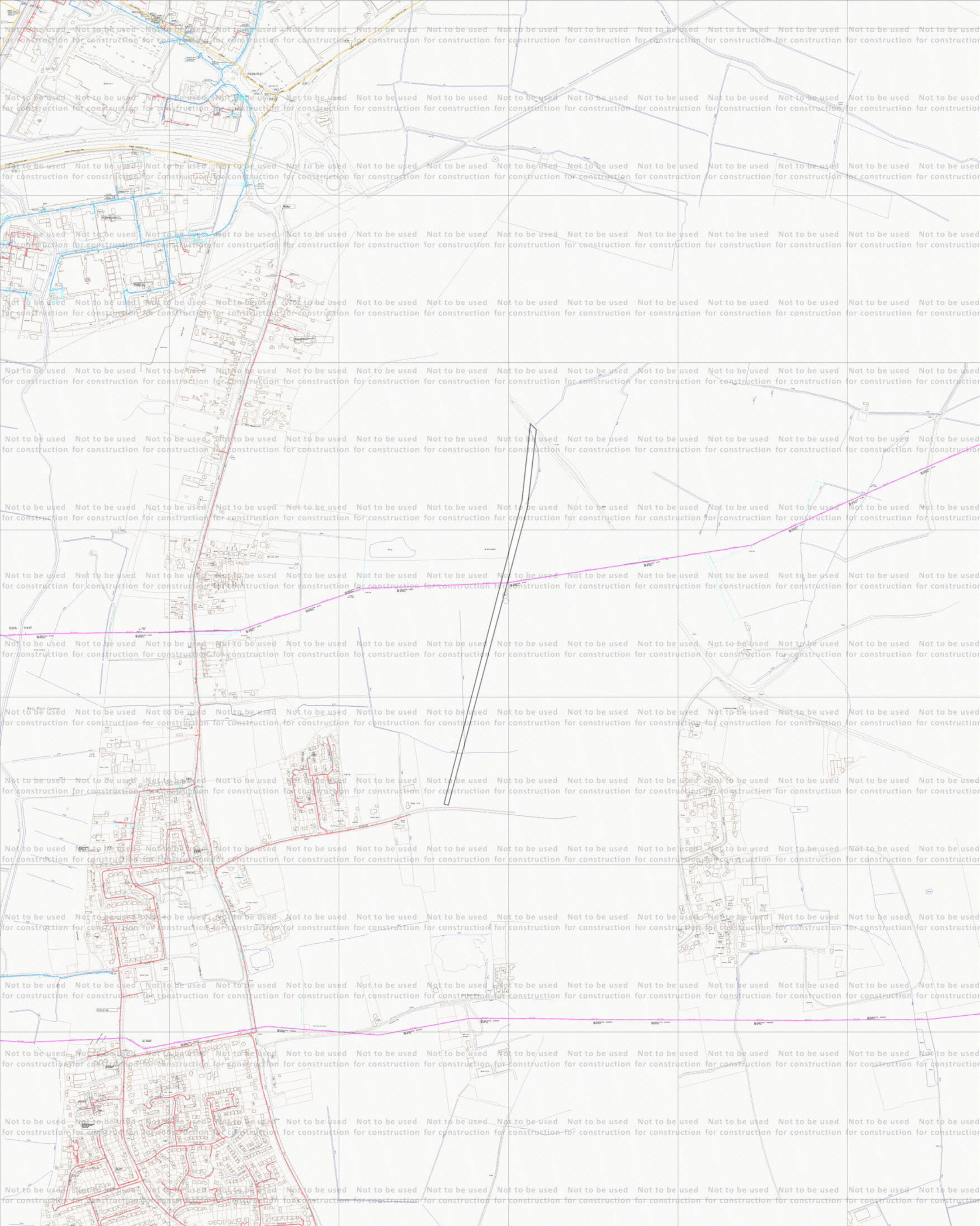
Excavating Safely in the vicinity of gas pipes guidance (Credit card):

<http://www.nationalgrid.com/NR/rdonlyres/A3D37677-6641-476C-9DDA-E89949052829/44257/ExcavatingSafelyCreditCard.pdf>

Excavating Safely in the vicinity of electricity cables guidance (Credit card):

<http://www.nationalgrid.com/NR/rdonlyres/35DDEC6D-D754-4BA5-AF3C-D607D05A25C2/44858/ExcavatingSafelyCreditCardelectricitycables.pdf>

Copies of all the Guidance Documents can also be downloaded from the [National Grid](#) and [Cadent](#) websites.



ID: EA_GE2B_3NWP_028679 View extent: 2890m, 3670m

USER: James.Parker
 DATE: 26/03/2021
 DATA DATE: 25/03/2021
 REF: SCO/2021/0001 pt.2 (JP)
 MAP REF: TF6316
 CENTRE: 563946, 316749

LP MAINS ————
 MP MAINS ————
 IP MAINS ————
 LHP MAINS ————
 NHP MAINS ————

0m ———— 200m
 Approximate scale 1:10000
 on A3 Colour Portrait

Do not proceed without further consultation

This plan shows those pipes owned by Cadent Gas Limited in its role as a Licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

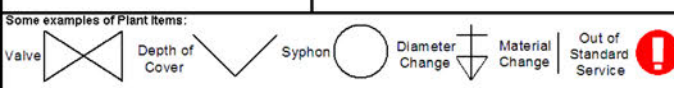
Map 1 of 1 (GAS)

MAPS Plot Server Version 1.11.0



Requested by: Norfolk County Council

This plan is reproduced from or based on the OS map by Cadent Gas Limited, with the sanction of the controller of HM Stationery Office. Crown Copyright Reserved. Ordnance Survey Licence number 100024886



ENQUIRY SUMMARY

Received Date

26/03/2021

Your Reference

SCO/2021/0001 pt.2 (JP)

Location

Centre Point: 563946, 316749

X Extent: 275

Y Extent: 1145

Postcode: PE33 0FB

Location Description: PE33 0FB West Winch and North Runcton

Map Options

Paper Size: A3

Orientation: PORTRAIT

Requested Scale: 10000

Actual Scale: 1:10000 (GAS)

Real World Extents: 2890m x 3670m (GAS)

Recipients

pprsteam@cadentgas.com

Enquirer Details

Organisation Name: Norfolk County Council

Contact Name: Nick Johnson

Email Address: MaWP@norfolk.gov.uk

Telephone: 01603 222724

Address: County Hall , Martineau Lane, Norwich, NR1 2SG

Description of Works

PA West Winch Housing Access Road SP

Enquiry Type

Formal Planning Application

Development Types

Development Type: Development for use by General Public

Nick Johnson
Norfolk County Council
County Hall
Martineau Lane
Norwich
NR1 2SG

Plant Protection
Cadent
Block 1; Floor 1
Brick Kiln Street
Hinckley
LE10 0NA
E-mail: plantprotection@cadentgas.com
Telephone: +44 (0)800 688588

National Gas Emergency Number:
0800 111 999*

National Grid Electricity Emergency Number:
0800 40 40 90*

* Available 24 hours, 7 days/week.
Calls may be recorded and monitored.

www.cadentgas.com

Date: 26/03/2021

Our Ref: EA_GE2B_3NWP_028678

Your Ref: SCO/2021/0001 pt.1 (JP)

RE: Formal Planning Application, PE33 OFB West Winch and North Runcton

Thank you for your enquiry which was received on 25/03/2021.
Please note this response and any attached map(s) are valid for 28 days.

An assessment has been carried out with respect to Cadent Gas Limited, National Grid Electricity Transmission plc's and National Grid Gas Transmission plc's apparatus. Please note it does not cover the items listed in the section "Your Responsibilities and Obligations", including gas service pipes and related apparatus.

For details of Network areas please see the Cadent website (<http://cadentgas.com/Digging-safely/Dial-before-you-dig>) or the enclosed documentation.

Are My Works Affected?

Searches based on your enquiry have identified that there is apparatus in the vicinity of your enquiry which may be affected by the activities specified.

Can you please inform Plant Protection, as soon as possible, the decision your authority is likely to make regarding this application.

If the application is refused for any other reason than the presence of apparatus, we will not take any further action.

Please let us know whether Plant Protection can provide you with technical or other information that may be of assistance to you in the determination of the application.

As your proposed activity is in close proximity to National Grid's Transmission assets we have referred your enquiry/consultation to our Asset Protection team for further detailed assessment. We request that you do not commence work or take further action with regards to your proposal until you hear from us. We will endeavour to contact you within 21 days from the date of this response. Please contact us at assetprotection@nationalgrid.com if you have not had a response within this time frame.

Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your scheduled activities at this location.

It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near Cadent and/or National Grid's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to Cadent Gas Limited, National Grid Electricity Transmission plc (NGET) and National Grid Gas Transmission plc (NGGT) and apparatus. This assessment does **NOT** include:

- | Cadent and/or National Grid's legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent and/or National Grid's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Plant Protection.
- | Gas service pipes and related apparatus
- | Recently installed apparatus
- | Apparatus owned by other organisations, e.g. other gas distribution operators, local electricity companies, other utilities, etc.

It is **YOUR** responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities. Further "Essential Guidance" in respect of these items can be found on either the [National Grid](#) or [Cadent](#) website.

This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to Cadent and/or National Grid's easements or wayleaves nor any planning or building regulations applications.

Cadent Gas Limited, NGGT and NGET or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you require further assistance please contact the Plant Protection team via e-mail ([click here](#)) or via the contact details at the top of this response.

Yours faithfully

Plant Protection Team

ASSESSMENT

Affected Apparatus

The apparatus that has been identified as being in the vicinity of your proposed works is:

- | National Gas Transmission Pipelines and associated equipment
- | Electricity Transmission overhead lines

As your proposal is in proximity to apparatus, we have referred your enquiry / consultation to the following department(s) for further assessment:

- | Land and Development Asset Protection Team (High Pressure Gas Transmission and Electricity Transmission Apparatus)

We request that you take no further action with regards to your proposal until you hear from the above. We will contact you within 28 working days from the date of this response. Please contact us if you have not had a response within this timeframe.

Requirements

BEFORE carrying out any work you must:

- | **Ensure that no works are undertaken in the vicinity of our gas pipelines and that no heavy plant, machinery or vehicles cross the route of the pipeline until detailed consultation has taken place.**
- | Carefully read these requirements including the attached guidance documents and maps showing the location of apparatus.
- | Contact the landowner and ensure any proposed works in private land do not infringe Cadent and/or National Grid's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.
- | Ensure that all persons, including direct labour and contractors, working for you on or near Cadent and/or National Grid's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' and GS6 – 'Avoidance of danger from overhead electric power lines'. This guidance can be downloaded free of charge at <http://www.hse.gov.uk>
- | In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

GUIDANCE

High Pressure Gas Pipelines Guidance:

If working in the vicinity of a high pressure gas pipeline the following document must be followed: 'Specification for Safe Working in the Vicinity of Cadent and/or National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties' (SSW22). This can be obtained from: <http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>

National High Pressure Gas Pipelines Guidance:

<http://www.nationalgrid.com/NR/rdonlyres/9934F173-04D0-48C4-BE4D-82294822D29C/51893/Above7barGasGuidance.pdf>

Dial Before You Dig Pipelines Guidance:

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33969>

Working Near National Grid Electricity Transmission equipment:

If you are carrying out any work in proximity to an overhead line or any excavation that may be near an underground cable then please consult National Grid Technical Guidance Note 287 that can be found at https://www.nationalgrid.com/sites/default/files/documents/8589935533-TGN%20287_Third%20party%20guidance%20for%20working%20near%20NGET%20equipment.pdf Further guidance related to underground cables can also be found at <https://www.nationalgrid.com/sites/default/files/documents/8589936512-Excavating%20Safety%20Leaflet%20Electricity.pdf>

Standard Guidance

Essential Guidance document:

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=8589934982>

General Guidance document:

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=35103>

Excavating Safely in the vicinity of gas pipes guidance (Credit card):

<http://www.nationalgrid.com/NR/rdonlyres/A3D37677-6641-476C-9DDA-E89949052829/44257/ExcavatingSafelyCreditCard.pdf>

Excavating Safely in the vicinity of electricity cables guidance (Credit card):

<http://www.nationalgrid.com/NR/rdonlyres/35DDEC6D-D754-4BA5-AF3C-D607D05A25C2/44858/ExcavatingSafelyCreditCardelectricitycables.pdf>

Copies of all the Guidance Documents can also be downloaded from the [National Grid](#) and [Cadent](#) websites.