



# **West Winch Housing Access Road**

## **Environmental Statement Chapter 14: Appendix 2 Sustainability Statement**

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## 1 Introduction

1.1.1 WSP UK Ltd (WSP) was commissioned in June 2023 by Norfolk County Council (NCC), to prepare a Sustainability Statement that supports a Planning Application for the design and construction of West Winch Housing Access Road, Norfolk (hereby referred to as ‘the Proposed Scheme’). The Proposed Scheme is described in more detail, overleaf.

1.1.2 The Proposed Development will aim to meet the highest levels of sustainability and this Statement is derived from, and responds to, the relevant regional and local policies from NCC. The Statement details how the Proposed Development aligns with planning policy on, and any underpinning requirements for, sustainable development.

### 1.2 The Proposed Development

1.2.1 Norfolk County Council is applying for full planning application for the West Winch Housing Access Road (WWHAR) on approximately 68.8 hectares of land, to provide the following:

- 3.5 km of new single lane access road, with a new roundabout junction between the West Winch Housing Access Road (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;
- Roundabout Junctions on the WWHAR to provide access to the residential allocation area;
- Treatment of local roads which will be severed by the WWHAR, including Rectory Lane and Chequers Lane;
- A new access to Manor Farm constructed from Chequers Lane;
- Modification and re-orientation of the Hardwick Interchange;

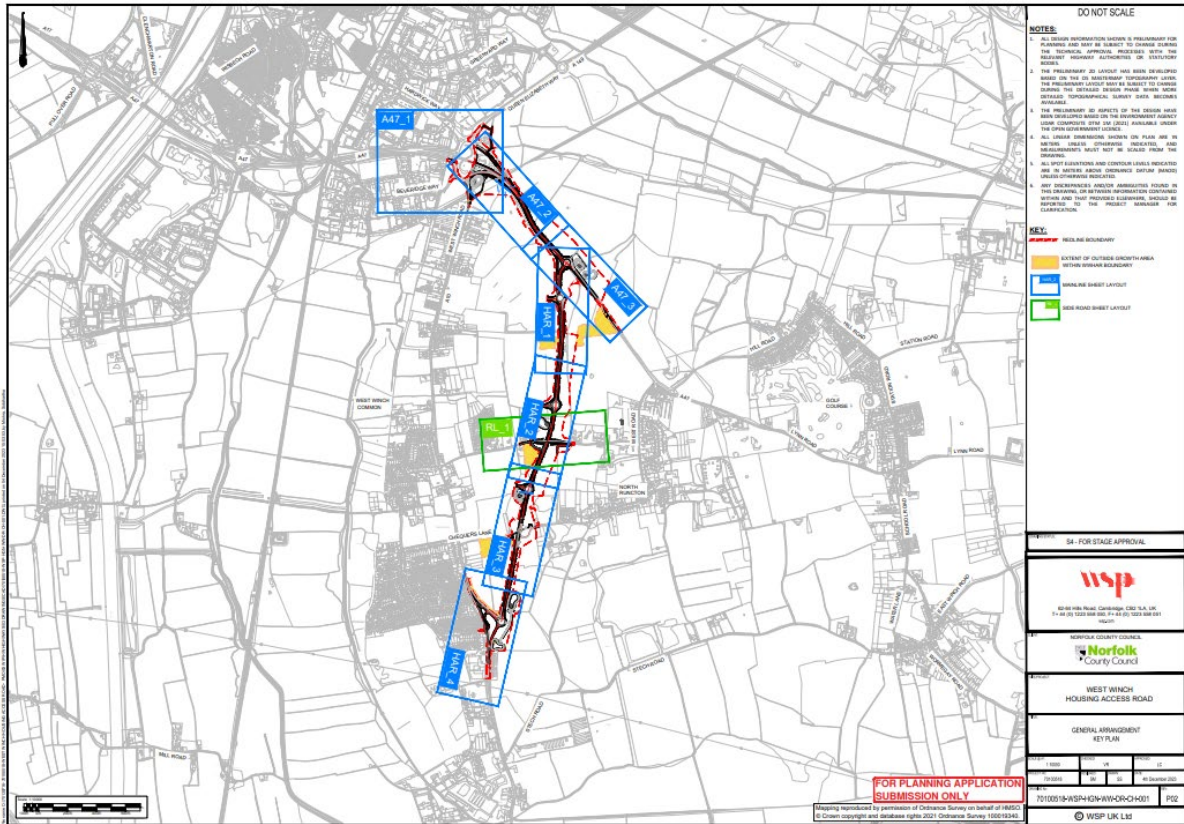


- Dualling of the A47 to the north of the existing highway alignment between the WWHAR and the A10/A47 Hardwick Interchange junction; and
- Temporary working areas for road construction including haul routes and two sets of National Grid gas main diversion works including construction compounds and temporary access and working areas;
- The demolition of two dwellings – Hill Cottages on A47 Constitution Hill;
- The construction of 7 no. drainage basins adjacent to Hardwick roundabout and housing access road;
- The construction of drainage swales along the proposed new housing access road;
- New road over bridge with shared footway, cycleway and bridleway on Rectory Lane to cross over the proposed WWHAR; and
- The construction of maintenance access tracks to the south of A47, Rectory Lane and southern roundabout to serve drainage basin (WSP, 2023, West Winch Housing Access Road Outline Business Case).

1.2.2 Figure 1 below shows the location of the WWHAR scheme.



Figure 1-1 – Scheme location



1.2.3 The Proposed Development is closely aligned with national, regional, and local plans, policies and strategies as outlined in Section 2.

## 2 A foundation for action on sustainability

2.1.1 This section describes NCC's strategic aims and responsibilities and sets out the policy context in which the scheme has been developed. It considers the relevant legislation, policy, plans and strategies, to identify the key themes and priorities.

### 1. The National Policy Framework (NPPF) [National Policy Framework \(NPPF\)](#)

The National Planning Policy Framework was updated on 5 September 2023 and sets out the government's planning policies for England and how these are expected to be applied. This replaces the previous framework, published in March 2012, and updated in July 2021. At the heart of the NPPF is a



presumption in favour of sustainable development (paragraph 2), with economic, social, and environmental objectives to be met through planning policy.

Sustainability is a common theme in many sections of the NPPF including most notably the sections titled “Promoting healthy and safe communities,” “Promoting sustainable transport,” “Meeting the challenge of climate change, flooding, and coastal change,” “Conserving and enhancing the natural environment” and “Facilitating the sustainable use of minerals.”

**2. Climate Change Act (2008) [Climate Change Act \(2008\)](#)**

The Climate Change Act commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. The Act also established the Committee on Climate Change (CCC) to ensure that emissions targets are evidence-based and independently assessed. In addition, the CCC’s Adaptation Committee advises on these climate change risks and opportunities and assess the progress to adapting or tackling them.

The Climate Change Act requires the government to set a legally binding target ‘carbon budget’ to act as steppingstones towards the 2050 target. Carbon budget is the cap of how much emissions can be emitted by UK over a five-year period. To date, five carbon budgets have been put into law that run up to 2032 which require a 57% reduction by this time. The UK government is to enshrine a new target in law to cut emissions by 78% by 2035, setting also the sixth carbon budget for the period 2033-37.

**3. Planning Practice Guidance [Planning Practice Guidance](#)**

National Planning Practice Guidance (PPG) is an extensive online resource of detailed policy guidance provided by the Ministry of Housing, Communities and Local Government. Along with the NPPF (National Planning Policy Framework), PPG sets out how the government envisages the day to day working of the planning system in England to operate.

NPPF and PPG does not apply in Wales, Scotland, or Northern Ireland as they have their own devolved planning systems.



#### 4. **Clean Growth Strategy** [Clean Growth Strategy](#)

This strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of ‘clean growth,’ i.e., deliver increased economic growth and decreased emissions. The key actions which the government will take as part of the strategy include ‘Accelerating clean growth,’ ‘Improving Business and Industry Efficiency – 25% of UK Emissions,’ ‘Accelerating the shift to low carbon transport – 24% of UK emissions,’ ‘Delivering Clean, Smart, Flexible Power – 21% of UK Emissions,’ ‘Enhancing the Benefits and Value of Our Natural Resources – 15% of UK Emissions,’ ‘Leading in the Public Sector – 2% of UK Emissions,’ and ‘Government Leadership in Driving Clean Growth.’

#### 5. **Clean Air Strategy (2019)** [Clean Air Strategy \(2019\)](#)

This document builds on an extensive consultation process which indicated broad-based support for many of the actions proposed. It sets out the comprehensive action that is required from across all parts of government and society to meet the new goals to cut public exposure to particulate matter pollution, as recommended by the World Health Organization. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms.

#### 6. **Net Zero Strategy: Build Back Greener** [Net Zero Strategy: Build Back Greener](#)

This strategy sets out this Government’s long-term plan to reduce the greenhouse gas emissions and end the UK’s domestic contribution to man-made climate change by 2050. This document discusses clear policies and proposals for keeping the UK on track for the upcoming carbon budgets, ambitious Nationally Determined Contribution (NDC), and then sets out the vision for a decarbonised economy in 2050.

This strategy sets out the plans for reducing emissions from each sector of the economy, while offsetting any residual emissions with greenhouse gas removals.

## 2.2 Local policy research

As stated previously, sustainable development is a material consideration in planning. Therefore, to identify those elements of sustainability that are relevant to



the Proposed Development, the following local policy and guidance documents were (in addition to the Local Plan) researched for key commitments and requirements:

**7. Core Strategy of the Local Development Framework [Development Framework Strategy](#)**

The Local Development Framework consists of many documents, including Local Development Schemes (Project plan), Statement of Community Involvement, Annual Monitoring Report, Other Plan and Planning Documents, Site Specific Allocation and Policies and the Core Strategy.

The Core Strategy sets out the spatial planning framework for the development of the borough up to 2026 and is part of King's Lynn and West Norfolk's Local Development Framework. It broadly covers the Spatial Strategies, Policies for Places, Area wide Policies (like Housing, Transport, etc.), as well as Implementation and Monitoring.

**8. Neighbourhood Plan of West Winch and North Runcton Parish [Neighbourhood Plan](#)**

The North Runcton and West Winch Neighbourhood Plan, sets out a vision supported by planning policies, to help to define future development in the area up to and beyond 2026. This creates opportunities to enhance existing settlement structure, improve existing infrastructure, utilise brownfield land, and, where possible, safeguard good agricultural land and landscape assets.

**9. Strategic Infrastructure Delivery Plan [Strategic Infrastructure Delivery Plan](#)**

The Strategic Infrastructure Delivery Plan (SIDP) sets out Norfolk County Council's priority projects each year. The goal of these projects and the SIDP is to deliver projects that will provide significant economic, housing, and jobs growth across Norfolk. The SIDP supports the commitments to achieve 'net zero' emissions on the NCC (Norfolk County Council) estates and aids the work towards 'carbon neutrality.'





**10. The Fourth Local Transport Plan [Local Transport Plan](#)**

The Fourth Norfolk Local Transport Plan (LTP4) Strategy, adopted in 2021, proposes an approach for addressing current and future transport issues in the County. The Strategy encompasses all modes of transport and covers the period 2020 – 2036, with the following strategic objectives of enhancing the future, connectivity, quality of life, safety, accessibility, and management. One of the key issues is the aim to work towards carbon neutrality by 2030.

The LTP4 is supported by a **Local Transport Implementation Plan** which is updated regularly. This plan outlines methods to implement strategies set out in the LTP4.

**11. Norfolk County Council's Environmental Policy [Norfolk Council's Environmental Policy \(2019\)](#)**

This policy reflects the areas that the Council (NCC) sees as key to protecting and maintaining the health of Norfolk's distinctive environment and its occupants. It ensures that Norfolk's economic and social development is inclusive while championing sustainable development. The policy provides a high-level context for all works conducted by NCC.

**12. Site Allocation and Development Management Policies Plan [Norfolk County's Site Allocations and Development Management Policies Plan](#)**

The King's Lynn and West Norfolk Local Plan - Site Allocations & Development Management Policies (SADMP) Plan was formally adopted in September 2016. The SADMP sets out land allocations and development management policies for King's Lynn and West Norfolk. The plan encompasses Development Management Policies, Site Specific Policies and Allocations, and Development Boundaries.

**13. Core Strategy and Minerals and Waste Development Management Policies Development Plan Document [Core Strategy and Minerals and Waste Development Management Policies Development Plan \(2010-2026\)](#)**

Minerals and Waste Development Management Policies Development Plan Document (DPD), runs for a 17-year period and provides NCC's framework for managing minerals and waste in Norfolk. It sets out policies that ensure the



development of mineral extraction, associated development and waste management facilities can happen sustainably, at appropriate locations.

**14. Safe, Sustainable Development [Safe, Sustainable Development \(2019\)](#)**

The document presents Norfolk's aims for sustainable development across the county through several aims that are supported by the Proposed Scheme.

Aim 2: Minimising travel to ensure people can access facilities they need by appropriate transport modes, encouraging walking, cycling and public transport use and reducing the use of private cars especially for shorter journeys.

Aim 3: To encourage residents to explore healthier ways to travel. And,

Aim 11: To reduce the environmental impact of highway improvements associated with any new developments.

**15. Climate Change Policy [Climate Change Policy \(2020\) and articles associated \(2023\)](#)**

The policy states that the council will “proactively identify, understand, manage and review its level of greenhouse gas emissions to play its part in contributing towards achieving the Climate Change Act 2008 and the Paris Climate Agreement”. The policy noted the net zero target has now been brought forward to 2030 demonstrating commitment to tackling climate change, in reducing corporate emissions. This is supported by the ‘Climate Change Strategy’ document which addresses the strategies required to reach the target.

**16. Norfolk Council's Climate Strategy [Norfolk County Council's Climate Strategy \(2023\)](#)**

The document sets out a strategic framework for the way Norfolk County Council is tackling climate change locally and building resilience to its effects. It sets out seven focus areas, to plan activities. A few of these areas include transport related emissions. The focus areas are:

- Our estates (Norfolk County Council)
- Indirect Emissions
- County wide emissions



- Promoting a green economy
- Adapting to climate change
- Space for nature to recover and grow.
- Engage and collaborate.

**17. Local Flood Risk Management Strategy Policy and Amendment [Local Flood Risk Management Strategy Policy and Amendment](#)**

The Local Flood Risk Management Strategy aims to inform the ability to influence or manage flood risk for all stakeholders and parties involved. It sets out 8 objectives to tackle and manage flood risk in Norfolk County. The King's Lynn & West Norfolk Strategic Flood Risk Assessment (SFRA) provides further detail on the extent of flood risk associated with main rivers and the sea.

**18. Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy [Norfolk Green Infrastructure and Recreational impact avoidance and mitigation Strategy](#)**

The GI and Recreational Impact Avoidance and Mitigation Strategy supports the Local Plans and ensures that LPAs secure the provision of GI at both a development site and a plan making level. This strategy contains recommendations to enhance green infrastructure to avoid potential impacts on recreational pressures, mitigate climate change, and improve wildlife corridors and connectivity.

**19. Biodiversity Supplementary Planning Guidance on Norfolk [Biodiversity Supplementary Planning Guidance on Norfolk](#)**

The biodiversity document is a planning guidance to increase biodiversity in Norfolk. It is intended to support the Development Plan policies on nature conservation and demonstrate how planning policies enhance and maintain biodiversity in Norfolk.



**20. Highway Guidance for Development: Drainage** [Highway Guidance for Development: Drainage](#)

Guidance published on NCC's website in relation to the disposal of surface water from the highway and design standards for development schemes.

**21. Norfolk District Council Air Quality Annual Status Report** [North Norfolk District Council Air Quality Annual Status Report \(2021\)](#)

An annual report published by North Norfolk District Council providing an overview of air quality in North Norfolk.

## 2.3 Policy outputs

2.3.1 The output of research into the above-stated policies culminated in the identification of a number of core sustainability themes, as relevant to the Proposed Development. These themes were as follows (listed alphabetically):

- Accessibility
- Air Quality
- Business Case
- Carbon and energy reduction
- Climate resilience
- Health and Wellbeing
- Heritage and archaeology
- Materials
- Noise
- Sustainable transport
- Waste
- Water – Flood Risk Assessment



2.3.2 Future readiness is a theme that has been identified, but it has not been included here as the Proposed Development is in the scheme stage. This may be considered as the design develops further.

**2.4 Sustainability Themes and Relevant Policies**

2.4.1 The table shown below indicates the relevant policies associated with the sustainability themes from the policy review.

**Table 2-1 – Relevant policies associated with sustainability themes**

<b>Sustainability theme</b>	<b>Policy document used to inform sustainability questions</b>	<b>Policies and key words considered for Performance Indicators</b>
Accessibility	Local Transport Plan 4 Strategy	<p><b>LTP4 –</b>                      Access for all at all times including improvement works stage.                      Network management for efficient highway network and increase journey time reliability.</p>
Accessibility	Neighbourhood Plan of West Winch and North Runcton Parish	<p><b>NP (WA09) –</b>                      Introduction of safe crossings and pedestrian areas.                      Improve village centre and safe access to adjacent sites.                      Traffic calming measures and improved junctions.                      Improvement of footpath and cycling path and their safety.</p>
Accessibility	Development framework of King’s Lynn and West Norfolk Core Strategy Document	<p><b>CS11 –</b>                      Improve accessibility and connections.                      Integrated route pedestrian and cyclists.                      Recognise that in rural areas private cars may remain important means of travel.</p>



Sustainability theme	Policy document used to inform sustainability questions	Policies and key words considered for Performance Indicators
Air Quality	North Norfolk District Council Air Quality Annual Status Report 2020	<b>AQASR</b> – Guidance which summarizes Air Quality actions, which predominantly include promotion of active travel, non-motorized transport, and better integration of public transport along with encouraging mixed-use developments, undertake AQ assessments and create awareness.
Air Quality	Local Transport Plan 4 Strategy	<b>LTP4 (7)</b> – (a) Shift to efficient vehicle fleet. (b) Promote active, healthy travel. (c) Travel mode integration. (d) Tackle traffic problems for air quality.
Biodiversity	Neighbourhood Plan of West Winch and North Runcton Parish	<b>NP (WA03)</b> – Management plans to show how they are protected.
Biodiversity	Biodiversity Supplementary Planning Guidance on Norfolk	<b>BSPG</b> – Design in opportunities to improve habitats for biodiversity and enhance existing habitats.
Biodiversity	Development framework of King’s Lynn and West Norfolk Core Strategy Document	<b>CS12</b> – Proposals to protect and enhance our historic environment and habitats will be supported.
Business Case	Norfolk Strategic Infrastructure Development Plan (SIDP)	<b>SIDP</b> – Key infrastructure needed to deliver economic growth identifies WWHAR
Business Case	Safe, Sustainable Development	<b>SSD (7)</b> -Sustainable development without detriment and with public safety and goods delivery.
Business Case	Development framework of King’s Lynn and West Norfolk Core Strategy Document	<b>CS11</b> – Priority for network serving from and through borough, improving reliability, safety and reducing congestion.



Sustainability theme	Policy document used to inform sustainability questions	Policies and key words considered for Performance Indicators
Carbon and Energy Reduction	Norfolk County Council's Environmental Policy	<b>EP</b> – Net zero carbon by 2030 by planting trees, active travel, using EV and LED streetlights.
Carbon and Energy Reduction	Development framework of King's Lynn and West Norfolk Core Strategy Document	<b>CS08</b> – Generation of energy from renewable sources encouraged. <b>CS13</b> – Waste management to minimise carbon footprint.
Climate Resilience	Norfolk County Council Climate Change Policy	<b>CC</b> - Goal to achieve net zero in estates and carbon neutrality by 2030.
Climate Resilience	Norfolk County Council's Environmental Policy	<b>EP</b> – Planting trees to improve biodiversity and a potential mitigation measure for climate change.
Climate Resilience	Highway Guidance for Development: Drainage	<b>HGDD</b> – Reduce rate of run-off water using sustainable drainage systems
Noise	National Policy Statement for National Networks (NPS NN)	<b>5.195</b> – Avoid significant adverse impacts from noise on health and quality of life. Mitigate and minimise other adverse impacts of noise from new developments. Contribute to improvements to health and quality of life through noise from new developments.
Health and Wellbeing	Safe, Sustainable Development	<b>SSD (2)</b> – Encourage active and healthier means of travel
Health and Wellbeing	Norfolk County Council's Environmental Policy	<b>EP</b> – Alternatives to car, public transport, cycle, and pedestrian Use planning agreements to encourage (a) Integrated transport hubs across the county to maximise opportunities.



Sustainability theme	Policy document used to inform sustainability questions	Policies and key words considered for Performance Indicators
Heritage	Development framework of King's Lynn and West Norfolk Core Strategy Document	<b>CS08</b> – New development will be required to demonstrate the ability to protect and enhance the historic environment
Heritage	Neighbourhood Plan of West Winch and North Runcton Parish	<b>NP (WA02)</b> – Sites with local heritage interest gives significance statement of assets affected, proportional to the asset's importance.
Materials	Safe, Sustainable Development	<b>SSD (9)</b> – Minimise waste of resources through the reduction, reuse, and recycling of materials.
Materials	Development framework of King's Lynn and West Norfolk Core Strategy Document	<b>CS17</b> – NCC to promote use of recycled material and require inclusion in local frameworks, with yearly increase in percentage of inert, C&D waste recycled starting at 70%.
Sustainable Transport	Core Strategy Document	CS11 – Reduce vehicular traffic.
Sustainable Transport	Local Transport Plan 4 Draft Strategy	LTP4 – Encourage clean transport.
Sustainable Transport	Safe, Sustainable Development	SSD (01) – Walking, cycling and public transport emphasis.
Waste	Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010 - 2026	<b>CS13</b> – NCC to promote use of recycled material and require inclusion in local frameworks, with yearly increase in percentage of inert, C&D waste recycled starting at 70%.





Sustainability theme	Policy document used to inform sustainability questions	Policies and key words considered for Performance Indicators
Waste	Norfolk County Council's Environmental Policy	<p><b>EP –</b></p> <p>Maximise resource efficiency.</p> <p>Zero avoidable plastic waste in operations.</p> <p>No single use waste in value chain.</p> <p>Maximise recycling opportunity.</p> <p>Impact of materials using energy strategy to account for all GHG.</p> <p>Working with supply chain to reduce environmental footprint.</p>
Water: Flood Management	Highway Guidance for Development: Drainage	<p><b>HGDD –</b></p> <p>Reduce rate of runoff water using sustainable drainage systems.</p> <p>New scheme to provide brownfield betterment.</p> <p>Should be approved by local highway authority.</p>
Water: Flood Management	Development framework of King's Lynn and West Norfolk Core Strategy Document	<p><b>CS01 –</b> Acknowledges that some development may be needed in flood risk areas to meet development objectives and needs to meet stringent criteria, such as demonstrate that it contributes to wider regeneration of the borough and ensure that appropriate design and engineering is used to minimise flood risk.</p>
Water: Flood Management	Site Allocation and Development Management Policies Plan	<p><b>DM4 –</b> Flood Risk Assessment FRA to inform decisions on material extraction and waste management facilities. Tests according to the proposals</p>



### **3 Design team engagement**

- 3.1.1 To effectively target information that could support this Statement, WSP generated a series of questions based on the sustainability themes identified as material to planning in Norfolk. Questions were developed and tailored by the WSP team based on their experience and knowledge of the scale and nature of the Proposed Scheme and also based on the performance indicators compiled by the review of the existing applicable policies for the proposed development.
- 3.1.2 The questions were then circulated to the specialists working on the scheme from disciplines including Transport Planning, Air Quality, Drainage, Acoustics, Cultural Heritage & Archaeology, Sustainability and Climate Change etc. and evidence against the questions (among other considerations) was collated.
- 3.1.3 An online workshop was also organised with key members of the design team to get an overview of the scheme and get insights into a high-level overview of the sustainability measures being adopted into the design of the Proposed Scheme at the concept stage. At a later stage, for further details, the various technical reports for the relevant sections were referred.
- 3.1.4 The approach adopted meant that design intent, as well as any measures achieved to date, could be clearly tied back to the sustainability requirements of local strategy and planning policy.
- 3.1.5 The following section describes the results of this process.

### **4 Statement Findings**

- 4.1.1 This section of the Sustainability Statement provides information and data on how the Proposed Scheme has responded appropriately to the relevant core themes identified, as distilled from the local strategic and planning policy documents reviewed. For ease of reference, information is provided by theme, alphabetically.



4.1.2 It should be noted that no modelling or data analysis has been undertaken for this work, though semi- and other quantitative results have been provided, where available.

## 4.2 Accessibility

Targeted design questions

*Is accessibility relevant to the design of the Proposed Scheme? If so, what accessibility and connectivity measures will be deployed?*

### **Evidence / Response**

There is a major proposed housing development that is being co-located along the WWHAR and this is an opportunity to provide sustainable transport improvements for both new and existing residents to improve their accessibility for the transportation services that they use every day. This is described by the WWHAR Sustainable Transport Strategy (WSP, 2023, West Winch Housing Access Road Sustainable Transport Strategy Report). The WWHAR is a key scheme to be implemented as the scheme is seen as crucial in reducing congestion on the A10 and improving sustainable travel on the A10 and onto the A47. The STS demonstrates the strategy to improve accessibility for all users within the local area, improve transport safety for vulnerable users and enhance the quality of life for residents through encouraging active travel.

The vision of the STS includes safe, easy green routes for people to travel, by wheelchair, on foot, or by other Non-Motorised Transport modes. The STS will also help to mitigate severance issues presented by crossing a major strategic highway and open new options for access. The remit includes local access within West Winch to cater for new desire lines created by the development, and access in the wider local area to Kings Lynn and key destinations further afield. Access to bus services is considered to be a priority and provision of mobility hubs have been emphasized. The mobility hub is an integrated centre where, disabled residents, electric car users, walkers and bus users can find all the facilities required to access various locations around West Winch.



The STS includes a study of the existing transport network for accessibility and analyses the proposed development on a criteria scale which includes improving connectivity to public transport, local services, and active travel network. The strategies in the Proposed Development with the maximum sustainability score have been listed in the STS and active engagement and workshops with users and stakeholders have been held to formulate the strategy. The above opportunities are proposed to be taken forward alongside the WWHAR to provide a complete package of measures that supports growth and encourages mode shift to active and sustainable travel choices, thus improving the overall accessibility through the Proposed Scheme.

#### 4.3 Air quality

Targeted design questions

*How will the Proposed Scheme help minimise local air quality impacts?*

##### **Evidence / Response**

An Air Quality Assessment (WSP, 2023, West Winch Housing Access Road Air Quality Chapter (ES)) has been undertaken for the Proposed Scheme by WSP. An assessment of construction phase dust impacts was undertaken. With embedded mitigation, the effects of the construction phase on air quality are not significant. An assessment of operational phase impacts was also undertaken for the Proposed Scheme. At all the receptors in every modelled scenario, there was no exceedance of the respective NO<sub>2</sub>, PM<sub>10</sub> or PM<sub>2.5</sub> annual mean objectives. Therefore, the operational phase air quality effects are not significant. Embedded mitigation measures and best practice included within the Proposed Scheme design include storage of potentially dusty materials as far as practicable from sensitive receptors and with appropriate screening/containment to minimise dust emissions, promptly clearing any spillages of potentially dusty materials, minimise material drop heights and avoid double handling, enforcement of vehicle speed limits on site, regular inspection and maintenance of haul road surfaces, damping down of unpaved surfaces during dry conditions to minimise dust emissions; ensure all loads of



potentially dusty materials leaving the site are covered to prevent dust emissions/loss of materials during transit, regular inspection and cleansing of all paved surfaces including the public highway in the vicinity of site access points; and use vacuum sweepers for cleaning of hard paving/public highway as deemed required.

#### 4.4 Biodiversity

Targeted design questions

*What steps have been taken to ensure that the value of biodiversity at site is not reduced as part of the Proposed Scheme?*

*Has the Proposed Scheme committed to achieve biodiversity net gain?*

##### **Evidence / Response**

An Ecological Impact Assessment (WSP, 2023, West Winch Housing Access Road Ecological Impact Assessment) has been carried out for the Proposed Scheme by WSP. The Site is located within an area of arable farmland between West Winch and North Runcton. There are semi-natural habitats present in the northeast of the Scheme, comprising woodlands, grasslands and scrub which forms a large expanse of habitat that extends beyond the Scheme Boundary. The habitats within the Scheme Boundary and surrounding area are suitable for a range of protected species, including species that are a priority for nature conservation such as birds, mammals, reptiles, amphibians, fish and invertebrates. There are also several designated sites for nature conservation in proximity to the Proposed Scheme.

The Proposed Scheme has the potential to have **adverse impacts** upon these habitats, species and sites (referred to as Important Ecological Features) during construction and during the operation of the Proposed Scheme once completed. Mitigation measures have therefore been embedded within the design of the Proposed Scheme and have been put forward as additional mitigation measures that will be secured through planning condition and delivered during detailed design and construction.



Embedded mitigation includes the provision of landscaping that will reduce impacts upon certain species and provide compensatory habitat to reduce the impact of habitat loss. This includes habitat planting as well as extensive woodland and hedgerow creation. In addition, the boundary of the Proposed Scheme has been adapted to avoid sensitive areas and reduce the impact of habitat loss. The drainage strategy also identifies measures to reduce the potential for pollution during operation of the Proposed Scheme. The design of the A47 underpass has focussed on maintaining the connectivity for wildlife including bats. Measures to reduce impacts during construction are also in place that will avoid water-borne pollution, reduce dust pollution during construction, and protect retained trees.

Additional mitigation is proposed that will be designed and provided as the detailed design progresses. This includes additional mitigation during construction that will be detailed within a Construction and Environmental Management Plan. This will also detail the measures required to ensure that impacts upon legally protected species are designed and implemented. It has also been stated that in advance of construction, a licence from Natural England will be sought for Great Crested Newts and it is anticipated that the District Level Licensing scheme will be used. The landscape proposals will also be developed further to ensure that the areas of compensatory habitat are designed to optimise their ecological value. A Landscape and Ecological Management Plan will be produced to detail these design measures and the ongoing management requirements. To reduce the impact of lighting during operation of the Proposed Scheme a sensitive lighting strategy will be design that will reduce impacts upon sensitive areas and reduce impacts on sensitive species such as bats. An offsite reptile receptor site will also need to be identified and secured in advance of construction to ensure that reptiles are able to be relocated from construction areas.

A Biodiversity Net Gain Assessment Report (WSP, 2023, West Winch Housing Access Road Biodiversity Net Gain Report) has been completed to determine whether the Proposed Scheme will achieve 10% net gain in



biodiversity. In terms of the quantitative assessment, it is predicted that the Proposed Development **will not achieve a quantitative 10% biodiversity net gain**. However, the qualitative assessment concluded that the Proposed Scheme is predicted to meet with four of the ten Principles.

The following recommendations have been identified which, if implemented, are predicted to achieve both qualitative and quantitative BNG, including consideration to be made to improve the BNG outcomes on site. as the scheme moves through the next phases of design. Offsite areas will need to be secured to further compensate habitats that will be lost through the development. A detailed 30-year Landscape and Ecology Management Plan (LEMP) should be produced (e.g., as a requirement of a planning condition), setting out the details of a management programme, tasks, and responsibilities to ensure that target habitat types and conditions are achieved within the timescales set out in the Metric. It will also set out an appropriate monitoring regime for checking progress towards achieving target condition and identifying any remedial actions required, following the principles of adaptive management.

#### 4.5 Business Case

Targeted design questions

*Will the Proposed Scheme contribute directly / indirectly to the local economy?*

##### **Evidence / Response**

This Outline Business Case (OBC) for the West Winch Housing Access Road (WWHAR; the scheme) has been prepared on behalf of Norfolk County Council (NCC) for consideration by the Department for Transport (DfT) (WSP, 2023, West Winch Housing Access Road Outline Business Case). The OBC demonstrates that the proposed scheme is based on analysis of the current situation, a clear vision for the future, a careful consideration of options, a robust appraisal of costs and benefits, and a clear plan for delivering the scheme.



The structure of the OBC is presented as follows.

- Strategic Dimension - The Strategic Dimension defines the case for change, confirming the need for intervention, as well as outlining the option development process to date. It sets out the socio-economic context, transport, and environment context to support its objectives.
- Economic Dimension – The Economic Dimension presents the scheme options and their Value for Money appraisal. The economic, environmental and social impacts of the scheme are all examined using qualitative, quantitative and monetised information, to determine the extent to which the scheme's benefits outweigh the costs.
- Financial Dimension – The Financial Dimension considers the affordability of the proposed scheme, and it includes a Quantified Risk Assessment. It presents the costs of the scheme, using the preliminary design information, at this stage, and the proposed funding sources.
- Commercial Dimension – The Commercial Dimension outlines the approach taken to assess the feasibility and practicability of delivering the WWHAR scheme. It provides evidence of the commercial viability of the proposed scheme and describes the potential procurement strategies that will be used to engage the market.
- Management Dimension - The Management Dimension considers whether the scheme is considered deliverable in terms of governance. It sets out the processes and controls in place to manage the implementation of the WWHAR scheme, and track and realise future benefits.

4.5.1 The outline business case builds on earlier work and analysis undertaken, re-confirming the necessity as well as providing further detail into the delivery case of the Proposed Scheme.





## 4.6 Carbon and energy reduction

Targeted design questions

*What measures will be put in place to reduce energy consumption / carbon emissions across the Proposed Scheme life?*

### **Evidence / response**

A Greenhouse Gas Assessment (WSP (2023) West Winch Housing Access Road Greenhouse Gas Assessment) has been undertaken for the Proposed Scheme, wherein a carbon emissions study has been undertaken for the construction as well as operational stage of the Proposed Scheme. The mitigation measures proposed to reduce the magnitude of GHG emissions from the embodied carbon of materials, transport of materials, transport of waste from site, and plant and equipment use for the Proposed Scheme include design optimisation to reflect the carbon reduction hierarchy; substituting construction materials for lower-carbon alternatives (e.g. procuring steel with a higher than average recycled content (preferably between 70-100%) or specifying concrete with a higher portion of ground-granulated blast-furnace slag (GGBS) content; using more efficient construction plant and delivery vehicles and maximising the local sourcing of materials. Designing, specifying and constructing the Proposed Scheme with a view to maximising the potential for reuse and recycling of materials / elements at the end-of-life-cycle stage has also been recommended.

For reducing carbon emissions during the operational phase of the Proposed Scheme, mitigation measures such as opportunities to sequester carbon through increased tree planting and using road surface options with greater longevity, to reduce frequency of replacements throughout use phase have been proposed.

The operational energy use from lighting has not been quantified at this time due to data availability, however it will be incorporated and assessed in the later stages of the Proposed Scheme.



A Carbon Management Plan (WSP (2023) West Winch Housing Access Road Carbon Management Plan (Appendix O of the Outline Business Case Document)) has also been prepared which lists actions to manage and reduce Greenhouse Gas (GHG) emissions from the Proposed Scheme. Carbon management opportunities and recommended mitigation actions have been listed in this document after the identification of carbon hotspots in terms of materials and use stages. The mitigation actions are related to traffic management, potential to use locally sourced materials, considering the usage of lower carbon concrete mix, investigating the potential of re-using the materials on site etc.

#### 4.7 Climate resilience

Targeted design questions

*Have any measures been considered to enhance the scheme's resilience to forecast changes in climate?*

##### **Evidence / response**

A Climate Resilience (Environmental Statement) Chapter (WSP, 2023, West Winch Housing Access Road Climate Resilience Chapter ) has been prepared for the Proposed Scheme by WSP. The baseline findings of the assessment reveal that the Proposed Scheme is likely to experience hotter, drier summers and warmer, wetter winters with more extreme weather such as heatwave events and rising sea levels. While considering embedded mitigation obtained on consultation with the various topic specialists, significant effects were identified in relation to risk of heat exhaustion / heat stroke to end users and impact on mobility by reducing visibility distance due to wind-blown snow, dust and smoke can thereby increasing the risk of accidents.

For these effects, some additional mitigation measures have been proposed in the assessment, including installation of local on-the-ground temperature sensors which will serve as warning signals for end users during extreme heat events; inclusion of cool routes or shaded walkways in the design to provide temporary cooling shelters for pedestrians; consideration for lighter colour



paving options to create more reflective paved surfaces that reduce heat risk; permeable pavements, including reinforced grass pavements, which are known to have a cooling effect through evaporation, Roadway Visibility Forecast can be put in place by identifying potential smoke pathways and modelling surface smoke and winds, particularly during winters.

#### 4.8 Health and wellbeing

Targeted design questions

*Will the Proposed Development protect and/or enhance active travel routes?*

##### **Evidence / response**

A Sustainable Transport Strategy (STS) has been prepared for the Proposed Development. The strategy aims to identify a complementary package of sustainable travel measures facilitated by the WWHAR. The vision for the STS is essentially to enhance sustainable access for existing residents of West Winch whilst also accommodating the need of a future expanded settlement as envisaged within the Kings Lynn and West Norfolk Borough Council Local Plan. One of the outputs or operational objectives of the Proposed Development is to provide the necessary infrastructure to support the use of active modes as well as enhance public transport opportunities for the residents.

The STS package of measures would encourage mode shift away from private car use by providing the means to travel sustainably by cycle, on foot or by bus, as well as linking up the existing network of Public Rights of Way to maximise local connectivity for pedestrians, cyclists, and equestrians.

The Proposed Development aligns with the recent transport policy requirements thereby creating provisions for pedestrians, cyclists and horse riders, such as new green bridges crossing the highway and new sections of Public Rights of Way which join up and enhance the existing network and connect with National Highways Improvement Scheme Proposals.



This scheme does not expect generation of new trips on the network but rather focuses on redistribution of vehicle journeys thereby offering resilience to the local highway network and future proofing.

A Population and Human Health chapter (WSP, 2023, West Winch Housing Access Road Population and Human Health) has been prepared by WSP for the Proposed Scheme. The design and embedded mitigation measures associated with construction of the Proposed Scheme have been listed down in the report which include:

- All diversions will have heras fencing along the boundary of the diverted Public Rights of Way (PRoW) during construction to ensure users do not stray onto the construction site.
- Design will consider vulnerable user groups (such as children, older people, and wheelchair users) and ensure accessibility is maintained for those with limited mobility where practicable.
- Access to residential properties, businesses, and community facilities will be maintained throughout the construction period, in agreement with occupants.

#### 4.9 Heritage

Targeted design questions

*Are there any known heritage or archaeological features at or near the Site, which could be adversely impacted by the Proposed Development? If yes, has a mitigation plan been prepared to ensure the preservation of any archaeologically significant features?*

*What measures have been adopted to soften / integrate the Proposed Development in the local landscape?*



## **Evidence / response**

An Archaeology and Heritage Assessment (WSP, 2023, West Winch Housing Access Road Archaeology and Heritage Assessment) has been undertaken for the Proposed Scheme.

It has been reported that the site does not contain any nationally designated (protected) heritage assets, such as scheduled monuments, listed buildings or registered parks and gardens. There is one listed building adjacent to the site: The Old Rectory. A two-storey brick house and former rectory located 20m east of the site are Listed at Grade II. A list of built heritage assets (low to medium significance) has been identified for the assessment and are listed in detail in the Archaeology and Heritage Assessment report. The Proposed Scheme would not directly affect the fabric of any identified heritage asset. However, the proposals could affect the setting of identified heritage assets.

There has been one archaeological trial trench evaluation, one geophysical survey and one archaeological watching brief within the Site. The archaeological trial trench evaluation was undertaken in 2014 ahead of the proposed Southeast King's Lynn Expansion site in North Runcton. A geophysical survey was undertaken as part of this project in 2023 comprising a total of 31ha of the Site. A watching brief during improvements on the Hardwick Roundabout in 2002 recovered no archaeological material. Within the 500m study area there have been nine archaeological excavations. Roman remains have been found at two sites, Medieval remains at one site, post-medieval remains at two sites and either post-medieval or modern remains at another site. There were two investigations which did not yield any archaeological information.

A desk-based study has also been undertaken for the assessment and includes a review of available information to determine the baseline conditions in the Site and surrounding study area. This assessment consisted of an analysis of existing written, graphic, photographic, electronic information and a



site walkover, to identify the likely heritage assets within the Site and study area(s) and establish their significance.

The sensitive receptors (heritage assets) identified under archaeology during the assessment are of medium or low significance. As per the recommendations mentioned in the assessment, additional mitigation measures include post-determination field evaluation has been suggested for receptors showcasing adverse significance of effects leading to an agreed programme of mitigation, if required. The sensitive receptors (heritage assets) identified under Built Heritage during the assessment are of high to low significance. The construction phase effects for built heritage were scoped out due to their temporary nature and the assessment only considers the effects of the operational phase of the Proposed Scheme. The Proposed Scheme would not directly affect the fabric of any identified heritage asset; however, the proposals could affect the setting of identified heritage assets. The significance of effect on these receptors prior to mitigation is moderate to slight adverse, no additional mitigation is proposed as per the assessment.

#### 4.10 Materials

Targeted design questions

*Have any measures been adopted to maximise reuse of materials, and/or incorporate recycled / secondary content, or resources with sustainability credentials?*

*Have circular economy principles been considered for the Proposed Scheme?*

*Will any modern methods of construction be adopted to reduce material impacts at Site?*

#### **Evidence / response**

The Materials and Waste Chapter (WSP, 2023, West Winch Housing Access Road Materials and Waste Chapter ) prepared by WSP describes the potential effects and mitigation measures of construction materials, particularly in construction and operational phase. The NMWLP describes, the remaining



reserves of sand, gravel, silica sand and carstone. It is noted that the sand and gravel landbank would last till 2031, and carstone would last till 2043. By comparison with other UK regions, East of England has a slightly lower than average availability of some construction materials, like crushed rock, which is imported. The availability of other construction materials typically required for highways construction scheme in East of England and across the UK indicates that stock/ production/ sales remain buoyant. For the assessment. it is considered that there are no national or regional supply issues regarding key construction materials. Using professional judgement to apply the impact criteria, the sensitivity of material resources is considered **medium**. The magnitude of material resource consumption is **minor**, and the effects associated with this are **slight adverse** and therefore, **not significant**.

The volume of imported earthworks represents the largest material resource required for the Proposed Scheme. Whilst efforts to reuse excavated arisings have been made, they would not be of the required topsoil quality or composition. Sourcing of topsoil from excess cut on other construction projects or sustainable sources should be applied where feasible. This is in line with waste hierarchy, when selecting materials, and the preferred approach to be considered is:

- the use of reclaimed materials.
- the use of materials with higher levels of recycled content; and
- the use of new materials

No additional mitigation measures are required. However, it is recommended that best practice design and construction methods are incorporated, such as specifying material resources in accordance with standards, maximising efficient design practices, using recycled materials and incorporating prefabricated components.



#### 4.11 Noise

Targeted design questions

*Has a noise/vibration assessment been undertaken as part of the Proposed Scheme?*

*What measures will be installed to reduce impacts from noise pollution from the Site?*

##### **Evidence / response**

A Noise and Vibration Assessment (WSP, 2023, West Winch Housing Access Noise and Vibration Assessment) has been undertaken by WSP for the Proposed Scheme, which reports the likely significant noise and vibration effects arising from the construction and operation of the Proposed Scheme. During the construction phase, the adoption of Best Practicable Means (BPM), as defined in the Control of Pollution Act 1974, has been specified as a fundamental primary mitigation measure. The manifestation of BPM will be a series of noise and vibration control measures, which will be incorporated within the Outline Construction Environmental Management Plan (OCEMP). Some of the most relevant measures demonstrating BPM with respect to noise and vibration include, all construction plant used on the site to be in good working order and certificates of inspection and maintenance to be available on request, all plant items to be properly maintained and operated according to manufacturers' recommendations, and as far as reasonably practicable, all plant items to be sited so that noise and vibration at nearby sensitive properties is minimised. Construction works shall be monitored on site to ensure that best practicable means and other appropriate mitigation measures are being adhered to.

For the operational phase, noise mitigation for operational road traffic noise has been considered in terms of mitigating the source, the pathway of noise or at the receiver. The Proposed Scheme alignment has been designed to avoid passing close to residential receptors as far as reasonably practicable. The Proposed Scheme has a design speed lower than 75 kph and as such would





not gain a benefit from a low noise surface. Mitigation has been considered at a scheme wide level.

Specific mitigation measures have been considered for receptors where significant effects have been identified. For some of the significantly affected receptors in the assessment, the effectiveness and viability of a typical noise barrier has been assessed as the mitigation strategy. For this, a noise barrier following the alignment of the road at the highest point of the landscaping east of the Proposed Scheme has been modelled. The results showcase that this barrier would only reduce impacts at a handful of receptors and not reduce the significance of impact at the majority of receptors. For receptors adjacent to existing roads, any mitigation would need to comprise noise barriers in close proximity to the property potentially resulting in visual and setting effects, loss of views and blocking light for the property and the efficacy of the barrier would be reduced due to the need to maintain access to the property. Therefore, the use of noise barriers/earth bunds has been ruled out as suitable mitigation for the Proposed Scheme.

In this case, mitigation measures beyond those already embedded into the Proposed Scheme design are not considered practical. On this basis, whilst a few of the receptors are anticipated to exceed the LOAEL (Lowest Observed Adverse Effect Level as introduced within the Noise Policy Statement for England) and SOAEL (Significant Observed Adverse Effect Level as introduced by the Noise Policy Statement for England) thresholds, but as no further additional mitigation measures would be sustainable, the Proposed Scheme is considered compliant with national noise policy.

Out of the receptors assessed, most showcase Minor to Negligible residual effects and no additional mitigation has thus been proposed.

#### **4.12 Sustainable Transport**

Targeted design questions

*Will the Proposed Development help increase connectivity to active travel and public transport connections?*



*Will the Proposed Development facilitate sustainable travel patterns or modes?*

*Are there any improvements to the local walking/cycling network being through the scheme design?*

**Evidence / response**

A Sustainable Transport Strategy (Norfolk County Council, 2023, Sustainable Transport Strategy) has been put together for the Proposed Scheme. The vision for the STS is to enhance sustainable access for existing residents of West Winch whilst also accommodating the need of a future expanded settlement as envisaged within the Kings Lynn and West Norfolk Borough Council Local Plan.

This WWHAR STS is fully aligned with the objectives of the Transport Strategy compiled by Norfolk County Council (NCC) and will ensure that safe, and coherent sustainable travel infrastructure is demonstrated and incorporated into the WWHAR scheme.

The housing access road element of the WWHAR which connects the A47 with the A10 provides an alternative route from the villages south of King's Lynn, diverting traffic away from residential dwellings and reducing severance between the existing and future communities. The scheme also addresses gaps in the network to the southeast of King's Lynn for non-motorised users via the Sustainable Transport Strategy. The STS will help meet the aims of local, regional, and national policy. The STS will ensure the WWHAR scheme will keep sustainable travel modes at the centre of the proposals making active travel the priority.

The strategy considers safe, easy, green routes for people to travel by wheelchair, on foot, by bike or on horseback. Access to bus services that is also a priority. Access to a mobility hub where disabled residents, electric car users, walkers and bus users can all find the facilities they need to move around West Winch not in the way they have to, but the way they wish to. Access to ways of getting to work, school and essential services that are



efficient, but are also pleasant, and promote the wellbeing of users of all ages and fitness.

A range of options for improvement to the West Winch area have been identified within the STS and collated into relevant actions. The schemes have been broken down into the following categories:

- Active Travel
- Bus Improvement
- Traffic Calming
- Mixed-Use
- Rail Improvement
- Micro-mobility (E-bikes and E-scooter schemes such as Beryl Bikes etc)

The measures identified include targeted support to encourage travel behaviour change and sustainable travel. These promote active mode and bus priority improvements with the aim to provide solutions that are future-proof in terms of our changing travel behaviours and seeking to address climate change where possible through more sustainable travel and the use of technology.

The STS has been shaped by on-going public and stakeholder liaison to generate a package of complementary measures that will be of the greatest benefit to local users. The Strategy lists down measures that have been distilled into a number of NMU (Non-Motorised Users) and Public Transport based opportunities. This Sustainable Transport Strategy has been developed alongside the WWHAR proposals and presents a complementary package of interventions to support the sustainable travel objectives of the proposed scheme. This will help to foster sustainable travel patterns with less reliance on private car travel.



#### 4.13 Waste

Targeted design questions

*What volume and type of excavated arisings are expected at Site?*

*How will these arisings be managed to maximise action in accordance with the highest tiers of the Waste Hierarchy / the Proximity Principle?*

*Have any design measures been adopted to minimise the potential for waste generation at Site (pre-fabrication, standardisation of units)?*

*Are there any strategies to recycle/reuse the waste that arises from the Proposed Scheme?*

##### **Evidence / response**

The Materials and Waste Chapter prepared by WSP describes the potential effects and mitigation measures of waste management, particularly in construction and operational phase. The report demonstrates that no hazardous waste landfill sites are present within the East of England region. The NMWLP describes that since the East of England is hydro geologically unsuitable, there are no such hazardous material landfills in the region. Further, the NMWLP specifies that proposals for new inert waste landfill void space will not be acceptable unless there is a clear need. This then results in an absence of future provision. Waste capacity in East of England is forecast to reduce by as much as 45% (48% for inert, and 76% for non-inert and non-hazardous).

The sensitivity of remaining landfill capacity is considered **Very High** for both inert and non-hazardous waste and hazardous waste.

As stated in the materials section, it is anticipated that of the volume of arisings and waste generated by the Proposed Scheme, 64% will be diverted from landfill and 36% of the waste has a potential to be landfilled.

Given the adverse effect of waste generation and disposal to landfill,

- The Principal Contractor will develop and implement a Site Waste Management Plan (SWMP) for the Proposed Scheme



- Environmental awareness training is proposed to be provided for all staff involved in construction, with the aim of reducing wastage on site through the correct storage and use of materials.
- The contractor will also consider a Material Management Plan to ensure excavated earthworks are suitable for reuse and maximised to their full potential.
- Further, the project should consider 100% reuse, recovery and recycling and must not achieve less than 90% inert and non-hazardous material recovery.

#### 4.14 Water: Flood Risk Assessment

Targeted design questions

*How will surface water run-off be managed at Site, to reduce the risk of flooding / off-Site pollution?*

*Has an FRA been undertaken to inform design decisions?*

*Are there any nature-based solutions in place for drainage?*

Evidence / response

A Flood Risk Assessment (FRA) and Drainage Strategy (Flood Risk Assessment and Drainage Strategy, 2023, WSP ) has been prepared by WSP for the Proposed Scheme. Based on the information provided within this report, it is concluded that the site is located predominantly within Flood Zones 1 with a small area (0.004ha) within Flood Zone 2. The site is at low or negligible risk from all sources of flooding and is not located within a Groundwater Source Protection Zone.

As there will be an increase in impermeable area across the site, there will be an increase in the likelihood and magnitude of standing water and surface water runoff occurring. A surface water strategy has been devised to mitigate this.



Surface water will be managed via the proposed drainage strategy. The proposed road drainage arrangement for the site will comprise filter drains, gullies and a piped drainage network that will direct surface water to attenuation basins via a sediment forebay. The basins will discharge to adjacent existing watercourses. Surface water runoff will be attenuated on-site for events up to and including the critical 1 in 100-year storm rainfall event with a 40% allowance for climate change, prior to discharge to watercourse. It is considered that this approach will not increase the risk of flooding elsewhere. Flows associated with exceedance events will be directed to the on-site attenuation facilities by suitably designed overland flow routes to surface the proposed attenuation basins.

Whilst the area of impermeable surfacing will increase at the Proposed Development, SuDS (Sustainable Drainage Systems) are proposed to be integrated within the current infiltration system and a feasibility study has been done for various techniques like filter strips, swales, rainwater harvesting, basins and ponds etc. To ensure the effectiveness of the proposals a maintenance regime will be in place to ensure the future performance of all the SuDS and drainage devices. Based upon information provided within this report, it is concluded that the site is presented as sustainable in terms of flood risk.

## 5 Conclusions

- 5.1.1 The evidence provided in this Statement supports the Planning Application to be submitted to NCC, for the Proposed Scheme. It details plans for delivering sustainable outcomes based on design work for the construction of a new single carriageway road linking the A47 Constitution Hill from its junction with the A10 and A149 Cromer Road to the A10 south of West Winch.
- 5.1.2 Building on a detailed review of local policy, evidence collated during the workshop with members of the design team and further correspondence with the members carrying out various technical assessments for the Proposed Scheme, has shown that a range of positive and proportionate steps to



achieving sustainable outcomes across the Proposed Scheme lifecycle have been considered and will continue to be pursued.

- 5.1.3 Currently there is strong evidence to suggest that the design has responded well, and consistently, to local policy and strategy commitments to sustainable development, and aligns with the North Norfolk District Council First Draft Local Plan.
- 5.1.4 Any further refinement of the design and delivery of the Proposed Development will be expected to progress in accordance with the commitment and intent set out in this Statement, as well as other relevant documents submitted under this planning application. Evidence of outcomes achieved in this context will remain valuable in demonstrating a comprehensive and ongoing response to the requirements for a sustainable development.