

# Objection to the Norwich Western Link Road Proposal

To: Norfolk County Council

Subject: Formal Objection to the Norwich Western Link Road Project

Norwich Western Link application. Land between the A1270 Broadland Northway near Ringland and the A47 near Honningham. Ref: FUL/2024/0022

Thank you for consulting Norwich Friends of the Earth on the above proposal. This is a formal **objection** submitted in response to the proposed Norwich Western Link Road (NWL). The planned infrastructure project poses significant risks to environmental sustainability and biodiversity and contradicts both national and local policies on climate and environmental protection. This objection highlights the detrimental impacts on local wildlife, particularly bats, the threat to ancient woodlands, the failure to align with climate targets and the potential harm to designated sites.

## Impact on Bats

The NWL proposal threatens local bat populations, notably the rare Barbastelle bats found in the Wensum Valley. All UK bat species and their breeding and roost sites are fully protected under UK law, primarily through the Wildlife & Countryside Act (1981) (as amended) and the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). The proposed road cuts through critical habitats and roosting sites, potentially leading to a severe decline in the bat population. Additionally, bats rely on dark, undisturbed areas for navigation and foraging, which will be compromised by the road's construction and subsequent use. Light pollution, noise, and the physical barrier of the road can disrupt their natural behaviours, leading to fragmentation of habitats and isolation of populations.

We do not feel that the mitigation strategy outlined in the Environmental Statement would be sufficient to ensure there is no detrimental impact on bats. It must be evidenced that the application would not have a negative effect on the Favourable Conservation Status of the barbastelle bat population (either in the Wensum Valley, Norfolk or nationally). In order to do this, sufficient survey data is required to demonstrate that it can provide a robust estimate of the baseline barbastelle bat population. An assessment can then be made of the likely impacts on the population's mortality level from the direct habitat loss, degradation of any remaining woodland within the zone of impact, reductions in prey availability due to direct loss of habitat and degradation of nearby habitats due to increased air and light pollution, and deaths from road collisions. Until such data and analysis is provided, we urge that this application is refused.

## Threats to Ancient Woodlands and other irreplaceable habitats

The NWL project threatens several areas of ancient woodlands, which are irreplaceable ecosystems that have developed over centuries. Ancient woodlands are reservoirs of biodiversity, hosting unique plant and animal species that are dependent on the specific conditions present in these habitats. The destruction or degradation of these woodlands

would lead to a loss of irreplaceable biodiversity and disrupt the ecological networks that support various species. National planning policy in the UK, as outlined in the National Planning Policy Framework (NPPF), emphasizes the importance of protecting ancient woodlands from development due to their biodiversity and ecological value. The proposed road project is in direct conflict with these policies, as it would result in the loss and fragmentation of these critical habitats.

### Inconsistency with Climate Targets

The UK government has set targets to reach net-zero carbon emissions by 2050, with interim targets to reduce emissions by 50% by 2030 compared to 1990 levels. The NWL, however, contradicts these goals by promoting increased car usage and emissions. The construction and operational phases of the road will generate significant greenhouse gas emissions, both directly and indirectly.

Building a new road creates more traffic and car travel, called induced demand, or the [Black Hole Theory](#) of road investment. Induced demand creates higher traffic volumes and higher emissions. The [Transport for Quality of Life](#) report, "The carbon impact of the national roads programme", clearly demonstrates that new road capacity induces additional traffic, resulting in increased greenhouse gas emissions.

The construction phase of the road will itself generate significant carbon emissions. The extraction, production, and transportation of asphalt and concrete, as well as the use of construction machinery, is a substantial additional carbon footprint. The disturbance of soils will also release stored carbon into the atmosphere.

Norfolk County Council's Local Transport Plan (LTP4, <https://www.norfolk.gov.uk/localtransportplan>) commits to removing more than 5,000,000 tonnes of carbon dioxide from Norfolk's transport system by 2035. However, data in the NWL planning consultation documents shows that the NWL would be adding an extra 175,000 tonnes of carbon by 2035 from destroying carbon-storing natural habitats, using steel and concrete in the long viaduct, and vehicles using the new road.

Local transport policies, including the Norfolk Transport Plan, prioritize sustainable transport solutions and reducing carbon footprints. The NWL fails to align with these policies, favouring short-term infrastructure development over long-term sustainability.

### Impact on Designated Sites

The Wensum Valley, a designated Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC), stands to be severely impacted by the NWL. These designations underscore the area's ecological importance, particularly for its riverine habitats and associated species. The construction and operation of the road is likely to lead to increased pollution, hydrological changes, and disturbance to sensitive habitats. This would not only jeopardize the integrity of the SSSI and SAC designations but also contravene policies protecting such sites under the Conservation of Habitats and Species Regulations 2017.

Furthermore, the road's development will impact locally designated sites (County Wildlife Sites (CWS)), both directly and indirectly. CWSs in Norfolk form a significant part of the Nature Recovery Network being developed for the county, to help deliver nature's recovery.

#### Impacts on delivery of Local Nature Recovery Strategy (LRNS)

The LRNS for Norfolk is currently in development but will play an important part in helping delivery nature's recovery, in line with the wider ambitions of the Environment Act 2021. This proposal would have a significant negative impact on the delivery of Norfolk's LRNS. This is an area of exceptional value for wildlife, as demonstrated by the recent discovery of the barbastelle bat super colony in the Wensum Valley woodlands, as well as the valuable network of habitats in the adjoining river valley. It forms a major wildlife corridor in the county and if the NWL is approved, it would significantly severely compromise this, setting back society's wider work towards nature's recovery.

#### Biodiversity Duty

There is a duty on local authorities from The Environment Act 2021 to have regard to the conservation and enhancement of biodiversity in its decision making. This application would cause significant harm to Norfolk's natural environment, and result in impacts of a national significance on one of our rarest bat species, as well as likely adverse impacts on ancient woodland and fen habitats, both listed as Irreplaceable Habitats. Therefore, granting planning permission would clearly go against the Council's Biodiversity Duty.

#### Conclusion

The Norwich Western Link Road presents significant contradictions with established national and local policies aimed at protecting the environment and promoting sustainable development. Its potential impacts on protected species, ancient woodlands, and designated conservation sites, alongside its contribution to carbon emissions, make it a highly inappropriate project and as such as **strongly object** to the proposal. It is essential to explore alternative solutions that align with climate goals, such as investing in public transport, and prioritize biodiversity conservation. The NWL, in its current form, should not proceed.

Norwich Friends of the Earth