From:
To:

NWL Planning

Subject: Norwich Western Link Consultation Response - Reference FUL/2024/0022

Date: 16 August 2024 16:05:48

WARNING: External email, think before you click!

Dear Officer

I would like to object to this planning application on the following grounds:

There are bat maternity roosts in woodlands on and near the route of the NWL. Barbastelle bats are present in the vicinity which are not in favourable conservation status. This road would damage the habitat of these animals and cause more general habitat fragmentation. Other species that will be put at risk of harm include yellowhammer, linnet, owls, beetles, mayflies and mammals. Ancient woodland including veteran trees are present. Natural England have designated North Wood as ancient woodland. This is not noted in the planning application paperwork. Other habitats at risk of harm include the River Wensum chalk river, grassland and wetland. It is hard to see that the planned mitigation and biodiversity net gain schemes can compensate for the loss. Replanting on the Broadland Northway (A1270) has not been entirely successful, with hundreds of new trees dying. Can we ensure the success of planned mitigation measures? There will be an impact on a Site of Special Scientific Interest (SSSI), the River Wensum SSSI from run off from the road and construction of a viaduct over the river valley. Biodiversity in the UK is under serious threat due to habitat loss and human activity and development that impacts seriously on this, as this road will, should be avoided.

(NPPF paragraph 180 Planning policies and decisions should contribute to and enhance the natural and local environment. NPPF paragraph 186 applies as there is potential harm to biodiversity with insufficient mitigation proposed).

Pollution from road run-off is being increasingly recognised as a problem. Hazardous waste such as nutrient accelerators, hydrocarbons and toxic heavy metals can run off into water courses and attenuation ponds where it is contained. These chemicals enter ecosystems causing harm. Pollution of the River Wensum SSSI is likely to occur both from construction of the road and from vehicles using the viaduct when in use. Chemicals from large HGV vehicles in water run-off will come over the barrier. There will also be noise impact from vehicles affecting the river valley despite the proposed barrier.

There will be air pollution from vehicle emissions when the road is in use which can affect not only human health but the health of animals and plants in the vicinity. The level of harm from pollution will be unacceptable.

(NPPF 174e Planning policies and decisions should contribute to and enhance the

natural and local environment by: preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality).

There is a potential risk of flooding as part of the road infrastructure is sited on a 3a and 3b flood plain and a need for clear evidence that this risk is adequately mitigated for. The impact of climate change needs to be clearly accounted for in the planning application as we will see increasingly heavy rainfall in winter seasons and periods of drought during the summer accompanied by flash flooding events.

(NPPF 153 Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures).

The road is primarily designed for motorised transport and the plans to do not adequately consider other forms of sustainable transport modes such as cycling. The road will increase carbon emissions simply by the nature of its provision and existence as vehicles will use roads more if their journeys are made quicker and easier by doing so. The construction of the road will also produce carbon emissions. This does not align with the NCC Local Transport Plan 4 policies.

(NPPF 152 The planning system should support the transition to a low carbon future in a changing climate. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure.

There is no plan to light the road. I support this, should the application be approved, because it is in line with government guidance on the need to reduce harmful light pollution which supplements the NPPF.

To conclude, I object to this application as it will cause more harm than benefits, particularly when considering environmental harms. If the road needs to be built, another route should be chosen with detailed analysis of the potential impacts undertaken for each possible option.

Kind Regards

Member for Brundall Ward Broadland District Council