

Planning Department
Norfolk County Council
County Hall
Martineau Lane
Norwich
NR1 2DH

16/08/2024

**Norwich Climate Commission response to Norwich Western Link planning application
FUL/2024/0022**

Dear Sir/Madam,

We are writing to formally object to the proposed Norwich Western Link (NWL) road, primarily on the grounds of its cumulative impact (with the other Norfolk roadbuilding schemes, such as for the A47) on county carbon emissions and that the scheme is against national and local climate policies and strategies.

The United Kingdom has committed to a legally binding target of achieving net zero carbon emissions by 2050, as stipulated in the Climate Change Act 2008 (2050 Target Amendment) Order 2019. Norfolk County Council launched its Climate Strategy in June 2023 and in March 2024, Councillors [unanimously endorsed](#) its Climate Policy. Norfolk County Council commits to using its powers, influence and partnerships towards supporting the county's low carbon development in line with the UK-wide target to reach net zero by 2050. [Norfolk County Council's Climate Policy 2024](#) (page 1). The construction of the Norwich Western Link Road is in direct opposition to national and local commitments.

Increased carbon emissions from the proposed road are inevitable and described in the consultation documents. 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 greenhouse gas 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 \(LTP4\)](#) commits to annual carbon targets for transport between 2022 and 2037 which equate to an overall reduction of 1,179,000 tonnes of carbon dioxide equivalent (tCO₂e) by 2037. However, data in the [NWL Environmental Statements](#) (Chapter 15) submitted for planning estimates that the NWL would be adding 423,340 tCO₂e (and could be as much as 718,252 tCO₂e) over the 60-year appraisal period, with 129,724 tCO₂e from the construction phase alone, from destroying carbon-storing natural habitats, using steel and concrete in the long viaduct, and vehicles using the new road. The NWL, alone, could reverse nearly 21% of the emissions reductions required by 2037 in the LTP4. Furthermore, the Environmental Statement says that no emissions monitoring is required for the NWL during construction or operation, which goes against the LTP4 preferred approach to implementation. The ambitions of the county's Local Transport Plan

are difficult to realise, in any case. If the NWL is built adding transport emissions rather than reducing them, then the LTP4 is bound to fail.

The [National Planning Policy Framework \(NPPF\)](#) stresses the importance of sustainable development and explicitly requires that local authorities should take proactive measures to mitigate and adapt to climate change, including reducing greenhouse gas emissions. Paragraph 148 of the NPPF states that *'the planning system should support the transition to a low carbon future in a changing climate... and support renewable and low carbon energy and associated infrastructure.'* The [Greater Norwich Local Plan \(GNLP\)](#) adopted by Broadland District Council, South Norfolk Council and Norwich City Council is the local plan which addresses the NPPF guidance. The Climate Change Statement states that *'...development must be designed to promote local service provision, include green infrastructure and reduce the need to travel. It must promote the use of public transport and active travel, along with supporting electric vehicle use'*. The NWL does not meet this plan and is likely to lead to further development in the locality.

The Climate Change Committee (CCC) recommends to the UK Government that no new roads can be constructed unless they do not increase emissions overall. They state in their [2021 Progress Report to Parliament](#) public money should not support industries or infrastructure that is not consistent with the future net-zero economy or that increases exposure to climate risks. *'Decisions on investments in roads should be contingent on analysis justifying how they contribute to the UK's pathway to Net Zero. This analysis should demonstrate that the proposals would not lead to increases in overall emissions. Wherever possible, investment in roads should be accompanied by proportionate investment in EV charging infrastructure and in active travel and public transport.'* In their [2024 Progress Report to Parliament](#), the CCC state that surface transport emission reductions need to more than quadruple to meet the UK's 2030 Nationally Determined Contribution (NDC).

In conclusion, we believe all evidence shows that the Norwich Western Link Road has failed every climate policy test and is inconsistent with national and local strategies. Norfolk is at the front line of climate change. It should be an exemplar in every way, showcasing best practice not worst. New roads cannot be built in Norfolk while also upholding climate policies.

Yours faithfully,

Norwich Climate Commission

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