From:	Jamie Osborn
To:	NWL Planning
Subject:	Objection to Norwich Western Link
Date:	19 August 2024 09:22:53

Dear NWL Planning team,

Please find below an objection to the NWL from

Cllr Jamie Osborn:

Objection to the Norwich Western Link planning application, from Jamie Osborn

Destruction of nature

We believe that the NWL should be refused planning permission, firstly on grounds of the destruction to irreplaceable habitats that it would cause. The planning documents set out in general terms a commitment to leave "all applicable habitats... in a measurably better state than before construction started", but does not set out in detail how this will be achieved and does not address the concerns of biodiversity experts. The proposed road would cause severe fragmentation of uniquely intact chalk stream and woodland habitats. In addition, light, noise and air pollution from vehicles on the road would put habitats and species under strain.

Biodiversity Net Gain failures

The project proposes creation of biodiversity net gain habitats, but neglects the fact that for legally-protected species along the route of the NWL, habitats cannot be "created" in the short- or even medium-term. Many species, most notably barbastelle bats, rely on ancient and veteran woodland that simply cannot be replaced. There is therefore no way that the road can comply with BNG requirements.

Furthermore, the commitment to leave all applicable habitats in a measurably better state, being passed on Biodiversity Net Gain requirements, only applies to habitats and is not applicable for legally-protected species, including bats. It is therefore impossible for the Planning Committee to grant consent with assurance that species protected under law will not be damaged by the road.

Illegal destruction of barbastelle bat habitats

In fact, the absence of a bat derogation licence from Natural England is the strongest possible indication that there are no grounds under which this road can be granted planning consent. The scheme cannot be delivered in compliance with wildlife laws, and the criteria for a bat derogation licence for barbastelle bats would not be met (the three tests being maintaining Favourable Conservation Status, No Satisfactory Alternatives and Imperative Reasons of Overriding Public Interest). The barbastelles that are present along the route of the NWL are a nationally important population of a very rare and threatened mammal species that is reliant on the unique ecology of this landscape. Proceeding with the scheme not only risks the future survival of this species, it would not comply with wildlife or planning law and therefore cannot be granted planning consent.

Carbon impact

The NWL would have an adverse impact on climate change, as it would add significant amounts of greenhouse gases through its construction and the increased traffic it would induce. This goes against the National Planning Policy Framework (2023) which repeatedly states that steps should be taken to avoid adverse impact on greenhouse gases and that development should be planned in a way that supports the reduction of carbon emissions.

Councillor Jamie Osborn Green Party councillor for Mancroft Division Jamie.osborn.cllr@norfolk.gov.uk Mobile:

Norfolk County Council

As a county councillor acting on your behalf it will be necessary to collect, use and share you or your family's personal information. When I use personal information for this purpose, I am a "data controller" and must give you a privacy notice. To access the privacy notice please enter the following in your search tool to access <u>https://bit.ly/2TKrXRj</u>