



The countryside charity
Norfolk

CPRE Norfolk Position Statement The Norwich Western Link Road

April 2021

CPRE Norfolk is highly concerned about the substantial harmful impacts to countryside, environment, wildlife and ecology which are likely to be caused by any of the proposed options, including the selected Route C, for the Norwich Western Link road (NWL). CPRE Norfolk opposed the construction of the Northern Distributor Road (NDR or Broadland Northway) for Norwich, on the basis that there were other less damaging options, and noted that the westward extension beyond the A140 was not justified, warning that it would lead to 'rat-running' in the Wensum valley.

It should also be noted that when planning permissions were being granted for the NDR, Norfolk County Council (NCC) did not promote any construction of the NWL "because of the environmental impact on the Wensum valley" (NCC website accessed on 03.01.18.) It is therefore with dismay that CPRE Norfolk observes that NCC has seemingly put these concerns to one side as the NWL has now perhaps unsurprisingly become part of its road infrastructure priorities. It is particularly concerning that such a proposal is being pursued at a time of greater public awareness of climate change, and a government commitment to lead towards new zero greenhouse gas emissions by 2050. It should be noted that recent research ('the end of the road? Challenging the road-building consensus', CPRE, 2017) shows that building new roads only generates a long-term increase in traffic, leading to more congestion, along with many other negative environmental impacts. Moreover, it is very disappointing to see the apparent re-allocation of priorities towards building the NWL rather than following the transport policies within the adopted Joint Core Strategy, in particular the commitment to significant improvement to the bus, cycling, and walking network, including Bus Rapid Transit on key routes in the Norwich area (Policy 06: Access and transportation, JCS.) These six Bus Rapid Transit Corridors are shown on the Key Diagram of the JCS area. CPRE Norfolk feels strongly that this element of the JCS should be enacted before thought and spending is given to the construction of an un-planned NWL. It is hoped that this commitment to Bus Rapid Transit corridors and other forms of public transport, and walking and cycling routes are maintained in the new Greater Norwich Local Plan.

With Option C being selected as the preferred route, as with all of the options, serious environmental damage and loss of countryside will result. The flawed concept of 'biodiversity net gain' (BNG) is being quoted as a way to ensure the road will be built in "an environmentally responsible way" and hence that environmental impacts will be limited. There are massive problems with the BNG approach, as by constructing a major road through precious and sensitive habitats including three County Wildlife Sites, a SSSI and established woodland, these harms, specifically the loss of connectivity between established wildlife habitats, cannot be addressed by creating new habitats. It is vital that there is no net loss of existing biodiversity and real progressive gains in new and resilient biodiversity. We are concerned about the apparent proposals for a viaduct supported by many pillars rather than having a longer span bridge (although the latter could present more negative visual impacts), as the pillars are likely to cause harm by the diversion of subterranean flow patterns, which are relevant across the river valleys, not just within the relatively narrow SSSI designated landscape of the Wensum. The run-off from the new roads and viaduct is a major concern, along with the effects on existing habitats of the large roadside lagoons which would be installed to cope with this.

Visual, light and noise impacts would also be substantial and harmful. The current tranquillity of this area of landscape would be lost through the new roads and associated structures, as well as through the increase in traffic. Any tree-screening would be poor mitigation, as this would contribute further to the loss of the current open character of the Wensum valley in particular. At night, even if the road is not lit, the current dark sky would be lost due to car headlights.

CPRE Norfolk is concerned that if a new NWL is constructed it will come to be seen as the outer limit for the development of Norwich and its suburbs in the long term, and is therefore disappointed to see options closer to Norwich were not included for public consideration within the consultation. The justification for this is noted: that recent development and housing growth closer to Norwich means that a new road would impact on “many more homes and businesses”. It is feared that the preferred Option C route will be used as a reason to allow new houses and businesses to be permitted to be developed on greenfield sites away from good public transport, in particular close to Honingham.

In its research on road building entitled ‘the End of the Road? Challenging the Road-building Consensus’ mentioned above, CPRE’s National Office commissioned research by Transport for Quality of Life (TfQL). This report reinforced the long-held view that road building simply generates more traffic, leads to permanent and significant environmental damage, and shows little evidence of economic benefits to local economies. CPRE Norfolk strongly endorses these findings and believes that other transport solutions should be considered which could achieve more beneficial long-term outcomes for the locality and the county. The serious concerns which have been raised above means that CPRE Norfolk currently objects to all of the suggested options for a NWL, including the preferred Option C route. CPRE will be happy to engage with other parties in continuing the consultation into how to find much lower carbon solutions for this link as well as enhanced biodiversity over the entire Wensum Valley.

The biodiversity issue remain a substantial one, with new evidence emerging regarding a super-colony protected species of barbastelle bats found directly on this route. We call for a halt to consideration of route C until a full investigation is carried out, and believe this could prevent this route from being a viable option.

It should be noted that the issues of ‘rat running’ of traffic through this sensitive area has been a major issue for at least the last 40 years, however this traffic issue has increased as a result of the building of the NDR to terminate by the Wensum Valley at the Taverham Road, exacerbating the issues even further. We call for Norfolk County Council to work with the local communities to at least provide a temporary solution to this issue whilst a long-term strategy is developed for this area.

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The Northern Distributor Road was proposed solely as a way to release land for housing development in the ‘growth triangle’ area to the north east of Norwich. CPRE Norfolk opposed this new road, and in its place pressed for an alternative approach primarily using public transport.

Despite the high level of opposition, the road became reality, even (against our wishes) being extended as far as the A1067 Fakenham Road. This put it in close proximity to the A47, and by

this very fact has led to increased rat running and a call from many for a link to be built. This would effectively make the NDR a northern bypass to Norwich, a purpose for which the road was not designed or built for.

For those who are now subject to high levels of traffic using very minor roads between the NDR and the A47, the link is the only way they see for dealing with the situation. For others in the communities towards the western end of the road a simple quick way to reach the A47 is considered desirable. And for politicians, who still harbour the thought that roads offer part of a 'build build build' solution to bring economic prosperity, then they lend their support. On top of this we know that the view of anyone who seeks to stand in the way is a 'newt counter' to be ignored.

This situation was entirely foreseen, and one can only draw the conclusion that it was allowed to happen to create a situation where public and politician pressure would force through a road through this area of great environmental sensitivity. It has arrived on the table at the time when such projects are likely to be favoured. We have not campaigned for any of the proposed option routes as they all harm the environment, and will favour one community over another, but have continued with a clear policy of opposition and the policy statement on our website stands.

CPRE Norfolk has always warned that the building of the NDR would inevitably lead to the demand for a complete northern by-pass. We made this point consistently and robustly in all consultation responses and campaigning activities in regard to our opposition to the NDR.

Despite this, the opposition to the link has been muted with argument about the detail not the substance of the proposal. We are now in a situation where a preferred route has been selected, and consultation is taking place about various aspects such as cycle routes. The next step will be for the County Council to select a contractor and seek funding.

We still hold by the principle that any major road scheme is inappropriate and unsustainable in relation to our global environmental crisis, as well as opposing the damage caused to our precious local irreplaceable countryside. No remedial work proposed can ever put this right. We know that the funds should be spent on developing the public transport network, but opinion remains firmly wedded to the private car and even some of our local politicians believe no change in behaviour is required as electric or hydrogen cars will save the day.

There is one further issue. It is very likely that any funding scheme will be based upon release of additional land for development. Whilst any additional land would be an over allocation, and CPRE has consistently campaigned for the phasing of development so that existing land allocations are developed first, developers would be keen to build on the more attractive parts of areas allocated providing they could build smaller developments to avoid contributions to the road, communities and affordable housing as far as possible. This cherry picking of sites would lead to existing allocations of housing land remaining land banked. If not developed the land is still effectively blighted as landowners wait for profits rather than investing for the future. Under the changes proposed to planning law, where there is the potential for planning consents to be granted without consultation once land is allocated, we may see a major erosion of the democratic process. This is another area that should be of great concern to communities' and we are working with parish councils to ensure we are all robust in responses to the current consultation.

Our aim is to prevent funding of this link road. We are lobbying on this basis and will continue to do so. We are also working to change transport thinking that remains embedded in the 1950s. The more people who write to their MP opposing the road then the greater the chance of being able to stop the link being built. We urge everybody to undertake to do that, and influence others to do the same.

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