



The countryside charity  
Norfolk

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Working locally and nationally to  
promote, protect and enhance a  
beautiful and thriving countryside  
for everyone's benefit.

By email attachment to: [tom.mccabe@norfolk.gov.uk](mailto:tom.mccabe@norfolk.gov.uk)

Mr Tom McCabe  
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Baroness Vere of Norbiton by email attachment to: [verec@parliament.uk](mailto:verec@parliament.uk)

1 June 2021

Dear Mr McCabe,

We write on behalf of CPRE Norfolk to outline concerns regarding the Norwich Western Link road.

As Norfolk County Council (NCC) is well aware, there are major environmental concerns about the whole project and the preferred route in particular, which are likely to result in the road not being permitted to be built. It makes sense, particularly regarding the need not to waste taxpayers' money on a project which will not be completed due to inevitable legal challenge(s), to stop the project now and reconsider what is required given NCC's priorities to address Climate Change and to protect the environment. The rapidly spiralling costs of the project (currently estimated at £198m increased from £153m) whose benefits are at best debateable whilst the harms are clear should result in it being halted now.

These environmental harms have been acknowledged since planning permissions were being granted for the NDR (or Broadland Northway), when NCC did not promote any construction of the Norwich Western Link "because of the environmental impact on the Wensum valley" (NCC website accessed on 03.01.18.) This view was confirmed in Appendix 4 of NCC's 2014 scoping study for the Western Link which notes that: "This assemblage of species and habitat is sufficiently rare for the river [Wensum] channel to be protected under the Habitat Regulations. It is a site of European importance and national significance. It is the only river designated as an SAC [Special Area of Conservation] in the East of England. Looking at it in comparative terms it has the importance of a Grade One listed building, of similar importance to Norwich cathedral." It then partly concludes that: "The strength of international protection for the river corridor SAC would be an important factor to be considered at an inquiry. An NNDR [Norwich Western Link] scheme, which included a new crossing of the River Wensum SAC, would face a high risk of failure, unless the County Council could prove beyond doubt that the scheme would have no adverse impact on the integrity of the site."

Added to the issue of crossing the River Wensum SAC is the evidence of a "super-colony" of barbastelle bats as outlined in the open letter to Mr C Fernandez of 26 February 2021 from Dr Charlotte Packman and ten other signatories. This clearly demonstrates that the "scale and severity of the impacts of the road [NWL] on this nationally important barbastelle population and the documented ineffectiveness of mitigation/compensation options are such that the Favourable Conservation Status of this barbastelle population could not be maintained should the road scheme proceed as proposed."



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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 the River Wensum SAC, 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 SSSI designated landscape of the Wensum. The run-off from the new road 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.

Two further inter-linked factors should be considered now before any further consideration of the scheme. These are the need to combat Climate Change and the need to recalibrate transport options in the wake of the Covid-19 pandemic. In its research on road building entitled *the End of the Road? Challenging the Road-building Consensus*, 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. It is very likely that the economic case for the NWL has been weakened by the current pandemic, with at least a long pause being necessary to be able to accurately forecast its impacts in terms of travel requirements with the increase in home-working and other potential behavioural shifts.

We urge NCC to accept that the proposed route of the NWL would have an adverse impact on the integrity of the River Wensum SAC as well as on other designated and/or protected landscapes/habitats/species, and that potential mitigation/compensation measures regarding the barbastelle bat population would be insufficient to meet legal requirements/standards. In addition, as alternative solutions exist to the proposed route which would not affect the integrity of the River Wensum SAC the project cannot legally go ahead. Therefore, the logical conclusion is to withdraw the project now before further public funds are spent on a project which is not viable for environmental and legal reasons. This would give NCC an opportunity to signal its intention to be a leader in combatting Climate Change and in caring for the environment.

Yours sincerely,

Chris Dady (Chair, CPRE Norfolk)

David Hook (Chair, Vision for Norfolk Committee, CPRE Norfolk)

Michael Rayner (Planning Campaigns Consultant, CPRE Norfolk)