



Summary of Norfolk Wildlife Trust's response to the Norwich Western Link application

August 2024

Why has Norfolk Wildlife Trust commented on this road proposal?

As an organisation, we exist to protect and enhance nature in Norfolk. Where developments damage this we can, and do, legitimately and legally raise our voice and campaign - as we have done here.

We believe the Norwich Western Link road proposal will have very serious consequences for wildlife in the area, as explained below.

What is Norfolk Wildlife Trust's view of the road proposal?

The Trust was consulted by Norfolk County Council on its application for planning permission to build a road across the Wensum Valley on land between the A1270 Broadland Northway near Ringland and the A47 near Honningham (planning application ref: FUL/2024/0022). The Trust is gravely concerned at the proposal and has submitted an objection to it in the strongest terms possible for the following principal reasons:

- Likely loss (local extinction) of the country's largest breeding colony of barbastelle bats
- Impacts on two chalk rivers, the River Wensum and River Tud
- Permanent losses to the County Wildlife Site network
- Loss of irreplaceable habitats
- Impacts on the delivery of the Local Nature Recovery Strategy
- Landscape severance
- Conflicts with climate change targets

We believe the application would have disastrous impacts on Norfolk's wildlife, including the country's largest breeding colony of barbastelle bats, a protected species, as well as significantly damaging ancient woodland and two chalk rivers and their floodplains. We are concerned at the quality of the impact assessment accompanying the planning application, which appears to significantly underestimate the ecological impacts, and we also have serious concerns about the mitigation proposals offered.



What is at stake?

The multiple barbastelle bat colonies on and near the route form a super-colony which is the largest known in the UK. This legally protected species is highly dependent on old woodlands, including the area of ancient woodland recently listed in the Ancient Woodland Inventory, which Norfolk County Council's appointed surveyors missed in their baseline study. The mitigation proposals for impacts on the bat colonies are not sufficiently evidenced, and expert opinion by a leading independent bat ecologist raises serious concerns regarding the viability of these colonies should the road go ahead. The planning authority will also have to have regard to the likelihood of Natural England granting a bat licence, should planning consent be given, and evidence indicates that the Council's proposals fall far short of allowing a licence to be granted.

We are concerned at the impacts of the proposal on a range of important habitats, including irreplaceable habitats such as ancient woodland and fen, as well as direct and indirect impacts on the Wensum and Tud chalk rivers. The viaduct across the Wensum Valley would require pillars in the floodplain which would permanently damage the floodplain and impact on the link between the river and the ecologically valuable wet meadows that run alongside it. On the Tud, an important tributary would be crossed by the road, with the tributary being trapped within a culvert.

Recent surveys and research have identified an additional area of ancient woodland adjacent to the route, previously missed by Norfolk County Council's surveyors. This irreplaceable habitat is vulnerable to road pollution and disturbance, and the Council must revise their application in order to assess impacts. The failure of their surveyors to identify this area of ancient woodland also casts doubts on the quality of the habitat surveys for the rest of the route.

National significance

This proposal will have nationally significant impacts on rare and vulnerable protected species and is not identified as a requirement in the Local Plan. We therefore believe there is a clear need for this application to be determined the Secretary of State rather than by the County Council's planning committee.

Is this road needed?

The Trust understands that there is traffic congestion in the area and that Norfolk needs a sustainable transport network for the good of its economy and wellbeing. However, any proposal needs to properly take account of, and conserve, Norfolk's biodiversity, which is also of huge importance to its economy and wellbeing. We urge Norfolk County Council to find a solution which protects and enhances the county's wildlife and landscapes.



For further information, please visit norfolkwildlifetrust.org.uk/NWL.