To : NWL Project Team

**Norwich Western Link Pre-Planning Application Consultation**

This response is submitted for and on behalf of the Stop Wensum Link campaign group.

The consultation was established to seek the views of public on various aspects of the project in advance of the submission of a planning application. It is supported by material purporting to assist the public in answering a series of questions formulated by the project team. In formulating the questions, no input as we understand it was sought from Liaison Groups that have worked with the Council over the past two to three years.

Before providing general comments on the project, we do need to formally record our view that we regard the consultation to be both premature and seriously flawed. To provide the public with an incomplete picture and one that does not highlight the uncertainties and risks is incompatible with the Council’s constitutional duty to operate with openness and transparency. In the light of this we reserve the right to make reference to the following deficiencies in any future legal action that we may decide to take.

We say **premature** and **flawed** for the following reasons:

* There is no up to date data on air quality and noise which makes it difficult for those living in villages such as Ringland to provide informed feedback. Details of significant adverse effects and impacts, including cumulative effects and construction phase impacts, on health and quality of life/amenity from noise/vibration should have been made available.
* There is no up to date arboriculture survey making it difficult to ascertain the impact of the route on veteran tress especially in relation to air quality impact. There is no detail included on the negative impact of the proposed road on probable woodland loss at Primrose Grove.
* Environmental mitigation and compensatory measures are no better than suggestions, given it has been made clear that these aspects of the project will not become known until the contractor, to which this exercise has been delegated, had finalised a design. This also makes it difficult if not impossible for there to be meaningful engagement on this issue by consultees.
* There is no up to date origin and destination traffic data making it difficult for informed views to be taken on traffic congestion within affected villages.

* There is little data available to understand why Option B East as opposed to the new alignment might have less impact on the super colony of barbastelle bats. Nor is the probable impact of the realignment on Primrose Grove roost addressed.
* The consultation papers are silent on the probable impact on the project should an SSSI in relation to the bats is designated.
* The papers also make no reference to the super colony of barbastelle bats, and the national and worldwide significance of the finding.
* The papers do not highlight data sets that were not available at the time the realignment option was chosen. Without this information the public is deprived of commenting on the merits or otherwise of the decision to realign.
* There is no up to date condition report for the River Wensum SAC which means it is difficult, if not impossible, for any meaningful public engagement on the proposed mitigation measures for the safeguarding of the integrity of the river. There is nothing within the papers to evidence how the development will enhance the water body in terms of its hydro morphology, biodiversity potential and setting. Nor are the impacts of the development on the SAC fully assessed environmentally.
* The increase in the length of the proposed path is not highlighted nor is the impact this will have on one of the main objective of the proposed road to reduce travelling time. How can the public be expected to take an informed view on this when this information is not produced.
* The papers do not highlight the impact of the road on private rights of way especially the right of way in Ringland. The public need to be provided with details of impact to make meaningful contribution. Will the impact be significant?

In terms of the questions raised within the consultation we wish to make the following observations:

* Despite the realignment the new path of the road will pass close to known roost locations and will also catastrophically impact on habitat connectivity between Primrose Grove and Rose Carr. Moving the path to avoid one roost has only served to move it closer to other roosts, and delivers no tangible benefits in terms of reducing the calamitous impacts on the overall habitat of the super-colony which is founded and created on free and safe movement and connectivity for foraging over a wide area.
* Proposed mitigation measures are scientifically unproven. This was acknowledged by the National Highway’s ecologist who appeared before the A47 North Tuddenham to Easton Examiner who said : ‘"The evidence base for the effectiveness of the mitigation that we are recommending simply isn’t there and this is an industry-wide issue, not project specific’.
* The impact of the road on landscape is significant and totally out of character with the surroundings.
* The road if built will expose humans, wildlife, flora and trees to significant impacts in relation to detrimental air quality, including nitrogen deposition which has not been assessed.
* The road if built will adversely impact on a heritage site and at least one public right of way.
* The road if built will sever numerous hedgerows, the biodiversity impact of which has not been assessed, nor mitigation proposed.
* The true impact of the road on the integrity of the River Wensum SAC is unclear due to the failure to provide an up-to-date condition report and the decision to defer disclosure of mitigation measures until the design stage of the process is reached. The latest information available to the public is that in the past both the Environment Agency and Natural England have both stated that a river crossing is not achievable due to environmental considerations.
* With the increase in interest rates, supply chain costs, and the inevitability of further cost hikes, the estimated cost of the road has now become prohibitive. It is fiscally irresponsible for the Council to consider that this road can still be built. The true cost over the next two generations of Norfolk people is still being withheld from the public.
* It will not solve local traffic problems as building more roads has been proven over and over to just create more traffic. There are cheaper solutions that have not been considered.
* The road if built has two major impacts on meeting national and local climate change commitments. The first is the heavy carbon burden from embedded emissions in constructing the road. Taken with other roads proposed for construction close to Norwich, Council and National Highways estimate a massive additional 250,000 tonnes of carbon dioxide will be generated in the years 2024 and 2025.
* The second climate impact comes from vehicle exhaust emissions after opening. Whilst government policy to decarbonise road traffic mostly depends on electrification of the entire car, van and HGV fleets, this will take until 2040 and beyond. In the interim period, expanding road capacity and vehicle journeys around the Norwich area, as proposed by the A47 and NWL schemes together, will keep generating new emissions drastically in excess of the UK carbon budgets, and in breach of the trajectories in the Net Zero Strategy and the Council’s recently adopted Norfolk Local Transport Plan.
* It will have huge negative and destructive impact on flora and fauna in the Valley.

Our objection to this road as you know is supported by Norwich City Council, Norfolk Wildlife Trust, Norwich Labour Party, the Green Party, the Countryside charity CPRE, Friends of the Earth, Norfolk Rivers Trust and many other organisations. This objection is supported widely by the public with over 12700 people having signed the petition against the road.

We strongly believe this road will not pass the planning stage and in the interest of saving precious public funds we would invite the Council to cancel the project with immediate effect.