



NORFOLK WILDLIFE TRUST
Response to NDR Western Link consultation



16th January 2019

Northern Distributor Road Western Link route shortlisted options consultation

We are writing in response to the public consultation on the shortlisted options for the NDR Western Link road. We are concerned that it has not been possible for the Council to identify any routes that would avoid significant damage to multiple County Wildlife Sites (CWS) and Ancient Woodlands and offer our comments on all four options below.

The landscape between the A47 and A1067 is a well-connected network of habitats, not only along the River Wensum but also along the corridor of the River Tud and across the whole of the area of undulating landscape that rises towards Easton. It is made up of a series of interconnecting woodlands, grasslands and wetlands. A number of these woodlands are recognised as ancient woodlands and some areas are designated as CWS. There are also a number of sites that are in the process of being designated as CWS following recent ecological surveys, with further areas also likely to be of CWS standard. Habitat connectivity is important in this area, particularly with regard to species such as bats.

Without further evidence that the losses to important wildlife sites, degradation of nearby habitats and landscape severance can be avoided or successfully mitigated, and that the route can be delivered with a net gain for wildlife, we currently regard all of the options as unacceptable.

Summary of likely impacts

The western link road will lead to direct loss of habitat, severance of remaining habitats into smaller fragments and impacts on floodplain hydrology as well as increased light, noise, road run-off and air pollution over a considerable distance each side of the road. Severance of the landscape will result in reduced species mobility, whilst increased pollution will likely result in a reduction in habitat quality and species diversity. Both will reduce nearby sites' and populations' ability to cope with other environmental changes and increase the likelihood of localised extinctions.

Comments on shortlisted options

Route A

This route will lead to direct losses of parts of three CWS (Old Covert Wood Lane, Weston Meadow and Attlebridge Hills) as well as to a currently undesignated woodland. In addition, five CWS (Mouse Wood, Meadow adjacent to Sandy Lane, Lenwade Pits East & West and Land adjacent to concrete plant) are likely to suffer from indirect pollution impacts.

Route B

This route will lead to the direct losses to three CWS. Attlebridge Hills is likely to suffer loss from its western edge if the road is widened at this location. Land adjacent Foxburrow Plantation and Wensum Pastures at Morton Hall will be severed completely, with significant elements of the remnants being subject to indirect pollution impacts. There are also several undesignated woodland sites which are also likely to suffer damage.

Route C

This route will lead to direct losses and severance of remnant habitats to one CWS (Land adjacent Foxburrow Plantation) and three undesignated woodlands, as well as indirect impacts to a nearby ancient woodland.

Route D

This route will lead to direct loss to two CWS (Land adjacent River Tud, Church Hill Common), as well as indirect impacts on Jennis' Wood CWS. Five additional sites which are in the process of designation as CWS are also



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threatened, with Ave's Gap, Primrose Grove, River Wensum Pastures and Gravelpit Plantation & Church Hill subject to direct habitat loss and severance of remnants, and Dryhill Plantation subject to indirect impacts. We are also concerned at the likely impacts on the River Tud, a sensitive chalk river habitat, which would be vulnerable to permanent damage from the additional crossing needed.

Recommended next steps

Whichever option is chosen by the Council, we would expect any planning application accompanying it to be able to demonstrate robustly that it can, in preferential order, avoid, mitigate or compensate for the damage the new road would create, with the end result that there would be a net gain for biodiversity. This should include a significant up-front commitment to surveys along the zone of influence of the preferred route, avoidance of all impacts where possible through good design, and a commitment to land purchase and long-term management agreements on nearby land to secure sufficient mitigation and compensation. This should include replacing lost habitats, buffering sites from indirect damage, provision of multiple green bridges and underpasses to maintain connectivity at the landscape level, and creating new links between isolated sites near the road to enhance ecological connectivity in the wider landscape. All mitigation and compensation measures should be fully funded by the project and delivered in a functional state prior to the impacts occurring, and should be subject to the same monitoring standards that the existing NDR project requires, in order to inform any remedial actions that may be required following the road opening.

In coming to any decision over the preferred route, the Council will need to be confident that it can deliver sufficient mitigation and compensation measures to robustly demonstrate a net gain for wildlife alongside the new road.

Conclusion

Whilst it is possible to identify the route that would result in the least damage, it is clear that none of the proposed routes could be built without significant damage to multiple sites of importance for wildlife. Without significant commitments to mitigation and compensation that could robustly demonstrate that there would be a net gain for wildlife from the development, we would likely object to any of the shortlisted options if presented as a planning application. We seek confirmation from the Council that it recognises the significant impacts that the western link road would create, and that it commits to sufficient measures to ensure that whichever route is chosen delivers a net gain for wildlife as a result, in line with national planning policy.

We would be happy to discuss the potential for achieving this with the Council and their consultants if that would be helpful.

Yours sincerely,

Mike Jones

Conservation Officer