

mood and opinion is changing, is the wrong path. We need more support for ecosystems, wildlife, and nature. Not more support for tearing down of natural habitats and damaging coastlines. 3/I am concerned about the increased traffic, noise pollution, air pollution, vibrations the total destruction of the nearby wildlife and the huge impact it will have on the area.

## Sample 26:

I object to the proposed scheme for these reasons: The case for the scheme (at 3.5.1) says that it will increase capacity which means that it will increase traffic growth in Norwich area. This does not comply with national policies for climate change and modal shift towards walking, cycling and public transport. The traffic and economic modelling uses data, assumptions and projections from before the Covid 19 pandemic. Recent and future levels of home-working, the shift towards Internet-based meetings, and strong reductions of traffic on the roads due to COVID impacts need to be assessed against the supposed need for “increased capacity”.

The application and traffic modelling assume that the Norwich Western link is already built. To comply with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the environmental statement should start from the current situation now as the environmental baseline. The A47 dualling links with the Norwich Western link. The application does not fully explore the relationships between the two road proposal, and needs to be fully examined at the examination.

The traffic modelling is based on the NATS 2015 (baseline year 2015) model. Recent modelling by Norfolk County Council based on the newer NATS 2019 (baseline year 2019) model reports substantially lower (c. -30%) vehicle kilometres within the scheme area. The discrepancies need to be examined, and the models fully reconciled. The scheme involves fragmentation, loss or displacement of diminishing wildlife habitats such as wet grazing meadows and protected species, notably bats and the urbanisation of mature countryside. In-combination, and cumulative impacts, for biodiversity, ecology, air quality and carbon emissions have not been assessed with at least six other road infrastructure schemes near to Norwich and East Norfolk. Carbon emissions need to be cumulatively assessed both locally within this area, and nationally with up to 100 other schemes planned. The recent judgement of *Pearce v Secretary of State BEIS* [2021] demonstrates that the Courts accept the importance of cumulative environmental impact assessment. Carbon emissions should be tested against inter/national legislation and guidance including the Paris agreement, the legally binding target under the Climate Change Act 2008 to meet net-zero carbon emissions by 2050, the UK Sixth Carbon Budget (6CB), science-based carbon budgets from the Tyndall Centre, NPPF 148 which requires the planning system contribute to “radical reductions of greenhouse gas emissions”. Norfolk County Council has identified that the area north of the scheme has a nationally significant breeding barbastelle colony of bats, recently found, which although not yet afforded SSSI or SAC status would otherwise qualify as such (see: