

**From:** webmaster@norfolk.gov.uk  
**Sent:** 15 April 2024 11:29  
**To:** Planning Services  
**Subject:** New comments for application FUL/2024/0001

**Categories:** BSA

New comments have been received for application FUL/2024/0001 from [REDACTED]

**Comments:**

Please find attached our concerns and objections to the Proposed West Winch Housing Access Road. The route that you have chosen is unacceptable because of the damage that will be done to the woodland at the northern end of the proposed road and the apparent lack of concern for the wildlife which will be affected.

We do not think that you are doing enough to protect and enhance biodiversity nor are you adequately taking into account the loss of productive arable farmland by the road itself and by the proposed housing that may follow.

There are alternatives, should this road really be needed. We seriously doubt, however, that the new "access road" will materially affect traffic congestion on the A10, without looking more closely at the cause of the congestion, along the A149 through to the roundabout for the Queen Elizabeth Hospital and up to Knights' Hill.

The following files have been uploaded:  
Objections to WWHAR.pdf

## OBJECTIONS TO THE WEST WINCH HOUSING ACCESS ROAD

1. The north end of the route proposed for the West Winch Housing Access Road (WWHAR) is far too close to the Old Drovers Road, Illington Lane. It is difficult to be precise but at the entry to the woodland the proposed new road appears to be literally only a few metres away from the existing Illington Lane.
2. Illington Lane is designated as a Restricted By-Way by Norfolk County Council's Highways department. It must be considered an **Asset of Community Value** through its extensive use by ramblers, horses and riders, dog walkers, cyclists and children to the exclusion of motorised vehicles. It was never more valued than during Covid-19 lockdown periods when its use by villagers increased enormously. The proximity of the WWHAR as currently proposed, shown in the Route Plan, 2.03.00, is unacceptable since the traffic which would use the new road would scare horses and riders, dogs, children and walkers. As a Restricted By-Way, Illington Lane must NOT be used or crossed by any motorised traffic, particularly during the construction phase.
3. It is good to see that the proposed route on the Route Plan of the WWHAR does not actually impinge directly on Illington Lane, nor does it cut through Sheep's Course Wood. However, the route shown in the Route Plan 2.03.00 for the WWHAR does take it through the woodland adjacent to Sheep's Course Wood, requiring the flattening of woodland to accommodate both the road itself and the two new roundabouts. The woodland adjacent to Sheep's Course Wood is also a *de facto* Asset of Community Value with frequent visits of horses, walkers, cyclists and children to these adjacent woodlands.
4. The Forestry Commission has identified that both Sheep's Course Wood **AND** the adjacent woodland are listed on the **Priority Habitats Inventory (England)**, which was updated on 1 March 2024. Priority Habitats are those which are deemed to be of principal importance for the purpose of conserving biodiversity, being listed in the UK Biodiversity Action Plan and with maintenance, preservation and restoration of these habitats being promoted through agri-environmental schemes. For these Priority Habitats to have any meaning, they **MUST**, therefore be preserved and maintained and development schemes, such as this WWHAR, should accordingly avoid such Habitats.
5. The existence of **barbastelle bats** in particular has been noted in the area. This rare, vulnerable and protected species has been identified at 11 separate locations within the scheme boundary, where bat commuting and foraging activities, suggest the presence of nearby roosts, which will be negatively impacted by this scheme. **The greatest barbastelle activity in the area has been recorded at the eastern boundary of Sheep's Course Wood**, which is scheduled to be the location of the haul road for construction activities including site establishment facilities for the gas main diversion. Very few breeding sites of barbastelle bats are currently known in the UK and it is important that surrounding environments to these and to their winter hibernation sites are maintained. Apparently barbastelle bats prefer pastoral landscapes with deciduous woodland, wet meadows and water bodies, such as woodland streams and rivers - exactly this environment. The barbastelle bat

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is a UK Biodiversity Action Plan species, which means that it is a **conservation priority** on both local and national scale.

**The Planning Authority must refuse planning permission if the proposal would harm a protected species.**

6. The Forestry Commission inform that the National Planning Policy Framework (NPPF) should be observed and in particular paragraph 180(b), which states:  
*“Planning policies and decisions should contribute to and enhance the natural and local environment by: recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*

Also in paragraph 185(b) of the NPPF states:

*“To protect and enhance biodiversity and geodiversity, plans should...promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”*

The Forestry Commission has advised that the North Runcton and West Winch Neighbourhood Plan contains a “sites of nature conservation policy” (C3), which states in relation to Sheep's Course Wood that it is important to preserve the woodland which creates a local landmark and important habitat.

7. Therefore the proposed route for this WWHAR should be reconsidered and the road relocated **AT LEAST 200m to the west**, where it would then avoid going through the woodland adjacent to Sheep's Course Wood. This relocation, away from woodland, would bring a number of inherent advantages, as follows:
  - 7.1. Relocating the new road westward would avoid the need for felling hundreds, if not thousands of trees which have grown organically over the past 50 years in the woodland adjacent to Sheep's Course Wood. This woodland supports a whole range of biodiversity in terms of plants, fungi, insects, animals, birds and bats, etc.
  - 7.2. The two new roundabouts proposed for access to new housing and where the new road joins the A47 would also be relocated westward, thereby avoiding any impingement with known Priority Habitat areas. The suggested location for the new roundabout with the A47 would be where the previous lay-by was located (the lay-by which has recently been removed by Highways Department). Presumably this area of land currently remains within the A47 curtilage.
  - 7.3. The more westerly relocation of the WWHAR would reduce the impact on barbastelle bats, which have habitats in wet woodland, developing woodland, hedgerows and ponds. These bats are one of the most light averse species and the proposed lighting of the roundabouts at the north end of the WWHAR and headlights on vehicles would seriously harm this species. New woodlands are unlikely to provide sufficient natural roosting

## OBJECTIONS TO THE WEST WINCH HOUSING ACCESS ROAD

opportunities to support a colony of barbastelle bats for perhaps 50 years or more.

- 7.4. By relocating the new road westward at its northern end, the solitary mature oak tree in the field to the north of Rectory Lane would no longer have to be in the proposed path of the new road and consequently would not have to be needlessly felled.
- 7.5. The existing high pressure gas main would not have to be diverted under Illington Lane at its north end. The diversion of this gas main could instead be made at least 150m to the west, thereby avoiding the need to block any access into Sheep's Course Wood by walkers, horses and cyclists during the construction phase. This would also avoid any land compaction at the south and east side of Sheep's Course Wood in the area currently identified for the gas main traffic and site establishment facilities. This area is already presently vulnerable to flooding and subsequent compaction may make it totally unsuitable for future agriculture. Moving the diversion of the gas main further to the west would also avoid the need to remove the hedgerows to the west side of Illington Lane, approximately 150m up to the entrance into Sheep's Course Wood. An alternative route for the access of traffic to and site establishment of the gas main re-routing will have to be found. It is clearly unnecessary and unacceptable for construction traffic to cross or block Illington Lane at any point. While doubting the demand for a further 4,000 homes to be built around West Winch and for which this proposed housing access road is planned, there is already clearly a need to do something to alleviate the traffic queues at the north end of the A10, around the Hardwick roundabout and up the A149 to the junction with the A1056 at the Queen Elizabeth Hospital; and on occasions even further up to the roundabout at Knights' Hill. This is a significant problem, particularly in summer months. It has been discussed for over 35 years but never resolved. The additional traffic which would arise from the 4,000 new homes identified for the West Winch Growth Area will only make it worse. It is hard to believe that the proposed WWHAR will improve the existing problems in any significant way. **This planning application must address the social wellbeing and social interests of existing local community first.**

8. The proximity of vehicular traffic using the new road to [REDACTED] and the three houses located on Illington Lane will cause these and other properties to suffer excessive noise and air pollution from the traffic, considering also that there are 5 roundabouts to be located within the 1.5 mile stretch of road.

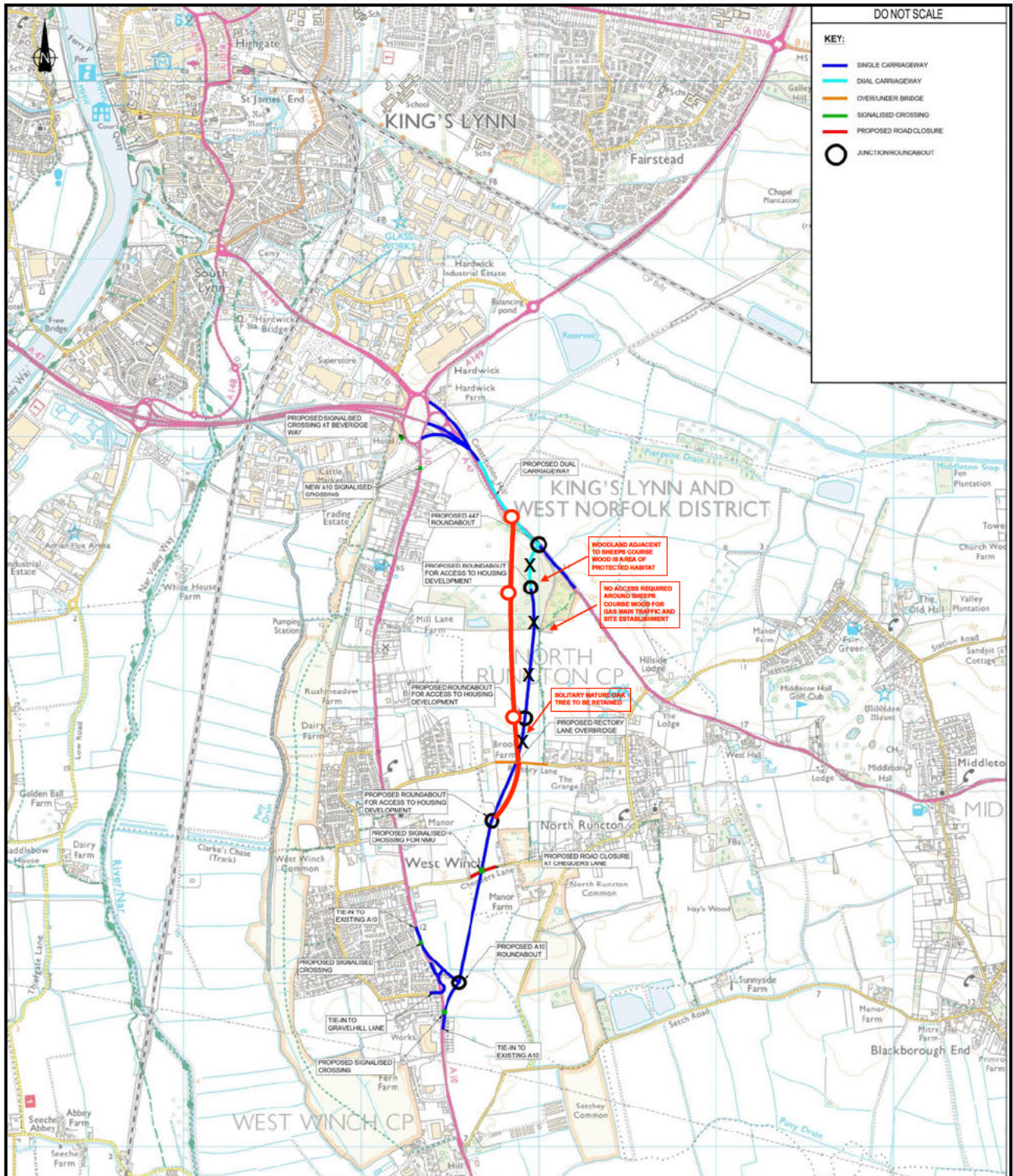
**What plans are in place to mitigate the noise and air pollution?**

9. The proposed roundabout for access to housing development to be located just north of Rectory Lane is not planned to be lit. Nevertheless, headlights from vehicles travelling on the new road will impact on the nearby properties. There may be other properties affected south of Rectory Lane.

**What plans are in place to mitigate this impact on all affected properties?**

# OBJECTIONS TO THE WEST WINCH HOUSING ACCESS ROAD

10. Suggested Revised Route Plan relocated westward (as shown in red):



11. Finally, and whichever route is taken, it is important to note that the footprint of just this road occupies approximately 160 acres of woods and productive agricultural land. We should not be turning our primary source of food into yet another traffic jam. It would be much preferable for any housing growth area to be built on brownfield sites, as [REDACTED] has recently advised.  
**Is anyone listening?**