

**From:** [REDACTED]  
**To:** [A47 NorthTuddenham to Easton](#)  
**Subject:** A47 North Tuddenham to Easton dualling - NWT comments  
**Date:** 12 November 2021 12:05:42

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Dear A47 team,

We missed the formal registration period for the A47 North Tuddenham to Easton dualling earlier this year, but are submitting comments in the hope that they are useful to the examination. We would be happy to discuss our comments further with relevant parties should that be required.

Regards,

Mike Jones  
Conservation Officer  
Norfolk Wildlife Trust

### **NWT comments on A47 North Tuddenham to Easton Dualling**

We are concerned at the scale of the ecological impacts of this proposal and object due to the significant impacts that are likely to occur, particularly to legally protected species known to be present in the vicinity of the route. Notwithstanding our concerns over protected species, the scale of residual impacts on habitats remains significant, even when the time lag until new habitat is functional is discounted, and would require further commitments from the applicant on extent and aftercare in order to avoid any residual impacts.

#### Insufficient information on protected species

All UK bat species are fully protected under the Wildlife & Countryside Act and the Habitats Regulations. We are concerned that a) the ES (library reference APP-047) predicts a large adverse impact on bats even after mitigation and b) that the ES itself considerably underestimates the impacts on the local barbastelle bat population. We strongly support the comments made by the Norfolk Barbastelle Study Group and Wild Wings Ecology, which note that the proposal is within the Core Sustainance Zone of a nationally important super-colony for barbastelle bats, with a crossing point identified on the proposed route from radio tracking work, and that the cumulative impacts of the scheme and the Norwich Western Link on the super colony have not been addressed. We strongly recommend that a full assessment of the impacts on the barbastelle super-colony is provided by the applicant prior to any decision on this application and that consent should only be granted if it can be robustly demonstrated that impacts on the favourable conservation status of bat species near the route can be avoided.

#### Unacceptable level of residual adverse impacts

Notwithstanding our objection raised above, should consent be granted, then we would expect to see a greater commitment made to habitat restoration and creation in order to address the multiple residual adverse impacts predicted in the ES. Table 8.14 of chapter 8 of the ES (library reference APP-047) notes that even after mitigation there will be residual adverse impacts on a range of Priority Habitats, due to the reduction in habitat area (for example woodland and floodplain grazing marsh), or due to the time lag involved where some habitat creation takes longer (as noted for breeding and wintering birds). We believe that it is feasible to provide

further habitat creation as mitigation in order to remove any remaining residual adverse impacts related to habitat loss. Where this is in part to do with any time lag associated with new habitat creation, then we recommend that additional habitat is provided, in line with the approach taken in the Defra biodiversity net gain metric for similar situations, in which additional habitat is required to compensate for the lower value of new habitat in early years whilst it establishes.

### Monitoring

We are concerned at the monitoring period set out in section 8.11 of the ES and (library reference APP-143). For a proposal of this scale, we do not consider five years to be a sufficient monitoring period, in particular for the successful establishment of new habitats that are critical to the mitigation of ecological impacts linked to habitat loss. A significant part of the ecological mitigation is reliant on the creation or restoration of complex habitats such as woodland and species-rich grassland, therefore we recommend that the monitoring period for habitat works is revised to cover the time needed to demonstrate it can achieve good condition, which will normally be longer than the standard five year period proposed. We refer to Table TS3-1 of the Technical Supplement to Defra's Biodiversity Metric version 3.0 [REDACTED] for peer-reviewed best estimates on the required time needed for successful establishment of new habitats, as a guide to the likely monitoring periods needed to demonstrate successful delivery of the habitat creation proposed in the ES. For example, the document advises that good condition ponds can be established in 5 years, whilst neutral grassland can take 10 years, floodplain wetland mosaics can take 20 years and woodland at least 30 years.

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**Mike Jones**  
**Conservation Officer (Planning)**

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