

Representation 1: Legal requirements

Background

R1.1.1 This part of the Norwich Green Party representation is authored by Councillor Andrew Boswell. I make this statement as local politician elected to Norfolk County Council in 2005 to represent residents in the Norwich Nelson division, an area to the West of the City Centre.

R1.1.2 I have very major concerns about the lack of transparency and democratic process that has led to this point where the GNDP JCS has come to public inspection. Since its inception in 2006, the GNDP has held its policy and decision making meetings in private, has refused calls to open its meetings to the public and for agendas and minutes of its meetings to be placed in the public domain.

R1.1.3 Further to my concerns about the lack of public access to the process that has generated the JCS, I am also concerned that the vast majority of elected councillors have also been excluded. The GNDP Policy Group is made up of 4 elected members (including the leaders) of each Broadland District Council, Norwich City Council, South Norfolk District Council – all other councillors are excluded, and like the public, have no access to agendas and minutes. In the case of each council, no opposition councillors have been included in the elected members group from that council. Further, in the case of Norfolk County Council, some councillors on GNDP have not been elected from the GNDP JCS area, and sometimes a majority have not been elected from the Norwich Policy Area.

R1.1.4 *It is crucial that it is understood that the whole genesis of the JCS from GNDP inception has been clouded by a lack of public transparency, democratic process, political inclusion and fair political representation.*

R1.1.5 With respect to this representation, I request the opportunity to take part in the Inspection Hearing on Matter 1.

Lack of transparent and accessible community engagement

R1.2.1 PPS12 (4.19 and 4.20 reproduced below) stresses the need for transparent and accessible community engagement in producing Development Plan Documents (DPDs):

Participation

4.19 The UK government has signed up to the UNECE *Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters* (the Aarhus Convention). Article 7 states:

“Each Party shall make appropriate practical and/or other provisions for the public to participate during the preparation of plans and programmes relating to the environment, within a transparent and fair framework, having provided the necessary information to the public.”

4.20 The production of core strategies should follow the Government’s principles for community engagement in planning. Involvement should be:

- appropriate to the level of planning;
- from the outset – leading to a sense of ownership of local policy decisions;
- continuous – part of ongoing programme, not a one-off event, with clearly articulated opportunities for continuing involvement;
- transparent and accessible – using methods appropriate to the communities concerned; and
- planned – as an integral part of the process for making plans.

R1.2.2 The Aarhus Convention, signed by the UK Government establishes a legal requirement for public participation in decisions (Articles 6 - 8) affecting the environment and quality of life. The Convention

states that in drafting rules and regulations governments shall strive to ‘promote effective public participation at the appropriate stage, *and while options are still open*’.

Minutes, agendas and papers not made available to stakeholders

R1.3.1 In order to meet these objectives and a ‘from the outset’ sense of community ownership of local policy decisions (PPS 12 4.20 above), GNDP should be able to demonstrate that they have made their Policy decisions transparently at meetings open to the public, and made the entire evidence base underlying the said policy decisions available in an accessible form. This would have meant also publishing the minutes and papers of GNDP sub-committees and specialist groups such as those on Sustainability, Housing and Transport. None of this has been the case, and the minutes of meetings are still not available to the community.

Erroneous and poor information availability

R1.4.1 The very recent publication of more documents on the www.gndp.org.uk website in an accessible form has occurred only since the Examination loomed. This is a poor fig-leaf of apparent transparency trying to cover up the non-transparency of a process that was essentially closed from public scrutiny between 2006 and 2009.

R1.4.2 Even now, the accessibility of the information on the GNDP website is still poor¹. The on-site search engine does not appear to be well indexed as even the published documents are often difficult to find, and it does not appear to search the entire content of documents, just document titles. It has also been reported that information within the public area of the GNDP website has been blocked from being made accessible to external Internet search engines such as Google² that would be helpful in finding information on a ‘content’ basis.

R1.4.3 In my experience, this is in contrast to the standard set on UK Government department websites where I can often find documents within these sites via external search engines on content based searching. Indeed, the facility for content based searching is an essential tool for community campaigners faced with huge evidence bases to sift through: yet this has apparently been denied for the GNDP JCS process. In denying such ‘common practice’ access to their ‘publically available’ material, the GNDP has made it much harder for community stakeholders to engage with consultations and, now, the Inspection.

No visible audit trail of policy decisions

R1.5.1 In this situation, the public do not know how decisions were made, nor they did not know this when the various previous consultations took place. I would suggest that it has also been difficult for the inspector to know why decisions have been made for the same reason – *the absence of any complete set of minutes, papers and evidence base with an audit trail of policy decisions in the public domain*. This situation cannot be accepted as meeting the ‘legal requirements’ on both counts. It has also meant that community stakeholders have not been able to respond fully and completely as they have been denied access to the information and decision processes that would have enable them to do so. It is worth noting that the recent release of EIP86 [“EM conclusions Issue 3: The distribution of development, particularly in relation to public

¹ For example, trying to access ‘Sustainability Appraisal – Non-Technical Summary’ on page <http://www.gndp.org.uk/resources/document-finder/?downloadIndex=s> on the GNDP website produces an error ‘Whoops’ (access attempted 12 October 2010).

² see: <http://snubcampaign.blogspot.com/2010/08/gndp-chooses-to-block-access-to-its-own.html>

transport opportunities”] has provided such an audit trail for the first time in one area of the JCS genesis, although far too late for any community stakeholders.

No conceptual options provided to communities

R1.6.1 The key authors of the JCS have conceded ‘there is no Plan B’. This makes the previous consultations a farce, and noncompliant with the Aarhus Convention that public participation be promoted while “*options are still open*”. The options provided to the public consultations amounted to:

1. NE Norwich Growth Triangle + NDR + housing number variation1
2. NE Norwich Growth Triangle + NDR + housing number variation2
3. NE Norwich Growth Triangle + NDR + housing number variation3

R1.6.2 Conceptually these are all the same option ‘NE Norwich Growth Triangle + NDR’. There were no options for alternatives to the Growth Triangle and to the NDR. Whilst the housing number variations are very important to the communities affected, they only provide variants to detail, not overall concept.

Exclusion of a majority of local politicians

R1.7.1 Politicians are elected by their local communities to represent them. This is particularly important for decision processes that involve major planning, economic and environmental issues. *Politicians from political groups that are not the ruling groups in the Norfolk, South Norfolk, Broadland and Norwich councils have effectively been excluded from doing so.* These councillors have not even been able to attend the GNDP meetings as observers, and nor have they been advised of key decisions, agenda and minute papers. This has meant that the opportunities for vast majority of local politicians to represent the local communities have been minimal. Put simply, these councillors have been reduced to attending stakeholder workshops (ie: talking shops with no real influence) or responding to public consultations.

R1.7.2 Further, councillors have been frustrated when GNDP related matters have come to committees within their own authorities and have seen decisions go straight to Cabinet. As an example, it is minuted that at the Norfolk County Council Planning, Transportation, the Environment and Waste Review Panel for 19 Sept 2007 that Councillor East raised concern (<http://tinyurl.com/ptew190907minspdf>, under item 14) that the Review Panel would not have the opportunity to consider the then JCS consultation document before endorsement by the GNDP Policy Group and adoption by all four Cabinets/Executives. This Review Panel is a key pre-Cabinet Overview and Scrutiny Committee: *it is the only place where opposition councillors can properly scrutinise and challenge the administration before decisions are made by Cabinet.* This undemocratic incident was compounded when the lead officer said that a report would be brought to the November 2007 Panel meeting (still during the consultation period) in order that Members’ views could be fed into the process. This report was never produced as evidenced by the agenda of the November 2007 Panel (<http://tinyurl.com/ptew141107agendapdf>). Instead, a report wasn’t brought to the Review Panel until 9 January 2008. Given that public consultation on the Joint Core Strategy Issues and Options document took place between 19 November 2007 and 8 February 2008, the report was brought to the Review Panel too late for members to influence the GNDP’s draft consultation.

Inclusion of non-local politicians

R1.8.1 The County Councillors who sit on the GNDP can be defined as non-local in two respects: 1) if they were elected outside the Norwich Policy Area (NPA), and 2) if they were elected outside the GNDP JCS area (ie: the Norwich, Broadland and South Norfolk District Councils). As the vast majority of the development is focused within the NPA, one would expect that the majority of these councilors would be elected by residents within the NPA.

R1.8.2 This table shows the recent representation of County Councillors on GNDP before the Leader and Cabinet changes of October 11th 2010.

| | Represents with NPA area | Represents within GNDP area | Distance from Norwich of seat (kilometres) |
|--|--------------------------|-----------------------------|--|
| Before October 11th 2010 | | | |
| Cllr Daniel Cox | Yes | Yes | 6 |
| Cllr Brian Iles | No | Yes | 19 |
| Cllr Adrian Gunson | No | Yes | 18 |
| Cllr Ann Steward | No | No | 48 |

R1.8.3 On October 11th 2010, Cllr Cox was replaced by Cllr Derrick Murphy and Cllr Gunson by Cllr Graham Plant in the Norfolk County Council Cabinet – if they succeed directly onto GNDP, they both represent areas outside both NPA and GNDP. Cllr Murphy’s division is over 65 kilometres from Norwich, and Cllr Plant’s over 30 kilometres.

GNDP JCS does not meet legal requirements

R1.9.1 The DPD process and the full preparation of the Core Strategies should be compliant with PPS12, and PPS12 makes very clear statements on community engagement ‘*from the outset*’ and ‘*while options are still open*’ as quoted above. This has not been the case with GNDP JCS process, and I conclude that it is irrefutably flawed, unsound and is not compliant with the legal requirements and in particular the 2004 Regulations (Matter 1 A3).

Representation 2 (copy for Matter 1)

The omission of a genuine low carbon transport policy and plan

R2.1.1 This part of the Norwich Green Party representation is authored by Councillor Andrew Boswell. I make this statement as local politician elected to Norfolk County Council in 2005 to represent residents in the Norwich Nelson division, an area to the West of the City Centre.

R2.1.2 I am also an individual concerned that we have a very few years to deal effectively in mitigating climate change and making the associated substantial reductions in carbon emissions. We will fail our children and their children's generations if we do not tackle this issue seriously and with forensic attention focussed on **really** reducing emissions rather than just making aspirational statements.

R2.1.3 The core strategy should identify mitigating climate change as one of its critical issues early on and then develop the strategy to address it with other critical issues. Crucially, it fails to:

1. identify mitigation of climate change as a critical issue
2. establish clearly the link between effective climate change mitigation and real numerical and quantifiable reductions in total carbon emissions across the JCS area
3. develop the strategy to make real numerical and quantifiable reductions in total carbon emissions, and across sectors

R2.1.4 This representation addresses to what extent the GNDP JCS has developed a transport and travel policy that will actively reduce quantifiable carbon emissions from the transport sector, builds in deliverable and future proofed low carbon transport, and avoids creating any additional sources of transport emissions.

R2.1.5 It is worth noting an important general point that, where the GNDP JCS addresses climate change, it tends to do so through 'low carbon development' ie: in new low energy housing technology. Whilst this approach may produce worthwhile benefits, it is only part of the equation. Climate change has to be addressed throughout all sectors and processes of the JCS. As the carbon emission reduction policy and strategy for the transport sector are particularly weak in the JCS, this representation concentrates on this area. National policy in the Climate Change Act (2008) is very challenging, and weakness in any one area of the JCS lets the whole down, essentially making it unsound and inconsistent with the national agenda.

R2.1.6 Planning Inspectorate experience of examining other DPDs¹ shows that "critical issues often raise difficult and possibly uncomfortable questions". This is no truer than when planning bodies are faced with providing a quantified strategy for reducing total and sector carbon emissions – the evidence below shows that the GNDP have attempted to duck this issue and that

R2.1.7 *The representation overarches a number of 'Matters'. I am submitting it primarily to be considered for Matter 1: (B1) [consistency with national policy] and Matter 5: (A) [NATS consistency with national policy], (B) [delivery confidence] and (C) [unsoundness on transport].* However, I request that it is also considered for Matter 3: (B2) [soundness of growth triangle/national policy], (B4) [public transport improvement]; Matter 8: (A) [consistency with national policy].

R2.1.8 With respect to this representation, I request the opportunity to take part in the Inspection Hearing on Matters 1 and 5 (, and Matters 3 and 8 at the Inspector's discretion).

¹ Examining Development Plan Documents : Learning from Experience, September 2009, The Planning Inspectorate

Background and National Policy Framework

R2.2.1 PPS1 Supplement on Climate Change, section 9 gives the Key Planning Objectives necessary to deliver sustainable development. It requires planning bodies to:

"deliver patterns of urban growth and sustainable rural development that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking; and which overall, reduce the need to travel, especially by car".

R2.2.2 PPS12, Local Spatial Planning, section 4.31 indicates that

"the courts have held that the Government's statements of planning policy are material considerations which must be taken into account, where relevant, in decisions on planning applications."

R2.2.3 I bring to the inspectors attention the recent Commission for Integrated Transport (CfIT) study² that generally argues that current planning guidance on transport issues is framed around reducing the need to travel by car (as above, PPS1) rather than achieving an actual reduction in car travel. CfIT argue that policies designed to achieve the former objective are unlikely to achieve the latter. This is extremely pertinent to the JCS and reducing carbon emissions – quantifiable reductions will only result from actively reducing car travel.

R2.2.4 Thus, in developing a Core Strategies, authorities should not only take material account of PPS1 and the need to secure the "fullest possible use" of sustainable transport, but also set out to generate an actual reduction in car travel.

R2.2.5 Further, the UK Climate Change Act 2008 has set the national target of an 80% reduction in CO2 emissions by 2050. There is clearly a serious need to address transport emissions at every step of planning and transport development, or simply, we, as a country, will fail completely to get anywhere near achieving this legislative target. Therefore, the GNDP should be able to demonstrate that:

- that the issue of reducing transport emissions has been a key issue in policy decision making through the development of the JCS, and
- that the resulting JCS contains an emission reducing transport policy as one of its main planks, along with a substantive evidence base that it will reduce rather than increase emissions, and
- the emissions reduction strategy is backed up with full quantitative data – this means emission reduction targets, and meaningful ways of measuring progress against them.

R2.2.6 In their June 2010 (2nd) Progress Report³, the UK Committee on Climate Change⁴ states:

Integrated land use and transport planning: we estimate that emissions reductions of up to 2 MtCO2 are available in 2020 through designing new residential and commercial developments to minimise additional car miles.

² Commission for Integrated Transport (2009), Land use and Transport – Settlement Patterns and the Demand for Travel.

³ <http://www.theccc.org.uk/reports/2nd-progress-report>

⁴ The independent advisory body that advises UK Government on emissions targets, and reports to Parliament on progress made in reducing greenhouse gas emissions

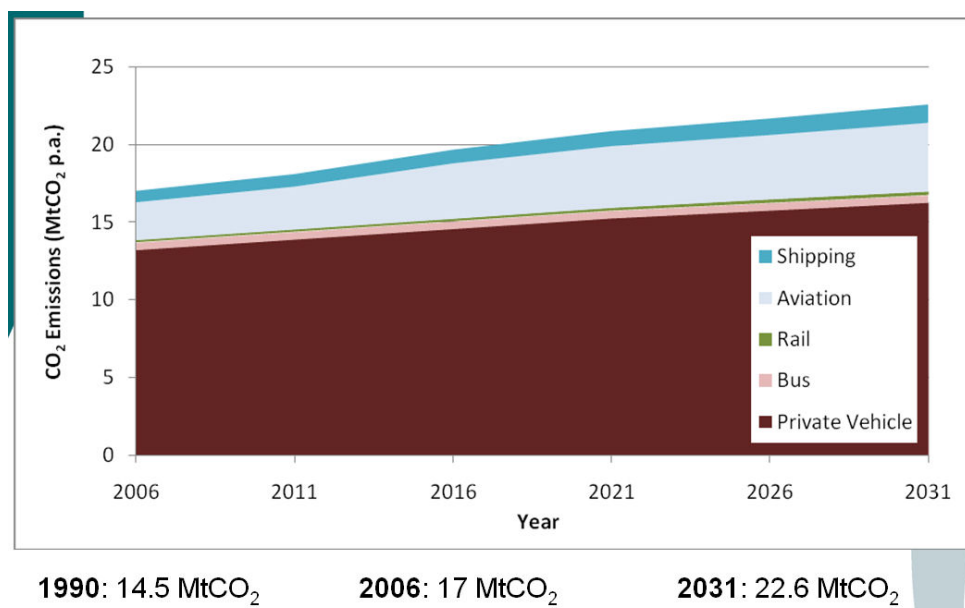
The report notes that this level of emissions reductions (the 2 MtCO₂ is part of a total of 25 MtCO₂ for transport emissions in total by 2020) “is required both to meet the first three carbon budgets, and to lay the foundations for deep cuts in transport emissions required through the 2020s”. For such large and numerically defined emission reductions to be achieved, it will be necessary also for DPDs to provide strategies with numerical emission reduction targets for their own localities.

R2.2.7 The JCS provides no such targets for its transport strategy – it is therefore unsound with respect to critical emerging national policy. This comment applies to Matter 5 (A), Matter 8 (A), and Matter 1 (B1).

The regional transport carbon situation

R2.3.1 It is important to understand that where we are talking above about reducing total transport emissions, that the existing trend is not flat. In fact, the general long term effect is of rising transport emissions, therefore the challenge is the double task of both stopping the rise and producing a reduction. This statement reflects long term trends rather than any short term fluctuations due to economic recession.

R2.3.2 The recent “East of England Transport and Carbon Study” by Atkins for EERA back this up with the strong message that transport carbon emissions ‘will grow if no action is taken’ and that ‘the main area of growth in emissions under a business as usual scenario is road transport’. The report’s ‘business as usual’ analysis shows in fact a steady increase in emissions (an estimated 33% increase) with the majority being private vehicle use, as below:



The NDR introduces and builds in major carbon disbenefits into the JCS

R2.4.1 A key problem is that the JCS has been developed from inception around the NDR road. This immediately builds in major carbon disbenefits. ***The known carbon disbenefits of the road are at a scale that no realistic public transport policy can be developed to offset them, let alone generate an overall emissions reduction.*** Despite this major flaw when considering the carbon impacts, the public were never offered a ‘No NDR’ option in any of the consultations, contrary to Aarhus Convention and PPS12/PPS1 compliance.

R2.4.2 This is an example of a critical issue (emission reduction) raising an uncomfortable question (whether the NDR road can be built without increasing emissions) in the JCS (see R.2.1.6 above). The Councils involved have been in denial in both addressing this question and allowing the public to comment on it. The public have never been told the additional emissions associated with the road in any JCS documentation although Norfolk County Council knew the figures below when they submitted their business case to the Department of Transport in 2008.

R2.4.3 The Major Scheme Business Case (MSBC) for the Northern Distributor Road (NDR) as submitted to the Department of Transport in 2008⁵ calculated that the road would introduce a further 25,000 tonnes of annual CO2 emissions in its first year – **an increase of 6% over current Norwich road transport emissions.** The road was also forecast to increase Norwich-wide transport carbon emissions by a staggering 57% by 2071. It would also be making a significant contribution to the estimated 33% increase in transport CO2 emissions in the East of England between 2006 and 2031 under a Business As Usual scenario from the Atkins study (see above).

R2.4.4 The corollary of these emission figures for the proposed NDR road is that any public transport scheme would need to remove 6% of vehicles and their drivers from Norwich’s road immediately the road opened, and continue to remove more vehicles (from the NPA area) as the road’s use expanded, just to break even (ie: achieve an overall 0% increase/decrease in emissions) – this is clearly impossible. [Matter 5 (A), Matter 8 (A), Matter 1 (B1)]

R2.4.5 It is worth noting that the County Council miscalculated the economic cost of these emissions in their MSBC to DfT as highlighted by CPRE (Norfolk) and NNTAG⁶. Using the standard DfT webtag methodology for appraising road schemes, the NDR carbon emissions have a cost of £83million. When this correction is applied, the Benefit-to-Cost Ratio of the road (BCR) falls from 2.7 in the BCR to 1.6, below the DfT threshold of 2.0.

R2.4.6 Not only has the high carbon emissions associated with the NDR not been published in the JCS, the low Benefit-to-Cost ratio and economic impact of the carbon costs has not been included in any section or background evidence of the JCS.

⁵ Appendix 3I, Norwich Northern Distributor Road Major Scheme Business Case for programme entry (NDR MSBC), Norfolk County Council,

⁶ Norwich Northern Distributor Road, Critique of the Major Scheme Business Case for Programme Entry, Norfolk and Norwich Transport Action Group and CPRE (Norfolk)

The JCS sets no objectives to reduce car use or reduce carbon emissions from transport

R2.5.1 Objective 1 (JCS, page 26) speaks primarily of ‘zero and low carbon developments’ to reduce carbon emissions. This is an example of the JCS only referring to emission reduction in terms of low carbon development (see R2.1.5). Although Objective 1 does mention ‘sustainable access’, this is too vague to be meaningful.

R2.5.2 Objective 7 (JCS, page 27) speaks of reducing the need to travel by car and greater use of sustainable transport modes. It does not specify an overall reduction in car use, or an overall target for reductions in transport emissions. This falls into the aspirational, but undeliverable type of statement highlighted by the CfIT (see R2.2.3).

The JCS sets no targets or delivery measures on carbon emissions

R2.6.1 A key element of planning for low carbon transport must be to set carbon emission targets, and realistic, quantitative methods of auditing their delivery. These must be at a high profile in DPDs. *The JCS makes some aspirational statements on carbon emissions but it fails, in two respects, to grasp this critical issue at all.*

R2.6.2 Firstly, there are no targets for carbon emission reductions in any sector, and especially from transport, made. Yet, the difficulties in reducing transport carbon are even more challenging in the Norwich Policy Area (NPA) with its projected above average growth of people, housing and jobs.

R2.6.3 Secondly, no measures or evidence base of how such targets (if they existed) might be delivered and verified are given. The JCS is unsound, here, in respect of the Climate Change Act and the first three carbon budgets of the Committee on Climate Change.

GNDP designed-out carbon accounting as early as 2007

R2.7.1 The Norfolk and Norwich Transport Action Group (NNTAG) asked GNDP (Ms Sandra Easthaugh) a number of questions in 2007, including this one and answer from GNDP:

Q4. Has a carbon audit been undertaken for the different growth location options?

Answer: No. This would be far too detailed at this stage. Issues around transport and accessibility are key considerations for assessing locations. Minimising carbon emissions arising from the development will be something for master planning stages. An SA of the potential locations for growth will be used to inform the selection of the Preferred Option.

R2.7.2 It is clear here that GNDP sought to design out carbon accounting in the JCS early on.

GNDP failed to build in carbon accounting and follow existing practice

R2.8.1 I subsequently raised the need for carbon targets and accounting at a meeting with the GNDP Programme Manager, Ms Sandra Easthaugh, and her senior colleagues in autumn 2009 suggesting that quantified targets were needed before it is possible to evaluate different policies and options against any strategic objectives of cutting emissions.

R2.8.2 To try to help the GNDP team at this stage, I showed them parts of the London Mayor’s Transport Strategy part of the London Plan that does do this including carbon emission targets on a sector-by-sector basis by 2025. Some key figures from this document are provided in Appendix 1.

R2.8.3 *No such targets are in the JCS meaning that it is not possible to make any sensible evaluation of the GNDP JCS transport policies and how they conform with national targets such as reducing carbon emission by 80% by 2050 in the UK Climate Change Act (2008).*

R2.8.4 *I urge the inspectors that such an overall strategy for carbon with overall targets and the evidence base of achievability needs to be in the JCS itself, as this is central to underpinning the sustainability of the plan, to testing options on carbon impacts and ensuring the plan is consistent with national policy.*

R2.8.5 It is fundamental to understand that delaying any emission targets until the delivery plan is too late. All the experts agree that reducing carbon from transport is going to be very difficult. If the overall strategy is not right at the DPD/JCS level then the delivery plan will not be able to (or be ‘sound’ enough to) deliver national and regional emissions reduction targets. Put another way, *if a transport policy that is not based around evidence based reductions in emissions (ie: that are set in concrete at the JCS stage), then no amount of tweaking delivery plans later will put the policy back on track.*

R2.8.6 The GNDP JCS is therefore inconsistent with national policy in the areas of Spatial Vision and Objectives [Matter 1 (B1)], Soundness of the Growth Triangle [Matter 3 (B2)], NATS [Matter 5 (A)], Sustainability, environment and design [Matter 8 (A)].

Carbon emissions accounting is totally missing from EIP88

R2.9.1 The recently released EIP88⁷ [EM conclusions Issues 3 and 4: Public Transport and the Northern Distributor Road] provides a list of the transport measures needed for a ‘full low-carbon development’ and describes them as being ‘ultimately proposed’ (section 5.1.6). It is not clear what ‘ultimately proposed’ means in this context, but it has a tentative ring in terms of real delivery. Crucially, the document doesn’t contain any real plan with dates for the introduction of its measures. It appears to be designed to ‘sell’ Norwich Area Transportation Strategy Implementation Plan to the Inspectors rather than provide a real evidence base of the ‘when and how’ of public transport development in the NPA.

R2.9.2 Whilst EiP88 sets some good aspirations – if all these measures were really to be implemented - it is totally deficient in indicating the real carbon benefits/disbenefits of the whole NATS strategy as follows:

- it does not include a proper timeline or quantification of usage of the measures/services themselves
- it does not show the introduction of the NDR alongside these measures which is known to bring major carbon disbenefits (see above)
- there is no carbon targets or accounting for this transport model so it is not possible to determine what the overall carbon mitigation impact will be or assess options (including not building the NDR)

⁷ This document was only made available on the GNDP website on 4th October 2010 – 4 working days before the original submission deadline.

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|---|---|
| Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk produced by the Greater Norwich Development Partnership | Norwich Green Party, representation number 8018 |
| Representation 2: Matter 1 (B1) and Matter 5 (A,B,C) and also Matter 3 (B2)(B4), Matter 8 (A). | |

Carbon emission reduction planning is totally missing from the decision process within EIP86

R2.10.1 The recently released EIP86⁸ [EM conclusions Issue 3: “The distribution of development, particularly in relation to public transport opportunities”] gives an audit trail of decisions leading to Option 2A. Whilst, this document appeared very late on the GNDP website [4th October] not giving community stakeholders enough time to analyse and respond to it, it is clear that carbon emission reduction planning was not taken into account in the decision process.

Carbon emission reduction is not properly addressed in the JCS Sustainability Appraisal⁹

R2.11.1 “Annex III – Appraisal Matrices” (starting at page 83) of the pre submission SA report omits any mention of the annual carbon emissions associated with NDR (see R2.4.3) that were submitted by Norfolk to the DfT. For example, in appraising ENV 1 for The Spatial Vision on page 83, the claim is made that the NDR will benefit ENV1 by improving public transport, cycling and walking. [This claim will be challenged by others at the Inspection and whilst I support that challenge I don’t discuss it further here] What is pertinent, here, is the huge omission that the authors of the SA make in not mentioning the annual carbon emissions associated with NDR (see R2.4.3) in the appraisal as these are a major carbon disbenefit that simply makes the JCS fails to comply with SA Objective ENV1.

R2.11.2 The omission in using the NDR emission data applies also to these appraisal statements: ENV 6, The Spatial Vision, page 84; ENV 1, Policy 8, page 132; ENV 6, Policy 8, page 133; ENV 1, Policy 9, page 138; ENV6, Policy 9, page 139.

R2.11.3 This begs the question of whether Scott Wilson Associates were aware of the emission figures provide by Norfolk County Council to the Department for Transport (in 2008) when they published this report in September 2009, and two consequential questions:

1. If they knew these figures why did they not use them in the SA?
2. If they did not, why did GNDP, a partner of Norfolk County Council, not provide the data to Scott Wilson.

This a major question on the JCS process and its legitimacy which should be answered.

R2.11.4 The July 2010 update¹⁰ of the Sustainability Appraisal does not rectify this omission.

R2.11.5 *The Sustainability Appraisal does not mention carbon reduction targets or accounting, nor seek to use such quantifiable data within its appraisal methodology. This not only a major omission, but in this author’s view a profound methodological flaw, in appraising sustainability at this time, when this country has had a Climate Change Act already on the statute for 2 years, and Carbon Budgets established up to 2023.*

⁸ This document was only made available on the GNDP website on 4th October 2010 – 4 working days before the original submission deadline.

⁹ Greater Norwich Development Partnership: Pre-Submission Joint Core Strategy Sustainability Appraisal Report, Scott Wilson, September 2009

¹⁰ Focussed Changes to the Submission Joint Core Strategy, Sustainability Appraisal Report, Scott Wilson, July 2010

A “Plan B” JCS is required with sustained and quantified transport emission reductions

R2.12.1 At the Inspector’s Exploratory Meeting, there was discussion of whether there had been a ‘Plan B’ and at one point a GNDP official admitted that there was no Plan B.

R2.12.2 The evidence above indicates that the current JCS provides insufficient evidence that it will build in necessary shifts in carbon reduction and modal shift. By designing out any carbon accounting within the JCS from 2007, the GNDP has generated a plan that by its very design can not prove one way or another its credibility in carbon reduction capability.

R2.12.3 However, there is evidence from Norfolk County Council’s own submission to the Department of Transport that the NDR, if built, would introduce a significant new source (25,000 tonnes a year) of carbon emissions. As shown above, if built, the NDR makes it very difficult/impossible to create a measurable transport model that can then really reduce carbon emissions. Further, the NATS IP has some very good public transport aspirations but shows no time plan for delivery, and fails to show the carbon impact of an NDR alongside public transport delivery.

R2.12.4 It is clear above that ‘Plan A’, the current JCS, is inconsistent with national policy in the Climate Change Act (2008) and PPS12/PPS1. Therefore, I urge the inspectors that a Plan B is required with carbon reduction targets, and that shows how it would meet these national policy objectives of reducing carbon emissions and achieving a modal shift to public transport, walking and cycling.

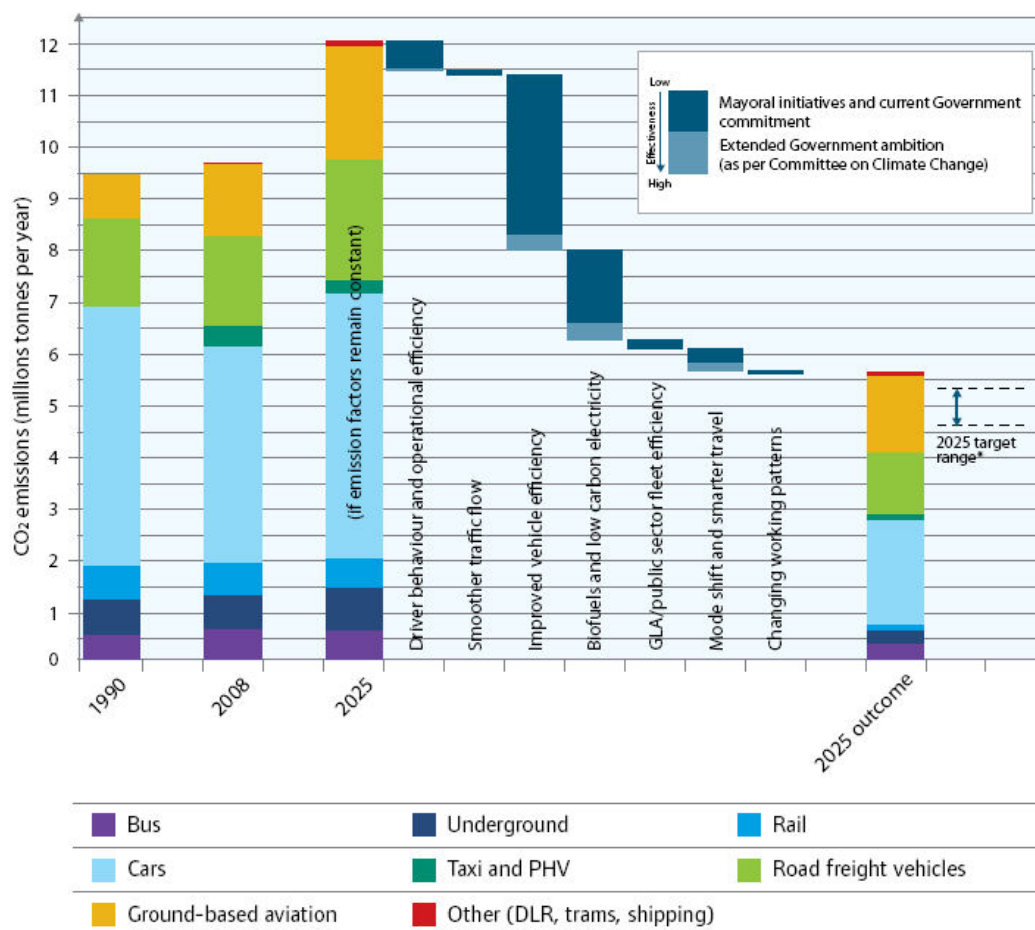
R2.12.5 With all these points in mind, the following is necessary:

1. As above, a Plan B JCS to be developed. **This does mean going back to the drawing board, building in carbon accounting and presenting a number of options including ‘No Growth Triangle’ and ‘No NDR’ ones.**
2. An evidence base of how carbon emissions will be reduced, including a substantive re-write of NATS and NATS IP to contain emissions-centric modelling and options appraisal against a delivery plan with real dates.
3. Carbon emission reduction targets and delivery measures for them. Interim annual targets are required between 2010 and 2031 with sector-by-sector models (public transport modes, road usage, freight etc) of transport emissions across the NPA. London has gone some way towards this with the “Mayor’s Transport Strategy - Proposals to reduce transport’s contribution to climate change and improve its resilience” document (see Appendix 1 below) - **if London can start doing this why can the GNDP not do this, despite being asked for carbon accounting since 2007?**

APPENDIX 1: Example from London Mayor’s Transport Strategy of high-level carbon targets

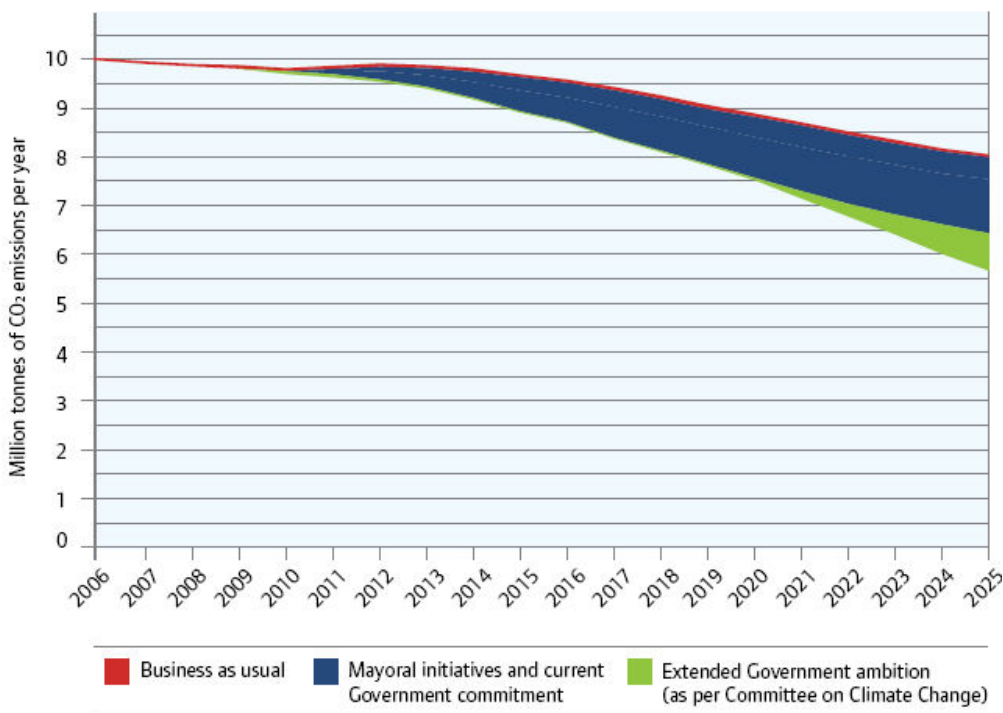
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Figure 61: Mid-range estimate of CO2 reduction impacts of transport policy areas by 2025



I also made the point to GNDP officers that interim targets and policies for 'getting there' were needed, as now given by a year-on-year profile graph in the London plan as below:

Figure 62: Projected transport sector CO₂ emissions to 2025



I would emphasise that I don't necessarily support, or not, any of the London policies, nor that that they are relevant for Norfolk, but I am showing these as an illustration of the necessary quantified approach to emissions that is manifestly missing from the GNDP JCS.

Representation 2 (copy for Matter 5)

The need for a genuine low carbon transport policy and plan

R2.1.1 This part of the Norwich Green Party representation is authored by Councillor Andrew Boswell. I make this statement as local politician elected to Norfolk County Council in 2005 to represent residents in the Norwich Nelson division, an area to the West of the City Centre.

R2.1.2 I am also an individual concerned that we have a very few years to deal effectively in mitigating climate change and making the associated substantial reductions in carbon emissions. We will fail our children and their children's generations if we do not tackle this issue seriously and with forensic attention focussed on **really** reducing emissions rather than just making aspirational statements.

R2.1.3 The core strategy should identify mitigating climate change as one of its critical issues early on and then develop the strategy to address it with other critical issues. Crucially, it fails to:

4. identify mitigation of climate change as a critical issue
5. establish clearly the link between effective climate change mitigation and real numerical and quantifiable reductions in total carbon emissions across the JCS area
6. develop the strategy to make real numerical and quantifiable reductions in total carbon emissions, and across sectors

R2.1.4 This representation addresses to what extent the GNDP JCS has developed a transport and travel policy that will actively reduce quantifiable carbon emissions from the transport sector, builds in deliverable and future proofed low carbon transport, and avoids creating any additional sources of transport emissions.

R2.1.5 It is worth noting an important general point that, where the GNDP JCS addresses climate change, it tends to do so through 'low carbon development' ie: in new low energy housing technology. Whilst this approach may produce worthwhile benefits, it is only part of the equation. Climate change has to be addressed throughout all sectors and processes of the JCS. As the carbon emission reduction policy and strategy for the transport sector are particularly weak in the JCS, this representation concentrates on this area. National policy in the Climate Change Act (2008) is very challenging, and weakness in any one area of the JCS lets the whole down, essentially making it unsound and inconsistent with the national agenda.

R2.1.6 Planning Inspectorate experience of examining other DPDs¹ shows that "critical issues often raise difficult and possibly uncomfortable questions". This is no truer than when planning bodies are faced with providing a quantified strategy for reducing total and sector carbon emissions – the evidence below shows that the GNDP have attempted to duck this issue and that

R2.1.7 *The representation overarches a number of 'Matters'. I am submitting it primarily to be considered for Matter 1: (B1) [consistency with national policy] and Matter 5: (A) [NATS consistency with national policy], (B) [delivery confidence] and (C) [unsoundness on transport].* However, I request that it is also considered for Matter 3: (B2) [soundness of growth triangle/national policy], (B4) [public transport improvement]; Matter 8: (A) [consistency with national policy].

R2.1.8 With respect to this representation, I request the opportunity to take part in the Inspection Hearing on Matters 1 and 5 (, and Matters 3 and 8 at the Inspector's discretion).

¹ Examining Development Plan Documents : Learning from Experience, September 2009, The Planning Inspectorate

Background and National Policy Framework

R2.2.1 PPS1 Supplement on Climate Change, section 9 gives the Key Planning Objectives necessary to deliver sustainable development. It requires planning bodies to:

"deliver patterns of urban growth and sustainable rural development that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking; and which overall, reduce the need to travel, especially by car".

R2.2.2 PPS12, Local Spatial Planning, section 4.31 indicates that

"the courts have held that the Government's statements of planning policy are material considerations which must be taken into account, where relevant, in decisions on planning applications."

R2.2.3 I bring to the inspectors attention the recent Commission for Integrated Transport (CfIT) study² that generally argues that current planning guidance on transport issues is framed around reducing the need to travel by car (as above, PPS1) rather than achieving an actual reduction in car travel. CfIT argue that policies designed to achieve the former objective are unlikely to achieve the latter. This is extremely pertinent to the JCS and reducing carbon emissions – quantifiable reductions will only result from actively reducing car travel.

R2.2.4 Thus, in developing a Core Strategies, authorities should not only take material account of PPS1 and the need to secure the "fullest possible use" of sustainable transport, but also set out to generate an actual reduction in car travel.

R2.2.5 Further, the UK Climate Change Act 2008 has set the national target of an 80% reduction in CO2 emissions by 2050. There is clearly a serious need to address transport emissions at every step of planning and transport development, or simply, we, as a country, will fail completely to get anywhere near achieving this legislative target. Therefore, the GNDP should be able to demonstrate that:

- that the issue of reducing transport emissions has been a key issue in policy decision making through the development of the JCS, and
- that the resulting JCS contains an emission reducing transport policy as one of its main planks, along with a substantive evidence base that it will reduce rather than increase emissions, and
- the emissions reduction strategy is backed up with full quantitative data – this means emission reduction targets, and meaningful ways of measuring progress against them.

R2.2.6 In their June 2010 (2nd) Progress Report³, the UK Committee on Climate Change⁴ states:

Integrated land use and transport planning: we estimate that emissions reductions of up to 2 MtCO2 are available in 2020 through designing new residential and commercial developments to minimise additional car miles.

² Commission for Integrated Transport (2009), Land use and Transport – Settlement Patterns and the Demand for Travel.

³ <http://www.theccc.org.uk/reports/2nd-progress-report>

⁴ The independent advisory body that advises UK Government on emissions targets, and reports to Parliament on progress made in reducing greenhouse gas emissions

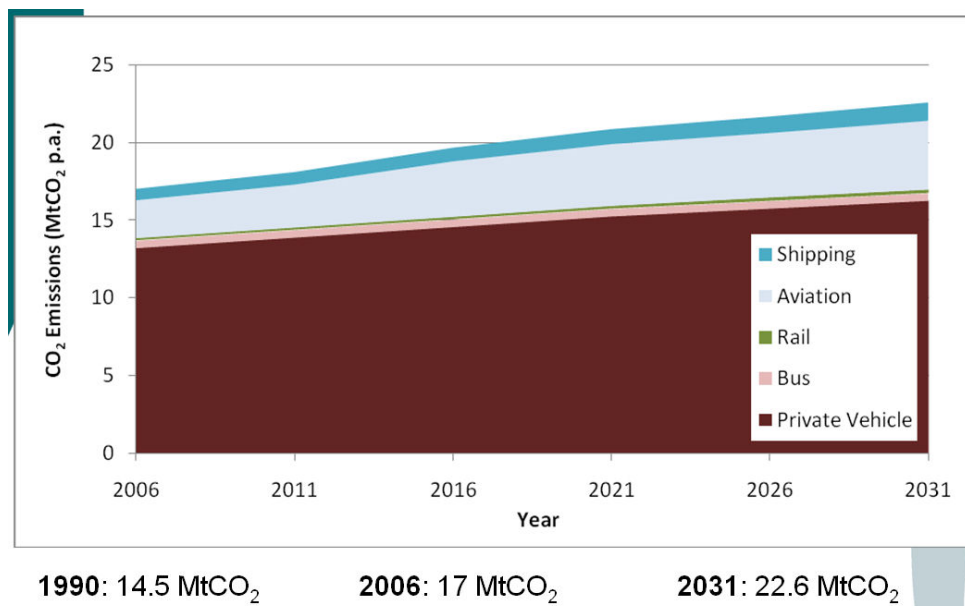
The report notes that this level of emissions reductions (the 2 MtCO₂ is part of a total of 25 MtCO₂ for transport emissions in total by 2020) “is required both to meet the first three carbon budgets, and to lay the foundations for deep cuts in transport emissions required through the 2020s”. For such large and numerically defined emission reductions to be achieved, it will be necessary also for DPDs to provide strategies with numerical emission reduction targets for their own localities.

R2.2.7 The JCS provides no such targets for its transport strategy – it is therefore unsound with respect to critical emerging national policy. This comment applies to Matter 5 (A), Matter 8 (A), and Matter 1 (B1).

The regional transport carbon situation

R2.3.1 It is important to understand that where we are talking above about reducing total transport emissions, that the existing trend is not flat. In fact, the general long term effect is of rising transport emissions, therefore the challenge is the double task of both stopping the rise and producing a reduction. This statement reflects long term trends rather than any short term fluctuations due to economic recession.

R2.3.2 The recent “East of England Transport and Carbon Study” by Atkins for EERA back this up with the strong message that transport carbon emissions ‘will grow if no action is taken’ and that ‘the main area of growth in emissions under a business as usual scenario is road transport’. The report’s ‘business as usual’ analysis shows in fact a steady increase in emissions (an estimated 33% increase) with the majority being private vehicle use, as below:



| | |
|---|---|
| Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk produced by the Greater Norwich Development Partnership | Norwich Green Party, representation number 8018 |
| Representation 2: Matter 5 (A,B,C) and Matter 1 (B1) and also Matter 3 (B2)(B4), Matter 8 (A). | |

The NDR introduces and builds in major carbon disbenefits into the JCS

R2.4.1 A key problem is that the JCS has been developed from inception around the NDR road. This immediately builds in major carbon disbenefits. ***The known carbon disbenefits of the road are at a scale that no realistic public transport policy can be developed to offset them, let alone generate an overall emissions reduction.*** Despite this major flaw when considering the carbon impacts, the public were never offered a ‘No NDR’ option in any of the consultations, contrary to Aarhus Convention and PPS12/PPS1 compliance.

R2.4.2 This is an example of a critical issue (emission reduction) raising an uncomfortable question (whether the NDR road can be built without increasing emissions) in the JCS (see R.2.1.6 above). The Councils involved have been in denial in both addressing this question and allowing the public to comment on it. The public have never been told the additional emissions associated with the road in any JCS documentation although Norfolk County Council knew the figures below when they submitted their business case to the Department of Transport in 2008.

R2.4.3 The Major Scheme Business Case (MSBC) for the Northern Distributor Road (NDR) as submitted to the Department of Transport in 2008⁵ calculated that the road would introduce a further 25,000 tonnes of annual CO2 emissions in its first year – **an increase of 6% over current Norwich road transport emissions.** The road was also forecast to increase Norwich-wide transport carbon emissions by a staggering 57% by 2071. It would also be making a significant contribution to the estimated 33% increase in transport CO2 emissions in the East of England between 2006 and 2031 under a Business As Usual scenario from the Atkins study (see above).

R2.4.4 The corollary of these emission figures for the proposed NDR road is that any public transport scheme would need to remove 6% of vehicles and their drivers from Norwich’s road immediately the road opened, and continue to remove more vehicles (from the NPA area) as the road’s use expanded, just to break even (ie: achieve an overall 0% increase/decrease in emissions) – this is clearly impossible. [Matter 5 (A), Matter 8 (A), Matter 1 (B1)]

R2.4.5 It is worth noting that the County Council miscalculated the economic cost of these emissions in their MSBC to DfT as highlighted by CPRE (Norfolk) and NNTAG⁶. Using the standard DfT webtag methodology for appraising road schemes, the NDR carbon emissions have a cost of £83million. When this correction is applied, the Benefit-to-Cost Ratio of the road (BCR) falls from 2.7 in the BCR to 1.6, below the DfT threshold of 2.0.

R2.4.6 Not only has the high carbon emissions associated with the NDR not been published in the JCS, the low Benefit-to-Cost ratio and economic impact of the carbon costs has not been included in any section or background evidence of the JCS.

⁵ Appendix 3I, Norwich Northern Distributor Road Major Scheme Business Case for programme entry (NDR MSBC), Norfolk County Council,

⁶ Norwich Northern Distributor Road, Critique of the Major Scheme Business Case for Programme Entry, Norfolk and Norwich Transport Action Group and CPRE (Norfolk)

The JCS sets no objectives to reduce car use or reduce carbon emissions from transport

R2.5.1 Objective 1 (JCS, page 26) speaks primarily of ‘zero and low carbon developments’ to reduce carbon emissions. This is an example of the JCS only referring to emission reduction in terms of low carbon development (see R2.1.5). Although Objective 1 does mention ‘sustainable access’, this is too vague to be meaningful.

R2.5.2 Objective 7 (JCS, page 27) speaks of reducing the need to travel by car and greater use of sustainable transport modes. It does not specify an overall reduction in car use, or an overall target for reductions in transport emissions. This falls into the aspirational, but undeliverable type of statement highlighted by the CfIT (see R2.2.3).

The JCS sets no targets or delivery measures on carbon emissions

R2.6.1 A key element of planning for low carbon transport must be to set carbon emission targets, and realistic, quantitative methods of auditing their delivery. These must be at a high profile in DPDs. *The JCS makes some aspirational statements on carbon emissions but it fails, in two respects, to grasp this critical issue at all.*

R2.6.2 Firstly, there are no targets for carbon emission reductions in any sector, and especially from transport, made. Yet, the difficulties in reducing transport carbon are even more challenging in the Norwich Policy Area (NPA) with its projected above average growth of people, housing and jobs.

R2.6.3 Secondly, no measures or evidence base of how such targets (if they existed) might be delivered and verified are given. The JCS is unsound, here, in respect of the Climate Change Act and the first three carbon budgets of the Committee on Climate Change.

GNDP designed-out carbon accounting as early as 2007

R2.7.1 The Norfolk and Norwich Transport Action Group (NNTAG) asked GNDP (Ms Sandra Easthaugh) a number of questions in 2007, including this one and answer from GNDP:

Q4. Has a carbon audit been undertaken for the different growth location options?

Answer: No. This would be far too detailed at this stage. Issues around transport and accessibility are key considerations for assessing locations. Minimising carbon emissions arising from the development will be something for master planning stages. An SA of the potential locations for growth will be used to inform the selection of the Preferred Option.

R2.7.2 It is clear here that GNDP sought to design out carbon accounting in the JCS early on.

GNDP failed to build in carbon accounting and follow existing practice

R2.8.1 I subsequently raised the need for carbon targets and accounting at a meeting with the GNDP Programme Manager, Ms Sandra Easthaugh, and her senior colleagues in autumn 2009 suggesting that quantified targets were needed before it is possible to evaluate different policies and options against any strategic objectives of cutting emissions.

R2.8.2 To try to help the GNDP team at this stage, I showed them parts of the London Mayor’s Transport Strategy part of the London Plan that does do this including carbon emission targets on a sector-by-sector basis by 2025. Some key figures from this document are provided in Appendix 1.

R2.8.3 *No such targets are in the JCS meaning that it is not possible to make any sensible evaluation of the GNDP JCS transport policies and how they conform with national targets such as reducing carbon emission by 80% by 2050 in the UK Climate Change Act (2008).*

R2.8.4 *I urge the inspectors that such an overall strategy for carbon with overall targets and the evidence base of achievability needs to be in the JCS itself, as this is central to underpinning the sustainability of the plan, to testing options on carbon impacts and ensuring the plan is consistent with national policy.*

R2.8.5 It is fundamental to understand that delaying any emission targets until the delivery plan is too late. All the experts agree that reducing carbon from transport is going to be very difficult. If the overall strategy is not right at the DPD/JCS level then the delivery plan will not be able to (or be ‘sound’ enough to) deliver national and regional emissions reduction targets. Put another way, *if a transport policy that is not based around evidence based reductions in emissions (ie: that are set in concrete at the JCS stage), then no amount of tweaking delivery plans later will put the policy back on track.*

R2.8.6 The GNDP JCS is therefore inconsistent with national policy in the areas of Spatial Vision and Objectives [Matter 1 (B1)], Soundness of the Growth Triangle [Matter 3 (B2)], NATS [Matter 5 (A)], Sustainability, environment and design [Matter 8 (A)].

Carbon emissions accounting is totally missing from EIP88

R2.9.1 The recently released EIP88⁷ [EM conclusions Issues 3 and 4: Public Transport and the Northern Distributor Road] provides a list of the transport measures needed for a ‘full low-carbon development’ and describes them as being ‘ultimately proposed’ (section 5.1.6). It is not clear what ‘ultimately proposed’ means in this context, but it has a tentative ring in terms of real delivery. Crucially, the document doesn’t contain any real plan with dates for the introduction of its measures. It appears to be designed to ‘sell’ Norwich Area Transportation Strategy Implementation Plan to the Inspectors rather than provide a real evidence base of the ‘when and how’ of public transport development in the NPA.

R2.9.2 Whilst EiP88 sets some good aspirations – if all these measures were really to be implemented - it is totally deficient in indicating the real carbon benefits/disbenefits of the whole NATS strategy as follows:

- it does not include a proper timeline or quantification of usage of the measures/services themselves
- it does not show the introduction of the NDR alongside these measures which is known to bring major carbon disbenefits (see above)
- there is no carbon targets or accounting for this transport model so it is not possible to determine what the overall carbon mitigation impact will be or assess options (including not building the NDR)

⁷ This document was only made available on the GNDP website on 4th October 2010 – 4 working days before the original submission deadline.

Carbon emission reduction planning is totally missing from the decision process within EIP86

R2.10.1 The recently released EIP86⁸ [EM conclusions Issue 3: “The distribution of development, particularly in relation to public transport opportunities”] gives an audit trail of decisions leading to Option 2A. Whilst, this document appeared very late on the GNDP website [4th October] not giving community stakeholders enough time to analyse and respond to it, it is clear that carbon emission reduction planning was not taken into account in the decision process.

Carbon emission reduction is not properly addressed in the JCS Sustainability Appraisal⁹

R2.11.1 “Annex III – Appraisal Matrices” (starting at page 83) of the pre submission SA report omits any mention of the annual carbon emissions associated with NDR (see R2.4.3) that were submitted by Norfolk to the DfT. For example, in appraising ENV 1 for The Spatial Vision on page 83, the claim is made that the NDR will benefit ENV1 by improving public transport, cycling and walking. [This claim will be challenged by others at the Inspection and whilst I support that challenge I don’t discuss it further here] What is pertinent, here, is the huge omission that the authors of the SA make in not mentioning the annual carbon emissions associated with NDR (see R2.4.3) in the appraisal as these are a major carbon disbenefit that simply makes the JCS fails to comply with SA Objective ENV1.

R2.11.2 The omission in using the NDR emission data applies also to these appraisal statements: ENV 6, The Spatial Vision, page 84; ENV 1, Policy 8, page 132; ENV 6, Policy 8, page 133; ENV 1, Policy 9, page 138; ENV6, Policy 9, page 139.

R2.11.3 This begs the question of whether Scott Wilson Associates were aware of the emission figures provide by Norfolk County Council to the Department for Transport (in 2008) when they published this report in September 2009, and two consequential questions:

3. If they knew these figures why did they not use them in the SA?
4. If they did not, why did GNDP, a partner of Norfolk County Council, not provide the data to Scott Wilson.

This a major question on the JCS process and its legitimacy which should be answered.

R2.11.4 The July 2010 update¹⁰ of the Sustainability Appraisal does not rectify this omission.

R2.11.5 *The Sustainability Appraisal does not mention carbon reduction targets or accounting, nor seek to use such quantifiable data within its appraisal methodology. This not only a major omission, but in this author’s view a profound methodological flaw, in appraising sustainability at this time, when this country has had a Climate Change Act already on the statute for 2 years, and Carbon Budgets established up to 2023.*

⁸ This document was only made available on the GNDP website on 4th October 2010 – 4 working days before the original submission deadline.

⁹ Greater Norwich Development Partnership: Pre-Submission Joint Core Strategy Sustainability Appraisal Report, Scott Wilson, September 2009

¹⁰ Focussed Changes to the Submission Joint Core Strategy, Sustainability Appraisal Report, Scott Wilson, July 2010

A “Plan B” JCS is required with sustained and quantified transport emission reductions

R2.12.1 At the Inspector’s Exploratory Meeting, there was discussion of whether there had been a ‘Plan B’ and at one point a GNDP official admitted that there was no Plan B.

R2.12.2 The evidence above indicates that the current JCS provides insufficient evidence that it will build in necessary shifts in carbon reduction and modal shift. By designing out any carbon accounting within the JCS from 2007, the GNDP has generated a plan that by its very design can not prove one way or another its credibility in carbon reduction capability.

R2.12.3 However, there is evidence from Norfolk County Council’s own submission to the Department of Transport that the NDR, if built, would introduce a significant new source (25,000 tonnes a year) of carbon emissions. As shown above, if built, the NDR makes it very difficult/impossible to create a measurable transport model that can then really reduce carbon emissions. Further, the NATS IP has some very good public transport aspirations but shows no time plan for delivery, and fails to show the carbon impact of an NDR alongside public transport delivery.

R2.12.4 It is clear above that ‘Plan A’, the current JCS, is inconsistent with national policy in the Climate Change Act (2008) and PPS12/PPS1. Therefore, I urge the inspectors that a Plan B is required with carbon reduction targets, and that shows how it would meet these national policy objectives of reducing carbon emissions and achieving a modal shift to public transport, walking and cycling.

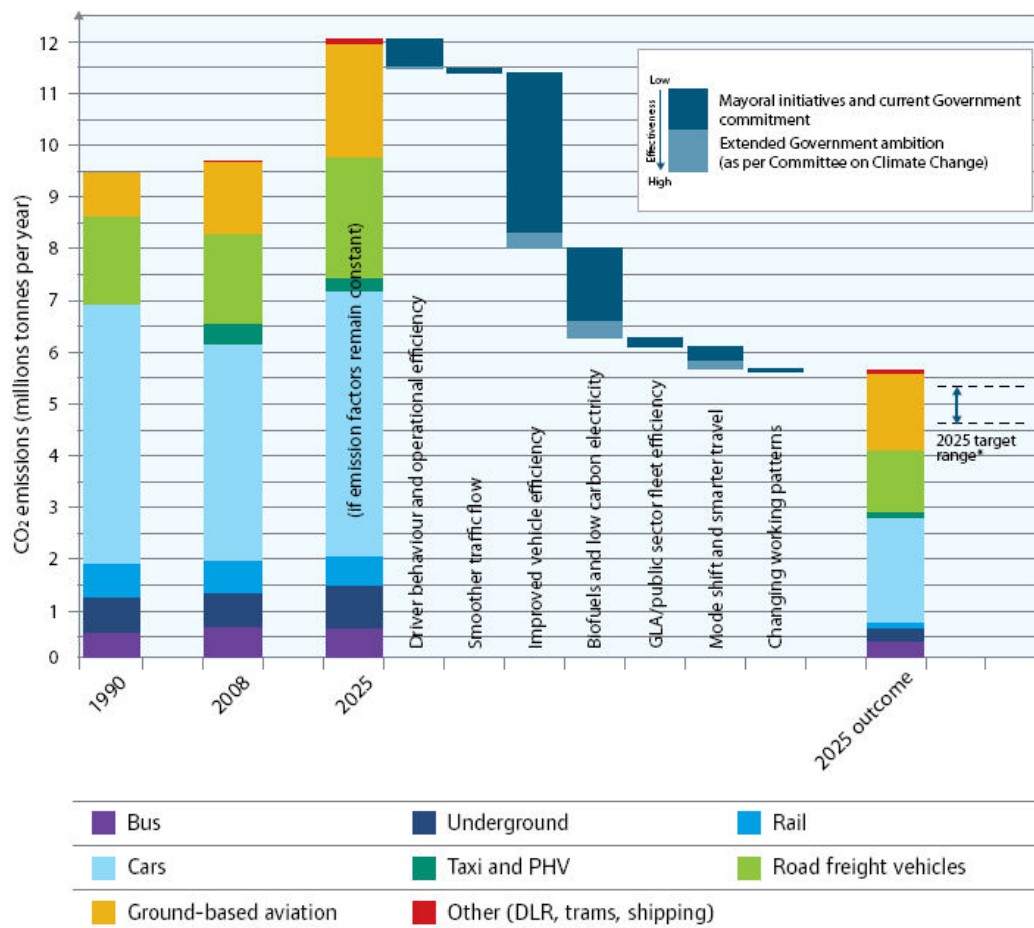
R2.12.5 With all these points in mind, the following is necessary:

1. As above, a Plan B JCS to be developed. **This does mean going back to the drawing board, building in carbon accounting and presenting a number of options including ‘No Growth Triangle’ and ‘No NDR’ ones.**
2. An evidence base of how carbon emissions will be reduced, including a substantive re-write of NATS and NATS IP to contain emissions-centric modelling and options appraisal against a delivery plan with real dates.
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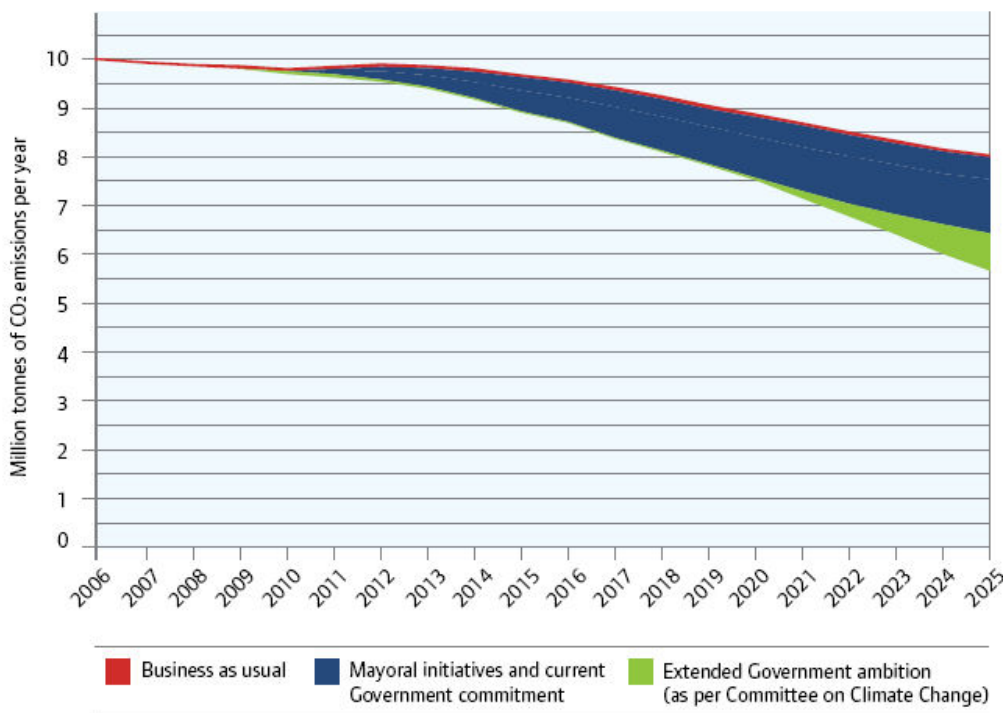
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