Greater Norwich Local Plan

Sustainability Appraisal Scoping Report: Report of Representations Received on Draft SA Scoping Report

December 2016

Reference	GNLP_SA_01
Respondent	Natural England

Date: 12 August 2016
Our ref: 188741
Your ref: GNLP SA Scoping Report

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

GNLP Sustainability Appraisal Scoping
Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

BY EMAIL ONLY

Dear Sir/Madam

Greater Norwich Local Plan Draft Sustainability Appraisal Scoping Report Consultation

Thank you for your consultation on the above dated 20 June 2016 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We welcome the efforts made by the councils involved (Broadland District Council, Norwich City Council and South Norfolk Council) in preparing the draft Scoping Report. We are reasonably satisfied that the Sustainability Appraisal (SA) of the Greater Norwich Local Plan is proceeding in a proper, logical and consistent manner. We welcome the integration of the requirements of the environmental assessment of Plan and Programmes regulations 2004, into the SA process. Please note under the section on *Legislative Requirements* the Birds Directive Directive 2009/147/EC should be included as Special Protected Areas (SPAs) are designated under this directive.

Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;

- Green Infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- River basin management plans
- AONB and National Park management plans.
- Relevant landscape plans and strategies.

Topics Covered and Issues Identified

We strongly support the topic based approach taken and are pleased to see consideration of issues of importance to Natural England (including but not limited to, statutory designated sites and landscapes, biodiversity, climate change, access to nature, water resources, geology and soils). In general, most of the environmental issues that may arise from the proposed plan have been correctly identified.

In the table entitled *Figure 82 Summary list of Issues* beginning on p131, it would be helpful to consider, in the SA, the following issues:

- **Air Quality** – changes in air quality on designated sites from increased emissions, especially those from increased traffic movements

- **Biodiversity, Geodiversity and Green Infrastructure** (GI)– protecting existing/developing new GI in areas of major housing growth and strategic employment sites
- **Health –** lack of access to GI close to homes and businesses
- **Transport and Assess to Services** - impacts on biodiversity, landscape, air quality and climate change from transport infrastructure improvements or new developments
- **Housing** – protecting existing/developing new GI alongside the delivery of new housing and economic growth

The SA needs to consider the potential for cross cutting issues, for example impacts on agriculture and Best and Most Versatile (BMV) land, from the development of employment land, could have adverse effects on biodiversity and landscape character. Similarly, air, water, light and noise pollution could have implications for biodiversity. The provision of accessible green infrastructure could have implications for health and wellbeing.

The SA needs to consider all relevant pathways for impacts on the notified features of designated sites including damage/disturbance through uncontrolled access and/or increased recreational pressure. The multi-functional benefits of a high quality well-connected green infrastructure network, including provision of informal open space to absorb increased recreational pressure, should be considered through the SA, as a good and effective local plan SA should identify suitable mitigation measures to address any adverse effects predicted from development.

SA Objectives

We broadly support the over-arching objectives identified in *Figure 84 – Sustainability Appraisal Framework* (p137 – 144). Given the number of issues identified under each topic, it may be helpful to break these over-arching objectives down further and to help ensure that there are suitable indicators identified for each one. The decision making criteria for site allocations and general policies could be expanded for some objectives, for example:

Air Quality: Will it minimise the impact of air quality on designated site?

Health or Green infrastructure: There are questions relating to enhancing provision of recreational resources, but none relating to impacts on existing recreational assets (quality and or extent). We suggest adding "Will it avoid impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths?"

Biodiversity, Geodiversity and Green Infrastructure: There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding "Will it ensure that current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?"

Landscape: Will it minimise impacts on the setting or boundary of The Broads?

Water: There are questions relating to new developments but it would be useful to see how greater water efficiency in existing homes could be delivered under the new local plan. How will it impact on any designated sites in terms of water quality discharges? How will it impact on water availability?

Monitoring Indicators

As set out in Planning Practice Guidance, you should be **monitoring the significant environmental effects of implementing the current local plan**. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).

The natural environment metrics provided in the table under *Figure 84 – Sustainability Appraisal Framework* (p137 – 144) appear to be driven by factors other than the plan's performance, in some cases. They are thus **likely to be of little value in monitoring the performance of the Plan**. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes.

Bespoke indicators should be chosen relating to the outcomes of development management decisions.

Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance, including SSSIs and CWSs.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

Landscape:

- Amount of new development within the setting of /or on the boundary of The Broads with commentary on likely impact. (The current suggested indicator is not appropriate and appears more suitable to measuring economic or housing targets)

Green infrastructure:

- Number of planning approvals that generated loss of existing strategic GI
- Percentage of the population within the Greater Norwich local plan area having access to a natural greenspace within 400 metres of their home.
- Length of new greenways constructed or existing greenway protected
- Hectares of accessible open space per 1000 population.

Soils:

- Area of class 1, 2 or 3 a (BMV) agricultural land built on (This should an essential indicator as the SA has already identified that extensive areas of BMV land will need to be developed as there is a limited supply brownfield sites)

We recommend that the list of indicators is re-visited and revised so that all major effects of the plan on the environment can be monitored. We would be happy to work with the Council to help ensure a suitable indicator set is developed.

Habitats Regulations Assessment

We trust that a separate Habitats Regulations Assessment will be prepared. The conclusions and recommendations of the assessment should be used to inform the SA

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Louise Oliver on 02080 264893. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Louise Oliver
Norfolk and Suffolk Team

Reference	GNLP_SA_02
Respondent	Environment Agency

Greater Norwich Local Plan Team
PO Box 3466
Norwich
NR7 7NX

Via email:
sa@gnlp.org.uk

Our ref: AE/2006/000017/SE-02/SP1-L01
Your ref: GNLP SA Scoping Report

Date: 10 August 2016

Dear Sir/Madam

Greater Norwich Local Plan Sustainability Appraisal Scoping Report Consultation

Thank you for consulting us on this draft scoping report. Having reviewed the document we can confirm that we are broadly satisfied with the document as currently written, and look forward to working with you further as the Local Plan progresses. We do however have some minor comments to make at this stage.

We note that Section 2 Climate Change has a strong flood risk focus. As part of this, it will be important for the plan to consider the most recent climate change allowances for peak river flows. We have recently initiated discussions on the need to prepare an updated Strategic Flood Risk Assessment (SFRA) to incorporate these allowances. This will be an important piece of evidence to help ensure that the impacts of future flood risk on proposed development in the area can be accurately considered and addressed through the plan.

In addition to the climate change issues highlighted, you may also wish to consider how the Local Plan can promote adaptation or mitigation measures in respect different types of extreme weather. For example, higher temperatures and heat waves may become more frequent, and design and layout measures could be required to help to manage this.

We welcome the reference to the importance of water quality in Section 3, also addressed in Section 5. We would suggest that stronger emphasis is given to the River Basin Management Plan, and the 2015 update. The Local Plan has a role to play not just in ensuring that the Water Framework Directive (WFD) status of water bodies within the area is maintained, but can also contribute to the delivery of improvements identified as necessary within the RBMP. We would also suggest that WFD is specifically referenced in the Sustainability Appraisal Framework, either under 'Water' or 'Biodiversity'. An accompanying objective might be 'Contribute to achieving RBMP actions and objectives'.

Essex, Norfolk & Suffolk - Iceni House
Cobham Road, Ipswich, Suffolk, IP3 9JD
General Enquiries: 08708 506506 Fax: 01473 724205
Weekday Daytime calls cost 8p plus up to 6p per minute from BT Weekend Unlimited.
Mobile and other providers' charges may vary
Email: enquiries@environment-agency.gov.uk
Website: www.environment-agency.gov.uk

Similarly to the above, we welcome the specific reference to the River Wensum and the need to improve water quality in relation to WFD. We would suggest that this can be broadened to recognize the ecological importance of other watercourses within the Wensum catchment and beyond. There are known populations of protected species such as White clawed crayfish which are sensitive to changes in water quality.

Finally, we note the recognition in Section 16 of the need to review the Water Cycle Study. As with the SFRA, we are currently in discussion with LPAs across Norfolk on this issue.

We trust this advice is useful.

Yours faithfully

MR MARTIN BARRELL
Sustainable Places - Planning Specialist

Direct dial 020 302 58450
Direct e-mail martin.barrell@environment-agency.gov.uk

Reference	GNLP_SA_03
Respondent	Campaign to Protect Rural England (CPRE) (Norfolk)

Greater Norwich Local Plan:

Sustainability Appraisal Scoping Report Consultation

Consultation Response from CPRE Norfolk

9th August 2016

When the Joint Core Strategy was being finalised, Sandra Eastaugh, Manager of the Greater Norwich Development Partnership, explained to CPRE Norfolk that the development planned for in the strategy, pushed to the limit the amount of housing which could be accommodated within South Norfolk, Broadland and Norwich and warned that elevating housing targets to higher levels could not be achieved without serious environmental consequences. CPRE is therefore very concerned that the process of seeking sites for an additional allocation of 12,000 houses (to 2036) has already been set in motion.

We do not consider that it is necessary to increase housing targets above present levels and we agree with Ms Eastaugh that to do so would not be sustainable, because of the serious environmental consequences. CPRE campaigned against what we already consider to be inflated housing targets in the existing JCS warning that the damage to the countryside would be substantial. This damage is now being revealed as Greenfield developments take place but we have only had a glimpse of what is to come as the delivery of housing has failed to keep up with the targets set.

To inflate housing targets further would have a very negative impact on the countryside and could destroy those features that make the landscape of this area so special. It is unlikely that our tranquility, absence of noise and light pollution, relative absence of traffic congestion and rural charm could withstand the population increase resulting from the provision of an additional 72,000 houses over the 2001 - 2036 period - i.e. 60,000* dwellings (2001- 2026) plus 12,000 (2026-2036). Norwich would almost double in size.

CPRE therefore concludes that the single most important issue that must be addressed in the Sustainability Appraisal is the impact on the environment and landscape of raising housing targets.

We met with Tim Horspole (SNC), Phil Morris (Norfolk CC) and Phil Courtier (Broadland) on April 22nd 2016 and more recently with the Housing Minister and on both occasions were told that the adoption of additional housing targets was not a forgone conclusion and that housing market assessments need not be slavishly followed if local authorities can present a convincing case that the environmental harm caused by adopting higher targets is serious enough to outweigh potential benefits.

We consider that the vote to leave the EU casts serious doubt on the reliability of current Strategic Housing Market Assessments. Furthermore, such assessments have historically proved inaccurate indicators as to how the housing market actually performs. For example, up to March 2015 only 21,323 of the 47,500 houses planned for 2001 - 2026 had been completed. Given that windfalls, which are not included in the targets, of around 4,500 are envisaged and that there has

already been an over allocation of some 8,000 dwellings (above the 47,500 target) this means that the Joint Core Strategy already allows for some 60,000 new houses to 2026 (see footnote*). The delivery of 21,000 houses therefore represents a shortfall of 39,000 dwellings. The market is clearly not in harmony with market assessments. So why should we trust such assessments as a reliable indicator of future need?

In conclusion, CPRE asks that, given the huge size of existing unused allocations, that no new sites are designated for house building to 2036 until all existing allocations have been developed and that the key focus of the Sustainability Appraisal should be the impact on the environment and landscape of raising housing targets.

In order to protect the more rural parts of the JCS area from suburbanisation, we also consider it important that the Sustainability Appraisal explores the importance of maintaining the distinction between the Norwich Policy Area and the Rural Policy Area (RPA) and of retaining the present boundaries between these two areas. This will enable the current protection of the landscape and environment in the RPA to remain in place to 2036. The current settlement hierarchy should also be retained.

CPRE would also like the Sustainability Appraisal to consider the possibility of a Green Belt for Norwich.

David Hook (Chairman CPRE Norfolk Planning Group and Trustee)

* The 60,000 figure for new housing (2001 - 2026) in Broadland, South Norfolk and Norwich comprises:

- 37,500 (target for 2001 - 2021)
- 10,000 added in to the JCS for the period 2021 - 2026
- Estimated windfalls of 4,500 - not included in the site specific allocations
- 8,000 additional allocations to 2026 (through the bulk builders exploiting a lack of a 5 year land supply in the Norwich Policy Area and through extra housing being allocated in the North East growth triangle)

COMMENTS ON DRAFT SUSTAINABILITY APPRAISAL SCOPING REPORT (SELECTED SECTIONS)

Section 2. Climate Change (and Flood Risk)

This section does not include an Issues list at the end. There is a generic issue that needs a reference on flood risk that to follow on from the quote from the statement at paragraph 2.2.2, a quote from the NPPF paragraph 100 which states: "The NPPF also states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of greater risk, but where necessary, making it safe without increasing risk elsewhere".

Much of the GN area is relatively flat, with drainage problems. The experience with the JCS suggests that the procedures for avoiding these are inadequate for the development planned; and where precautions might be taken (for example raised footings for new development), they will not take into account any 'knock-on' effect might inflict on existing housing and other development.

The Local Plan process differs from the JCS process as policy development and site allocations run in parallel instead of being sequential. This is a front loaded approach which leaves site allocations quite embedded with little more than a superficial attention to environmental considerations, such as flood risk and water supply. The SA report needs to come up with a position that addresses an existing problem that will be exacerbated by the Local Plan approach; namely an opportunity for developers to build and then leave any resulting difficulties to others.

Section 3. Biodiversity, Geodiversity and Green Infrastructure

There is a close relationship between Biodiversity and Water (Section 5) which is not brought out in either the full importance and significance of the connections (nor in housing, Section 15). This needs to be brought out in the SA, and the Local Plan policies and site allocations for development. The larger part of our designated EU, national and local sites of wildlife conservation are dependent on the water resource available directly or indirectly from the rainfall in the acquifers underlying the County land surface. Further, the wildlife corridors/ecological networks are heavily dependent on our river and water bodies in their catchment. In many cases those rivers which are non-designated rivers flow into sites of EU and national designations. It is not good enough to set them aside, and in any case the Water Framework Directive seeks that they should be in good ecological condition.

The summary of issues given registers firstly a need to protect and enhance both nationally and internationally protected nature conservation sites, and in particular reducing visitor pressure on such sites. This is too constrained in scope; albeit some concession in the second issue presented, "There are a number of locally important biodiversity sites that should be protected and enhanced".

The point on visitor pressure and its management is both a GN and a wider county issue, not least in the coastal AONB. The tourism industry is vital in terms of economy of the county. However the industry as a whole is disparate but guided by a strategy which appears to be limited to more growth each year. The industry is based on our natural and built environment, but in that respect has an orientation, with a few exceptions, of all take and no give. In addition it can and does impose on the amenities of residents and availability of housing for local people through buy to let; not dealt with by Sections 7 and 15, People and Communities and Housing. The SA should seek to influence the Local Plan so that individual and cumulative planning applications take more than a notional 'due regard' of these issues surrounding ever-increasing visitor numbers, especially day visits.

Section 5. Water

The Context to Section 5 points out that "The legislative responsibility for an integrated approach to water management is set out in the European Water Framework Directive". Also we have for the NPPF "Paragraph 156 requires local planning authorities to set out strategic priorities for water supply and the management of waste water for their area".

An integrated approach requires that for the Greater Norwich Area the constituent LPAs for the Local Plan need to take into account the various demands on water resource in the Broadland Rivers Basin Management Plan, the catchment including the rivers Wensum, Yare, Tud, Ant and Bure to the north; and also Tas and Waveney to the south; plus the Broads. The whole area is defined by the Environment Agency as suffering from severe water stress.

An integrated approach requires that the GN LPAs in their Local Plan should be acutely aware of the various demands on water resource, individually and cumulative. This involves not just the demands of the public water supply, but of agricultural irrigation and the needs of the natural environment. Within the PWS the impact of tourism will be significant, particularly as it peaks with agriculture in the summer months; this when the natural environment can be stressed with the highest levels of abstraction and lowest levels of recharge of acquifers through less rainfall, maximum plant transpiration and water surface evaporation.

We realise this is a hard call when the NPPF tends to a simple supply and demand approach when we are dealing with a finite resource. However we have to say that the few words in the Issues listed are partial, and within that inadequate, and offer at best a 'sticking plaster' approach. We illustrate on the specific problems discussed.

A major source of raw water for PWS supply is the Costessey water abstraction point on the Wensum, affecting the Wensum SAC. This will be moved to Heigham which lies outside the Wensum SAC; and we add, the Broads SAC. It lies in between. In doing it gets off the SAC hook, but it will make it more difficult for inland and coastal water bodies to reach Good Ecological Status by 2027, which is well within the 2034 timespan of the Local Plan.

While existing JCS policies for new development and water conservation are in place, and other measures such as energy conservation, this enters Catch 22 playing field. Like affordable housing, the implementation may well be negated by the financial viability argument raised by developers.

Long Stratton will be one of many cases where waste water treatment capacity of a water re-cycling plant - formerly known as sewage treatments works, but they do as have to also process rain water from buildings and hard surfaces - are already stretched in capacity, and cannot accommodate the needs of another 1,800 dwellings of the JCS. In addition, the CIL money raised by developers will be used to finance the by-pass. It seems unlikely that developers will stand the cost of installing water and energy conservation measures in new buildings; or contributions from them for affordable housing.

Section 12.Transport and Access to Services

The Content gives a long list of activities under this heading, but leaves a distorted impression of where priorities of the County Council lie, that is in major road schemes. This has taken up a huge

amount of NCC people and finance resource, in addition to funds from the DfT. Paragraph 12.2.10 first three bullet dominates the NCC agenda, and we can add to this list the unmentioned Western Link Road, which would connect the A1067 to the A47 west of Norwich at some point.

Maintaining public footpaths also does not get a mention. They are not being maintained other than the major long –distance trails, which are as they support the tourist economy. This policy detracts from the social and environmental aspects of the SA. The need for residents to access and relax in the countryside and see the landscapes and wildlife, enhance well-being and physical and mental health by exercise and a feeling of well-being, is outweighed by Council priority hugely expensive for new roads. What is lost with footpath maintenance are any connections to Sections 7-11 which precede; these cover people and communities, deprivation, health, crime and education.

NCC is progressing the Western Link Road, moving from the first consultant to do an initial Scoping Report to a second who gets nearer to the required answers with no evidence than the sudden great importance of a Food and Agriculture Hub,' just to the west of Easton' (Cllr Tim East, letter to the EDP of 28th July). This would require good access to other strategic sites of employment for synergistic interaction. Reading the intent of a July 2014 SPD, this would include the Norwich Food Research Park (Food Science), UEA to which Easton College is affiliated, the Norwich Centre for Digital Innovation, Hethel Engineering for machinery interests, and the Longwater Business Park.

With the planned dualling of the A47 between North Tuddenham and Easton, and associated works on the Longwater Interchange, the WRL is just not as relevant to the Food Hub. All the desired access and contacts could be met by public transport improvements, and improved facilities for cycling and walking. Nor in any case should the Hub be placed on the same level as the 'update' of the Local Plan (EDT meeting, 8th July), and be used to justify a WRL.

We point out these specific examples in this draft SA to illustrate the need for more searching objectives and evidence to be required by the SA; and a better balance between economic, social and environmental considerations.

Section 14. Employment and the Economy

In the JCS, the targets for housing and jobs were set while ignoring the presence of a recession in the national economy. We suggest that in the Local Plan this will not be followed by ignoring Brexit. The Local Plan should start with a realistic evaluation of both, and overall not relegated to a simple roll-over, or update. It is admitted that job targets are ambitious, and that the LEP Strategic Economic Plan, and the 2013 City Deal, have set the bar high. The City Deal, in seeing the requirement for additional housing to meet planned increases in jobs, raises the SHMA for Central Norfolk over the demographic housing needs by 20% for the GN Councils (and by 23% in North Norfolk, and 41% in Breckland). At paragraph 14.2.9 for this section we have: "The Deal is expected to create more than 13,000 jobs additional jobs above JCS target, including , including 3,000 high value jobs at the Norwich Research Park, 2,000 around Norwich International Airport, 1,000 based around the Norwich University of the Arts and 6,000 construction jobs. These figures need serious scrutiny. (Alternative last sentence: Which satellite of Planet Zog does the LEP live on?).

Dr. Ian Shepherd, CPRE Trustee, 2nd August 2016.

Reference	GNLP_SA_04
Respondent	Cllr A Boswell (Green Party Norfolk County Council)

Draft sustainability appraisal scoping report for the Greater Norwich Local Plan	**20 June to 15 August 2016 consultation**
Response from Norwich Green Party County Councillor Andrew Boswell	

1 Author

This individual submission is authored by Norfolk County Councillor Andrew Boswell. I have previously led the Green Party groups at both Norfolk County Council and Norwich City Council, and been a witness/interested party at the public inquiries and examinations into the GNDP Joint Core Strategy, the Postwick Hub and the Norwich Northern Distributor Road. I make this statement as local politician elected in 2005 to represent residents in the Norwich Nelson division, an area to the West of the City Centre.

Prior to being elected to Norfolk County Council, I pursued a career in scientific research and computing support for scientific research. My doctorate was in protein molecular structure and dynamics (Oxford, 1981). I worked for 10 years (1984-1994) in the design of the Very Large Scale Integrated (VLSI) circuits that have made the current digital revolution possible, and from 1995-2006 I managed the High Performance Computing (HPC) Research infrastructure at the University of East Anglia (UEA, Norwich) and worked with scientific research groups across the campus including those modelling the global climate system.

1 This submission relates primarily only three themes: Air Quality, Energy and Climate Change (mitigation). Whilst the draft SA scoping report gives much more emphasis to climate change adaptation, this submission focuses just on the mitigation aspect of climate change. Mitigation is the more important aspect – if we don't urgently get the mitigation right, then adaptation is somewhat academic - and needs to be addressed more enthusiastically in the report.

2 General

2 The current plan, the Joint Core Strategy, underwent a convoluted development and review process which included:
- A first Public Examination.
- A Judicial Review case which favoured the Plaintiff[1].
- The subsequent remitting and rewriting of parts of the JCS, including its Sustainability Appraisal.
- A further tortuous second Public Examination of a remitted JCS which included the Inspector requiring further changes to the Sustainability Appraisal, including the provision by the Authorities of a Transport carbon appraisal which had been previously omitted.

3 There were considerable public concerns throughout about the transparency and democratic credentials of the process including the decision making process within the GNDP and its visibility for public scrutiny. For example, the Board meetings were not held in public and did not publish minutes until significant public outcry forced the issue.

It is hoped that lessons have been learnt from both the above.

[1] *Case No: CO/3983/2011, MR JUSTICE OUSELEY Judgement* - http://www.eaststaffsbc.gov.uk/sites/default/files/docs/planning/planningpolicy/examination/g/PS-05_Appendix4.pdf

4 The Sustainability Appraisal scoping report as presented is currently very disappointing. There are opportunities at this point, at the start of new Local Plan process, to make a step change in environmental competence, expertise and aspiration for the Greater Norwich area. The Sustainability Appraisal and the definition of its scope is where such an environmental prowess could be clearly demonstrated – it is sadly missing. This submission seeks to make suggestions as to how the SA Scoping could be developed more in this direction.

3 The honest Sustainability Appraisal paradigm

5 It is noted that there are many references to existing local policy in the environmental sphere in the draft SA scoping report which "big up" the Councils' achievements in the areas. In some case, they are exaggerations and in other cases, they are outright misleading. Some of them are highlighted below.

6 Achievement can only be identified where there is rigorous monitoring and appropriate structures of metrics and measurements set up to enable this. The Councils have failed completely to do this satisfactorily on environmental issues such as air quality and climate change in the past and during the GNDP JCS so far. The SA scoping report risks "the same again" unless it is seriously enhanced – suggestions for this are made.

7 I propose here that it would be a benefit to all concerned and might reduce some of the heartache witnessed during the convoluted process with the JCS if the Sustainability Appraisal and its Scoping Report were to adopt an "*honest Sustainability Appraisal paradigm*".

8 This would be facilitated by developing an approach to environmental issues which was measurable, and measured the right things, and was then appraised and documented in an honest way. Some initial pointers to this approach are made later within this submission.

4 Energy

4.1 Energy needs to be accorded a greater status with its own section

9 Energy is highlighted as an important infrastructure requirement for the local plan is several places, for example, page 7. The JCS provided a Policy 3 for "Energy and water".

10 Energy infrastructure within the Greater Norwich area will be crucial to support developments, and will need to be a low carbon as possible to meet national and international Climate Change target.

11 Given the crucial role that energy will play until 2036, it is suggested that "Energy" is given its own section within the SA scoping and SA itself. Comments here have been separated as much as possible between "Climate Change" and "Energy" to correlate with this suggestion.

5 Section 1 – Air Quality (and Noise)

5.1 Context – International and National

12 The heading "National" should be "International and National" for this item as the UK is subject to European law/policy as well as national law/policy on this issue.

13 Relating to the international element, under the EU Ambient Air Quality Directive, all EU member states have been bound by limits on air pollution since 2010. The UK has failed to meet limits for nitrogen dioxide (NO2) in 38 of the 43 "zones". One of the key sources of NO2 is diesel vehicles. The Norwich Castle Meadow area has breached the EU limits for over 10 years, and has been illegal every year since 2010 (see below)

14 Under national context, it should be noted that:

- In April 2015, the UK Supreme Court ordered the Secretary of State for Environment, Food and Rural Affairs to come up with plans that would bring air pollution in the UK within legal levels as soon as possible (see judgement[2]).
- Earlier this year (2016) campaign group ClientEarth brought a fresh legal challenge, due to the Government failing to produce a plan which met compliance with legal AQ limits until 2025. An expedited hearing date has now been granted for the case in the High Court for 18th and 19th October 2016[3].
- There are loci within the Greater Norwich area where legal AQ limits have been systematically breached for many years (see below), and these are subject to the April 2015 Supreme Court ruling and any ruling from the October 2016 hearing for the second case.

15 The above are important legal contexts for the Local Plan which should be made plain in the scoping report.

16 Further, if action is not taken within the Greater Norwich area, this may have financial and other consequences for the Councils in future years. For example, the rulings from the current and future legal case may require the UK Government to take certain actions. Central Government will transfer the responsibility for delivering results onto Local Authorities (indeed they did this after the April 2015 ruling). In the future, this could involve financial penalties for not meeting targets to achieve legality especially if the UK as a whole was subject to fines from the European Courts: at current levels, Greater Norwich would be subject to such penalties if they existed now.

17 The Mayor of London consulted in July 2016 on a Clean Air Action plan[4] – the GNLP should seek to take policies and actions which may be scaled to Norwich urban area from this for the new Local Plan.

18 The health aspects of (lack of) Air Quality have a high national profile, and should be noted in the scoping report under national context too:

[2] https://www.supremecourt.uk/cases/docs/uksc-2012-0179-judgment.pdf
[3] http://www.clientearth.org/clientearth-clean-air-case-fast-tracked/
[4] https://www.london.gov.uk/press-releases/mayoral/mayor-unveils-action-plan-to-battle-toxic-air

- A February 2016 Royal College of Physicians report stated that 40,000 people across the UK suffer early deaths due to nitrogen dioxide and particulates (PM2.5 and PM10) (see: summary report[5])
- Royal College of Physician's Report included this key recommendation – "**Local authorities need to act to protect public health when air pollution levels are high**" – of which Norwich is one.
- Public Health England[6] estimates that in Norwich in 2010, 5.5% of all deaths of people age 25 years and over were attributable to particulate air pollution – 1 in 20 of the Adult population.

19 No link is made to the above issues in Draft SA Scoping Report section 9 on Health, and it should be.

5.2 Context – Local

20 1.2.15: whilst Norfolk's adopted 3rd Transport Plan includes a priority to "reduce emissions", it has failed to bring Air Quality levels to legal limits within Norwich.

21 1.2.16: whilst Norwich Area Transport Strategy (NATS) also aims to "reduce emissions", it also has failed to bring Air Quality levels to legal limits within Norwich.

22 Under the honest SA paradigm, local policies should be reviewed much more objectively in the scoping report.

5.3 Current baseline

23 1.3.1: The 2015 Draft Action plan. The claim that road infrastructure changes, to be implemented through NATS, would necessarily have the greatest impact on tackling air pollution issues is unsubstantiated, and doesn't fit with evidence and experience from elsewhere:

- Removing traffic from the City Centre under NATS programs can help (see under Evolution of Baseline). Typically, such a traffic change will make a step change over a short period, but then does not deliver further reductions.
- Other options that may reap rapid enhancements, and also more sustained improvements to air quality include:
  i. a graduated plan which sets out quantitative standards (percentages of fleet operating at different engine emission standards, Euro VI etc) for bus operators when the bus infrastructure provided by County such as BRT corridors, and also routes with the City. The graduated plan should set levels which are stretch targets and set a new level of aspiration.
  ii. greater priority for bus emission standards in awarding contracts for bus services, and also taxis and private hire cars contracts
  iii. significant increases to funds coming to the authorities to reduce pollution by submitting applications for clean bus technology, electric vehicle infrastructure and other grants related to reducing pollution (from central Government and European funds whilst still available)

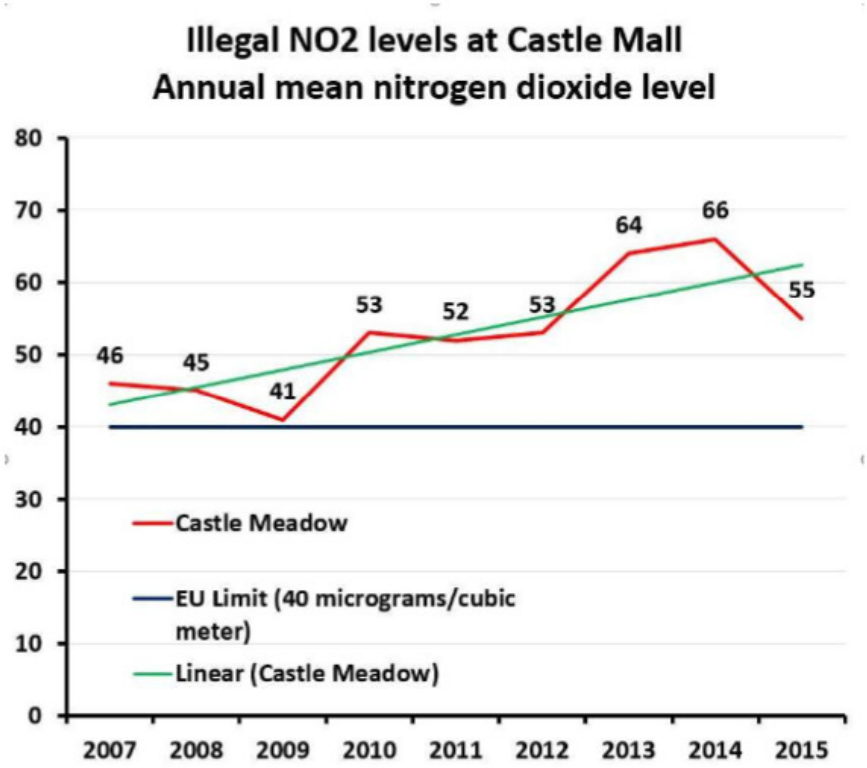
[5] https://www.rcplondon.ac.uk/file/2915/download?token=fV_ubz8n
[6] https://www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution

iv. Upgrade vehicle emission standards for Castle Meadow Low Emission Zone – currently set at Euro III, with stretch targets for Euro V and Euro VI rollout within next 3 years and continuing through plan period.
v. Bring in ultra-low emission vehicles (electric or hybrid) to the bus fleet with dates in the Local Plan for eliminate of combustion engines from the fleet. Work to introduce necessary infrastructure (eg: wireless charging) for bus companies to utilise.
vi. Ensure Norfolk is ready to be able to use electric buses which will trickle down from Transport for London from 2020 throughout the plan period. Failing to ensure adequate electric bus charging infrastructure and depots over the next 4 years will mean that this key opportunity for a step change in Norfolk buses for the early years of the plan will be missed.

5.4 Evolution of the baseline

24 The scoping report and the later Sustainability Appraisal should be honest about where we are at now, and the failings of NATS and the current plan to deliver on Air Quality.

25 The graph below shows the illegal NO2 levels at Norwich Castle Mall since 2007 taken from City Council data.



- The trend over the last decade of illegal NO2 levels at Norwich Castle Mall is upwards with a peak at 2014 of 66 (65% above the legal limit).
- The drop in 2015 probably reflects some of the changes to traffic in the city from City Centre changes under NATS – if so, this is likely to be a one-off step change without a sustainable downward trend.

26 Having once established a baseline under the honest SA paradigm, the new Local Plan should set policy targets and decision actions to deliver improvements to air quality for the entire period to 2036. As to the SA scoping report, it needs to establish a clear framework and associated criteria to set targets:

- Just scrapping in under the legal limits is not a good enough target. Over the period to 2036, targets should be for N02 levels to be reduced at Castle Mall successively and rapidly to under 40, under 30, under 20, under 10 micrograms/cubic meter.
- Similar appropriate targets should be set for City wide particulates (PMs) which also pose a serious health risk.

5.5 Issues

27 Blanket statements such as "air quality is generally good in the area" do not fit the "honest baseline" paradigm: it is simply not true for the Norwich Urban area. There are a number of other areas, not just Castle Mall with serious problems. For example, Riverside Road, St Stephens.

28 Further air pollution is a very localised phenomenon so general statements about the entire area are irrelevant. What is needed is precision is defining the problem, and a coherent set of policy actions which address the issue with equal thoroughness.

6 Section 2 – Climate Change

6.1 Context – International and National

29 The heading "National" should be "International and National" for this item as the UK is subject to international agreements as well a national law and policy on this issue.

30 On April 26th 2016, Lord Bourne of Aberystwyth signed the Paris Agreement on behalf of the United Kingdom of Great Britain and Northern Ireland (see full statement[7]). Lord Bourne's speech included:

> *"So the Paris Agreement starts **a race to the top**; a race in which every country will strive to do everything it can to achieve our shared goals."*

31 The development of the next GN Local Plan should, therefore, be part of this nationwide "race to the top" in terms of climate change mitigation and truly low-carbon renewable energy within the Greater Norwich area. The Greater Norwich Development Partnership can not only play its part, but lead the way within the UK with the right policies.

32 The UK Climate Change Act (CCA) (2008) is only mentioned in passing (at 2.2.3). This visionary law provides the means to the "race to the top" mentioned above, and far from being relegated to a minor reference, it should be the central driver to the SA development for this section. The scoping report should make use of it in a creative way.

33 First, the scoping report is out-of-date and incorrect/misleading on the targets enshrined within the CCA 2008. These targets cover the period under the GN Local Plan to 2036 (see details of the CCA 2008 Carbon Budgets and targets at the Committee for Climate Change (CCC) website[8]):

- The target of "34%" reduction by 2020 is not merely "interim" (and it is misleading to refer to it this way): it is the legal requirement for the 3rd Carbon budget period.
- The 3rd carbon budget (2018-2022) is legally set at 2,544 MtCO2e by 2022 corresponding to 35% reduction (not 34%) by 2020.
- The 4th carbon budget (2023-2027) is legally set at 1,950 MtCO2e corresponding to 50% reduction by 2025.

[7] https://www.gov.uk/government/speeches/the-paris-agreement-proves-that-the-transition-to-a-climate-neutral-and-climate-resilient-world-is-happening

[8] https://www.theccc.org.uk/tackling-climate-change/reducing-carbon-emissions/carbon-budgets-and-targets/

- In June 2016, the UK Government agreed to set the 5th carbon budget (2028-2032) at a 57% reduction by 2030 recommended by the Committee for Climate Change (CCC) in June 2016 (see[9]: and[10]).
- A 6th carbon budget covers 2033-2037, and be expected to be set by the Government around 2020.

34 Relating to the CCA 2008 and the "race to the top" to meet the international Paris agreement, the GN Local Plan should enshrine the highest aspirations to make a maximum possible local contribution to the national and international ambitions. **This is the only responsible position for Local Government to take with respect to this issue which has the greatest socio-economic ramifications of any current global issue** (death, disease, and displacement of human populations on a large scale hitherto unknown). This may take the form as a number of objectives:

- to meet, or exceed (in reductions of greenhouse gases), the national Carbon Budget levels when scaled to the local level based on population size and other demographics (which make the scaling correct). Although, this is not a legal requirement of the CCA 2008, it should be a cherished objective that is part of the GNDP area "leading the way".
- This "self-monitored compliance" with CCA 2008 at the local level should be just that *self-monitored* with *local targets* set within the plan and with appropriate *measuring and metrics* developed for monitoring.
- Further, this self-monitoring should be broken down to the sectorial targets covered by the CCC, for example, transport, energy, industrial. domestic.

35 Due to lack of time, I am not commenting on the adaptation aspect of climate change which is less important than mitigation.

36 Further background context on the scientific, international and national situation with climate change, including the latest 2016 developments, is given in Appendix A.

6.2 Context – Local

37 2.2.9, 2.2.10, 2.2.17 discuss existing policy instruments which purport to have the aspirations to "reduce carbon emissions", "minimise contributors to climate change" etc under:

- New Anglia Local Enterprise Partnership (LEP) Green Economy Pathfinder
- Tomorrow's Norfolk, Today's Challenge, Norfolk's Climate Change Strategy
- Spatial Planning Objective 1 of the JCS

38 The report doesn't say that these policy instruments have collectively failed to make serious impact on the issue since their various inceptions. Further some of the bodies involved have done next to nothing for several years:

- The New Anglia LEP website provides a document - New Anglia Green Economy Manifesto for 2012-2015, presumably written before 2012, with no apparent updates for years after 2015.

[9] https://www.theguardian.com/environment/2016/jun/30/uk-sets-ambitious-new-2030s-carbon-target
[10] https://www.theccc.org.uk/2016/07/06/the-data-behind-the-cccs-fifth-carbon-budget/

- A Google search on the Norfolk Climate Change Partnership indicated their latest document to be dated 2010
- The previous website https://www.norfolk.gov.uk/Environment/Low_Carbon_Norfolk/index.htm was reported now deleted from the Norfolk County Council website
- Do they still even meet? No records could be found of agendas or minutes of meetings.

39 Despite whatever paltry work these bodies may have done (statements of aspirations and platitudes without any associated realistic delivery plans) they have also catastrophically failed as Norfolk now has a transport policy which is set to increase emissions – the very opposite of what they purport to be trying to achieve - until 2032 using the Council's own data. This will be explored further under "Current Baseline".

40 The honest SA paradigm is particularly pertinent for the reporting and interpretation of carbon emission figures.

41 2.211: The Carbon Reduction Target for Norwich City Council originated from a Green Party motion at the City Council in February 2007. I acknowledge the progress that the City Council has made since then: it is genuine, and officers deserve credit for their hard work in it.

42 However, the City Council have yet to realise that their support, without any serious intentions to consider alternatives, for a single major transport intervention (ie the NDR) around Norwich which increases carbon emissions significantly outweighs all their good work within the Council itself in the greater scheme of things. **Unfortunately, the City Council cannot honestly identify itself as a progressive, low carbon city due to this massive hit on carbon emissions that it has sanctioned as part of the GNDP Councils: and, it has lost the opportunity to do for a generation.**

6.3 Current baseline

43 The SA Scoping report does not include a serious statement on the current baseline of carbon emissions although the evidence is available to do so.

44 Some high-level per capita estimates are given at 2.3.8. Although the numeric equivalents are not given the reductions since 2005 in the graph at Figure 13 is not impressive.

45 Whilst 2.39 identifies a general trend of reduction, it is an extremely complacent statement which does not indicate that the reduction is no more than the order of 10% whilst national objectives have a much higher objective.

6.4 Current baseline – carbon emissions - Norfolk/Greater Norwich transport models

46 The carbon emissions associated with transport in Norfolk were analysed in detail at the Examination of the Norwich Northern Distributor Road (DCO Application) in 2014.

47 Following DEFRA's revision of their Emission Factor Toolkit (EFT) version 6.0.1, interested parties and the applicant finally agreed that under the transport model used by Norfolk County Council at the Examination that[11]:

- Road transport emissions are predicted to rise by 6.17% over the Norfolk Wide area (the entire Norfolk area modelled at less precision)
- More detailed modelling within the Greater Norwich area (the "Fully Modelled Area") show road transport emissions predicted to rise by 1.66%.

48 It should be noted that these figures are based on JCS and NATS at their development stage around 2013. More recent proposals for **additional** major high carbon infrastructure such as the Wensum Valley extension to the NDR, and major expansion of the A47 around Greater Norwich will increase the emission risings further.

49 This contrasts to the UK Carbon Plan objective to make 15% reductions for the transport sector by 2020, with further reductions going forward and with the transport sector being the second largest source of UK emissions at 26% of the total.

50 The NDR DCO Examining Authority's Report[12] led by Inspector Peter Rowbottom confirmed these figures of 6.17% (Norfolk) and 1.66% (Greater Norwich) transport carbon emission increases as uncontested at bullet 4.278.

51 At bullet 4.283, the Inspector writes:

> "We note the NGP scepticism about the Government's assessment of the carbon impact of investment in road schemes, and the delivery of Climate Change 2008 Act targets (paragraph 65, D8 – 009 Andrew Boswell on behalf of Norwich Green Party). **We acknowledge that the scheme will lead to an immediate and on-going increase in carbon emissions as compared with the 'Do-Minimum' scenario, though these may be mitigated in future by efficiency improvements promoted in future carbon budget rounds.** …"

52 Further, detailed arguments by this author for Norwich Green Party were made on the financial evaluation of the NDR scheme (essentially the JCS Norfolk transport model) to include an assessment of the future costs of abatement and mitigation, either as carbon reductions elsewhere or in financial abatement costs under international treaties such as the Paris accord. These calculations are set out in the reports at (first report)[13] and (second report)[14].

[11] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010015/TR010015-002164-141103_TR010015_Norwich_Green_Party_carbon.pdf
[12] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010015/TR010015-002708-Examining%20Authority%20Recommendation%20Report.pdf
[13] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010015/TR010015-002347-Cllr%20Andrew%20Boswell.pdf
[14] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010015/TR010015-001923-142909_TR010015_Councillor%20Andrew%20Boswell_%20Carbon%20Hearing%20Commentary.pdf

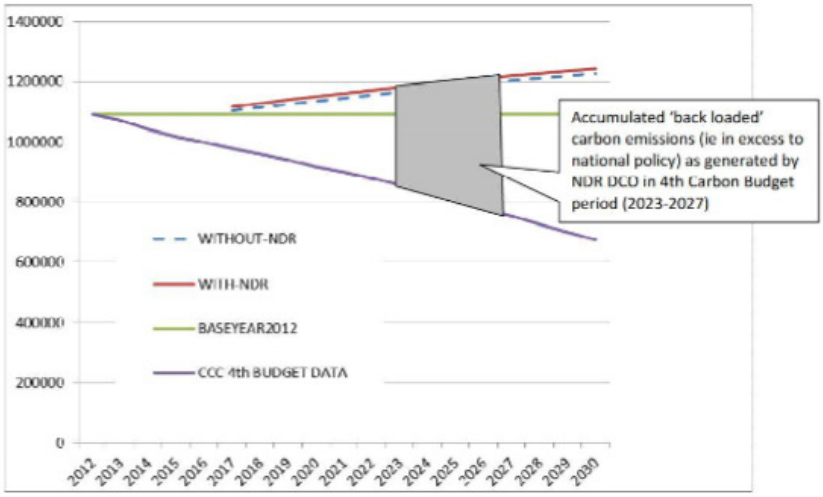


Figure 3: Absolute Transport Sector emissions for Norfolk WNA area: DCO, "Now", "National projections" comparison

53 Figure 3 above from the first report shows the effect of accumulating 'back-loaded' emissions for just one Carbon Budget period. The second report showed the accumulated costs over all carbon Budgets to 2050 and beyond to 2076 would be £2.27 billion to 2076, which would have produced a negative cost-benefit ratio for the NDR scheme of some -7.95 if properly included in the calculations.

54 These calculations are acknowledged in the Inspector's report at bullet 4.279 and 4.281 where the Inspector writes:

> "The case on value for money, which has been eloquently advanced by Councillor Boswell on behalf of the NGP, seeks to refute the applicant's benefit cost ratio claims for the scheme. It forms part of a wider objection to the growth strategy of the adopted JCS and promotes the evaluation of the scheme against an alternative solution based on a 'Plan B package' of integrated transport measures, including public transport, complementary measures and modest road building based on linking up proposed developer roads to the north-east of Norwich. We have addressed these objections elsewhere in this report, concluding that it is not our role to revisit the approved JCS development strategy. Much of the predicted increase in carbon emissions is a consequence of traffic growth resulting from the adopted development strategy. "

The Inspector notes role of the adopted development strategy is noted as key in shaping carbon emissions and their costs, and this is why methods for accurate, numerically based carbon appraisals are essential to the SA scoping for the new Local Plan.

55 The above analysis, based entirely on the data presented by Norfolk County Council from its own traffic models can form the basis for an "honest Sustainability Appraisal

paradigm" baseline for transport carbon emissions covering both the element of the physical quantities of carbon emissions themselves (transport carbon emissions across Norfolk in 2012 are modelled as 1092 ktCO2/annum[15] – over a million tonnes a year) and also the quantified total financial costs to UK plc in terms of future carbon abatement.

56 This starting place may be recovered from the documents at the Examination from both the Council and myself, updated with subsequent changes to the model by the Council, and their consultants, and changes to underlying data sets such as the DEFRA EFT.

6.5 Current baseline – energy

57 2.3.11 and Figure 14 summarise operational and potential renewable energy schemes. It is acknowledged that some very genuine success stories pertain to Renewable Energy infrastructure in the last few years, and officers are to be congratulated for delivering some of these under challenging deadlines from cuts to Government incentives.

58 I am particularly pleased to see the Scottow Moor Solar Farm, a significant solar installation, here and recall that the solar farm, now reality, was first suggested by myself and Green Party colleagues when the Council first purchased the RAF Coltishall.

6.6 Current baseline – energy supply in new build

59 2.2.18 makes reference to JCS Policy 3 requiring 10% of the energy supply for new development to be from renewable sources. However, nowhere else in the document does this appear to be developed into scoping criteria for SA of successor policy with the new Local Plan. **This is a major omission.**

60 I argued at the first JCS Planning Inquiry for a higher level to be set. My subsequent experience at a member of Norwich City Council planning committee is that the current 10% level is not challenging at all to developers. With technological advances, particularly in solar, it is entirely financially viable for developers to easily meet the 10% target with the provision of some solar arrays. We could be doing much better.

61 In general, the chance to innovate and push the envelope with renewables is not taken up. A notable exception is the proposed Wensum riverside development which seeks to use water source heat pumps to achieve a much higher level of renewable energy generation.

62 Planners should be looking to maximise "on-site" renewable energy generation, and this may be done with more use of heat-pump technologies such as air-source, ground-source and water-source. Further, solar photovoltaics at their current pricing should be used to the maximum afforded by roof space and other limitations. Further, new technologies such as built-in renewable energy via solar photovoltaic glass (eg East Anglian company http://www.polysolar.co.uk/) and the like should be actively promoted.

[15] See Table 2 and calculations within https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010015/TR010015-002511-140630%20TR010015%20Norwich%20Green%20Party.pdf

63 Scoping criteria need to be provided in the SA scoping report to drive a truly innovative local plan policy forward in this area. The scoping criteria should examine the best practice from other local authorities around the country for on-site renewable energy targets and aim to be in the upper quartile of achievement.

64 Monitoring the implementation of LP policy in this area needs consideration, and the automated remote monitoring of renewable/low-carbon energy for compliance by Ealing Council[16] should be looked into.

6.7 Projected baseline – climate change – call for rigorous scientific, numerical approach

65 2.4.1: This is a skimpy section, devoid of useful meaning.

66 Throughout the JCS process, we called for the Council to undertake serious, numerically creditable carbon footprinting, carbon accounting and carbon appraisal processes to underwrite the policies being developed, and to ensure alignment with international, national and local policy, targets and agreements.

67 Once again, I make this call which done with systematic rigour can be part of the "race to the top" in tackling climate change by implementing local policies which are thoroughly tested against their carbon emissions in a scientifically verifiable way.

68 I have tried over the years to give some idea of what this might look like, for example, the work above from the NDR Examination. As such, I have tried to pave a way towards an honest Sustainability Appraisal paradigm.

6.8 Projected baseline – climate change – history from JCS

69 It should be noted that when the remitted JCS came to its second public inquiry in 2013 that carbon appraisal was a significant issue.

70 This lack of climatic factors and carbon dioxide assessment in the SA for the remitted JCS created a potential legal failure to comply with Article 5 and Annex I of the EU SEA Directive (2001/42/EC) as shown in **Appendix B**. It also represented a potential legal failure to comply with UK legislation as presented within the Environmental Assessment of Plans and Programmes Regulation 2004, Section 12 and Schedule 2, as shown in **Appendix C**.

71 At the July 24th 2013 meeting of the Examination, Inspector David Vickery requested that the GNDP Councils prepare an assessment of vehicle emission carbon footprints for the different JCS Alternatives, stating before the meeting[17]:

> "… my initial opinion is that vehicle (road transport) emissions are an important, measurable factor in the production of greenhouse gases, for which the Climate Change Act 2008 sets national targets (see 3.3.4 on page 11 of SDJCS 3.2). It could have a significant effect on the environment under Regulation 12 of the SEA

[16] https://www.ealing.gov.uk/info/201162/planning_policy/600/complying_with_planning_policy
[17] Joint Core Strategy for Broadland, Norwich and South Norfolk, Broadland Part of Norwich Policy Area Examination, "AGENDA – RESUMED HEARINGS", Starting at 10.00 hours on Wednesday 24 July, available at http://www.greaternorwichgrowth.org.uk/dmsdocument/496

Regulations **and so it should be included in any SA**. However, it seems to be a factor which is missed in the 2007 SA Scoping Report (see ENV 6 on page 113 – aka page 154 – of Appendix 3 in SDJCS 3.3) and in the SA itself. If this is correct, then it should be assessed now in a revised SA …"

72 This was one of the tortuous points for the GNDP in birthing the JCS. It is suggested that this problem may be resolved on this new local plan by:

- Adopting a scheme carbon footprinting, carbon accounting and carbon appraisal processes to underwrite the policies being developed, and to ensure alignment with international, national and local policy, targets and agreements as proposed above.
- This methodology and structure for such a scheme should be spelt out in the SA Scoping report with explicit purpose to fully comply with the EU SEA Directive (2001/42/EC) and UK Environmental Assessment of Plans and Programmes Regulation 2004.
- This would turn the devoid "projected baseline" section (2.4.1) into credible framework for sustainability appraisal.

73 It is clear that the Councils have the know-how and the wherewithal to provide a quantitative assessment of carbon dioxide emission in relations to future local plans and growth alternatives, therein (for example the transport modelling data discussed above).

Therefore, in accordance with Part 3, Section 12(3) of the SEA Regulations the SA report should include all of the information referred to in Schedule 2, **including climatic factors**, taking account of (a) to (d) in Appendix C:

(a) **current knowledge and methods of assessment** – the Councils have the technical ability and expertise to provide a quantitative assessment of the impacts on carbon dioxide emissions and have a well-developed transport model previously used in the NDR Application and Examination.

An issue here is that more work could be done to make the Norfolk Transport Model transparent to stakeholders, so that outputs from it may be more readily verifiable. The model has been presented previously at Public Inquiries etc in a very opaque way which has made discussion between different parties extremely difficult.

(b) **the contents and level of detail in the plan or programme** - the level of detail of the plan can be very refined as it will build on the JCS and will have to show clearly the potential different growth locations and number of houses possible in very specific locations. Choices of different transport models need to be built in from scratch and must include a sustainable transport centric model as one of the options.

(c) **the stage of the plan or programme in the decision-making process – carbon assessments should underwrite strategic development of alternatives for the Local Plan so carbon appraisal should be built in to the Sustainability Appraisal phase of the Local Plan.**

(d) **the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment** – the Local

Plan preparation is the appropriate level in the decision making process to consider carbon dioxide emissions levels in relation to different alternative options, as this is the level at which decisions on where development will be allocated and what related transport model options best deliver sustainability can be made strategically. **If assessment of carbon dioxide emissions is remitted to a subsequent level of the planning hierarchy, such as Area Action Planning, this stage would be too late to minimise carbon dioxide emissions on a strategic level,** as high carbon development models may have already have been allocated. As a Local Plan wide assessment has yet been made in terms of carbon dioxide emissions for the Greater Norwich area, no duplication is possible.

6.9 Projected baseline – climate change – genuine transport model alternatives

74 Ground 1 of the 2012 Judicial Review case against the JCS was upheld[18] and related to the selection of alternatives. As point 66 of his Judgment, Mr Justice Ouseley states:

> "I conclude that, for all the effort put into the preparation of the JCS, consultation and its SA, the need for outline reasons for the selection of the alternatives dealt with at the various stages has not been addressed."

75 This refers to spatial plans alternatives.

76 However, objectors to the JCS have posited throughout that the 3 spatial alternatives in the JCS were in fact just variants of a singular model of transport, all based on one large scale road building proposal.

77 The public felt that this presentation of, in reality, 3 **non-alternatives** was deeply misleading and did not present the Councils as engaging with the public over alternatives in a sincere way.

78 For this new version of the Local Plan, it would be a huge step forward to have alternatives which present genuine choices over transport models, and give significant sustainable transport centric interventions as genuine options within the SA process.

6.10 Projected baseline – energy

79 The devoid section 2.4.1 gives no idea of how energy infrastructure may be developed and appraised in the SA (although Figure 14 previous indicates some Renewable Energy projects in the pipeline). Section 2.5 ("Issues) includes:

> "There is potential to increase renewable energy production chiefly from solar, wind and biomass developments, as well as from micro-renewables."

- yes, how?

[18] *Case No: CO/3983/2011, MR JUSTICE OUSELEY Judgement* - http://www.eaststaffsbc.gov.uk/sites/default/files/docs/planning/planningpolicy/examination/g/PS-05_Appendix4.pdf

80 I wish to highlight a strong concern that biomass has limited sustainability. See, for example, this RSPB report[19] and this briefing to MPs[20] from campaign group biofuelwatch.

81 In terms of energy development under the Local Plan (which I believe should have its own section), it is vital that the true sustainability of different technologies is properly appraised, and that Plan policies are not based on technologies like biomass which increasingly are being shown not to be sustainable.

82 The energy section should also cover energy storage technology. This is essential to turn the current renewable energy industry into one which can deliver zero-carbon energy throughout a 24-hour day cycle. Please see this recent Telegraph Business article[21] on the developments which may be made in storage technology in the next decade. The Plan and Sustainability Appraisal should consider energy storage technology not just in terms of infrastructure, but also in terms of economic development of the Green Economy, and research potential, in the local area.

6.11 Section 17 – Summary of Sustainability Issues

83 The severity of the Climate Change issue is not represented in this summary. It is suggested that the following may be a starting place:

> "Climate change is the most severe problem we are facing. We need to act to reduce greenhouse gas emissions significantly - at home, at work and when travelling. (Securing the Future: Delivering UK Sustainable development strategy, DEFRA 2005). Little progress is being made in reducing CO2 emissions and those from the transport sector are increasing significantly. There is also slow progress being made in the development of renewable energy resources."

84 An honest assessment, Yes. My words? No. They are reproduced from the "Proposed Sustainability Appraisal Scoping Report - Non-Technical Summary" of South Oxfordshire District Council 2013[22].

Norfolk County Councillor Andrew Boswell
August 13th 2016

[19] https://www.rspb.org.uk/Images/biomass_report_tcm9-326672.pdf
[20] http://www.biofuelwatch.org.uk/wp-content/uploads/MPs-briefing-on-biomass-sustainability-standards.pdf
[21] http://www.telegraph.co.uk/business/2016/08/10/holy-grail-of-energy-policy-in-sight-as-battery-technology-smash/
[22] http://www.southoxon.gov.uk/sites/default/files/SA%20Scoping%20Main%20Report%20Non%20Tech%20Summary%20and%20cover.pdf

7 APPENDIX A: Climate Change international, national, scientific background

85 Climate change ranks very high indeed as a UK government policy issue embracing very strong policy commitments to reduce greenhouse gases (so-called "mitigation") so that we can avoid the worst consequences of climate change. The science of climate change is clear that anthropogenic greenhouse gas emissions (i.e. those generated by human activity) are contributing to increases in atmospheric concentrations of greenhouse gases (GHG) including carbon dioxide (CO2) and that there is a powerful case for reducing these emissions.

86 In a seminal 2008 paper NASA and Columbia University scientist Professor James Hansen[23] states that we have already exceeded the safe level of atmospheric greenhouse gases (GHGs) to prevent ice sheet disintegration and equilibrium sea level rise of at least several metres.

> *"Humanity today, collectively, must face the uncomfortable fact that industrial civilization itself has become the principal driver of global climate. If we stay our present course, using fossil fuels to feed a growing appetite for energy-intensive life styles, we will soon leave the climate of the Holocene, the world of prior human history. The eventual response to doubling pre-industrial atmospheric CO2 likely would be a nearly ice-free planet, preceded by a period of chaotic change with continually changing shorelines."*

87 An article by twenty-nine of the world's leading climate scientist published in the journal ***Nature*** in 2010[24] identified 9 "planetary boundaries" that should not be crossed if we are to avoid drastic consequences in terms of biodiversity, weather, food production and the continuation of liveability for our species on planet Earth. The article concluded that the safe limit (i.e. the planetary boundary) for climate change was 350 parts per millions (ppm) of CO2 in the atmosphere: this level was breached in the mid-1980s.

88 Correcting this breach ("mitigation") and returning to a safe planetary boundary for atmospheric gases requires nothing less than reducing GHG concentrations to 1985 levels (ie 350ppm CO2eq). Note, this is different to reducing **rates** of emissions - a decreasing, but positive rate of carbon emissions rate still generates an overall increase in GHG concentration levels over time. To reduce **concentrations** of CO2 to safe levels implies actually removing CO2 from the atmosphere (ie a negative rate of emissions).

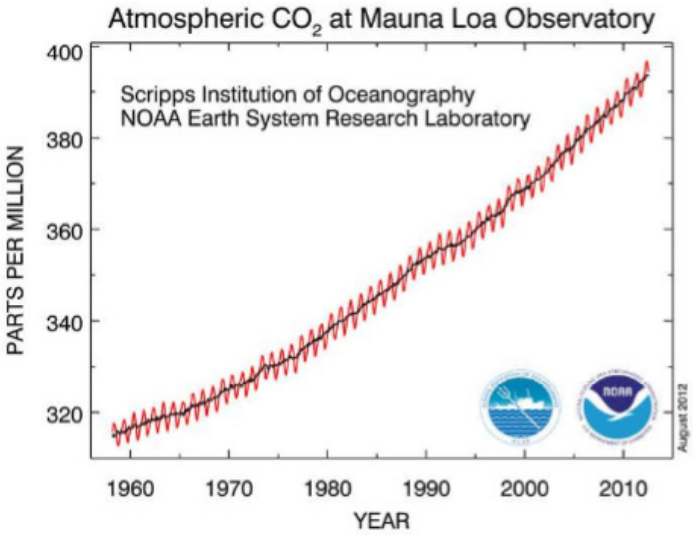
89 This is explained using the analogy of water in a bath where water trickles into the overflow at a depth of 12 inches (350ppm), or more, causing environmental damage. We are now at 14 inches (nearly 400ppm) and water is not only pouring through the overflow but close to pouring over the side ('catastrophic climate change'). As water is continually being added via the tap (the addition of about 2ppm of CO2 to the atmosphere each year), each year the bath level rises. The challenge to reach 350 ppm is not only to reduce the tap flow ("reduce emissions") but to remove water from the bath

[23] *'Target Atmospheric CO2: Where Should Humanity Aim?'*, Hansen J., et al, April 2008, http://www.columbia.edu/~jeh1/2008/TargetCO2_20080407.pdf

[24] *A safe operating space for humanity, Sept 24th 2009, http://www.nature.com/nature/journal/v461/n7263/full/461472a.html*

("reduce overall concentrations of GHGs" or "negative emissions") back to no more than the 12inch level.

90 Global levels of CO2 have been measured at the Mauna Loa Observatory in Hawaii[25] since the 1950s.



91 Pre-industrial revolution levels of CO2 were around 270ppm. The 300ppm threshold was crossed around 1950, and the 350ppm level was breached around 1986.

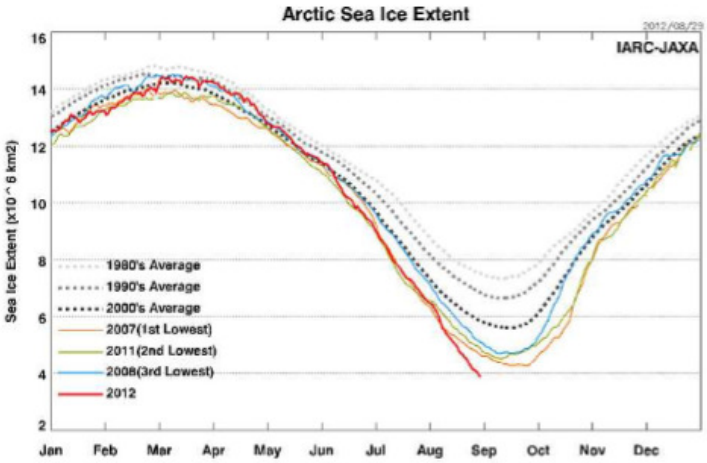
92 The 400ppm level was reached, at globally averaged measurements, in May 2013[26], although localised levels of 400ppm were recorded over the Arctic in the summer of 2012[27].

93 The global average concentrations for May 2010, 2011 and 2012 were 392.95, 394.16, 396.78 ppm CO2[28].

94 One of the global physical characteristics which indicate the effect of anthropogenic global warming is the melting of the Arctic polar ice cap. On 27th August 2012, scientists at the National Snow and Ice Data Centre announced that the extent of sea ice in the Arctic had reached its lowest level since satellite measurements began[29], breaking

[25] Graph from "Trends in Atmospheric Carbon Dioxide", http://www.esrl.noaa.gov/gmd/ccgg/trends/ (accessed August 29th 2012)
[26] *Global carbon dioxide in atmosphere passes milestone level - Climate warming greenhouse gas reaches 400 parts per million for the first time in human history*, Guardian, May 10th 2013, http://www.guardian.co.uk/environment/2013/may/10/carbon-dioxide-highest-level-greenhouse-gas *(accessed 13th May 2013)*
[27] *Greenhouse gas levels pass symbolic 400ppm CO2 milestone*, Guardian, June 1st 2012, http://www.guardian.co.uk/environment/2012/jun/01/record-greenhouse-gas-trouble-scientists *(accessed 29th August 2012)*
[28] Data from ftp://ftp.cmdl.noaa.gov/ccg/co2/trends/co2_mm_mlo.txt (accessed 29th August 2012)
[29] "Arctic ice melts to record low levels", Daily Telegraph, 28th August 2012, http://www.telegraph.co.uk/science/science-news/9502543/Arctic-ice-melts-to-record-low-levels.html, *(accessed 29th August 2012)*

the previous record in 2007. The graph below shows how this record was broken about 3 weeks before the usual minimum of summer ice (mid-September)[30].



95 For a number of years, UK Government and international UN policy has had the objective at limiting global temperature rises to 2°C.

96 On 23rd August 2012, Prof Sir Bob Watson, in an interview with the BBC[31] said that efforts to stop a sharp rise in global temperatures were now "unrealistic". He said that the rise could be as high as 5°C - with dire consequences. Sir Bob is among the most respected scientists in the world on climate change policy. He is currently chief scientist at the Department for Food and Rural Affairs (DEFRA) and a former chair of the Intergovernmental Panel on Climate Change.

97 On the evidence, given above, we are not performing well on carbon reduction targets and tackling climate change. There is no room for complacency. In May 2013, the Independent newspaper reported that UK GHG emissions jumped by 3.9% in 2012 more than any other country in Europe[32].

98 On August 2nd 2016, the Guardian[33] reported that the UK Carbon Footprint increase 3% between 2012 and 2013 – this is different to UK GHG emissions (emissions sourced in UK), and takes into account goods and services consumed by UK households, including emissions from the foreign manufacture of imported products (ie emissions source outside UK). The graph from the article shown below shows that at the UK Carbon Footprint level, little progress has been made since 1997:

---

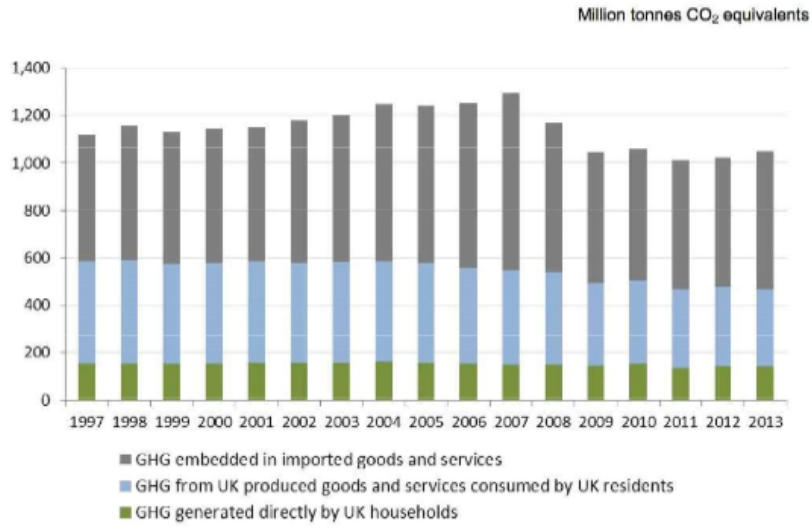
[30] Graph from "Arctic sea ice just hit a record low. Here's why it matters.", Washing Post, 28th August 2012, http://www.washingtonpost.com/blogs/ezra-klein/wp/2012/08/28/arctic-sea-ice-just-hit-a-record-low-heres-why-it-matters/ *(accessed 29th August 2012)*

[31] "Science adviser warns climate target 'out the window'", August 23rd 2012, http://www.bbc.co.uk/news/science-environment-19348194, and video of interview http://www.bbc.co.uk/news/science-environment-19359020 *(accessed 29th August 2012)*

[32] http://www.independent.co.uk/news/uk/politics/government-under-fire-over-commitment-to-fighting-climate-change-as-uk-carbon-dioxide-emissions-rise-more-than-other-country-in-europe-8636546.html

[33] https://www.theguardian.com/environment/2016/aug/02/uks-carbon-footprint-rises-3

Figure 1 Greenhouse gas emissions associated with UK consumption 1997 to 2013



99 In August 2016[34], leading climate scientists warned that the Earth is perilously close to breaking through a 1.5C upper limit for global warming, only eight months after the target was set at the Paris talks. However, figures – based on Met Office data – prepared by meteorologist Ed Hawkins of Reading University show that average global temperatures were already more than 1C above pre-industrial levels for every month except one over the past year (to August 2016) and peaked at +1.38C in February and March 2016. Keeping within the 1.5C limit will be extremely difficult, say scientists, given these rises. This should be abundantly clear to the intelligent layperson too.

100 Please see the animation at http://www.climate-lab-book.ac.uk/2016/spiralling-global-temperatures/ prepared by meteorologist Ed Hawkins of Reading University to see the situation over a 150-year period from 1866 – updated monthly.

101 This background has been given because it is crucially important to understand that local major infrastructure projects risk building **permanent future increases in CO2 emissions**, and associated increases to overall GHG concentrations into the system. These may be 'small' on the global level, but they are significant given the need for socio-economic responsibility at all levels under the UK Climate Change Act and Paris agreement.

102 With the global issue of carbon emissions, the issue of relative scale is not relevant. Any increase in emissions anywhere increases total emissions (the water level in the bath analogy).

[34] https://www.theguardian.com/science/2016/aug/06/global-warming-target-miss-scientists-warn

103 The consequences of failing to meet appropriate CO2 reduction targets are very serious indeed. They include an increase in the frequency and severity of severe weather events, floods, and disruption to transport systems, loss of agricultural productivity and large public and private financial losses in an era of fiscal restraint and in the context of reduced insurance cover.

8 Appendix B: EU SEA Directive 2001/42/EC

Article 5

Environmental report

1. Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.

2. The environmental report prepared pursuant to paragraph 1 shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

3. Relevant information available on environmental effects of the plans and programmes and obtained at other levels of decision-making or through other Community legislation may be used for providing the information referred to in Annex I.

4. The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.

ANNEX I

Information referred to in Article 5(1)

The information to be provided under Article 5(1), subject to Article 5(2) and (3), is the following:

(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;

(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;

(c) the environmental characteristics of areas likely to be significantly affected;

(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;

(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;

(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;

(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;

(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;

(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;

(j) a non-technical summary of the information provided under the above headings.

(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects

9 Appendix C: The Environmental Assessment of Plans and Programmes Regulations 2004 (No 1633)

Preparation of environmental report 12.

(1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—

(a)implementing the plan or programme; and

(b)reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

(3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of—

(a)current knowledge and methods of assessment;

(b)the contents and level of detail in the plan or programme;

(c)the stage of the plan or programme in the decision-making process; and

(d)the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

SCHEDULE 2 Regulation 12(3)

INFORMATION FOR ENVIRONMENTAL REPORTS

1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.

2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

3. The environmental characteristics of areas likely to be significantly affected.

4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.

5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—

(a) biodiversity;

(b) population;

(c) human health;

(d) fauna;

(e) flora;

(f) soil;

(g) water;

(h) air;

(i) climatic factors;

(j) material assets;

(k) cultural heritage, including architectural and archaeological heritage;

(l) landscape; and

(m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).
(a) O.J. No. L59, 8.3.1996, p.61.
14
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.
9. A description of the measures envisaged concerning monitoring in accordance with regulation
10. A non-technical summary of the information provided under paragraphs 1 to 9.

<END>

Reference	GNLP_SA_05
Respondent	Cllr D Carlo (Green Party Norwich City Council)

To: sa@gnlp.org.uk

From Councillor Denise Carlo,
Green Party, Nelson ward
Norwich City Councillor

15 August 2016

Dear Sir Or Madam,

Re. GNLP Sustainability Appraisal Scoping Report

Norwich Green Party Group has submitted comments, as has Green Party Norfolk County Councillor, Dr Andrew Boswell. I would like to make a few additional comments on Air Quality, Climate Change and Transport in relation to transport. I participated in the following: East of England Plan Examination in Public 2004, JCS EiP 2010, JCS Partial EiP 2013, Postwick Hub planning inquiry 2013, Norwich Northern Distributor Road Examination 2014.

1. Air Quality

1.3.7 Evolution of the baseline

Norwich city centre has been in breach of European air quality limits on nitrogen dioxide for a decade. The possibility expressed in 1.3.8 that air quality is likely to remain a major issue during the plan period to 2036 need not happen, if the Councils were to take concerted action. Indeed continuing breaches of air quality limits would be unlawful.

We support the removal of general traffic from the city centre, but without additional measures to generally reduce traffic volumes across the road network, there is the potential for further growth in vehicular traffic and air pollution on other parts of the network such as the inner ring road.

The scoping report focuses on the designated Air Quality Management Area in the city centre nitrogen dioxide. However, the Green Group is also concerned about about toxic substances in vehicle emissions such as particulate matter.

Public Health England estimates that in Norwich in 2010, 5.5% of all deaths of people age 25 years and over were attributable to ambient fine particulate matter (PM2.5). The figures for Broadland and South Norfolk are 5%. Altogether, Public Health

England estimated that a total of 1,902 life years were lost to PM2.5 pollution in these three districts in 2010. (Estimating Local Mortality Burdens associated with Particulate Air Pollution, April 2014).

The health effects of PM2.5 are considered to be more significant than those of other air pollutants, with particles penetrating deep into lungs. Current evidence suggests that there is no safe limit for exposure to fine particulates which can carry long distances. Although air-borne particulates arise from a number of sources, road transport is a major source of pollution locally.

Norfolk County Council has generally dealt with air pollution by building new roads for taking traffic away from built up areas or making changes to the road network to reduce localised congestion. Mortality associated with fine particulates across the three districts points to the need to reduce traffic on the road network as a whole and not just shifting traffic from one part of the network to others.

Issues

I disagree with the statement that air quality is generally good in the area. Combustion of fossil fuels for powering vehicles generates polluting vehicle emissions which adversely impact on human health and the environment and outside the city centre, traffic levels have either remained stable or increased. The evidence provided by the Public Health England indicates that PM2.5 pollution equally affects mortality rates across the three districts.

Improving air quality for the whole Plan area must be given high priority in order to improve public health.

2. Climate Change

This section requires some re-writing. Currently, the scoping report doesn't make clear that climate change is the single biggest challenge facing humanity and the planet. The section reads as though flooding is a greater risk and priority. Rather than fully describe and assess the evidence base, the scoping report puts policy first, (notably, Norfolk County Council policy to build more roads) and plays down the evidence. Unless the the scoping report adequately describes the current situation and scale of challenge, the basis for identifying and assessing a range of policy options will be lacking.

Context - National

2.2.1 Appendix 1 requires updating to include new recent plans:

1. The Kyoto Protocol 1997 has been superseded by the Paris Agreement 2015 which is due to come into effect in 2020. A long term goal of the Agreement is to keep the world temperature below a 2 degree C rise which is seen as the danger limit, with steps outlined for achieving this. The Agreement also aims to limit the increase to 1.5°C, in order to significantly reduce risks and the impacts of climate change. Even so, scientists regard the Paris Agreement and national climate action plans submitted by countries as insufficient for holding the world temperatures below a 2C rise, let alone a 1.5 degree C rise.

The scoping report doesn't give any sense of this challenge facing us.

Another key element of the Agreement is its recognition of the role of non-Party stakeholders in addressing climate change, including cities, other subnational authorities, civil society, the private sector and others. This behoves the Greater Norwich Development Partnership to actively step up its efforts in reducing greenhouse gas emissions and not leave it to others to take a lead.

2.2.3 Fifth Carbon Budget

This needs updating to refer to the fifth carbon budget covering the period 2028 – 2032 agreed by Parliament requires a 56.9% reduction in carbon against 1990 levels. The UK is on track to outperform the second and third carbon budgets, but it is not on track to meet the fourth, which covers the period 2023-27 and requires a 50% reduction in emissions on 1990 levels in 2025.

The Climate Change Commission says that transport sector emissions increased by 1.4% in 2015, with "emissions increasing across all modes as demand increases outpace efficiency improvements and biofuel uptake". (Meeting Carbon Budgets: 2016 Progress Report to Parliament, CCC, June 2016). Overall, the Committee concludes that

"Emissions reductions from announced policies (for transport) fall significantly short of our indicator by around 26 MtCO2 in 2027." (p. 135).

Its key policy recommendations for the Government's emission reduction plan reflect the lack of progress in decarbonising the sector and the urgent need to develop a cohesive set of policies to reduce transport emissions. The Committee advocates a fall of around 43% in domestic transport emissions between 2015 and 2030 and the development of options to allow near-zero emissions by 2050. Amongst the measures that it proposes are

"national and local policies to reduce demand, sufficient to deliver car-km reductions

of around 5% below the baseline trajectory, including through shifts to public transport, cycling and walking". (Table 5.1, page 136).

2.2.17: Ref. Spatial Planning Objective 1 of the JCS, To minimise the contributors to climate change and address its impact".

The climate change objective in the adopted JCS refers to 'sustainable access' in relation to locating new development. In my view, it was worded in this way so that the objective did not undermine the Northern Distributor Road which formed the bedrock of the JCS.

A new climate change objective in the Greater Norwich Local Plan should refer to the need to develop sustainable transport infrastructure (bus and rail infrastructure, walking and cycling networks), in support of an overall reduction in carbon emissions.

Current Baseline

UKCP09 projections referred to in para 2.3.1 and Figure 8 cover land scenarios. It would be helpful to refer also to impacts on coastal and marine environments and include maps depicting different scenarios for projected sea level rise and increased sea storminess. The degree of future sea level rise will have different potential impacts on coastal towns and low lying hinterlands, with implications for resources and the future planning of Greater Norwich.

Para 2.3.8 and Figure 12: the fact that carbon emissions in South Norfolk are higher in relation to national trends ought to ring alarm bells that local policy is taking carbon emissions in the wrong direction.

Evidence given by the Norwich Green Party to the Norwich Northern Distributor Road (NDR) Examination in Public showed that carbon emissions would rise across Norfolk by 6.17% between 2017 and 2032 with the NDR in place. In his decision letter, the Secretary of State accepted that the NDR would increase carbon emissions.

As indicated above, transport sector's national share of carbon emissions is increasing, with evidence that this is happening locally too. New national and local policies will be required to reverse this trend.

Projected Baseline

The scoping report narrowly focuses on flood risk in relation to climate change, but it

also should flag up other potential impacts such as loss of productive land for food, and areas for human habitation and biodiversity.

In relation to the scoping report statement that, 'it is difficult to predict longer term changes in the baseline', there is a need to provide a range of scenarios to testing different options. A plan is required to drastically reduce emissions in all sectors in line with the legally binding Climate Change Act target of at least 80% reduction on 1990 levels by 2050 and not simply to minimise' emissions.

Additional Issues for Inclusion

- impacts of sea level rise and increased storminess.

- creation of infrastructure for facilitating the transition to zero carbon transport.

- the need to re-use brownfield sites in accessible locations for development in preference to greenfield sites in order minimise the loss of undeveloped land to control temperature rise and protect shrinking land area for food.

There is also a large overlap with issues concerning transport.

3. Transport and Access to Services

Fig 57: the high percentage of Broadland and South Norfolk residents who travel to work by car must be addressed if carbon reduction is to be achieved.

Issues

Bullet 2: Policy rather than evidence appears to be the driver of the statement that "There is a need to improve the strategic transport network, most particularly improvements to the.... A47". The A47 has been the subject of several Government-led highways studies over the last 18 years, notably Norwich to Great Yarmouth study (2002), Norwich to Peterborough study (2004) and recently the A47-A12 Corridor Feasibility Study (2014). They concluded that end-to end dualling was not justified. Currently, the Government is committed to dualling several individual sections of the A47 which have not yet progressed to public inquiry.

Bullet point 3 requires clarification. Does "the completion of the NDR" refer to the NDR as described in the Development Consent Order? Or does it mean taking the NDR across the Wensum valley to connect with the Norwich Southern Bypass? Norfolk County Council has not made the case for a Western Link which would involve bridging the River Weusm SAC.

Additional Issues

There is a large overlap between transport and the need to address climate change.

- the importance of reducing the need to travel.

- the importance of achieving modal shift from car travel to sustainable less carbon-intensive modes such as walking, cycling, bus and rail, with scope for further demand management measures as part of a package.

- the need to reduce reliance on the private car in the suburban and peri-rural areas of Norwich.

- how can new local rail infrastructure improvements be delivered in the Norwich area? New rail halts have been identified in Broadland Local Plan yet there are still no plans for delivery.

- the need to identify environmentally sustainable solutions for supporting access in rural parts of the area.

  – the need to de-couple economic development from transport and the assumption that major road building equals growth and improved access.

I look forward to being kept informed on progress.

Yours faithfully,

Cllr Denise Carlo
Norwich Green Party
Nelson ward

Reference	GNLP_SA_06
Respondent	Norwich Green Party

Response to GNLP SA scoping report consultation
Norwich City Council Green Party Group
15th August 2016

We are generally very disappointed with this document as it stands. It does not place sufficient emphasis on the need to reduce carbon emissions and adapt to climate change, and misses an opportunity to underline the role of planning in building sustainable communities.

The sections on air quality and climate change both play down the scale of the problems we face, which will make it much more difficult to evaluate the Local Plan policies effectively.

It is vital that the Sustainability Appraisal framework be really robust, in order to help create a Local Plan that takes a long-term, community-focused view. We hope the below comments and suggestions can help to strengthen the draft framework.

Air quality

On air quality, NO2 levels have been illegal at Castle Meadow in Norwich for the last 10 years. This is a very serious problem in the city, and should be acknowledged as such. The aim should be to reduce levels of NO2 and particulates to as close to zero as possible; merely scraping in just under the legal limit does not represent success. The legal challenge from ClientEarth over the government's failure to act on air quality means that breaches may have significant legal and financial implications for Norwich in the future.

The increasingly well-documented health implications of air pollution (including a Royal College of Physicians report earlier this year which stated that 40,000 people across the UK suffer early deaths due to nitrogen dioxide and particulates) should be noted in the *Context* section of this chapter.

It should be noted that although the draft scoping report states that "road infrastructure changes, to be implemented through NATS, would have the greatest impact on air pollution issues", we cannot in the long run solve our air quality crisis by building yet more roads.

Climate change

The issue of climate change is closely related to this. The report suggests that action on CO2 emissions is already going in the right direction, when in fact the existing NATS model builds in a 6% CO2 increase across Norfolk by 2032, even before new proposed road schemes such as dualling of the A47 are taken into account. It should be made very clear in the report that without drastic remedial action, Greater Norwich will remain a significant part of the climate change problem, not part of the solution.

The link between car use and carbon emissions should be made explicit in the report, and detailed information should be included so that the importance of transport planning in reducing carbon emissions can be taken into account. This information is available and was analysed in detail in 2014 in relation to the NDR application.

Although the climate change section deals with flooding in some detail, it fails to grasp the scale of the crisis. Flooding is described merely as "a risk to development potential", yet even the likely 1m rise in sea level by the end of this century – with greater rises increasingly seen as probable – will wipe out large parts of Broadland. All planning policies should take these projections into account.

It is notable that whereas almost throughout the report, the language of the 'issues' sections includes directions/imperatives, e.g. "it is important to…"; "x should be…" "there is a need to…", this is not the case for the sections on air quality and climate change. In these two sections, the 'issues' raised are strictly factual, with no indication of what action should be taken, e.g. "There are AQMA areas in Norwich city centre and in Hoveton" and "CO2 emissions […] are above the national average". This should be rectified by the addition of statements recognising the gravity of the situation and acknowledging that the region needs to act more quickly on climate change and air pollution. Resilience to climate change should be built into all planning policies.

Housing

Energy efficiency is another notable omission from the report. Not only do we need to end our dependence on fossil fuels with a massive shift to renewable energy, we also need to significantly reduce our energy consumption; yet the report contains no reference to this. To a considerable extent, reductions in demand can be achieved through energy efficiency improvements to all buildings. A requirement for all new buildings to conform to the Code for Sustainable Homes level 5 or Passivhaus standard should be written into local planning policy.

We welcome the inclusion of affordable housing in the Housing section, but feel an opportunity has been missed to include more detail on types of housing. There is great potential for housing to contribute to sustainability – through energy efficiency but also other measures such as green roofs and use of sustainable materials – and this should be clearly included in the scoping report so the possibility of including such measures in the Local Plan can be explored. Energy efficiency can also help to reduce deprivation by addressing fuel poverty.

This section would also benefit from an acknowledgement of the need to minimise development on greenfield land and to bring contaminated land back into use. On the report's contents page, section 13 is entitled 'Natural Resources, Waste and Contaminated Land', but in the section itself the title is only 'Natural Resources and Waste'. It should be ensured that contaminated land is included within the scope of the SA.

Transport

We strongly object to the inclusion of the following statement in the list of issues: "Further investment is required to promote sustainable transport patterns. The completion of the NDR

provides an opportunity to implement further improvements in the Norwich urban area and in the main growth locations and to reduce cross city traffic movements."

The NDR represents the very opposite of sustainable transport and these two sentences should not be associated. Furthermore, it is unclear whether the statement refers to the completion of the existing NDR project, on which work is already under way, or the controversial Wensum Link, which some consider would 'complete' the NDR. This is an issue yet to be decided, and there should be no possibility of this ambiguity in the report being used to justify a Wensum Link at a later date. The statement should preferably be removed; it must at least be rephrased to clarify that it refers only to the completion of the work already ongoing.

The issues listed in the Transport section should include a specific reference to active transport (walking and cycling) as well as the existing reference to sustainable transport (which includes public transport).

People and Communities

There is a growing body of research around the importance of community-led initiatives in building sustainable places and resilient communities. This has been largely overlooked in the SA framework, and there is a serious risk that a major opportunity will be missed to write the importance of communities into planning policy.

The section on People and Communities focuses entirely on population and demographics, with no real consideration given to what a sustainable community might be. The issues listed refer to the need to provide services for people, but not the equally important need to include people in the planning and design of those services.

A more detailed section on communities could include reference to community-led housing and energy projects, community gardens, community planning, etc. There is scope to support these within the planning process and they should not be overlooked at this stage. This would be in line with the 'community enabling' approach being adopted by Norwich City Council.

Health

A focus on sustainable places could also strengthen the Health section. The national context in this section does include NPPF guidance on the role of planning in promoting "healthy communities", but the local context, baseline and issues focus mainly on CCGs and healthcare provision. Access to care is vital, but it is not the limit of planning's role in building healthy places. Strong communities, well-designed places and access to green spaces are all crucial to health and wellbeing, and this should be acknowledged in the SA framework.

Reference	GNLP_SA_07
Respondent	Cllr S Jackson (Green Party Norwich City Council)

Response to GNLP SA scoping consultation from Cllr Simeon Jackson, Green Party Norwich city councillor for Mancroft Ward and Norwich Green Group Development and Environment Spokesperson

"We shape our buildings; thereafter they shape us." Winston Churchill

It is important to acknowledge the massive consequence that city planning has on communities and vice versa. The way our cities develop not only is a consequence of the decisions we take, but the resulting form of the city also determines the choices that are available to residents and all the participants within the life of a city.

I feel that this sustainability appraisal scoping report fails to acknowledge this link to the extent required to meet the social, economic and environmental challenges that we face.

In a sense, this document is talking about the "tactics" of trying to achieve sustainability without identifying that key "strategy" that underpins how sustainable communities are formed.

I'm now going to list a few of the issues that I feel should be included to help address this.

Within the air quality section, none of the "issues" acknowledge the need to manage potential new sources of air pollution and prevent them from being concentrated to form problem areas.

In the climate change section, there is no acknowledgement that CO2 emissions are influenced not just by *supply* of low-carbon energy, but by the level of energy *demand* in its various forms. The levels of demand are heavily influenced by planning policy, and therefore it is critical that this will be criteria against which our policy can be appraised. Types of demand that may be able to be influenced by planning policy include:

- Energy use in the home
- Energy use by industry and commercial uses
- Fossil fuel demand from industry
- Fossil fuel demand from transportation
- Demand for transportation in general

In particular, I find it deeply troubling that neither in the climate change nor the transport sections of this report is there any reference to carbon emissions from transportation and the need to reduce excessive demand through the planning process (for example, by creating communities where homes are nearer to employment uses thus reducing the level of commuting by private car).

In the health, deprivation, crime and education sections, I think it is important to acknowledge the influence that planning decisions have on lifestyle choices. Therefore the health section should not just be about the provision of health services, but the wider health benefits that can be gained from good planning. For example, the health benefits of more walking and cycling travel options, of keeping people (and indeed other animals!) away from significant sources of pollution

including roads, and the proven increased well-being associated with connections with nature and attractive neighbourhoods.

In the same vein, planning has influence on whether there are secluded areas that may attract unwanted criminal behaviour and whether children are exposed to the variety of life that may inspire educational attainment. Planning can also heavily influence levels of deprivation through the variety of housing provision, local services (including not just quantity but also quality) and transport options.

In the transport section, I agree that investment is required to promote sustainable transport patterns, but am shocked that the NDR is mentioned as an opportunity to do this. At best the NDR is just unrelated, but in my opinion the NDR is more likely to increase the most unsustainable of transport modes – private vehicles – rather than sustainable transport modes. I would reword this point to become "There is a need to invest in the infrastructure required to enable sustainable transport patterns, including provision of walking and cycling facilities, and public transport." and add a new one: "Policies should seek to reduce demand for high-carbon modes of transport and promote shifts to lower-carbon options."

SJ 11/08/2016

Reference	GNLP_SA_08
Respondent	Hempnall Parish Council

Hempnall Parish Council -**August 14th 2016**

Greater Norwich Local Plan:
Sustainability Appraisal Scoping Report Consultation

Hempnall Parish Council (HPC) was critical of what it considered to be unnecessarily large housing targets in the Joint Core Strategy (2021 – 26) and as these targets are not being met (AMR March 2015 revealed a delivery of only 21,323 of the 47,500 houses planned for 2001 – 2026) does not consider it necessary to increase housing targets beyond existing levels in the new local plan that is currently being developed to 2036.

CPRE/Norfolk has informed *HPC that Sandra Eastaugh*, manager of the Greater Norwich Development Partnership, told them that the development planned for in the Joint Core Strategy (to 2026) pushed to the limit the amount of housing that could be accommodated within South Norfolk, Broadland and Norwich and warned that elevating housing targets to higher levels could not be achieved without serious environmental consequences.

HPC is therefore very concerned that the process of seeking sites for an additional allocation of 12,000 houses (to 2036) has already been set in motion.

The countryside surrounding Norwich is attractive and relatively tranquil. This landscape would suffer severe degradation if housing targets were increased further. **Therefore the single most important issue for the Sustainability Appraisal to consider is the impact on the environment and landscape of raising housing targets.**

While the current JCS suffers from over large housing allocations it does at least afford good protection for parishes outside the Norwich Policy Area, including Hempnall. It is important that the distinction between the Norwich Policy Area and the Rural Policy Area is retained in the new plan (to 2036) and that the boundaries of the Norwich Policy Area are not extended. The current settlement hierarchy should also be kept in place.

The Sustainability Appraisal should therefore look out how the retention of the Rural Policy Area and the settlement hierarchy can continue to protect the landscape and environment of the area.

In the new plan, to 2036, Hempnall wishes to remain in the Rural Policy Area and to retain its status as a Service Village. We do not want to be elevated to a higher level in the settlement hierarchy. As a Parish Council we favour small infill developments and have resisted proposals for new estates in the village.

LOCAL COUNCIL AWARD SCHEME FOUNDATION	Regards Ian Nelson Clerk to Hempnall Parish Council Now Available "Virtually" all the time at http://www.hempnallpc.org
We issue a newsletter quarterly which contains useful information for Hempnall parishioners. If you would like to receive a regular copy of the newsletter by email please click on this link	
Please consider the environment before printing this e-mail This communication is sent for and on behalf of Hempnall Parish Council, Karinya, Bungay Rd, Hempnall, Norwich, NR15 2NG CONFIDENTIALITY NOTICE This communication together with any attachments contains information which is confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please note that any distribution, copying, or use of this communication or the information in it, is strictly prohibited. If you have received this communication in error please notify us by e-mail and then delete the e-mail and any copies of it.	

Reference	GNLP_SA_09
Respondent	Historic England

Historic England

EAST OF ENGLAND OFFICE

Mr Mike Burrell
Greater Norwich Planning Policy Team Manager
POBox 3466
Norwich City Council
Norwich
NR7 7NX

Direct Dial: 01223 582775

Our ref: PL00034762

23 August 2016

Dear Mr Burrell

Greater Norwich Local Plan Sustainability Appraisal Draft Scoping Report Consultation

Thank you for your e-mail dated 20th June 2016. We have briefly reviewed the Scoping Report and have the following comments for you.

Please note that Historic England have produced guidance entitled Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment: <https://content.historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/SA_SEA_final.pdf/> (31 July 2013)

We have also produced updated guidance on the matter which is currently out for public consultation. This document, entitled Sustainability Appraisal and Strategic Environmental Assessment Historic England Advice Note 8 can be found at: <http://content.historicengland.org.uk/content/docs/guidance/sea-advice-note-consultation-draft-jul16.pdf>

These documents provide useful guidance on the Scoping stage of the SA process. We would recommend that you refer to these documents for detailed advice.

Owing to current staff shortages we do not have the capacity to provide a full and through response to the Draft Scoping Report. However, from a brief review of the document, we have the following comments to make.

Chapter 6 Built Heritage

We welcome consideration of the historic environment as part of the sustainability appraisal process. We would suggest that the chapter is renamed The Historic Environment. This is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.

24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU
Telephone 01223 582749
HistoricEngland.org.uk

Key Plans and Programmes

We welcome the inclusion of the Government's statement on the Historic Environment for England and the NPPF as well as the Norfolk Historic Environment Record.

In addition we recommend the inclusion and consideration of the following plans and programmes:

International/European
- UNESCO World Heritage Convention
- European Landscape Convention
- The Convention for the Protection of the Architectural Heritage of Europe
- The European Convention on the Protection of Archaeological Heritage

National
- Planning (Listed Buildings & Conservation Areas) Act 1990
- Ancient Monuments & Archaeological Areas Act 1979
- National Policy Statements

Local
- Local Plans
- AONB Management Plans
- Heritage/Conservation Strategies
- Other Strategies (e.g. cultural or tourism)
- Conservation Area Character Appraisals and Management Plans
- Listed building Heritage Partnership Agreements

Baseline Information

We welcome the identification of some designated heritage assets (Conservation Areas, Listed Buildings and Ancient Monuments) within the area. We welcome the mapping of these assets as it provides a greater indication of their distribution and highlight sensitive areas.

However, we are concerned that there is no reference to Historic Parks and Gardens. These should be included and mapped.

There is also no reference to non-designated historic assets including locally listed buildings. This should be included.

In addition to the above, there is no reference to currently unknown heritage assets,

particularly sites of historic and archaeological interest (excepting the mention of archaeological potential at bullet point 2, paragraph 6.4). The unidentified heritage assets of the District should be acknowledged and outlined in this section.

We very much welcome reference to Heritage at Risk at 6.3.20.

Historic England's Good Practice Advice Note 1 contains advice on other relevant sources of evidence. These include Conservation Area Appraisals and Management Plans, Local Lists, Historic Characterisation assessments and any other in-house and local knowledge. We recommend that these other sources of evidence are considered as part of the SA process.

Key Sustainability Issues

We welcome identification of the Built Heritage (as mentioned though we would prefer the term Historic Environment) as a separate chapter as well as the issues identified at paragraph 6.4. and in Figure 82 on p 132.

However, the issues set out are very general. Further detail is recommended. we would suggest that the Key Sustainability Issues for the Historic Environment should include:

- Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings
- Heritage assets at risk from neglect, decay, or development pressures;
- Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

We were surprised to see that Figure 82 does not include a column for opportunities. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities. Example opportunities for the historic environment to include within the Sustainability Appraisal can be found in our guidance notes in the links above.

Historic England

EAST OF ENGLAND OFFICE

Section 16 Limitations in Data Found

We note reference to non-statutory locally designated heritage assets at paragraph 16.1.6. However, non-designated assets should be considered as outlined in the section on baseline information above.

Section 18 The Sustainability Framework

p135 Again we would suggest the use of the term Historic Environment rather than Cultural Heritage.

p142 We welcome the inclusion of sustainability objective 13 on page 142 which covers the historic environment. We would advise that it is re-worded to read, 'To conserve and enhance the historic environment, heritage assets and their settings', to provide greater clarity as to what the objective covers. Paragraph 2.11 of our draft guidance sets out a number of environmental, social and economic objectives that could also be used.

Regarding the decision making criteria, we broadly agree with the criteria listed. However, we would amend the first bullet point to delete the word, 'designated' Non-designated assets make up an important and valued part of the historic environment and their protection is required by the NPPF. As such non-designated assets should be given due consideration in the SA process. Examples of other criteria that could be included as listed at paragraph 2.12 of our draft guidance.

We broadly welcome the indicators in the final column of the table. Further advice on indicators and monitoring is given at paragraphs 2.13 - 2.16 of our draft guidance.

p150 We note that there are no specific plans and programmes listed in the Appendix pertaining to the historic environment. See list of plans and programmes to be reviewed above.

We would also encourage you to work with local conservation officers, archaeology officers and local heritage community groups in the preparation of the Sustainability Appraisal.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

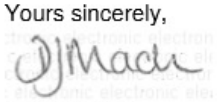
24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU
Telephone 01223 582749
HistoricEngland.org.uk

Historic England

EAST OF ENGLAND OFFICE

If you have any questions with regards to the comments made then please do get back to me. In the meantime we look forward to continuing to work with you and your colleagues.

Yours sincerely,



Debbie Mack
Historic Environment Planning Adviser, Planning Group
Debbie.Mack@HistoricEngland.org.uk

24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU
Telephone 01223 582749
HistoricEngland.org.uk

Reference	GNLP_SA_10
Respondent	Norfolk County Council

Norfolk County Council's Comments on the:
Draft Sustainability Appraisal Scoping Report for the Greater Norwich Local Plan (June 2016)

August 2016

1. Introduction

1.1. The officer-level comments below are made on a without prejudice and the County Council reserves the right to make further comments on the emerging Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA).

1.2. The County Council welcomes the opportunity to comment on the draft SA Scoping Report

2. Infrastructure delivery

2.1. It is felt that the SA/SEA will need to address the delivery of infrastructure required to support the proposed housing and employment growth. The SA needs to consider whether the planned housing growth can be delivered with the commensurate/necessary level of supporting infrastructure. Unless the necessary supporting infrastructure can be delivered, either through developer funding (CIL and / or planning obligations) or other funding sources, then the proposed levels of growth set out in the emerging GNLP would not be sustainable.

2.2. For example, the education chapter of the SA should consider the likely number of children arising from planned housing growth and the implications on existing schools and the potential need for new or expanded schools. Similarly there needs to be consideration of the impacts on the existing and planned library service arising as a consequence of planned growth.

2.3. The SA will also need to consider other infrastructure implications covering:

Highways & Transport; Green Infrastructure; Adult Social Care; Fire Service Provision; and Household Waste Recycling Facilities.

2.4. Should you have any queries with the above comments please contact Stephen Faulkner (Principal Planner) on 01603 222752 or email stephen.faulkner@norfolk.gov.uk

3. Environment

Archaeology -

3.1. The report contains a number of measures pertaining to the historic environment, and the scope of the report should adequately address these. One minor point – section 6 would be clearer if named "Historic Environment", rather than "Built Heritage", as built heritage implies a hierarchy of significance, with archaeological deposits of less significance than, for example standing buildings. Planning

guidance does not distinguish between categories of heritage asset, and so naming the chapter "Historic Environment" would better reflect this.

3.2. Should you have any queries with the above comments please contact Dr Ken Hamilton (Historic Environment Service) - telephone number: 01362 869275 or email: ken.hamilton@norfolk.gov.uk

4. Minerals and Waste

4.1. Norfolk County Council in its capacity as the Mineral and Waste Planning Authority welcomes the inclusion of the baseline information relating to minerals and waste included in section 13. In particular the stance suggested in paragraph 13.2.13 is supported.

4.2. If you have any queries regarding this response please contact Richard Drake (Senior Planner, Minerals and Waste Policy) by email at richard.drake@norfolk.gov.uk or telephone 01603 222349

Reference	GNLP_SA_11
Respondent	Mr Walker, Member of Wensum Valley Alliance (WVA)

Dear Sirs

I wish to make the following comments on the above document and ask you to give them serious consideration.

First, I wish to complain about the manner of consultation. I am a member of the Wensum Valley Alliance and it is regrettable that you did not contact us as we are a diverse environmental group with access to a range of professional and scientific support. In view of your deadline, we have not been able to obtain the necessary professional input to provide you with the level of submission that we would like. In future please include us in the consultation process and to this end I understand that you are running a Transport Workshop on the GNLP at Blackfriars Hall, 13th September,2016 - as Chair of WVA am I to be afforded an invitation?

Therefore, I can only provide my personal comments.

1. You need to radically reappraise, the 'Objectively Assessed Housing Need' based on SHMA. The estimated increase in population to the plan year, 2036 is currently 58,300 or in raw terms something like the need for 25,500 more dwellings. There is currently planning consent and allocations for 37,171 dwellings in the plan area. In addition there is likely to be a number of backland and infill sites that in aggregate will boost this figure as will emerging brownfield sites. It would be prudent to use the lower range of estimates for land need requirements as there is a five year review process that can respond to trends and so long as there is a land bank of current consents and allocations, the 5 yearly review process is the 'hand on the tiller'. This also provides an opportunity to take into account market trends that are likely to reduce the need for residential land as, say, the ageing population looks to downsize to much smaller accommodation without gardens or even car spaces. I speak from experience as my 80 year old uncle was very happy to move to a small, easy to heat studio, near facilities and transport as opposed to a bungalow on an isolated estate. In fact, with a 90% under occupation rate it should be policy to encourage this beneficial movement. It also means that allocated sites can be built to much higher densities as 3/4 bedroom houses/bungalows with large gardens are released in existing estates. Another major rethink you must consider is policy post Brexit that may see reduced inward and increased outward migration. Furthermore, (see 2 below), any overheating of the local economy in the plan area should be directed to deprived towns with existing infrastructure and brownfield sites in the County such as Great Yarmouth.

2.You need to radically revise your land need requirement for employment sites in the plan area as this is largely led by the LEP forecasts that in fact go well beyond the predictions of the JCS need requirements. As I state in 1 above any surplus capacity should be directed at more deprived towns in the County. Further the Norwich based expansion sites mentioned by LEP - Research Park, NUA and NIA already have allocated land on site. The increase in construction jobs cited may be inflated as the housing requirement appears to be overstated as would be the requirement for supporting infrastructure. No doubt there will be one off opportunities for major employment and these should be assessed on individual merits rather allocating land on a speculative, advanced basis.

3. Regarding infrastructure, I trust that when you refer to the completed NDR, you are referring to the DCO stretch and not a possible western link between A1067 and A47 (W). Mouchel have been appointed to carry out a £675,000 study on this - including whether the

link is necessary and the merits of an orbital bus route. It would be injudicious to pre-empt this study and take a western link as a 'given'. It is also a concern that you are neglecting sustainable transport measures that were promised in previous plans and now look to be falling outside that plan period of 2026 such as the BRT along the A1067. A firm commitment should be made to completing all these sustainable transport measures by 2026 before advocating further non sustainable measures.

4. I would like to see a plan that commits within the plan period to providing safe footpaths, capable of wheel chair/motability use between ALL villages and centres of population, including circular walks. Initially such a scheme would be based on consent, but would require back up CPO powers. This is not only a sustainabality issue but a wellbeing issue as well.

5. Commuter cycle lanes to main employment centres as distinct/ancillary to recreational paths such as Marriotts Way - a wonderful facility but not good for commuting on dark winters. Again consent backed by CPO's.

6. I do not believe that you have adequately assessed the natural environment of the Tud and Wensum Valleys, Ringland and Royal Hills. Online, your maps are unclear but they do not seem to show any ancient woodland, SSSI's or County wildlife sites. To mention but a few, what about Primrose Grove, Snake Wood, Jennis Wood, Blyths Wood, Blackhall Wood, Old Wood and Harmons Grove?

In conclusion it appears to me that there are a number of environmental constraints you do not seem to have taken into account, while at the same time recklessly accepting land development requirements as 'given'. Further, you seem to be ignoring sustainability measures promised by 2026 in previous plans. I hope you can allay my fears.

Finally, much of the report's content - eg on Climate Change, is of a technical nature on which I would have liked to have obtained scientific advice - thus it is important that I/ WVA are kept in the consultation loop in good time in future.

Yours faithfully
A B Walker (MR)