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31<sup>st</sup> January, 2011

Examination of JCS – Broadland, Norwich and South Norfolk Council  
REPRESENTOR I.D. 11743 – British National Party

RESPONSE TO INSPECTOR'S PROPOSED CHANGES  
*IC1 - Flexibility/resilience of the JCS in relation to the Northern Distributor Road*

Continuing to apply the "broad brush" approach based on national and international law, the following comment is based very simply on the closing summary paragraph of the new addendum for Policy 20 (headed "Contingency") at page 63 after existing paragraph 7.11.

The new summary paragraph reads: "Development beyond the pre-NDR threshold established through the AAP process will not be possible without a commitment to the NDR. If there is no possibility of the timely construction of the NDR, a complete review of the JCS would be triggered."

Leaving aside the uncertain availability of funds, two major considerations prohibit the construction of the NDR – and indeed the construction of any further transport infrastructure for motorised vehicles.

### **1. Laws of Economics (Supply and Demand, and the Equilibrium thereof)**

Robert Morris, in a 1977 article titled "*Traffic as a Function of Supply and Demand*," took his readers back to basic principles of economics. The point at which the demand and supply curves cross is referred to as the "point of equilibrium." Here, supply and demand join harmoniously, establishing a balanced price and corresponding quantity for production. As conditions change (as is their wont), the demand and supply curves are redrawn, thus establishing new *points of equilibrium*.

Applying this to transport: The "demand" in this case is trip generation. The "supply" is the available transportation system. Consumption is the number of trips taken, and is a function of the costs of those trips, typically measured in the time it

takes. Thus, when cost (time) is increased, fewer trips are taken (demand); when costs are decreased, more trips are taken.

For example, if in response to a congested road, new lanes are added, travel speed will *increase*, trip time will *decrease* and trips taken will *increase*. If, on the other hand, in response to a congested road, nothing is done, or lanes are removed, then trip time will increase, and demand and consumption will both be reduced.

Transport planners themselves have a plethora of research that comes to this very same conclusion. Referred to as the *Pigou-Knight-Downs paradox*, or the *Downs-Thomson paradox*, or even the *Braess paradox*, the general conclusion is that expanding a road system as a remedy to congestion is not only ineffective, but often counterproductive.

Transport expert Stephen Plowden translated the graphs into plain English with great clarity: "Very broadly speaking, the amount of traffic is governed by what is regarded as a tolerable level of congestion. If the capacity of the road network is increased, whether by road construction or traffic management measurements, the mileage will increase until the same conditions obtain. If the capacity of the road network is not increased, the mileage performed will stabilize, and if the capacity is reduced, the mileage will be reduced correspondingly."

Applying this to housing Supply and Demand in Norfolk: Roads and other infrastructure are to relieve congestion caused by recent in-migration or to cater for future in-migration which is projected to be nearly a quarter of a million people by 2030. Native Europeans have a declining birth rate, but for immigration. Norfolk is no exception, the population is falling due to natural decline (more deaths than births) and the existing housing supply is therefore increasing – or would be, but for in-migration.

Every single new house is to cater for an influx into Norfolk of a projected 224,000 people, 124,000 from outside Norfolk and 100,000 from outside the UK. Building new houses will encourage yet more people to come, as in a world with an exploding human population, there will always be more people coming to Britain unless the borders are sealed inwards (but not outwards). Keeping Demand high in this way will also keep house prices high, and there will be more local people who cannot afford to buy and must be housed at public expense.

The point of Equilibrium will be forever too high and will negate Sustainability, and will also negate the Promotion of Wellbeing (a Council's duty under the Local Government Act 2000).

References:

Morris, Robert. "Traffic as a Function of Supply and Demand." In *Traffic Quarterly*. Volume 31. Connecticut: ENO Foundation for Transportation. 1977. pp. 591-603.

Arnott, Richard and Kenneth Small. "The Economics of Traffic Congestion." In *American Scientist*. Volume 82. North Carolina Scientific Research Society. (Sept.-Oct. 1994). pp. 446-455.

Plowden, Stephen. *Towns against Traffic*. London: Andre Deutsch. 1972. p. 117.

**Conclusion for Consideration 1: It is economic folly of the highest order, akin to the reckless borrowing by several UK governments over recent years, to do anything but allow congestion on the existing supply of roads to reduce demand to a point where Equilibrium is a Bio-Sustainable amount. Therefore, it will save time (and money) if the GNDP move straight to the Inspector's alternative,**

**“a complete review of the JCS” as the need for such a review is triggered now by Consideration 1 without waiting for news of funding.**

## **2. National and International “Clean Air” legislation**

2(i) Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe states, for example, that:

(9) Air quality status should be maintained where it is already good, or improved. Where the objectives for ambient air quality laid down in this Directive are not met, Member States should take action in order to comply with the limit values and critical levels, and where possible, to attain the target values and long-term objectives.

(10) The risk posed by air pollution to vegetation and natural ecosystems is most important in places away from urban areas. The assessment of such risks and the compliance with critical levels for the protection of vegetation should therefore focus on places away from built-up areas.

(11) Fine particulate matter (PM<sub>2,5</sub>) is responsible for significant negative impacts on human health. Further, there is as yet no identifiable threshold below which PM<sub>2,5</sub> would not pose a risk. As such, this pollutant should not be regulated in the same way as other air pollutants. The approach should aim at a general reduction of concentrations in the urban background to ensure that large sections of the population benefit from improved air quality. However, to ensure a minimum degree of health protection everywhere, that approach should be combined with a limit value, which is to be preceded in a first stage by a target value.

London is currently being prosecuted by the EU for breach of this Directive. It is only a matter of time before other areas of Britain are found to be in breach as well. In any case, as Section (9) above states, areas not in breach are to either maintain the status quo, or improve it. New roads will make it worse, especially if they are to facilitate new housing and therefore more cars. The GNDP has not, to my knowledge, supplied anything like all of the information required by the Directive, although there may be something tucked away on the NCC’s website.

2(ii) The UN Framework Convention on Climate Change and its Kyoto Protocol

I repeat the points made in my first Statement, and remind everyone that Article 3 para 1 of the UNFCCC says “... the developed country Parties should take the lead in combating climate change and the adverse effects thereof”. And that the Convention throughout continually refers to the importance of “Sinks” meaning “any process, activity or mechanism which removes a greenhouse gas, an aerosol or a precursor of a greenhouse gas from the atmosphere”. The JCS is destroying Sinks,

and creating “Sources” (“any process or activity which releases a greenhouse gas, an aerosol or a precursor of a greenhouse gas into the atmosphere”).

Please note that in Annex A to the Kyoto Protocol, Nitrous Oxide is named as one of the six principal greenhouse gases and that amongst the sources of greenhouse gases is Transport (and “Other” and “Other sectors” of course). Although the concentration of nitrous oxide in the atmosphere is considerably lower than that of carbon dioxide, the global warming potential of nitrous oxide is over 300 times greater. Nitrogen compounds have a greater global warming potential, could lead to more exaggerated climate change problems, and cause havoc with health and the environment to boot ([www.thenakedscientists.com](http://www.thenakedscientists.com)). In order to comply with legally binding Greenhouse Gas reduction targets, the UK needs to reduce existing car use, and prevent altogether any increased dependency on private cars. It therefore seems unlikely that NEW houses with garages and parking spaces outside are even legal any longer, and any NEW streets around them need to be open to buses and dustcarts and taxis etc., but not to private cars.

The Climate Change Act 2008 is a national UK enforcement (the first in all the world I believe) of the Kyoto Protocol. In an Impact Assessment of the Act in March 2009, it is stated that “There is an overwhelming body of scientific evidence highlighting the serious and urgent nature of climate change, largely due to emissions of greenhouse gases (GHGs) as a result of human activities such as the combustion of fossil fuels and *changing patterns of land use*.” (My emphasis.)

**Conclusion for Consideration 2: The JCS is dependent on the provision of several new roads and road networks and is therefore in breach of UK, EU and UN law in its present form. Therefore, it will save time (and money) if the GNDP move straight to the Inspector’s alternative, “a complete review of the JCS”, as the need for such a review is triggered now by Consideration 2 as well as Consideration 1, taken together or separately.**

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