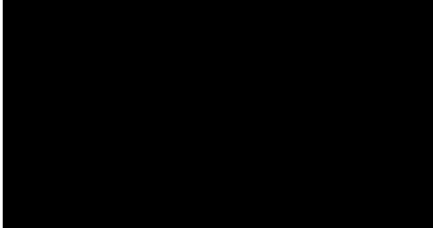


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26th May 2010

Mr Simon A W Osborn BA Tech RTPi



Dear Mr Osborn,

Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk produced by the Greater Norwich Development Partnership: Conclusions from the Exploratory Meeting (EM)

Thank you for your letter of 24 May on the conclusions of the Exploratory meeting. I was at the meeting on 13 May, and I welcome the thoroughness of the exploratory meeting and the conclusion document.

I would like to draw the Inspectors' attention to a further point that I did not have an opportunity to raise on the day which I think should be considered before the Examination in Public. I would be grateful if you could forward on this letter to Inspector Roy Foster and Assistant Inspector Mike Fox for their consideration.

The point is how the GNDP JCS addresses '**Policy SS1: Achieving Sustainable Development**' of the East of England Plan, particularly in relation to climate change and carbon emissions reductions. In respect of this, Policy SS1 contains the key statement:

Local Development Documents and other strategies relevant to spatial planning within the region should:

- (a) help meet obligations on carbon emissions; and*
- (b) adopt a precautionary approach to climate change by avoiding or minimising potential contributions to adverse change and incorporating measures which adapt as far as possible to unavoidable change.*

Whilst carbon emissions in general need to be approached under this policy, I am restricting my comments in this letter to transport related emissions only. I note that your letter notes concern as to whether the JCS provides the most effective strategy for meeting EoE plan policy NR1 on modal shift ('a major shift in emphasis across the NPA towards travel by public transport, cycling and walking'), but my focus here is on carbon emissions themselves inherent in the future transport infrastructure of the JCS.

PPS1 Supplement on Climate Change, which is due to be replaced by a new PPS currently in draft, requires planning bodies to:

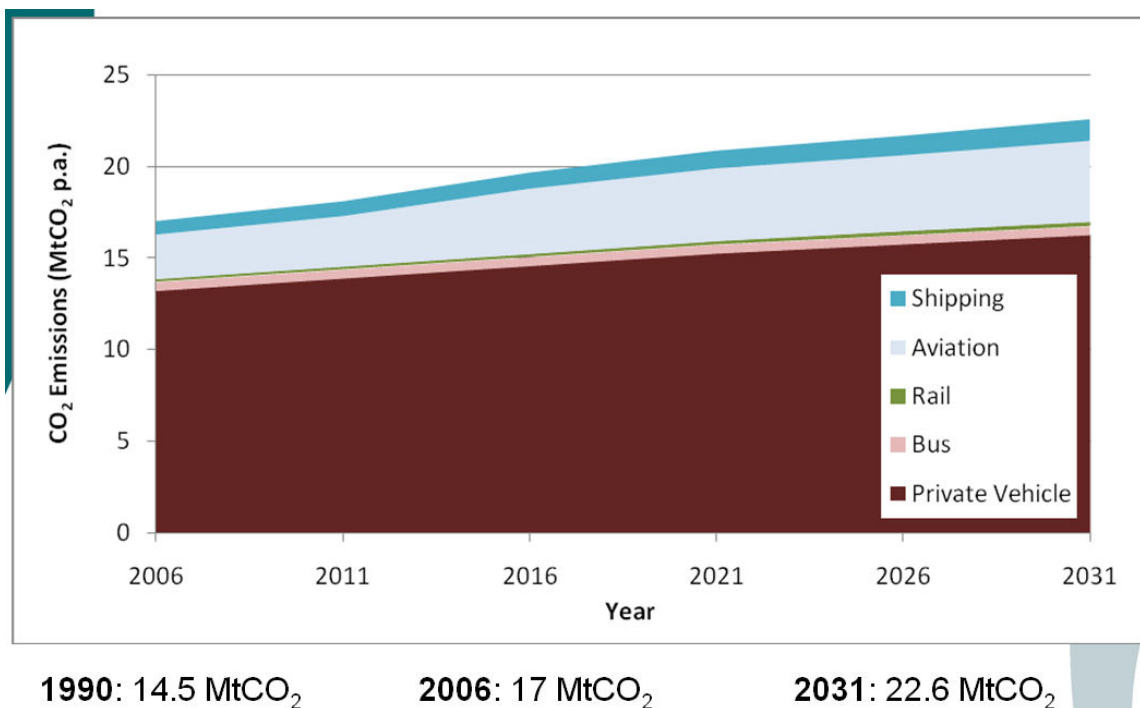
"deliver patterns of urban growth and sustainable rural development that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking; and which overall, reduce the need to travel, especially by car".

The proposed new Planning Policy Statement – "Planning for a Low Carbon Future in a Changing Climate" that is currently under consultation by CLG until June 1st - looks to strengthen this. It is intended to combine and supersede existing PPS1 – "Supplement on Climate Change" and PPS22 on "Renewable Energy", and the consultation version states:

Plan-making and development management should fully support the transition to a low carbon future in a changing climate. This means planning should:

- *shape places so as to help secure radical cuts in greenhouse gas emissions. This requires the location and layout of new development to be planned to deliver the highest viable energy efficiency, including through the use of decentralised energy, reducing the need to travel, and the fullest possible use of sustainable transport.*

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



Given the national target of a 80% reduction in CO2 emissions by 2050 as enacted by the UK Climate Change Act 2008, there is clearly a serious need to address transport emissions at every step of planning and transport development, **or simply, we will fail completely to get anywhere near achieving this legislative target.**

It is therefore crucial that carbon emission targets, and realistic, quantitative methods of auditing their delivery are given a high profile in Development Plan Documents. My examination of the JCS suggests to me that although there are some aspirational statements made, it fails in two respects to grasp this issue at all.

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

Secondly, no measures or evidence base of how such targets (if they existed) might be delivered and verified are given. **It is, therefore, my view that the JCS is unsound both in respect of the Climate Change Act and future national PPS policy, and the existing regional policy SS1.**

SS1 is mentioned in two places in the JCS as a vague supporting reference – no evidence is given of how the JCS is conformant with SS1, what its *'obligations on carbon emissions'* are or how it would achieve delivering reductions. Further, I was very concerned to find no mention at all on carbon emissions, or SS1, in 54 pages of the JCS Transport Strategy Report, January 2010.

The GNDP team has been aware of this issue for several years, but the response has always been to shift the necessary analysis and work 'downstream' to implementation planning after the JCS.

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

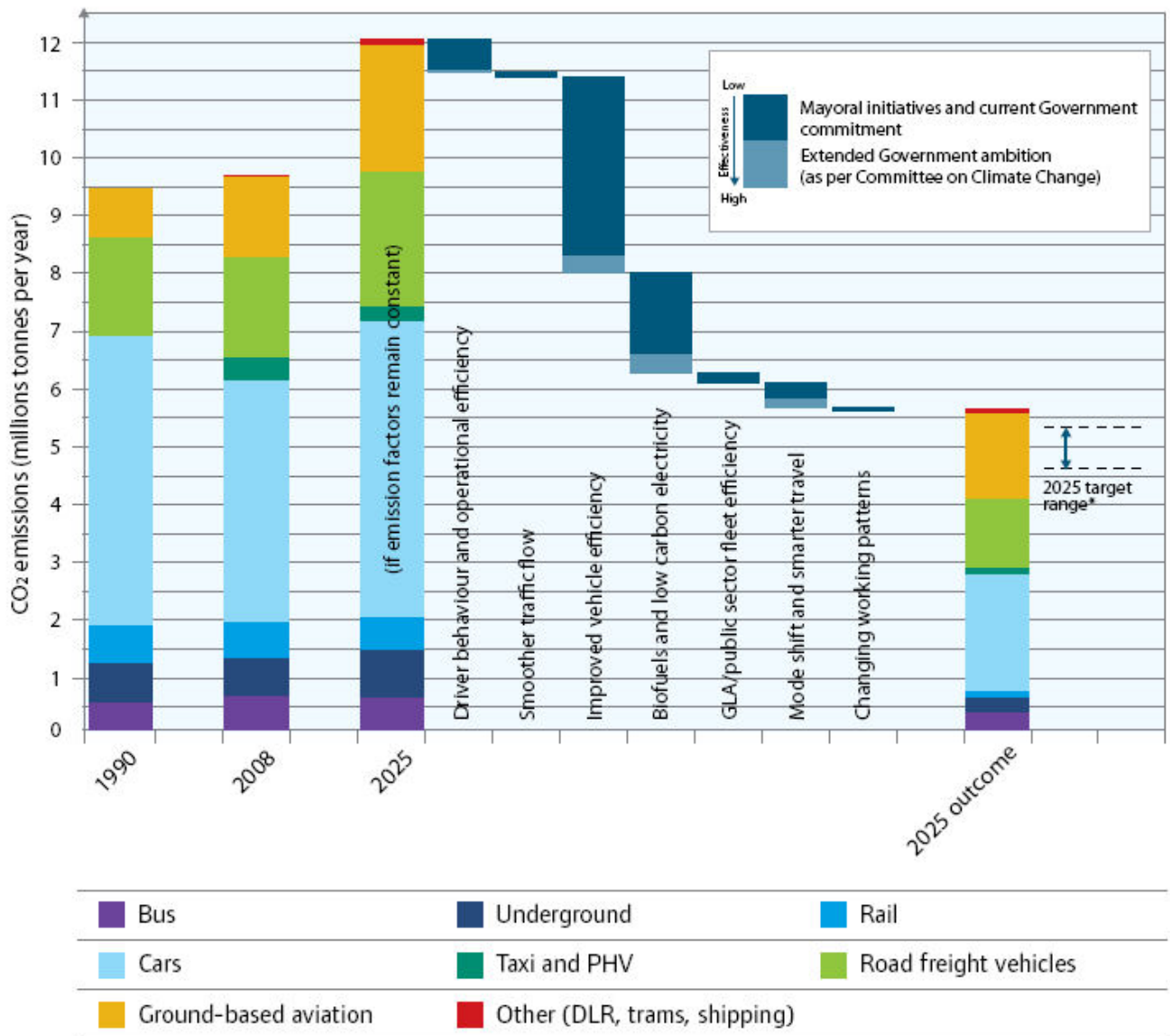
Q4. Has a carbon audit been undertaken for the different growth location options?

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

2. I subsequently raised carbon targets and accounting at a meeting with the GNDP Programme Manager, Ms Sandra Easthaugh, and her senior colleagues last autumn whilst the JCS was still being drafted. I made the case that the JCS as a future plan for Norwich area must include a real quantification of the carbon emissions on policy-by-policy basis to ensure that plans are as sustainable as possible. Such an analysis is necessary before it is possible to evaluate different policies and options against the strategic objective of cutting emissions. I referred to a draft of the London Mayor's

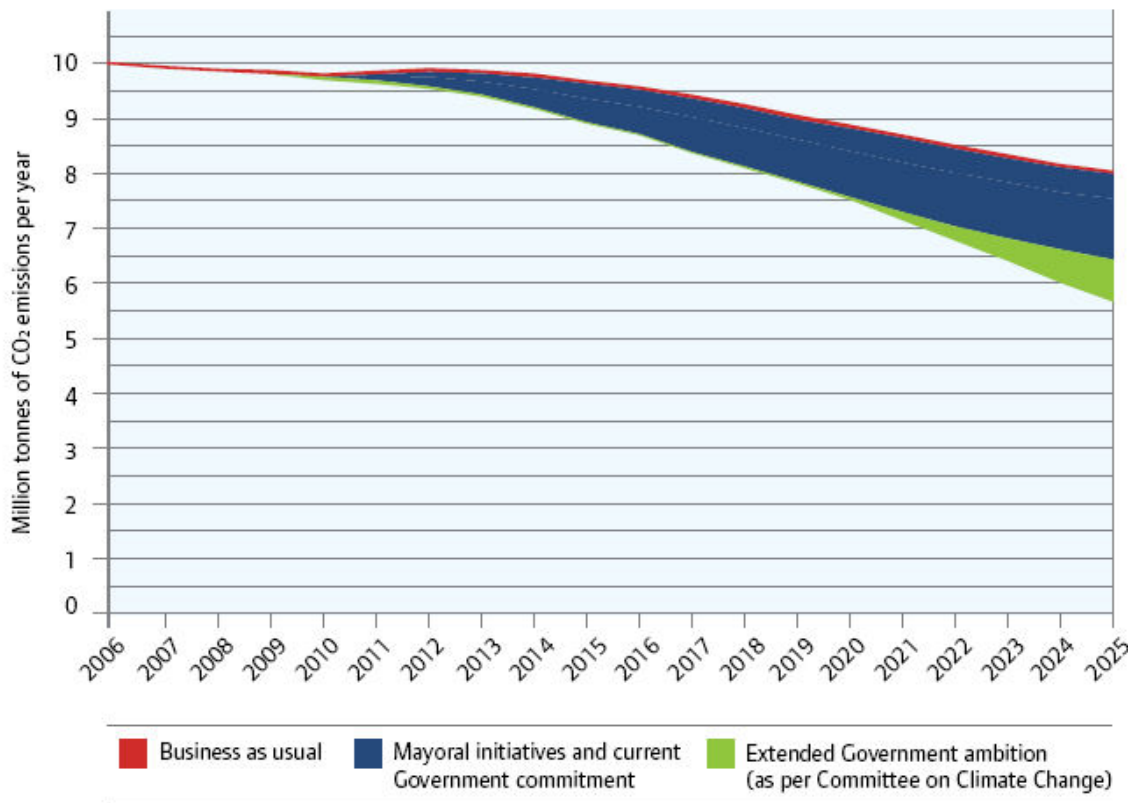
Transport Strategy that showed an overall transport strategy for reducing emissions. This has subsequently been updated with a further draft at: http://www.london.gov.uk/sites/default/files/MTS_Chapter_5_pt5.pdf which contains this diagram of CO2 emission reductions in London to 2025 (similar to the version discussed with GNDP):

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



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

Figure 62: Projected transport sector CO₂ emissions to 2025



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

I urge the inspectors that such an overall strategy for carbon with overall targets and the evidence base of achievability needs to be in the JCS itself, as this is central to underpinning the sustainability of the plan and to testing options.

The delivery plan is a suitable place for fleshing out the detail, but all the experts agree that reducing carbon from transport is going to be very difficult. If the overall strategy is not right at the JCS level then the delivery plan will not be able to deliver national and regional emissions reduction targets. Put another way, if a transport policy that is **not** based around evidence based radical reductions in emissions is set in concrete at the JCS stage, then no amount of tweaking delivery plans later will put the policy back on track.

The inspectors should also be aware that the Major Scheme Business Case for the Northern Distributor Road (NDR) as submitted to the Department of Transport in 2008 calculated that the road would introduce a further 25,000 tonnes of annual CO₂ emissions in its first year – an increase of 11% over current Norwich road transport emissions. The road is also forecast to increase Norwich-wide transport carbon emissions by a staggering 57% by 2071. It would also be making a significant contribution to the estimated 33% increase in transport CO₂ emissions in the East of

England between 2006 and 2031 under a Business As Usual scenario from the Atkins study.

At the exploratory meeting there was discussion of whether there had been a 'Plan B' and at one point a GNDP official admitted that there was no Plan B. The current plan does not build in radical shifts in carbon reduction and modal shift, and therefore, I urge the inspectors that a Plan B is required with carbon reduction targets, and showing how it meet RSS NR1 objectives of achieving a modal shift to public transport, walking and cycling.

With all these points in mind, I request that the inspectors ask the GNDP to provide before the Examination of the JCS can start:

1. a Plan B which would contribute to a carbon reduction target and meet RSS NR1 objective of achieving a modal shift to public transport, walking and cycling.
2. an evidence base of how carbon emissions will be reduced in the GNDP JCS that shows the plan as being conformant with a) EoE plan Policy SS1, b) future national PPS's on planning for a low carbon future and securing radical cuts in greenhouse gas emissions, c) national climate change targets as in the UK Climate Change Act.
3. carbon emission reduction targets for transport and also for other sectors such as used in the London plan. To consider using a sector-by-sector model of transport emissions as already done in the London plan (as in the document referenced above – "Mayor's Transport Strategy - Proposals to reduce transport's contribution to climate change and improve its resilience"), and also to provide interim target figures between 2010 and 2031. [Otherwise, the question has to be asked – if London can do this why can the GNDP not do this?]. These may then form the basis for further work in the implementation details to be provided in the Delivery plan.
4. a detailed evidence base of how the current NATS strategy will deliver these carbon emission cuts.

I look forward to hearing from you.

Yours sincerely,

County Councillor Andrew Boswell,
Green Party group leader, Norfolk County Council

cc:

Rt. Hon Chris Huhne MP, Secretary of State, Department of Energy and Climate Change
Rt. Hon Grant Shapps MP, Minister for Housing and Local Government,