To Greater Norwich Local Plan – gnlp@norfolk.gov.uk

Re. Regulation 19 Greater Norwich Local Plan March 2021

From Norwich City Council Green Party Group - **GNLP Ref. 12781**

**Contact: Councillor Denise Carlo** **Denise.carlo@btinternet.com**

**Date: 22 March 2020**

Dear GNLP Team,

Please see below Norwich Green Group’s Response to Regulation 19 GNLP.

We refer in our text to the paper, submitted separately by the Centre for Sustainable Cities which Norwich Green Party commissioned in support of our response to Reg 19 and this should be read alongside.

One of our main concerns throughout the GNLP process has been the lack of priority given to climate change. Norwich Green Party councillors have consistently and repeatedly raised this vital issue at every opportunity over the past four years and before that during the preparation of the adopted Joint Core Strategy.

In our response here, we have commented on Emissions and climate change (paras 93-97 in the GNLP consultation); on Policy 4 and Transport and also on the Norwich Western Link. We also comment on East Norwich, Anglia Square and the King Street stores.

We support the responses submitted by other parties who share the same concerns on a range of matters, for example, CPRE, Norfolk Wildlife Trust, Wensum Valley Alliance, Dr Andrew Boswell and Client Earth.

Yours sincerely,

Councillor Denise Carlo

On behalf of Norwich City Council Green Party Group

**Regulation 19 Greater Norwich Local Plan March 2021**

**Response by the Norwich City Council Green Party Group**

**GNLP Ref. 12781**

**Summary**

We consider the GNLP to be unsound:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with the NPPF

The GNLP Reg 19 would increase carbon emissions, contrary to the national legal target of net zero by 2050. The policy framework on climate change and local plans is addressed in the Centre for Sustainable Energy paper. Although climate change has been strengthened in the GNLP by the inclusion of a new climate change statement, it has been bolted onto to a previously prepared growth strategy and set of policies which are inconsistent with the statement and the evidence base on climate change. The GNDP is aware of this deficiency because they have agreed to review the Local Plan on climate change following its adoption.

The GNLP was not ready for the Regulation 19 stage. GNDP members had agreed to commission further work and undertake a Regulation 18C six week focussed consultation, but following the Planning White paper, they decided to proceed immediately to Regulation 19.

In our view, the Plan should not be accepted as sound but returned to the GNDP for further work to ensure soundness.

There are a number of matters which we consider to be unsound because they are

incompatible with the duty to proactively contribute to the mitigation of, and adaptation to, climate change under section 19 (1A) of the Planning and Compulsory Purchase Act 2004 which requires Local Plans to include:

*“policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change”*

The matters include:

* Absence of an overall carbon budget for Greater Norwich to 2050 consistent with the Climate Change Act 2008, supported by a strategy and policies in line with the carbon budget trajectory.
* High housing number which will increase development pressures on greenfield sites;
* Growth that includes dispersal of development to small villages which lack services and the possibility of new garden city settlements in open countryside distant from railheads (Thorpe Honingham, Hethel and Silfield).
* Sub-optimal energy efficient standards and renewable renewable energy generation
* Lack of attention to retrofitting of historic development.
* A transport strategy which would increase carbon emissions by caterimng for traffic growth and modest modal shift to bus, walking and cycling.
* Inclusion of a Norwich Western Link.
* Support for improvements to strategic highways.

Several of these issues are addressed in the Reg 19 response by the Centre for Sustainable Energy which was commissioned by Norwich Green Party (on sustainable communities, zero carbon development, sustainable transport, renewable heating, renewable energy generation and retrofitting of traditional and historic buildings).

The CSE paper forms part of our representation on Regulation 19.

We also endorse responses submitted by other parties who share the same concerns on a range of matters: CPRE, Norfolk Wildlife Trust, Wensum Valley Alliance, Dr Andrew Boswell and Client Earth.

They cover soundness matters at considerable length:

* Climate change
* Housing numbers
* Growth Strategy
* Green Wedges
* Green Infrastructure

Norwich Green Party Group’s representation mainly covers Transport Policy 4 which we consider to be unsound. We also make comments on a number of individual development sites: East Norwich, Anglia Square and on the smaller King Street Stores site.

The changes to the Plan that we would like to see are those we have set out in our previous representations on Regulation 18. They include:

* An overall carbon budget for Greater Norwich to 2050 consistent with the Climate Change Act 2008, supported by a strategy and policies in line with the carbon budget trajectory.
* A lower housing number (42,568 dwellings plus a 5% buffer) resulting in lower development pressures on greenfield sites;
* Growth concentrated in high density low car developments close to sustainable transport hubs, with a high concentration of growth located around Norwich.
* No dispersal of development to small villages which lack services.
* No new garden city settlements in open countryside distant from railheads (Thorpe Honingham, Hethel and Silfield).
* Protection of Green Wedges around Norwich.
* Development build to zero carbon standards that include renewable heating based on renewable energy generation
* Retrofitting of historic development.
* A transport strategy based on traffic reduction and a high degree of modal shift to bus, walking and cycling.
* Abandonment of a Norwich Western Link.
* No further major increase in road capacity.

**Section 2 Greater Norwich Profile**

**Infrastructure**

We comment on **clause 76** as background to our response on Transport Policy 4.

The statement, ‘Historically relatively poor strategic infrastructure links limited growth in the area’ is only partially correct and should read:

“*Whilst the strategic and local road network is largely in place, poor public transport and rail infrastructure limit accessibility to employment and essential services and discourage modal shift to sustainable transport modes*”.

The statement about relatively poor infrastructure limiting growth stands in stark contradiction to the Economy Profile which describes Greater Norwich as a world leader in plant and climate change research, a nationally significant retail centre, a centre for financial services and a national contributor to the UK’s food supply and part of the wider area’s world leader status in off-shore wind energy.

It is the case that Greater Norwich has historically poor public transport and local rail infrastructure relative to other cities. This acts as a major constraint in trying to encourage modal shift to sustainable modes of transport and is a barrier for the significant percentage of households without private transport in endeavouring to access employment, education and other essential services.

We disagree with the frequent and persistent claim that Norfolk is a poor relation in terms of the road network compared to the south-east and London. This is rolled out as ‘evidence’ that the local road network is holding back development and that further dualling of Norfolk’s roads is essential for growth. This attitude has skewed the County’s priorities and spending. (in 2016 Norfolk County Council voted spending on the Norwich Western Link, the 3rd Great Yarmouth River Crossing and the Long Stratton Bypass as the County Council’s top spending priority for the future) and its transport agenda in favour of road building and accommodating travel by private car.

A large body of academic research has challenged assumptions about the effects of new road infrastructure and economic growth (for example[[1]](#footnote-1)); on how we cannot build our way out of congestion[[2]](#footnote-2) and on how optimistic traffic predictions can lead result in building surplus road space.[[3]](#footnote-3)

Road improvements add vehicle capacity and speed up journey times, encouraging people to live further from their workplaces; this in turn leads to more dispersed development, increased reliance on car use, more congestion and pollution and more demands for improved roads.

Nonetheless, Norfolk County Council has demanded much larger road schemes than necessary for addressing localised problems or for serving new development. For example, the A11/A47 Thickthorn Junction is a major project which Highways England acknowledges will increase carbon emissions. The Agency originally proposed a small scheme with the objective of assisting buses to negotiate the A11/A47 Thickthorn roundabout and serve new housing growth along the A11 corridor. Norfolk County Council lobbied for a major junction improvement with the aim of increasing road capacity and serving housing growth. To address the likelihood of an enlarged junction attracting single occupant car commuters travelling short distances, the Council proposes expanding Thickthorn park and ride. This mirrors the story at A47 Postwick Junction, where the County Council doubled the capacity of Postwick Park and Ride in 2014 on the back of Postwick Hub and ended up leasing unfilled spaces to Aviva at the adjacent Broadland Business Park.

The County Council frequently cites the rural nature of Norfolk and reliance on the private car as a reason for road improvements. This argument is over-stated. A majority of the Norfolk population lives in Norwich, Great Yarmouth, King’s Lynn and 21 market towns where there is considerable scope for people switching to active travel and public transport. Most journeys in the UK are short. In 2017, 67% of journeys were under five miles; a further 15% were between five and ten miles, whilst journeys of over 10 miles made up less than a fifth of all trips. Over 60% of journeys of between one to two miles are made by car or van.[[4]](#footnote-4)

An example of Norfolk’s reliance on car use is Wymondham along the A11 corridor, nine miles from Norwich with direct rail links to Norwich and Cambridge. Census data (2011) shows that 22.1% of residents in Wymondham travel less than 2km (walking distance) to work and 30.2% travel less than 5km (cycling distance) to work. On the other hand, 71.8% of Wymondham residents (2011 Census), drive to work, mainly in Norwich. A conclusion of the market towns study is that travel pattern data shows the huge potential for a shift to active modes of transport for commuting. [[5]](#footnote-5)

85. Rail Network

The local rail network around Norwich is limited compared to new rail infrastructure around Cambridge where Cambridge North station has been built to serve major growth close to the city and Cambridge South station is planned. Whilst the GNDP has devised the concept of a Norwich - Cambridge Arc, Norwich is the poor relation in terms of sustainable transport infrastructure.

89. Transport for Norwich and the Transforming Cities Programme

Transport for Norwich and its predecessor, the Norwich Area Transportation Strategy Implementation Plan (NATS 2013), based around modal shift to bus, walking and cycling, have been successful in reducing vehicles entering the city centre and increasing the numbers of journeys on foot and by bike. Bus service improvements have also been achieved but the Councils are a very long way from delivering an upgraded bus infrastructure plan based on six corridors for the Norwich built up area as promised by the Joint Core Strategy. An application was made to the Transforming Cities Fund for between £74m to £127m for bus infrastructure schemes. Norfolk County Council was awarded £32m and currently, no other sources of funding have been identified.

**Emissions and Climate Change**

**Clause 93**

 We agree that mitigating the effects of climate change within the Greater Norwich area should be a cornerstone of the GNLP.

Although the GNLP has been strengthened by a stated objective to reduce per capita emissions and contribute to meeting the national target to achieve net carbon zero by 2050, the strategy for growth and supporting policies are not in line with S19 (1A) of the Planning and Compulsory Purchase Act 2004.

In 2021, government will set the level of the sixth carbon budget, covering 2033 to 2037. This will require faster progress in reducing emissions as the UK emissions are currently projected to exceed the legally binding 4th and 5th carbon budgets for the years 2023 to 2027 and 2028 to 2032.

The Committee on Climate Change is advising that the UK set its sixth Carbon Budget to require a 63% reduction in emissions across all sectors including international aviation and shipping between 2019 and 2035 (a reduction in UK of emissions of 78% by 2035 relative to 1990). [[6]](#endnote-1)

The GNLP Plan period 2018 – 2038 will be a critical period for local councils to contribute tonet zero greenhouse gas emissions by 2050 and hence the vitl importance of crafting and adopting a Local Plan which meets the challenge.

The Centre for Sustainable Energy, Dr Andrew Boswell and others address the planning framework for climate change and local plans. We would like to make the following observations about the lack of priority given to climate change during plan preparation.

The GNLP Regulation 18 Growth Options Consultation (early 2018) treated climate change as a subordinate matter. The Foreword, ‘The Choices We Face’ bracketed climate change along with other environment issues in the Draft Vision and Objectives viz:

*“To protect and enhance the built and natural environment, make best use of natural resources, mitigate against and adapt to climate change”.*

The GNDP’s Favoured Option on climate change was the **‘**Current Policy Approach’ (ie that taken by the adopted Joint Core Strategy (2011)) based on minimising greenhouse gas emissions in new development, with no reference to addressing the contribution made by transport.

The GNLP Regulation 18 Consultation was deferred by 3 months to Jan 2020 to address various shortcomings raised by GNDP members that included the need for improved actions to address climate change. (GNDP Member Board Meeting Minutes 26 Sept 2019).

The GNLP Regulation 18 C (Consultation 29 Jan to 16 March 2020) was strengthened to reflect current thinking on climate change viz:

*Environment Objective*

*“To protect and enhance the built, natural and historic environments, make best use of natural resources, and to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emissions by 2050.”*

Nevertheless, the added reference to net zero was not reflected in the body of the Plan. At the GNDP Board on 6 Jan 2020, a member questioned whether measures in the Strategy for a low carbon future were sufficiently robust.

The GNDP Board agreed to carry out further work on housing needs and delivery issues, a viability study and CIL evidence and economic evidence, but notwithstanding some member concerns over climate change, no further work was agreed on this score.

Plans for further consultation were upended by the Planning White Paper in late July 2020 and the GNDP decided to take a Regulation 19 GNLP to consultation in early 2021.

Norfolk planning authorities will now pursue climate change work through the Norfolk Strategic Planning Framework Forum. A paper ‘Climate Change and the Planning System’ tabled at the forum on 25 January 2021

identified current opportunities for the planning system to support decarbonisation. Alongside, members agreed through the revised draft Norfolk Strategic Planning Framework to address climate change more fully through a policy review of the GNLP following its adoption.

Deferral would result in several years’ delay before a Local Plan that is better aligned with climate change policies is adopted. Meanwhile, the GNDP is relying on central government policy changes for carbon cuts.

**Clause 94**

Although nitrogen dioxide levels have been falling in the AQMA, breaches continue, notably on Castle Meadow, the main bus corridor.

Particulate matter pollution is an even more serious concern. Fine particulate matter (PM2.5) has been shown to affect every organ in the body. The WHO has set a limit for PM2.5 at 10mcg/m3 whilst recognising that there is no healthy limit. In Norwich, where road traffic is a major pollutant source, a study by Public Health England attributed 5.5% of deaths of people aged 25 and over in 2010 to PM2.5. [[7]](#footnote-6) Although PM2.5 levels have fallen slightly in Norwich, they remain above the WHO limit in the city and just below the WHO limit in suburban and rural parts of Greater Norwich. Electric cars would not avoid the friction of rubber tyres and brakes on road surfaces, a major source of PM2.5.

**Clause 95**

Locally per capita CO2 emissions have fallen, largely driven by the fall in emissions from the national power sector. Data on per capita emissions (from transport, domestic dwellings, commercial/industrial settings), collected by the Department of Business, Energy and Environmental Strategy excludes emissions from international aviation, shipping, production and consumption. Consequently, per capita emissions are higher than presented by officials figures and radical cuts will be required to achieve Net Carbon Zero.

At the present rate of carbon emissions, the Tyndall Centre for Climate Change Research using Scatter (a carbon footprint tool to reduce city-level emissions) estimates that Norwich will use up its global carbon budget within around seven years.

The City must cut its carbon emissions by 13% every year to meet its contribution to Net Zero. Broadland and South Norfolk with their higher emissions from road transport must make an annual cut of 13% and 14.25% respectively. [[8]](#endnote-2)

**Clause 96**

Information should be included on the implications of changes in temperature and precipitation. These include impacts on human, plant and animal health, with implications for food production, water supply, infrastructure, public health and education. The National Trust has mapped the various effects of climate change in England and Wales between 2020 and 2060 and shows major overheating across the whole of the south east and east of England by 2060. [[9]](#footnote-7)

**Clauses 98 – 102 Flood Risk**

Under this section, coastal flooding and sea level rise must be referred to. Whilst the GNLP area is not coastal, the extent of the 5 districts that lie within flood zones 2 and 3, the low lying nature of the coast to the east, the Broads area which extends into Norwich and rivers running through the area to the sea are significant risks. Additional carbon emissions from new significant growth in GNLP area plus delays in cuts to existing emissions would contribute to rising global temperatures leading to an increase sea level rise and stormier seas.

For further information, see section on Flooding on pages 28-31 of the Centre for Sustainable Energy paper which highlights advice from the Environment Agency on the need to plan for two scenarios for a cumulative sea level rise of 1.20m and 1.60m between 1990 and 2115.

**117 Green Belt**

We strongly endorse CPRE’s case made for a Green Belt for Norwich based on a Green Wedges principle.

**Policy 1: The Sustainable Growth Strategy**

The GNLP is unsound. The number of new dwellings and deviation from the Government’s standard methodology using 2014-based projections is not justified and additional homes would increase carbon emissions.

The total provision of new dwellings has been raised from 40,541 to 49,500 with an unjustifiable increase in the buffer from 5%, as required by the NPPF, to 22%, a figure that the GNDP describes as ‘significant’ and has not been subject to public consultation. In addition, to this allocation, a minimum of 1,200 new homes will be provided in South Norfolk Village Clusters Housing Site Allocations document and 250 will be provided through allocations in the Diss and area Neighbourhood Plan, which are outside the purview of this consultation.

The experience of a high housing target in the Joint Core Strategy has been the difficulty of meeting a five- year housing land supply leading to developers winning planning appeals to build on greenfield sites unallocated in the JCS. Local councils are keen to grant planning permission for new homes, but the rate of delivery is in the hands of developers. Before the recent spurt in local housing delivery, Greater Norwich was below the five year housing land target. This was not due to any unwillingness on the part of the councils to grant planning permission, but to the slow rate of housing completions. Buildings rates have increased in the past three years leading to a current housing land supply for Norwich (March 2021) of just over 6 years which does not suggest a shortage of sites.

The GNP local planning authorities are keen on high housing targets for several reasons. Firstly, to deliver affordable homes, although ironically the Councils have experienced repeated problems of developers challenging housing viability which led for several years to considerable under-delivery of affordable dwellings. We have seen an improvement in the number of affordable homes being built in Norwich in the last three years, but this has been largely achieved by the City Council building council homes. Secondly, housing growth at a strategic scale attracts central government investment.

These above reasons do not justify inflating the housing figures because the downside is that the external environmental impacts such as carbon emissions and traffic growth are borne by society. Over 70% of the locations identified for the quantum of proposed housing are greenfield land which will increase journey distances and reliance on the private car. The SEA of the GNLP calculates that the proposed development of 49,492 dwellings within the GNLP would be expected to increase carbon emissions in the Plan area by 27.1% (565,079 tonnes based on 2018 estimates), for example due to allocating housing on a total of 84 sites located on previously developed land (1,091ha) . (Residual Effects from the GNLP). In response, the GNDP says that the increase in the number of residents is over-stated as a large proportion of need for new homes arises from the existing population and that the strategy for future development is to focus growth in the more sustainable locations.

The GNP underestimates the impact of new housing on greenfield land. These include the loss of agricultural land; the increase in buildings and hard paving, contributing to temperature rise, and the additional resources used by the population living in smaller households and occupying more housing such as car ownership, water usage and waste creation, the latter which is increasingly being sent for carbon intensive energy from waste incineration.

The GNDP argument that new homes will be located in more sustainable locations with the potential for non-vehicle modes of travel. However, this argument does not bear out the reality in Norfolk where even in large market towns such as Wymondham where a majority of even short journeys take place in the car. Norfolk County Council’s depiction of the County as a rural place which will remain reliant on the private car allows the Council to continue to argue for road improvements. The GNDP is trying to face both ways in claiming that housing in rural areas is sustainably acceptable and then arguing for improvements of the road network to support rural dwellers.

It is for this reason that the Green Group is **opposed to Village Clusters** amounting to the rural dispersal of housing to places with no or few services. South Norfolk Council’s argument has been that electric vehicles will be the panacea. However, this is not the case that electric vehicles will save the transport sector from having to addressing its mega carbon impact and allow business-as-usual- to continue. Dispersal of development adds to journey distances and to environmental impacts such as congestion close to urban areas, leading to demands for road building which together with embodies carbon in vehicle manufacture, involves considerable carbon in constructing new roads.

Weight should be given to draft consultation NPPF (Jan 2021) and the replacement policy on sustainable development for clause 11a):

*‘Plans and decisions should apply a presumption in favour of sustainable development.*

*11a) ‘Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects’.*

We support the concentration of development in and around the Norwich urban area. However, we disagree with the allocation of a **contingency site at Costessey** for around 800 homes in relation to our argument about the excessive number of dwellings overall. It would be more sustainable to consider East Norwich which is within easy walking distance of the city centre, bus and railway stations.

We would like to see a greater reliance on windfalls on brownfield sites. It is highly likely that a generous number of windfall sites will come forward given the shake up of the economy, for example, loss of city centre retail and conversion of offices to dwellings. The GNLP states that evidence provides an estimated 4,450 homes from resulting from windfall development. Yet, only 1,296 dwellings have been allowed under windfalls, even though the GNLP acknowledges that ‘windfall development is likely to remain robustly high’.

**Policy 4: Transport**

The GNLP is unsound

* **Not positively prepared**: the GNLP Policy 4 on Transport relies on an inadequate and incomplete evidence base. GNLP Transport Policy 4 is a summary of Draft Norfolk  Local Transport Plan 4 Strategy  (Draft LTP4) and the Strategy has not yet produced a chapter relating to Norwich. Only one strategy was consulted upon: continuation of the approach in the adopted Joint Core Strategy 2006 – 2026, as informed by the Norfolk LTP3 2011-2026 and now being reflected in the Draft LTP4, which as it stands would not meet the area’s objectively assessed needs in relation to climate change. Alternative strategies which would cut carbon emissions on a path to Net Zero and that include traffic reduction measures were not considered.
* **Not consistent with national policy**.  Draft LTP4 Strategy will increase transport carbon emissions and is not consistent with the legally binding target of Net Zero

**Not justified:**  the Draft LTP4 Strategy and proposed Policy 4 on Transport would result in additional traffic growth and carbon emissions.   The Sustainability Appraisal (SA) of Draft LTP4 incorrectly concluded that the Draft LTP4 Strategy would have a positive impact on carbon emissions. It incorrectly concluded that there was no need to consider reasonable alternatives to the Draft LTP 4 Strategy with regard to climate change. In the SA Scoping Report, the SA incorrectly accepted the Norwich Western Link as part of the current baseline.

**Not effective**: Draft LTP4 Strategy and GNLP Policy 4 would not deliver a cut in Norfolk’s transport carbon emissions consistent with the need to achieve Net Zero by 2050.    The Norwich chapter in the Draft LTP4 Strategy has not been published for consultation and the Norwich Area Transportation Strategy Implementation Plan 2013 (since renamed Transport for Norwich) is reaching its end date.

The GNLP should be declared **unsound** and a revised LTP4 Strategy prepared for framing the GNLP transport policy that involves an ambitious programme which will contribute to Net Zero.

**Inadequate Evidence Base**

The transport evidence base for the GNLP is incomplete. The GNLP Reg 19 evidence base for transport gives a link to the Greater Norwich Local Plan Infrastructure Needs Report (Jan 2021), (alongside a version relating to the Reg 18 Consultation of 2018 which has been superseded). The Needs Report is a review of the infrastructure requirements to provide for growth planned through the GNLP. It lists transport plans and strategies which have yet to be approved or published:

Norfolk Local Transport Plan 4 Draft Strategy 2021 -2036

The GNLP Policy 4 on Transport is a summary of the Draft LTP4 Strategy.

It is NCC’s intention to adopt the LTP4 in April 2021. The Green Party view is that further work is required on this wholly inadequate document. As a start, the consultation version (autumn 2020) included two national climate change targets under the Climate Change Act 2008: an 80% reduction in carbon emissions on the 1990 baseline by 2050 and further on, a reference to net zero by 2050. The document is a continuation of Norfolk LTP3 2011 – 2026 in seeking to address carbon reduction, tackle the infrastructure deficit on major road, rail and bus connections, ensure good transport connections in urban areas and towns to serve planned growth that includes bus priority lanes on certain corridors, improve connectivity between rural areas and services in urban centres and support new transport technology to respond to a changing society and economy.

Draft LTP4 Strategy does not contain a separate chapter on Norwich which instead is addressed in a sub-section amounting to one third of a page in a chapter on Increasing Accessibility where the County’s ambition for Norwich is expressed thus:

*“NCC (Norfolk County Council) want to encourage the use of more sustainable forms of transport, such as public transport, cycling and walking, while also improving the capacity of the road network, in particular through the completion of the Norwich Western Link.” [[10]](#footnote-8)*

We read in the Sustainability Appraisal of LTP4 (3.2.7) that the assessment of the Transport for Norwich strategy policies will be reported on separately, once it becomes available, and will be appended to the SA Report. This had not happened.

Norwich City Council responded to the draft LTP pointing out that LTP4 contained seven short paragraphs on Norwich, that Norwich Area Transportation Strategy Implementation Plan (NATS, 2013) was out of date and Transport for Norwich update overdue, undermining the ability to plan land use and transport together. In relation to general content of Draft LTP4, the Council commented:

*Our overall view is that the document is deficient due to a lack of clarity of expression, with too many words and too few images; generic policies that unsuccessfully attempt to straddle the needs of the City and the rest of the County; specific commitments to infrastructure schemes that promote long distance car-based connectivity but a lack of equivalent scheme commitments that would support the more environmentally progressive policies in the document; and a general lack of ambition and recognition that the world must be radically different by the end of the plan period……... [[11]](#footnote-9) (para 1.9)*

The City Council offered a set of high-level policy principles and interventions for incorporating into the suite of transport policy documents being updated.

Transport for Norwich Strategy

The GNLP Reg 19 evidence basis for transport gives a link to Transport for Norwich webpage which as noted above is becoming out of date.

Norfolk Rail Prospectus

A consultation to update rail priorities contained in the 2013 Prospectus was carried out in early 2020, but a final version has not been published. The 2013 Plan listed new stations at Postwick and at Broadland Business Park on the Wherry and Bittern lines as medium-term aims and it advocated a new station on the Bittern Line at Rackheath for investigation in conjunction with developer proposals for the North East Norwich Growth Triangle, but there has been little progress.

**GNLP Policy 4 on Transport would increase transport carbon emissions**

GNLP Policy 4 would increase transport carbon emissions, contrary to Net Zero.

In their Sixth Carbon Budget Report, the Climate Change Committee advises on the need for a 70% reduction in surface transport emission by 2035 and for year-on-year reduction in traffic growth under the Balanced Pathway to Net Zero by 2050.

Surface transport has made little progress to date; emissions have fallen by just 1% since 2011 due to the increase in road traffic and rise in the sales of heavier sports utility vehicles, cancelling out expected reductions from sales of electric and hybrid vehicles.[[12]](#footnote-10)

The SA/SEA Scoping Study for Draft LTP4 Strategy considers the current baseline for transport. It notes:

* ‘Transport is one of the largest contributors to greenhouse gas emissions in Norfolk’.
* “There was no change in emissions related to transport between 2016 and 2017 which remained at 27% (125.9 MtCO2e).” [[13]](#footnote-11)
* Transport carbon emissions increased for all Norfolk authorities between 2015 and 2016. (Table 3.13). Total CO2 emissions from transport were highest in South Norfolk District Council, which accounted for 424.6 kt CO2 in 2016, and the lowest emissions were in Norwich City Council with 132.3 kt CO2.

Notwithstanding this negative situation, the SA/SEA Report assessment of LTP4 is :

*‘Polices have resulted in predominantly significant positive effects on climate change and carbon emissions.’ [[14]](#footnote-12)*

The LTP4 policies largely rely on electric vehicles to do the heavy lifting work on cutting carbon emissions, together with an enhanced degree of modal shift. However, there is growing scepticism that electric vehicles will solve carbon emissions from road transport.

THE SA does not recommend the need for alternative strategy in order to achieve radical cuts in greenhouse gases. Furthermore, it suggests that a Norwich Western Link should form part of the Scoping Report baseline. We note that WSP who conducted the SA of Draft LTP4 also lead on the NWL for Norfolk County Council.

The SA/SEA of the GNLP (Jan 2021) tabulates the carbon emissions for all local authorities in Norfolk for 2016, 2017 and 2018, (an additional year on the SA of the Draft LTP4 Strategy). Table 9.4 shows that carbon emissions for transport increased in all three years in South Norfolk and Broadland. Transport emissions in Norwich increased between 2016 and 2018 and fell slightly in 2018. Emissions from the transport sector in Broadland were more than double the figure for Norwich, whilst South Norfolk was more than three times the level for Norwich.

This trajectory for Broadland and South Norfolk ought to have set alarm bells ringing for Norfolk County Council and put them on a different path. Policy 4 is the continuation of Business As Usual.

Recent major road schemes around Greater Norwich are adding to transport carbon. The Norwich Northern Distributor Road (NDR) will increase Norfolk’s transport carbon emissions by 6.17% between 2018 and 2032. Dualling of the A11 between Ketteringham and Cringleford increased traffic volumes by 25% between 2012 and 2017 is part of the explanation in the huge growth in South Norfolk’s transport carbon emissions. Nonetheless, Draft LTP4 continues to promote strategic road connections such as the Norwich Western Link. In addition, national strategic road schemes sought by Norfolk will further bump up emissions. Highways England recognise that A47 North Tuddenham to Easton scheme and the A47/A11 Thickthorn Junction Improvement will increase greenhouse gas emissions.

Norwich Airport is a further source of greenhouse gases. Optimistic assumptions about future expansion of national and regional airports are open to question following the Climate Change Committee Sixth Budget report and recommendation,

‘that *there should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory and can accommodate the additional demand’*. [[15]](#footnote-13) (Table p81, p29).

**Need for an ambitious transport strategy based on traffic reduction**

Because most local authorities in Norfolk have allowed transport carbon emissions to rise with little check, in particular levels in South Norfolk and Broadland, radical action will be necessary to address the problem. Transport can no longer rely on other sectors to achieve net zero.

An important lesson to be drawn is that the Transport for Norwich Strategy has lowered emissions in tandem with local population and economic growth by encouraging modal shift and cutting traffic in Norwich city centre. On the other hand, traffic around the periphery of Norwich, along strategic road corridors and in rural areas continues to grow in consequence of planning and transport decisions.

In built up areas, Government transport policy is encouraging modal shift and active travel through a number of policy papers such as ‘Decarbonising Transport’. In his Ministerial Foreword, Grant Shapps, Transport Minister declares:

 ‘*Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network’*. [[16]](#footnote-14)

The growth in digital technologies coupled with the covid-19 pandemic has speeded up changes in society with ramifications for transport and travel, such as the greater moves to on-line shopping and home working and the vital importance of fast broadband. The GNLP transport policy must reflect these upheavals and the overarching need to radically cut carton from the transport sector. We need to see measures that:

* Support for low car and car free living in high density communities concentrated around Norwich. The Centre for Sustainable Energy paper proposes changes to the text on Policy 4 Strategic Infrastructure Transport relating to non-car modes with a target for ‘*half of all journeys in towns and cities being cycled or walked by 2036*’ and additional wording on the need for new infrastructure in support of this.
* Enable substantial model shift through well- funded comprehensive \* packages to include the types of measures set out in the Norwich City Council response on the Draft LTP4 consultation.
* An end to further major road building to accommodate traffic growth. The future of travel and will be heavily shaped by information technology and digitally connected Smart infrastructure.

**\*Comprehensive** means simultaneous consideration of bus, rail, cycling, walking, park and ride, information services, marketing, traffic management, allocation of road capacity among the competing users, formal travel planning in residential areas, workplaces, schools, and other major attractors, parking provision, telecommunication impacts (home working, work conferences), traffic calming in residential areas and pedestrianisation.

**Transport Policy 4: Norwich Western Link**

We strongly object to this road scheme on soundness grounds. The NWL should be deleted from Transport Policy 4. The fact that the NWL has not been allocated in the GNLP suggest that growth identified is not dependent on the NWL for its delivery.

Given the reference to the NWL in implementing the Transport for Norwich Strategy, it should be a subject for discussion at the plan examination (with a view to its deletion).

**Not positively prepared:** NPPFPara 102 states that "transport issues should be considered from the earliest stages of plan-making..."   The NWL referred to in Policy 4 is not an allocation in the emerging plan and officers inform us that adoption of the GNLP will not result in a route being safeguarded. However, Norfolk County Council regards the NWL as a critical part of the current Transport for Norwich Strategy and is proceeding with the NWL in parallel with preparation of the GNLP. This has denied the public the opportunity for commenting on the NWL as part of an integrated land use planning and transport plan.

A paper to the GNDP Board on 10 July 2020 considered a revised timetable to allow a focussed consultation. *‘This would include the possibility of including a specific allocation for use of land for the NWL within the GNLP, supported by a considerable evidence base such as a wider package of transport planning measures to be included in the Transport for Norwich Strategy and consideration of reasonable alternatives’*.

Following the Planning White Paper, a paper to the GNDP Board on 30 Sept 2020 concluded that the allocation of the NWL envisaged in July would not be possible: ‘*However, as in the draft version of the GNLP, the road would still be promoted by policy 4 on implementation and would be delivered through the Transport for Norwich Strategy.’*

Reference to the NWL in Reg 19 is not ‘supported by a considerable evidence base’. The County Council has not published an updated Transport for Norwich Strategy.

Alongside preparation of the local plan, the NWL must be subject to a Habitat Regulations Assessment (HRA) as it would cross the River Wensum SAC. Because the NWL is not allocated in the GNLP, the SA/SEA of the plan is able to conclude that none of the allocated sites coincide with, or are located adjacent to, a European site. (SEA/SA of GNLP Reg 19, Box 8.3).

Also, because the updated Transport for Norwich has not been published, there has been no HRA screening of the NWL as part of the SA/SEA of the Draft LTP4.

There is a wholesale lack of information relating to the NWL and GNLP.

Under the Habitats Directive, development that adversely impacts upon a SAC must demonstrate for planning purposes ‘an imperative reason of overriding public interest’. Norfolk County Council has not done this.

The ecological importance of the River Wensum valley in the NWL study area has become more evident. Recently, significant numbers of rare barbastelle bats have been identified by Wild Wings Ecology consultancy in the corridor crossed by the NWL. The findings will add weight to the need for full habitat and species assessments under the EU directive.

**Not Justified:** Inclusion of the NWL is not appropriate and reasonable alternatives have not been considered. Besides the large adverse environmental impacts of the NWL,Norwich Green Group is also concerned about its land use and transport consequences. The NWL would create a complete third orbital road around Norwich and lead to further car-based urban sprawl and traffic growth. It would increase travel by private car especially between NE Norwich where major housing is located and SW Norwich where there are major employment sites. The report, Trunk Roads and the Generation of Traffic (DoT,1994) examined as a case study a full length NDR connecting up with the A47 southern bypass to the west and east of Norwich. It concluded that large scale development of land along the NDR corridor would result in “very significant” level of induced traffic on the new road. [[17]](#footnote-15)

Already, Broadland and South Norfolk Councils have located a major Food Hub which is dependent on car and lorry access, on land at Easton overlooking the Wensum valley. Land at Honingham, next door to Easton is flagged up in the GNLP Reg19 as a possible location if a new settlement is required.

Public transport catering for orbital movements is not in place. The NWL is not supported by a package of sustainable transport measures for discouraging traffic growth arising from the road scheme and encouraging modal shift.

The NWL Options consultation considered a large number of individual transport interventions, but it did not put forward comprehensive packages of sustainable transport options.

**Not consistent** with national policy and the legal target of Net Zero by 2050. The NWL would generate new traffic as shown by the case study in ‘Trunk Roads and the Generation of Traffic’ and this would increase carbon emissions.

**East Norwich**

We suggest several additions to scope of development for to meet the area’s objectively assessed needs:

* ‘designed and built to zero carbon standards’
* ‘achieve traffic neutrality across the wider road network’
* green open spaces that include an extension to Whitlingham Country Park’

The revised paragraph 335 to read

“The masterplan will promote development of a high density sustainable mixed-use community **designed and built to zero carbon standards**, coordinate delivery of new transport infrastructure and services **and achieve traffic neutrality across the wider road network**, enhance green links **and green open spaces that include an extension to Whitlingham Country Park**, provide for a local energy network, enhance heritage assets, protect Carrow Abbey County Wildlife Site and address local issues including the active railway, the protected minerals railhead and flood risk issues.”

We support the creation of a proposed new sustainably built urban quarter in this location. Public consultation on a masterplan has yet to take place and the GNLP policy is the first opportunity for public comment. We consider that the GNLP summary description of the development omits important requirements

GNLP Policy 2 on carbon emission reduction in new development seeks the minimisation of energy demand but it needs to go much further. East Norwich should achieve zero carbon in a number of ways: calculation of Whole Life-Cycle Carbon Assessment; low impact construction; high energy efficiency standards that include optimal levels of thermal insulation, passive ventilation and cooling and passive solar design; production, storage and use of renewable energy on-site. The adopted London Plan (March 2021) sets an exemplar in stating ‘major development should be net zero carbon’ as part of the Mayor’s commitment to London becoming a zero carbon city. [[18]](#footnote-16)

Para 335 refers to ‘the delivery of new transport infrastructure and services’ network’. We are concerned that Norfolk County Council may propose new or improved external road links for serving East Norwich. When the County Council recently sold Carrow House on King Street to the City Council as part of East Norwich land assembly, the County retained ownership of a 10 metre corridor along its frontage. It leads us to worry that the County Council may consider widening or even dualling of King Street, the oldest road in Norwich leading out of the city, between its junction with Rouen Road and junction with Bracondale. The latter road leads to Martineau Lane roundabout, with roads leading off to Trowse, County Hall and Trowse bypass and it is busy at peak times. Neither would we wish to see a link road across the River Wensum to connect Bracondale/Martineau Lane with Harvey Lane. This idea, in effect the completion of the outer ring road, was proposed as an alternative to the completion of the inner ring road phase 3 in 1992. A road bridge would have a large number of adverse impacts: it would change the quiet suburban character of Thorpe, increase noise and pollution, reduce air quality, threaten marshland biodiversity and water storage capacity, reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas and add extra road capacity and encourage more travel by private car.

The brief for the masterplan includes an emerging development objective, ‘promotion of a low car environment’. We agree with the creation of this in order to create an attractive and safe community but we consider that it does not go far enough because it essentially refers to internal travel within the development. We are concerned about the impact of up to 4,000 dwellings on the wider road network. Hence, we propose ‘a low car development’ with strong measures that encourage car -free living. This would better achieve Net Zero and minimise the impact of East Norwich on the surrounding roads and wider road network.

We propose for investigation, the opening the former rail halt at Trowse for serving East Norwich and County Hall, with bus connections to UEA, the N and N Hospital and Norwich Research Park.

East Norwich would add to pressures on Whitlingham Country Park. The number of visitors has grown, creating conflicts between car-borne visitors and people travelling on foot and by bike along the narrow Whitlingham Lane and increasing pressures on the natural environment. East Norwich provides the opportunity to extend Whitlingham Country Park to cater for to cater for increased demands by incorporating and re-wilding suitable arable land close to the current park boundary.

**GNLP Regulation 19 – Part 2 – The Sites**

**2. Norwich – New Allocations**

# Policy GNLP0506: Land at and adjoining Anglia Square

We have welcomed the Secretary of State’s decision to refuse the recent planning application. Norwich Green Party councillors participated in the call-in inquiry as objectors, alongside many other bodies such as Historic England, Save Britain’s Heritage and the Norwich Society and individuals. The scheme attracted a substantial number of objections from Norwich citizens.

Policy GNLP0506 gives the first opportunity for the public to comment on revised uses but without discussion and debate. We consider that Policy GNLP0506 repeats some of the same elements which contributed to a lack of public support for the rejected scheme.

**800 homes**

The smaller number of homes (800) marks a change from the earlier figure of1,250. However, the proposed amended policy has added unquantified student accommodation which did not feature in the 2017 policy brief and would bump up the overall number. We support the principle of student accommodation at Anglia Square. However, the combination of 800 homes plus student accommodation creates an open-ended number of dwellings on this relatively small site of 4.79 ha alongside other major uses. The total could reach 1250 dwellings as before and result in another high rise scheme coming forward. We prefer to see in the region of 800 dwellings as a maximum that includes student accommodation in the total figure and not in addition.

Bullet 1. Lack of recognition of the importance of the local artistic community and their need for facilities as part of the creation of a diverse, integrated community.

Bullet 5: Delete reference to a multi-storey car park

A multi storey car park does not fit with net zero. Low levels of car parking would minimise carbon emissions and traffic impacts such as community severance, free up valuable land, facilitate a better site layout and design and create a safe environment. Anglia Square is one of the most highly sustainable and accessible locations in the city centre

Bullet 6: Lack of ambition for net zero development

The policy reference to ‘energy efficient design’ is weak. The development should achieve zero carbon in a number of ways: calculation of Whole Life-Cycle Carbon Assessment; low impact construction; high energy efficiency standards that include optimal levels of thermal insulation, passive ventilation and cooling and passive solar design; production, storage and use of renewable energy on-site.

Bullet 6: Remove reference to ‘landmark building’

We have strong reservations about the need for a ‘landmark’ building to act as a focal point for the Northern City Centre given the experience of the failed Anglia Square scheme which resulted in a 20 storey block, designed to mirror the Anglican Cathedral Spire and act as a ‘wayfinder’. The view that north city needs a landmark building misinterprets the historic evolution of Norwich over the Water where buildings of significance such as churches and merchant houses were erected. Those buildings that still stand are not landmark buildings akin to the monumental buildings around the market place, but nonetheless they contribute to the historic character of the city and the townscapes in which they stand. Of greater importance is the need to design an attractive, liveable, lively, resilient urban quarter which is sympathetic to its historic surroundings and meets the needs of the local community.

Bullet 7: Add reference to Medieval Street Pattern

Layout and design of the new development should reflect the former medieval street pattern. Norwich’s medieval street pattern remains intact apart from the area which was cleared to build Anglia Square. It forms the basis of the city centre conservation area and is a major determinant of the city’s historic character.

Bullet 8 Add reference to green open space

As well as high quality landscaping, planting and biodiversity enhancements, a new scheme must include public and private green open space for amenity use, minimise urban overheating and support biodiversity.

Historically, Norwich Over the Water had a semi-rural appearance and areas remained undeveloped until the 20Cth. The green settings of St Augustine's Church and Gildencroft are a reminder of its former character. Anglia Square today is largely devoid of any greenery.

The rejected scheme involved extensive hard structures and landscaping. Roof top podiums provided private outdoor space for residents. Children's play opportunities were 'incidental in the landscape'. The Anglia Square developer expected occupants to use existing limited green open space around the Gildencroft..

The Climate Change Committee recommends an increase in green infrastructure for cooling cities and providing pathways through the urban environment for biodiversity to migrate as the climate changes. [[19]](#footnote-17)

The proposed policy should therefore include extensive green infrastructure improve amenity, reduce the urban heat island effect and enhance biodiversity.

Bullet 13: In addition, redevelopment should create a low car environment and minimise its contribution to traffic on the surrounding road network. Anglia Square is located in a highly accessible location at the heart of the city centre.

**Policy CC8 - King Street Stores, Norwich (approx. 0.21ha), allocated for residential use**

The number of homes should be compatible with retention of the industrial heritage buildings and the existing mature trees.

Current policies prioritise reinstatement of King Street’s historic street and building right up to the highway. While we consider this appropriate at the northern, city end of King Street, it is no longer appropriate for the area covered by policy CC8, particularly as a number of mature trees now line the boundary between the site and the highway. It would be beneficial to keep these trees and to develop housing around them, in a careful manner which does not damage them. These mature trees are important as they help battle flooding, urban heating, climate change and biodiversity loss. The retention of these trees and the boundary wall outweighs the reinstatement of the street frontage. As the trees have matured over the last few years since policy decisions about this site were made, they are now of greater value and so policies affecting this site should be revised if they are to remain sound.

Furthermore, we would like to see the retention of the warehouse buildings on this site, preferring to see them renovated and re-used, most likely for accommodation, rather than demolished. River access and the further retention and promotion of biodiversity also need to be considered as part of the site development.

### **Policy R13: Site of former Gas Holder at Gas Hill, Norwich (approx. 0.30ha), allocated for residential development**

Given the acknowledged constraints of the site, the steep hill and surrounding woodland, and the risks to properties above from undermining the hill on which they stand, we advocate keeping the area as woodland. This would support biodiversity and climate objectives and remove a risk to the Thorpe Ridge Conservation area

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