

## **Greater Norwich Local Plan Proposed Main Modifications**

**Denise Carlo on behalf of Norwich Green Party (NGP)**

**December 2023**

The representations below are from the Norwich Green Party (13 city councillors and four County councillors and four Broadland councillors).

Overall, we are disappointed to see the extent that the Plan would result in loss of green field land and vegetation to development, further suburbanisation of the rural landscape and sprawl around Norwich, more journeys by car in rural areas and in and around the suburban fringes of Norwich and a significant annual increase in carbon emissions from new dwellings alone. The SA of Updated Policy 1 The Sustainable Growth Strategy paints a worrying picture:

*5.1.7 “Despite this (ie new technologies, renewables, sustainable drainage, green infrastructure), the development of 45,041 new dwellings across the Plan area within this policy would be expected to result in a loss of greenfield land and vegetation cover to some extent and would result in an increase in carbon emissions due to development. In 2020, Greater Norwich had a total annual carbon footprint of approximately 1,826,996 tonnes CO<sub>2</sub>, and residents had an average annual carbon footprint of 4.4 tonnes CO<sub>2</sub> per person. At an average of 2.19 people per dwelling, the development of 45,041 new dwellings could increase the local population by approximately 98,559 people. The introduction of 98,559 new residents could therefore potentially increase the annual carbon footprint of the Plan area by 432,573 tonnes, or 24%. Overall, a major negative impact on climate change mitigation and adaptation would be expected.”*

This assessment of a major negative impact on climate change and mitigation ought to trigger alarm bells and lead the GNDP to conclude that the quantum of housing, its spatial distribution and its design are unsustainable.

Yet, the GNDP ignores the projected 24% increase in annual carbon emissions from new dwellings. It fails to show how the 24% increase is consistent with the nationally determined target of cutting emissions by 68% by 2030, and legally binding national targets of 78% by 2035 and Net Zero by 2050. It fails to acknowledge that this is a problem in a county that is highly vulnerable to climate change. It fails to consider what necessary action and policies are necessary for radically reducing rather than increasing GHG emissions.

The GNDP has made the situation worse by allocating unsustainable levels of new housing in rural areas, particularly in South Norfolk where transport emissions are significantly higher due to longer journeys and increased dependence on car-use facilitated by local transport policies and have shown little real change over the past decade.

If the GNDP proceeds to adoption of the GNLP as it currently stands, it will make the local contribution to climate change worse and not better.

Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires *local planning authorities to include in their Local Plans “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”*.

A number of parties including the Green Party objected to the Regulation 19 plan submission on grounds that the policies would not contribute to the mitigation of and adaptation to climate change as required by S19 (1A) of the PCPA 1990 above. The GNDP disagreed, despite lacking evidence to show otherwise.

Changes in per capita emissions shown in Joint Core Strategy Annual Monitoring reports have been painfully small especially relation to transport in South Norfolk. On top of this, the GNLP would result in an annual aggregate increase in emission levels. Clearly additional measures are required to achieve radical cuts changes in emissions such as ensuring all new homes are built to net zero standards and locating new homes close to rail and public transport hubs.

## **S9 Proposed Additional Modifications**

### **Proposed Additional Modification: AM98 – The Updated Vision for Norwich in 2038**

We note the new addition of the national target to reduce GHG emissions by 78% by 2035. The Plan should also refer to the nationally determined commitment of cutting emissions by 68% by 2030 compared to 1990 levels.

## **Objection to MM8 to Policy 2 Sustainable Communities**

Norwich Green Party objects to the deletion of the policy reference to:

*“mitigating and adapting to climate change, assisting in meeting national greenhouse gas emissions targets”.*

Otherwise, there is no mention in GNLP policies of the need to mitigate and adapt to climate change. Although Climate Change and Adaptation is a SA Objective, it should be explicitly articulated in the policy text. This is consistent with the NPPF in achieving sustainable development.

Further measures are needed to ensure that all new dwellings are built to net zero standards. NPPF 154b) states that *“Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards”*. We consider that the GNLP should aspire to go beyond national standards in order to minimise acknowledged future emissions.

Suggested additions:

Amend para 10. to include references to importance of **design** in ensuring new homes are built to zero carbon standards. Local design codes will consider built form involving the arrangement of blocks, streets, buildings and open spaces but not the design and construction methods of buildings. Architects working on net zero buildings make the case that energy demand can be eliminated through good design by using low emissions materials, thermal mass, natural ventilation and taking account of local site and climate conditions. NPPF para 154b) refers to the importance of design in planning new development to help reduce greenhouse gases.

As well as ensuring a low level of energy consumption, all new homes and buildings should be built with integrated passive solar and batteries to generate and store their own energy.

Re-word para 10 to read:

10. Ensure a low level of energy consumption **and a high level of renewable energy generation**. To achieve this development proposals should:

- i. Take account of landform, layout, building orientation, massing, **site and building design** and landscaping and the risk of overheating:
- ii. Provide for the use of sustainable energy and the **generation of renewable energy in new buildings using passive solar in their design**, local energy networks and battery storage where appropriate.

Para 10 should also be re-worded for consistency with the NPPF with regard to renewable energy ie on-shore wind schemes will be positively encouraged.

#### **-Policy 4 – Strategic Infrastructure MM10**

NGP objects to the i) ambiguous wording of MM Policy 4 Strategic Infrastructure and Transport in relation to the NWL and ii) to the retention of a NWL broad corridor shown on the Key Diagram.

The NPPF (Sept 2023), S.16 states that ‘Plan should:

*d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*

Uncertainty over the status of the NWL in the Regulation 19 submission led the Inspectors to seek clarification in the first round of written questions. In their response, the GNDP stated that,

*“the Western Link Road is not necessary for the delivery of any of the proposed allocations”.*

This position is underlined by the fact that scheme which would cross the River Wensum SAC on a viaduct was not subject of a Habitats Regulations Assessment, for the reason given in the ‘HRA published proposed submission GNLP’ (July 2021)

*“The Norwich Western Link road is a Norfolk County Council project not controlled by or reliant on the GNLP, but GNLP recognises progress of the scheme.” (7.2.2)*

Despite the GNLP’s clear statement that the NWL is not part of the GNLP, the GNDP has modified the Plan in a way which increases the ambiguity over the NWL. In the Regulation 19 submission, ‘delivery of the Norwich Western Link Road’ was referenced under the Transport for Norwich Strategy (TfN). As a Main Modification, Policy 4, the NWL has been moved from the TfN heading to a new section headed, ‘And promoting regional connectivity recognising the work already undertaken on.....’ and goes onto to list a number of schemes that include, ‘The Norwich Western Link being progressed by Norfolk County Council’.

The Key Diagram continues to show an indicative NWL corridor as part of the Plan strategy.

This is notwithstanding the position that the NWL *'is not controlled by or reliant on the GNLP.'*

A Habitat Regulations Assessment Addendum on the Main Modifications to the GNLP assessed the amendments to policy 4 Strategic Infrastructure and judged that:

*'There is no change to impacts on any European site. Policy 3 provides safeguard for European sites.'*

The SA of the Main Modifications opines that:

*'The proposed modification does not substantially change the policy but introduces some amendments to wording regarding Norfolk County Council's role in providing highways upgrades, including the Norwich Western Link.'*  
(5.4.3)

In other words, the changed MM wording does not alter the position with regard to the NWL **not** being a policy of the GNLP.

The question of whether the NWL is part of the adopted Plan or not is critical in determining any planning application as Clause 2 of the NPPF makes clear:

*"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise."*

Despite the fact that the NWL is not a policy of the Plan, Norfolk County Council is using the emerging GNLP Policy 4 to progress a NWL planning application and compulsory purchase orders in a report to Cabinet on 4 December. In the accompanying draft document, 'Combined Statement of Reasons for the CPOs and SROs' under a heading of 'Planning and Policy Context', the County Council states:

*3.1.24 There is also specific emerging planning policy support for NWL in Policy 4 ('Strategic Infrastructure') of the emerging GNLP. Emerging draft policy is currently worded, following the release of the Schedule of Main Modifications in October 2023....." to state that:*

*"POLICY 4 - STRATEGIC INFRASTRUCTURE Strategic infrastructure improvements will be undertaken to support timely delivery of the Greater Norwich Local Plan and the wider growth needs of the area. Key elements will*

*be: Transport..... This will be achieved by:..... And promoting regional connectivity recognising the work already underway on.....*

*♣ The Norwich Western Link being progressed by Norfolk County Council.....”*

Reference to the NWL in Policy 4 is allowing the County Council to claim that a NWL is a policy of the emerging GNLP when clearly this is not the case.

For the sake of clarity, we recommend deleting the reference to the NWL from Policy 4 and deleting the NWL corridor from the Key Diagram.

### **Additional Modifications – Updated Vision for Norwich**

#### **Proposed Additional Modification: AM98 The Vision for Greater Norwich in 2038**

We note that the MMs have added in the national target to reduce greenhouse gases by 78% by 2035 compared to 1990 levels.

We recommend a further reference to the target of cutting GHG by at least 68% by 2030 compared to 1990 levels.

### **Annex 1: Monitoring Framework Document**

#### **SGS8 Local Contextual Indicator: Per capita carbon emissions**

In addition to this performance indicator, we would like to suggest:

- Number and percentage of new dwellings built to net zero standard.
- Number and percentage of new dwellings built within 5 miles of a railway station.