

## **Policy 2 – Sustainable Communities MM8**

### **Greenhouse Gas Emissions and Climate Change**

- 1.1. I object to this modification as it deletes the references to mitigating and adapting to climate change and assisting meeting national Greenhouse Gas (GHG) emissions targets.
- 1.2. These should remain as primary definitive policies.
- 1.3. It is generally accepted internationally that long term sustainability cannot be achieved without addressing the impacts of climate change.
- 1.4. Provision 19(1A) of the Planning and Compulsory Purchase Act 2004 states;

*“Development plan documents must (taken as a whole) **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.**” [Emphasis added]*

- 1.5. The Strategy is vague on how the Plan will contribute to net zero and therefore cannot be considered as sustainable or demonstrate mitigation of and adaption to climate change.
- 1.6. It is perplexing why the Partnership now relegates both the climate and GHG emissions to “contextual” only in the monitoring proposals (SGS8), the definition of which is included in the introduction text for the Annexe 1 Modification as;

*“Local Contextual Indicators are other sources of information available at the district level, usually annually, from external organisations such as Historic England, the Office for National Statistics (ONS), and the Department for Energy Security and Net Zero/Department for Business Energy and Industrial Strategy. **Local Plan policies can generally have a more limited impact on such indicators as the outcomes are not solely related to new development.** Nevertheless, they are included because they provide an indication of the direction of travel of issues on which the local plan aims to have some influence on and can inform policies in future local plans.” [Emphasis added]*

- 1.7. It will be noted from Tables A, B & C below that over 50% of the current emissions are aspects covered by the Plan and therefore, contrary to the definition, will have a significant impact on the indicators.
- 1.8. The Sustainability Appraisal on the Modifications notes that the housing numbers alone over the duration of the plan has the potential to increase carbon emissions by 432,573 tonnes, or 24%<sup>1</sup>.

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<sup>1</sup>[https://gnlp.oc2.uk/docfiles/82/LC-85\\_GNLP\\_SA\\_Main\\_Modifications\\_6\\_161023LB\\_compressed.pdf](https://gnlp.oc2.uk/docfiles/82/LC-85_GNLP_SA_Main_Modifications_6_161023LB_compressed.pdf)  
(paragraph 5.1.7)

- 1.9. The Plan does not address how this potential cumulative increase of emissions should be approached in individual planning applications.
- 1.10. A footnote to the SA statement is added stating *“Please note this is a coarse precautionary indicator, and greater detail of carbon data would help to better quantify effects.”*
- 1.11. This missing basic information is essential to understand the overall impact of the Plan for assessing mitigation requirements, or preferably reducing in carbon levels, which are necessary for individual applications.
- 1.12. Without this decision-makers are unable to properly consider the implications arising from individual applications within the area wide solutions of Greater Norwich.
- 1.13. Whilst acknowledging that some of the climate related issues are outside the control of the Partnership, all three Authorities must collectively and individually plan for what aspects they can influence to cater for and mitigate impacts of extra housing numbers.
- 1.14. The starting point must be an understanding of the origins of the exiting emissions within each area with differing challenges between the rural and urban areas.
- 1.15. Looking at the data published annually by the Department for Energy Security and Net Zero (DESNZ) for the various categories it is evident that mitigation requirements will differ for each authority as Tables A, B & C below;

Table A: Carbon Emissions by Local Authority 2021 - Totals

Carbon Emission Totals per Sector (ktCO <sub>2e</sub> )									
	Industry	Commercial	Public Sector	Domestic	Transport	Agriculture	Waste	LULUCF	TOTAL
Broadland	145.2	17.5	16.0	202.6	237.6	131.4	15.2	35.2	800.8
Norwich	79.8	44.7	56.4	176.5	104.7	12.7	38.6	3.1	516.5
South Norfolk	112.2	19.9	25.5	212.7	375.2	231.7	42.5	98.4	1,118.1

Table B: Carbon Emissions by Local Authority 2021 – Percentages of Sector Totals by Authority

	Industry %	Commercial %	Public Sector %	Domestic %	Transport %	Agriculture %	Waste %	LULUCF %	TOTAL ktCO <sub>2e</sub>
Broadland	18.13	2.19	2.00	25.30	29.67	16.41	1.90	4.40	800.8
Norwich	15.45	8.66	10.93	34.16	20.27	2.46	7.45	0.62	516.5
South Norfolk	10.04	1.78	2.28	19.02	33.56	20.73	3.80	8.79	1,118.1

Table C: Sector Totals with Percentages by Local Authority

Carbon Emission Totals per Sector (ktCO <sub>2e</sub> )									
	Industry	Commercial	Public Sector	Domestic	Transport	Agriculture	Waste	LULUCF	TOTAL
Total ktCO <sub>2e</sub>	337.2	82.1	97.9	591.8	717.5	375.8	96.3	136.7	2,435.4
Broadland %	43.06	21.32	16.34	34.24	33.11	34.97	15.78	25.75	32.88
Norwich %	23.67	54.44	57.61	29.82	14.60	3.38	40.09	2.27	21.21
South Norfolk %	33.27	24.24	26.05	35.94	52.29	61.65	44.13	71.98	45.91

- 1.16. It will be evident that the challenges to reduce emissions are different for each of the three Local Authorities for the sectors covered in the Plan.
- 1.17. For instance, while Norwich has the lowest emissions from Domestic, this represents a higher percentage of its sector total than both Broadland and South Norfolk.
- 1.18. The Plan groups the outer fringes of Norwich with the Norwich administrative area combining housing numbers, which differ from those in the DESNZ figures. Details are not available to determine whether the lower domestic emission totals in Norwich City Council area are due to lower existing housing stock in the city area or other factors.
- 1.19. The proposed indicator (SGS8) for climate change affirms the target nationally is to reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels, within the timescale of the Plan.
- 1.20. Assuming that the Partnership is required to reduce its emissions proportionately, the pertinent questions are what are the actual 2035 emission **numbers** to be achieved in the Greater Norwich area as 78% of 1990 levels and how will this be achieved? Unfortunately this crucial information is missing but should be considered essential to determine the targets required for each sector from each authority.
- 1.21. As an academic exercise to plot movements in Greater Norwich since 2005, Table D plots the Sector Totals for 2005 and 2021 as extracted from the DESNZ figures.

Table D: Comparison of Sector Totals Years 2005 and 2021

Carbon Emission Totals per Sector (ktCO <sub>2e</sub> ) for the Combined Authorities									
	Industry	Commercial	Public Sector	Domestic	Transport	Agriculture	Waste	LULUCF	TOTAL
Total ktCO <sub>2e</sub> 2005	547.7	390.1	149.7	953.9	840.1	421.8	235.7	143.0	3,682.0
Total ktCO <sub>2e</sub> 2021	337.2	82.1	97.9	591.8	717.5	375.8	96.3	136.7	2,435.4
% change	-38.43	-78.95	-34.60	-37.96	-14.59	-10.90	-59.14	-3.71	-33.86

- 1.22. No consideration is given on the emissions from transport in the HRA or SA documents.
- 1.23. Whether the road schemes noted in Policy 4 are within the Plan (see comments to MM10) or not, they are relevant projects which should be included in the cumulative effects of the Plan within the Environmental Impact Assessments in calculating greenhouse gas emissions.
- 1.24. An quick review of the various submissions to the Planning Inspectorate for the three A47 schemes and preliminary figures in the Norwich Western Link reports, suggests that construction of these combined schemes will incur 300,000tCO<sub>2e</sub> of emissions with another 300,000tCO<sub>2e</sub> coming from end user emissions between various anticipated opening dates and the end of the Plan, year 2038.
- 1.25. Together with the per capita emissions from the additional houses as above, the Plan is predicted to increase emissions by over 1,000,000tCO<sub>2e</sub> without any quantified details presented to both compensate and further reduce to meet the national mandated carbon budgets.
- 1.26. It is clear from the tables that irrespective of whether one is considering indicators for the Plan or contextualised outside the Plan, there seems little point in recording emissions per capita. (see comments on Annexe 1 SGS8)
- 1.27. The comparative changes per capita between 2005 and 2021 to the cumulative reduction of 33.86% as Table D are;
- Broadland -39%, Norwich -55% and South Norfolk -38%.
- 1.28. All three areas are showing greater reductions in emission totals which is primarily due to the distortion caused by a 15% increase in population numbers over this period.
- 1.29. Whilst Climate change is referenced in the general text of the documents it should also be included as part of the Policy Statements to have effect and comply with NPPF.
- 1.30. Reducing GHG emissions is crucial to compliance with climate change and net zero by 2050 and therefore it is also essential that this is a specific policy in the Plan.
- 1.31. The NPPF balances the often conflicting objectives of economics, social and environment pressures, but precedence must be assumed for climate aspects of the environment and the legislated target to reach net zero by 2050.
- 1.32. If climate legislation of net zero cannot be met the Plan cannot be considered sustainable for future generations.

- 1.33. What are the risks to the delivery to Policy for sustainability and climate net zero: how are the cumulative aspects of the Plan plus third party infrastructure projects to be addressed in each application under the Plan?
- 1.34. Without this guidance, decision-makers for individual planning applications will have insufficient information to understand the implications let alone be able to determine the extent of mitigation or negation required arising out of the cumulative impacts of the Plan as a whole.