

## **Annexe 1 : Monitoring Framework**

### **General Comments**

- 1.1. I object to these monitoring proposals as lacking objectivity.
  - 1.2. Most of the triggers for action and the resultant actions are vague, simply requiring analysis to determine whether there is a need for a full or partial review of the Plan.
  - 1.3. The monitoring appears to be based on quantity of indicators not quality of information collated.
  - 1.4. Some monitoring seems to suggest there will be planning approvals which do not comply with the Plan and/or advice from statutory and other professional consultees such as the Environment Agency, Natural England and Norfolk Wildlife Trust. (Table 3)
  - 1.5. It is assumed that this is only likely to occur if there are over-riding other material considerations if decision-makers are acting in accordance with NPPF and government guidance.
  - 1.6. Norfolk County Council publishes a Local List setting out its material considerations for planning decisions and it is assumed that any material considerations particular to each member of the Partnership will be individually tailored and covered in supplementary documents under this overarching Plan.
  - 1.7. The monitoring proposals of the whole area do not reflect any differences for individual authorities.
2. **Indicator SGS1 - Plan Indicator – Jobs Growth**
- 2.1. Looking at the number of jobs annually gives only part of the picture.
  - 2.2. Location of where jobs are created, or indeed lost, is also important for a review of this policy.
  - 2.3. As an example, the retail and office jobs currently which are being created at the Thorpe St Andrew complex, are having a negative impact on those in the Norwich City area. This type of detail would seem critical to the location of housing.
  - 2.4. The acceptance of this outward migration appears to be acknowledged by indicator NUA1, which seeks to minimise losses in the City.
  - 2.5. Are there studies to indicate whether this has beneficial or negative impact on commuting?

3. Indicator SGS3 - Plan Indicator – Housing Delivery

- 3.1. How does the housing land supply monitoring proposal satisfy the requirements stipulated in the NPPF?

4. Indicator SGS7 - Plan Indicator – Brownfield Land Redevelopment

- 4.1. Please confirm under which Strategy in the Plan is the “at least 22% brownfield redevelopment” included.
- 4.2. The reference to paragraph 194a is confusing. It is acknowledged that paragraph 188a in the Regulation 19 document states “*The brownfield/greenfield split for new homes in the plan is around 22%/78%*” but this is not in the strategy.
- 4.3. It should therefore be a Local Contextual Indicator.

5. Indicator SGS8 - Local Contextual Indicator - Per capita carbon emissions

- 5.1. The local target is to reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels in line with the mandated national target.
- 5.2. Without a statement to the contrary, it must be assumed that the Partnership is targeting the same percentage reductions from the Greater Norwich area relative to 1990 figures.
- 5.3. Why do emissions per capita have any relevance to the target to reduce all greenhouse gas emissions by 78% by 2035 compared to 1990 levels?
- 5.4. Principally, how do the 2020 per capita baseline monitoring figures relate to the 1990 total emissions?
- 5.5. Is there any reason why the proposed data to be used is from the Local Government Information (LGI) website?
- 5.6. The data published annually by the Department for Energy Security and Net Zero (DESNZ) also provides the emissions per capita per local authority area but gives the total emissions broken down in to various categories, which would seem far more relevant.
- 5.7. The baseline figures for 2020 in the Table do not accord with the figures given in the link to the LGI website;

	Year 2020 as Table 1	Year 2020 as LGI
Broadland	4.9	4.8
Norwich	2.9	2.8
South Norfolk	5.4	5.6

5.8. The figures in the DESNZ spreadsheet differ again;

	Year 2020 as Table 1	Year 2020 as LGI	DESNZ Spreadsheet
Broadland	4.9	4.8	5.8
Norwich	2.9	2.8	3.1
South Norfolk	5.4	5.6	7.4

5.9. An explanation is needed why these figures are so different.

5.10. What is the point of measuring per capita when the population numbers are proposed to increase?

5.11. The Sustainability Appraisal on the Main Modifications notes that the housing numbers over the length of the plan will increase carbon emissions by 432,573 tonnes, or 24%<sup>1</sup>.

5.12. As this is based on the increase in overall population numbers, the emissions per capita will remain the same without movements in other sectors or specific interventions.

5.13. **The matrix should monitor the emission totals annually not per capita.**

5.14. The advantage of using the data published annually by DESNZ is that it will enable the review to establish sectors which are performing well or badly effecting the overall movements. (see comments on MM8)

5.15. The trigger action is proposes an “*Analysis of the reasons for carbon emissions not falling annually **will inform an assessment of the need to review policies***” [Emphasis added].

5.16. This is too weak and if the trajectory is showing the mandated reduction will not be met; immediate drastic remedial action must be considered to ensure the Partnership’s contribution to the government mandate.

5.17. Local Authorities need to take a holistic approach to carbon reductions but unfortunately this assessment is lacking in the Sustainability Assessment for GNLP, simply looking at whether each site is above 1% or below 0.1%.

## 6. EPE8 - Local Contextual Indicator - Condition of protected habitats (nutrient neutrality)

6.1. The nutrient neutrality restriction requires that new housing developments in certain areas should not add more 'nutrient pollution' to the water catchment.

<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)

- 6.2. The target set in this indicator is for a **reduction** in nutrient loading so that the water quality in internationally protected habitat sites meets water quality targets and the sites are no longer in an “unfavourable condition”.
- 6.3. This is a laudable target but there is nothing in the policies to indicate a reduction rather than no additional nutrients from housing.
7. S14 – Plan Indicator – Sustainable Transport
- 7.1. Sustainable transport is defined in the Plan as including improved walking and cycling facilities, the promotion of bus travel, Park and Ride and rail use, increased use of electric vehicles and demand management measures.
- 7.2. Why is the Partnership only monitoring cycle network links and not other aspects?
8. Table 3 Sustainability Appraisal indicators

*Generally.*

- 8.1. The themes listed are important environmental issues and it is disappointing to note that there are no actions should the vague increase/decrease or zero targets not be met.

*Air*

- 8.2. The three air quality indicators overlap with targets Norfolk County Council Local Transport Plan (LTP4) covering the wider area of the whole county.
- 8.3. The LTP4 targets are influenced by the GNLP policies in traffic levels and the use of public transport.
- 8.4. LTP4 sets annual targets to 2027. For instance the “Grow annual bus patronage in Norfolk” sets a target of 1% per annum from 2023 to 2027 while the GNLP indicator targets unspecified annual increases.
- 8.5. The two monitoring regimes should either reflect the same targets or the monitoring should be left to one organisation only.
- 8.6. There seems little logic in GNLP monitoring traffic flows on main roads when it is not responsible for transport.
- 8.7. Noting the rural aspect of the majority of the Greater Norwich area, it seems illogical to monitor main roads only.

*Biodiversity, flora and fauna - Number of Planning Approvals granted contrary to the advice of Natural England or Norfolk Wildlife Trust or the Broads Authority.*

- 8.8. I support the principle that advice from organisations dedicated to protection of the environment and nature must be followed in determining planning applications. The zero target for this indicator is acknowledged as appropriate.
- 8.9. If there is a zero target, why is there not a policy stipulating that the advice of any of these organisations must be followed?
- 8.10. I fail to understand why annual measurements are required one application approval contrary to such advice must infer that there will be circumstances which planning authorities are permitted to ignore this advice.
- 8.11. The overriding material considerations should be clearly set out in the document.
- 8.12. It is particularly galling to note that while this is a zero target for the three LPAs comprising the Partnership, they do not place the same emphasis on the need for Norfolk County Council to set the same standard for roads.
- 8.13. I refer to Policy 4 – Strategic Infrastructure which now is “promoting” the Norwich Western Link despite the fact that the Norfolk Wildlife Trust is openly opposed to the scheme due to the destruction of the habitat for a super colony of rare barbastelle bats<sup>2</sup>.
- 8.14. This double standard is unacceptable and the promotion of the Norwich Western Link should be removed from the Development Plan as was my understanding from the Partnership’s reply to the Inspectors first set of questions.

*Climate factors - Renewable energy generation*

- 8.15. The indicator targets an increase and cross references this to indicator SC5 which notes that no action is proposed.
- 8.16. The monitoring of this indicator misses the crucial issue of solar farms resulting in the loss of productive agricultural land.
- 8.17. Environmental considerations should monitor not only the extent of renewable energy created (presumably recorded in values of energy output) but also acreage of various grades of agricultural land lost.
- 8.18. There should be a limit to which the finite area covered by the Plan can afford to lose quality agricultural land.
- 8.19. There is a growing concern that solar farms are similar to on-shore wind turbines relating to the loss of agriculture. Is there a need for similar restrictions in Policy 2 – Sustainable Communities for local support?

---

<sup>2</sup> See [norfolkwildlifetrust.org/news-and-articles/news/all-news/2022-07-04-norwich-western-link](https://norfolkwildlifetrust.org/news-and-articles/news/all-news/2022-07-04-norwich-western-link)

*Population and material assets - Number of affordable housing completions*

- 8.20. This indicator targets an increase, but cross references to H1 which requires the affordable housing percentages to be maintained.
- 8.21. These indicators should be aligned.