1 Introduction

1 This is our response to the Inspector's Agenda – Resumed Hearing documents, points 5-7.

2 Reasonableness

2 Firstly, the Councils' case states that the Green Party evidence is "unreasonable" as it does not include an NDR. Since the NDR does not yet exist, and has been justified to central Government as required in order to facilitate growth, it is reasonable that, in looking at other options for the dispersal the growth throughout the Norwich Policy Area, not to include the NDR. This is due to the fact that, theoretically, the NDR may no longer be needed, as the need for the road is likely based on the fact that the majority of housing allocations have been placed in NEGT, away from existing access points to current and future employment opportunities.

3 Secondly, the Councils' maintain that Alternative 3 (growth in the south-west) performed less well than the other options. However, the SA was fundamentally flawed in its assessment, particularly in terms of assessment climatic factors (ENV6), such as carbon dioxide emissions, or the lack thereof. The fundamental flaw arises from the fact that no assessment was made in relation to the levels of carbon dioxide emissions arising from the different growth options, other than in terms of CHP viability. It is unacceptable to assess climatic factors as "Not Applicable" within the SA. Therefore, as no assessment was undertaken in relation to such an important aspect of the environment and such a core part of sustainability, it cannot be taken as given that Alternative 3 was in fact the lesser performing alternative, as this conclusion is based on incomplete information.

4 As the housing numbers are the same with each scenario, there would likely be no difference between all the options in terms of domestic carbon dioxide emissions. Therefore, the key determinant in where to locate growth in order to minimise carbon dioxide is typically considered in transport terms – i.e. in which location would growth minimise carbon dioxide emissions from transport.

3 Lack of carbon assessment

5 The lack of carbon dioxide assessment on behalf of the Councils within the SA, particularly in transport terms, was a matter of choice – the County Council has a relatively sophisticated traffic model covering Norwich and, as shown in the recently published consultation information on the NDR[1], is capable of assessing traffic impacts across the network for a range of development scenarios. Traffic data can easily be utilised to determine likely carbon dioxide emissions, and the Department for Transport provides an easy to use methodology and spreadsheet for calculating changes in carbon

[1] http://www.norfolk.gov.uk/Travel_and_transport/Transport_future_for_Norfolk/Transport_for_Norwich/Northern_Distributor_Road_and_Postwick_Junction/NCC123849

dioxide emissions using traffic data in WebTag 3.3.5[2]. Although this is typically used for comparing "with scheme" and "without scheme scenarios", it nevertheless could also have been used as a tool for comparing development dispersal options in carbon terms using traffic data for differing development dispersal options. As the County Council is a part of the GNDP, all that was needed was for the County Council to provide the necessary information for inclusion in the SA.

6 The fact that the GNDP had ready access to the resources, tools and knowledge required to undertake a carbon dioxide assessment of the growth options in transport terms indicates that there may have been some foresight as to what such an assessment would show, making their decision not to provide one relatively easy, as such an assessment quite possibly could have undermined their plans for the NEGT and the NDR, which are inextricably linked.

7 There were further fundamental flaws in the assessment of the reasonable alternatives within the SA, which raises further questions as to the validity if the SA as a whole, as well as the question of which alternative performed best. These include:

- Traffic data should also have been used for the assessment of the reasonable alternatives against ENV1, as it would have provided an objective, rather than subjective, assessment.
- Despite being written into the objective, water quality (governed by the EU Water Framework Directive) was not given any consideration under ENV2, only the availability of sewer capacity.
- Under ENV3 no environmental amenities were considered other than air quality, such as noise, vibration and visual intrusion, all of which are key facets of amenity. Air quality was deemed "not applicable" despite the fact that traffic data did not appear to be used, making it impossible to state with any certainty that no existing Air quality Management Areas would be affected nor that any new Air Quality Management Areas may be triggered under the different development alternatives.
- Under ENV5, no assessment of the impact of the development options on the historic environment was made in relation to Conservation Areas, Registered Historic Parks and Gardens and listed buildings.

8 Additionally, SOC6 (which provides the assessment for all four of the economic objectives, as well as SOC8) is wholly inaccurate, stating that alternatives 1 and 2 would have excellent access to large employment locations (Broadland Business Park, City centre, and the Airport, as well as Rackheath, although not mentioned) and therefore provide better access overall to new employment than Alternative 3.

9 On closer scrutiny however, it becomes clear that Alternatives 1 and 2 have good access to the airport, Rackheath and Broadland Business Park jobs growth – around 45% of the employment land within the NPA (JCS Policy 9), excluding the City Centre (which is given no developable land area for employment, to which access from all areas should

[2] http://www.dft.gov.uk/webtag/documents/expert/unit3.3.5.php

be considered equal). Access to the remaining 55% of jobs growth land (as well as the significant amount of existing jobs) in the south-west would be poor at best.

10 However, Alternative 3 offers good access the for the 7,000 new homes in the south-west to Broadland Business Pak (via the A47 Southern Bypass), Wymondham, Hethel and the Norwich Research Park - totalling 69% of the developable land area for employment, as well as the City Centre. The 1,200 new homes in the north-west will have good access the new growth at the airport and the City Centre. The 1,200 new homes in the north-east will have good access to the airport, Broadland Business Park and the City Centre. Overall, Alternative 3 seems to provide the most appropriate balance and distribution of housing with good access to new jobs growth, yet was given the lowest assessment rating of the three options in terms of access to jobs. Furthermore, it is likely that Alternative 3 currently has the best access to existing jobs, in addition to good access to jobs growth.

11 As a result of so many deficiencies in the assessment of the reasonable alternatives within the SA, it is not possible to use the assessment to determine which alternative performs best, as the existing assessment is flawed and incomplete.

12 Norfolk County Council is currently in the process of consulting on their *Preliminary Environmental Information Report* (PEIR) for the NDR. Again, despite legislative requirements to assess climatic factors, no assessment of carbon dioxide emissions related to the NDR has been provided in this PEIR. This is despite the fact that climate change is continually mentioned throughout the document as part of nearly all the policy framework governing the project as a transport scheme, as well as the Environmental Impact Assessment/ Environmental Statement.

13 The lack of assessment of the climatic factors in the remitted JCS SA is a legal failure, as the SEA Directive and Regulations require an assessment of climatic factors. Stating that carbon dioxide and climate change are “not applicable” to large scale growth options and decisions is contrary to nearly all national policy and legislation that governs the planning system, and therefore the JCS.

14 The SA very clearly should have considered carbon dioxide emissions under climatic factors, particularly in relation to transport, as required by Article 3 and Annex 3 of the SEA Directive (85/337/EEC) and Schedule 2 of the Environmental Assessment of Plans and Programme Regulations 2004. The GNDP had access to the expertise and modelling software required to undertake such an assessment, but chose not to.

15 Reducing carbon dioxide emissions in order to mitigate climate change is a key facet of all national (and international) policies governing planning, transport and the environment with which the JCS should be consistent. The fact the remitted JCS continues to present preferred options for growth without undertaking an assessment of carbon dioxide emissions arising from growth options leads to the overall conclusion that the remitted JCS remains contrary to national policies and not legally compliant, and is therefore unsound.

4 Rectifying the omission of carbon assessment from the SA

16 In order to rectify these failures, the GNDP should:

- Provide an updated Environmental Assessment of the three Reasonable Alternatives, and this should include an assessment of the carbon dioxide implications from transport arising from the three different scenarios.

- This assessment should utilise the traffic model for Norwich. Output traffic data from the model under all three scenarios should then be input into the Department for Transport WebTag methodology/spreadsheet for calculating carbon dioxide emissions.

- The traffic modelling and carbon dioxide assessment should be overseen by an independently appointed transport professional, agreed by all parties (GNDP, the Green Party, NNTAG and the Planning Inspector, if necessary).

- On completion of the carbon dioxide assessment, the whole of the SA should be revised, taking into account the other deficiencies also outlined above, and with consideration for the evidence resulting from the traffic modelling, where applicable (such as ENV1, ENV3, ENV6, SOC6, SOC8, EC1, EC2, EC3, and EC4).

- Once the revised SA is complete, the GNDP should objectively consider which growth dispersal alternative minimises carbon dioxide emissions most and amend the remitted JCS accordingly.