

Submission by Bryan Robinson

1. Matter 1 - Compliance with statutory procedures and legal matters.

Issue 2: Does the Sustainability Appraisal (SA) including the addendum, adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?

Issue 2.1 - Have the likely environmental, social, and economic effects of the Plan's policies and proposals been adequately assessed in the SA?

- 1.1. The definition of sustainable in planning terms is understood to be 'meeting the needs of the current population without compromising the ability of future generations to meet their own needs'.
- 1.2. The definition in the Glossary in the Plan refines this further as;

"A term mostly derived from the 1987 Brundtland Report. Interpretation varies but typically the term means meeting economic and social goals without undermining the environment, as well as meeting needs of the present without compromising the environment for future generations." [Emphasis added]
- 1.3. There is more emphasis on the environment rather than the general meaning.
- 1.4. With so many alternative strategies and site options reduced to numerous colour coded tables based on generalisations, it is difficult to understand the basis of any sifting principles and hierarchy in the selection process.
- 1.5. I refer to the Non-Technical Summary by Lepus Consulting as a guide to the sustainability concerns rather than the detailed SA.
- 1.6. There are 5 positive effects listed, namely 1) Housing provision; 2) Employment opportunities; 3) Multi-Functional Green Infrastructure Network; 4) Physical and Mental Health; and 5) Community Cohesion.
- 1.7. The first two, housing and employment, I consider are the actual needs which have to be met and should not be considered in themselves as offering various degrees of sustainability.
- 1.8. The effect of different strategies proposing how these needs are proposed to be met should be considered not the fact that the needs are being satisfied.
- 1.9. 13 adverse effects are given in table N6 as:
 - Reduction in air quality: Due to the volume of development proposed, an increase in traffic flows and subsequent reduction of air quality would be expected to have residual adverse effects on human health. In addition,

many new residents could potentially be located within 200m of a main road. Cumulatively, this would be expected to result in a reduction of local air quality.

- Increased pollutant emissions, including greenhouse gases: An increase in pollutants including greenhouse gases would be expected following the development proposed within the GNLP. The introduction of 110,367 residents would be expected to increase traffic volumes and energy demand, which would be expected to result in an increase of pollutant emissions.
- Increased greenhouse gas emissions: The proposed development of 49,492 dwellings within the GNLP would be expected to increase carbon emissions in the Plan area by 565,079 tonnes (based on 2018 estimates). This increase would be expected to exacerbate the impacts of climate change within Greater Norwich.
- Fragmentation of the ecological network: The GNLP would be expected to result in the loss of approximately 1,019ha of previously undeveloped land. This loss of land would be expected to include habitats and ecological links between designated biodiversity assets ultimately affecting the integrity of the wider ecological network.
- Reduced access to healthcare facilities: A total of 103 site allocations are located over 5km from an NHS hospital. Residents in some of the rural settlements of Broadland and South Norfolk would be expected to have limited access to emergency healthcare, which could potentially have detrimental impacts on human health.
- Increased risk of urbanisation of the open countryside and coalescence: A total of 85 allocated sites are located on previously undeveloped land in the open countryside of Greater Norwich. The proposed development within the GNLP in these locations would be expected to increase the risk of urbanisation of the countryside and coalescence.
- Loss of tranquillity: The proposed development of 49,492 dwellings across Greater Norwich, with a number of developments located within rural Broadland and South Norfolk, would be likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.
- Reduced access to facilities and services: The majority of new residents would be located in areas with good access to services and facilities, including convenience stores and bus services. Nevertheless, large areas of Broadland and South Norfolk have limited access to rail services.

- Increased household waste generation: The proposed development within the GNLP would be expected to increase household waste generation within the Plan area by approximately 31.5%. Although GNLP Policy 2 seeks to support sustainable waste management, there is little scope to reduce the quantity of waste generated per household.
- Loss of soil resources, including BMV land: Approximately 1,019ha of development allocated within the GNLP is located on previously undeveloped land. This would be expected to result in the permanent and irreversible loss of ecologically, and potentially agriculturally, important soil resources.
- Impact on soil ecosystem services: Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, filtering air, carbon storage and providing the basis for vegetation to flourish. The scale of development proposed within the GNLP would be expected to increase pressure on essential ecosystem services.
- Reduction of water quality and ecosystem services: A total of 85 allocated sites are located on previously undeveloped land. The proposed development at these sites could potentially result in the contamination of nearby surface waterbodies or groundwater. The proposed development within the GNLP could also reduce the ability of the aquatic ecosystem to effectively filter water, provide the basis for vegetation to flourish, have benefits in regard to mental and physical wellbeing, and support biodiversity.
- Increased demand for water: The introduction of 110,367 new residents would be expected to result in increased pressure on the local water resource.

1.10. It is difficult to understand how a strategy with the these compromising adverse effects as listed undermining the environment can be considered as sustainable against the policy definition, particularly as it must be obvious, as confirmed in the SA Addendum requested by the Inspectors, that the adversity factor is inflated in direct proportion to larger housing numbers.

1.11. The SA suggests that an over provision of houses has a greater benefit on homes and the economy which I find difficult to understand and I assume in based on an assumption for which no evidence is presented that all the extra houses will be occupied and surplus residents creating a demand for extra jobs to those in the Plan.

1.12. Also presumably working on a false assumption that a surplus of housing stock for those in housing need to access will provide a greater choice and at the same time reducing prices.

- 1.13. As long as the numbers of people who are in housing need are housed by all the strategies, irrespective of whether there is a surplus provision from which to choose, there is no difference in key issues for the housing theme as listed at table N3.
- 1.14. The housing market very rarely leaves a surplus for any length of time as developers start to land bank until equilibrium of supply and demand returns.
- 1.15. However, I concur with the patently obvious conclusion in the SA Addendum that the lower buffer allowances offer the more sustainable options.
- 1.16. I suggest that the main inadequacy of the SA is a failure to consider the projected demographics of the population increases and the types and sizes of housing needs including the higher proportion of smaller units of the increasing older population.
- 1.17. Is the more suited site location for this older demographic group in the rural or urban areas; how will this be serviced for access to public transport, basic shopping and health and social facilities; and what is the evidence of personal preference?
- 1.18. Finally, the electricity usage by 2050 is expected to be more than double existing production to meet the phasing out of oil and gas as well as the move to electric vehicles, but is not considered on whether this is achievable in the SA within the rural areas.
- 1.19. Instead the SA simply proposes the change to green electricity production and switch to electric vehicles.

Issue 3: Has the Habitat Regulations Assessment (HRA) been undertaken in accordance with the Regulations and is it robust?

Issue 3.2 - Is the GIRAMS Strategy robust and is it likely to be effective?

- 1.20. The GIRAMS states on page 1 that:
- This Strategy identifies that there is currently no justified need for a 'county-wide' or 'county-level' solution regarding GI provision in addition to those measures already in place at the strategic and localised/individual development level, to enable Local Plan growth.
- 1.21. As the draft GNLP does not make any reference to specific GI provision, it is assumed that the satisfactory localised development level already in place refers to the extant JCS.
- 1.22. Both the GIRAMS and the Greater Norwich Green Infrastructure Study (December 2020) makes reference to projects and policies.
- 1.23. What is the status of these if not specifically mentioned in GNLP?

- 1.24. Again, important to the different demographic groups is the different GI needs, with some requiring sport relating open space and others tranquillity; this is not made clear in the Plan.

Issue 4: Has the Plan been prepared in accordance with other legal and procedural requirements?

Issue 4.3 - Does the Plan accord with Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 and national policy in respect of climate change?

- 1.25. I do not consider that the Plan is compliant with paragraph 19 (1A) of the above Act which 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]

- 1.26. I interpret mitigation in this context as contributing to an immediate impact to lessen the effect of climate change, which must be from the current position; suggesting that the net zero target should start now with incremental carbon reductions not adding more until 2050 and then stopping further net emissions.
- 1.27. The statement in the climate change Topic paper that *“the GNLP does not, and cannot, address wider issues relating to climate change that are outside the remit of the planning system such as emissions from existing development, national energy and transport policy, agricultural practices, and individual's choices. Therefore, the local plan contributes to addressing climate change as part of wider overall measures being taken forward at national, local or individual levels”* is of concern as some of the omissions do relate to the Plan.
- 1.28. Should the Plan not be specifically encouraging alterations to existing developments which will reduce emissions? What is the Plan's policy on building in settlements which are reliant on oil for heating? What is the policy of gas on new developments? Where are the details that show the Plan influences transport patterns which reduce traffic? If the Plan is promoting agri-tech in favour of traditional agriculture the Plan needs explain its contribution to climate change?
- 1.29. The Topic Paper states that the Plan **ensures** *“that new development is located and designed to mitigate climate change and to be adapted to a changing climate”* but the majority of sites are brought forward on allocations prior to this consideration and there no standards prescribed for energy constraints in these developments.
- 1.30. Is the current JCS policy to include sources of 'decentralised and renewable or low-carbon energy' providing at least 10% of the scheme's expected energy requirements also to be carried forward?

- 1.31. It is noted that the Plan proposes that buildings should exceed the emissions performance in Part L of the Buildings Regulations by 19%, which is a national standard set by the Government.
- 1.32. Is a mandatory reduction to this national standard by a single authority legal?
- 1.33. The Topic Paper quotes Energy Infrastructure Study (2019) that *“consideration of how local planning policy could help facilitate development will be beneficial to optimise the (development) schemes coming forward. The details of the policy would have to be developed by each local authority; however, the following areas are recommended focus areas in order to shape developments and ensure grid constraints are not a barrier”*.
- 1.34. This retrospective policy development by each of the Councils would seem to go against the principle of a combined authority and cannot have influenced site selection if each authority is setting a different standard.
- 1.35. I refer to paragraph 3.9 above which is an extract from the SA Non Technical Summary stating that *“This increase would be expected to exacerbate the impacts of climate change within Greater Norwich”*.
- 1.36. How is this compatible with the Act?
- 1.37. The Plan simply extracts the 5 recommendations from ‘Rising to Climate Change – A Guide for Local Authorities on Planning for Climate Change (2018)’ and how these are incorporated in the policies.
- 1.38. The fundamental of climate change is a reduction of greenhouse gases in the atmosphere to stabilise and hopefully reverse the global temperature rise.
- 1.39. It is an accepted fact that once these gases are in the atmosphere they will take a very long time to dissipate, 300 to 1,000 years according to NASA scientists.
- 1.40. It must also be acknowledged that **all** future development will add to the current volumes of gases in the atmosphere unless there is an equivalent carbon absorption or storage, preferably locally. [In my opinion this should specifically exclude carbon credits]
- 1.41. Proposals should recognise that many absorption remedies such as tree planting take at least 20 years before they become effective.
- 1.42. Net zero carbon by 2050 is a meaningless concept if the amount of carbon between now and then continues as a net addition, adding to the global temperature rise during the next 28 years.

- 1.43. Obviously the problem is worldwide but this does not excuse all authorities not committing to annual reductions prior to 2050 at a local level.
- 1.44. The Plan must set reduction targets rather than simply monitoring **AND** demonstrate how the policies will achieve reduction targets together with the resulting implications on existing volumes of greenhouse gases to indicate the contribution towards the reduction even accepting the negligible contribution from each Authority.
- 1.45. As a starting point, it is folly to set an annual Housing Requirement in excess of the established Housing Need which will obviously produce more emissions in construction while removing more green carbon extracting infrastructure thereby adding to the overall volume in the atmosphere.