

## **GNLP Examination Written Statement by the Green Party**

### **Matter 16: Monitoring**

Is the Monitoring Framework set out in Appendix 3 of the Plan effective in delivering the policy requirements during the Plan period? In particular:

1. Are the proposed indicators and targets appropriate and measurable? Are they clearly time related such that they can be monitored during the Plan period rather than at the end of it? Are they clearly expressed as targets rather than objectives? Are any others necessary for monitoring to ensure soundness of the Plan?
2. Does the monitoring framework clearly set out what actions will be taken if targets and policies are not being achieved?

We comment on questions 1 & 2 with reference to Appendix 3 Monitoring Framework

**General point:** many of the indicators are not measurable but rather stated as aspirations. E.g., using the term “minimise” does not provide an indicator.

### **GNLP Economy objective**

<b>GNLP11</b>	<b>Skills</b>	<b>To increase the percentage of workforce employed in higher occupations (official labour market statistics, Nomis).</b>
---------------	---------------	---

In our submission on Matter 2, Issue 2: Housing growth, Q6, we commented on the acknowledged mismatch of education, training and jobs within Norfolk resulting in demand for “high-skilled jobs” which, under current circumstances, often means recruiting skills from outside Norfolk. The aim is to enhance provision to better match education and training to the high-skilled needs of the county. Therefore, the indicator should reflect improvements in matching Norfolk education & training to the higher skilled economy. I.e. High skilled jobs and housing for local people. We, therefore, suggest an amendment to the wording of the indicator:

“To increase the percentage of a home-grown workforce educated in Norfolk employed in higher occupations (official labour market statistics, Nomis).”

But there is also the more general point of how a Local Plan focussing on residential and commercial development can influence the percentage of workforce employed in higher occupations?

**GNLP Environment objective**

<b>GNLP16</b>	<b>Climate change</b>	<b>To minimise carbon dioxide equivalent emissions per capita to contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, taken from the Department for Business, Energy and Industrial Strategy data. The GNLP will support achievement of any objectives or targets identified in adopted local strategies.</b>
---------------	-----------------------	---

The final sentence is somewhat ambiguous since “objectives or targets identified in local strategies” may be less than necessary and potentially contradictory. The objective needs to be clear and specific. We suggest the following:

“To cut carbon dioxide equivalent emissions per capita to meet national targets of 68% reduction to 1990 levels by 2030 and 78% reduction by 2035 and to bring all greenhouse gas emissions to net zero by 2050, taken from the Department for Business, Energy and Industrial Strategy data. The GNLP will support achievement of more ambitious objectives or targets identified in adopted local strategies.”

<b>GNLP17</b>	<b>Air Quality</b>	<b>To minimise nitrogen dioxide and airborne particulates measured at:</b> <b>a) Castle Meadow</b> <b>b) Lakenfields (proxy close to city centre)</b>
---------------	--------------------	---

According to Public Health England, poor air quality is the largest environmental risk to public health in the UK<sup>1</sup>. Evidence from the World Health Organization (WHO) shows that older people, children, people with pre-existing lung and heart conditions, and people on lower incomes may be most at risk<sup>2</sup>. Therefore, it is important to identify effective indicators for this metric.

The Environment Act 2021 establishes a legally binding duty on government to bring forward at least two new air quality targets in secondary legislation by 31 October 2022. This duty sits within the environmental targets framework outlined in the Environment Act (Part 1). Target objectives under consideration for air quality include:

<sup>1</sup> Public Health England, ‘Estimating local mortality burdens associated with particulate air pollution’, 2014, [www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution](http://www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution)

<sup>2</sup> World Health Organization, ‘Review of evidence on health aspects of air pollution – REVIHAAP Project’, 2013 [http://www.euro.who.int/data/assets/pdf\\_file/0004/193108/REVIHAAP-Final-technical-report-final-version.pdf?ua=1](http://www.euro.who.int/data/assets/pdf_file/0004/193108/REVIHAAP-Final-technical-report-final-version.pdf?ua=1)

- Reducing the annual mean level of fine particulate matter (PM<sub>2.5</sub>) in ambient air
- Reducing population exposure to PM<sub>2.5</sub>

Once established, these targets for particulate air quality will need to be included in the above indicator as a minimum. It is noted that WHO PM<sub>2.5</sub> annual average limits are set at 5µg/m<sup>3</sup> with interim targets of 35, 25, 15, 10 µg/m<sup>3</sup> and rather than having the phrase “minimise” that specific targets should be included in the above indicator.

Similarly, with regard to NO<sub>2</sub> targets, the WHO targets of an annual average of 10µg/m<sup>3</sup> be included with interim targets of 40, 30 & 10 µg/m<sup>3</sup>

Consideration should be given to further air quality monitoring locations such as the East Norwich Regeneration sites where air quality has been identified as being of particular concern due to traffic and the proximity of the railway (diesel locomotives) and tarmac production.

<b>GNLP18</b>	<b>Biodiversity</b>	<b>Reference required to the <a href="#">Biodiversity Metric</a></b>
<b>GNLP19</b>		
<b>GNLP20</b>		

The Environment Act sets out several key components of mandatory biodiversity gain requiring the amendment of the Town & Country Planning Act (TCPA) to require a minimum 10% gain calculated using the Biodiversity Metric & approval of a biodiversity gain plan. It will also require habitat to be secured for at least 30 years via planning obligations or conservation covenants. The mandatory requirement is expected to come into force in 2023.

Measuring biodiversity net gain (BNG) requires an approach to measuring biodiversity. The [Biodiversity Metric](#) is a habitat based approach to determining a proxy biodiversity value developed by Natural England.

The Environment Act makes provision for a system of biodiversity credits that will be invested in habitat creation. The credits can be bought by developers as a last resort when onsite and local offsite provision of habitat cannot deliver the BNG required.

The whole process will require significant resources and expertise to implement, and it is not clear how local authorities will assess and approve schemes when few have ecologists to be able to make an informed judgement.

We suggest, therefore, there should be additional biodiversity net gain (BNG) indicators to monitor the effectiveness and implementation of BNG covering:

- Number of biodiversity gain plans approved and refused
- Average time for the approval of biodiversity gain plans

- Proportion of biodiversity credits bought by developers when onsite and local offsite provision of habitat cannot deliver the BNG required

<b>GNL26</b>	<b>Renewable energy</b>	<b>To increase sustainable and renewable energy capacity permitted by type (where not ancillary to other types of development).</b>
--------------	-------------------------	---

The scale-up of smart local energy systems (SLES) that combine renewable energy (RE) and smart technologies for system flexibility has been seen as a potential way to accelerate the energy transition to deep decarbonisation. We suggest there should be quantifiable indicators of energy generated through community energy or Smart Local Energy Systems by type to recognise the value of such schemes and monitor carbon savings for local residents, schools and businesses.

<b>GNL27</b>	<b>Renewable energy</b>	<p><b>To achieve 100% against the renewable energy policy:</b></p> <p><b>a) for housing to achieve a 19% reduction against Part L of the 2013 Building Regulations;</b></p> <p><b>b) for appropriate non-residential uses over 500 sqm in floorspace to achieve the BREEAM “Very Good” energy efficiency standard or its equivalent successor.</b></p>
--------------	-------------------------	--

Shouldn't this Theme be “**Buildings energy efficiency**” rather than “Renewable energy”?

As discussed in the first set of hearings under Matter 4: Issue 1: Policy 2, Q 9 & 10, these indicators are not ambitious enough and are likely to be superseded by revised government targets in any case. There also should be an indicator for embodied carbon emissions in building construction if carbon emissions are to be seriously tackled and effectively cut to reach net zero by 2050, or before.

In December 2021, the government amended part L to provide an interim uplift in energy efficiency which requires a 30% reduction in carbon emissions of new-built residential buildings and a 27% reduction of non-residential buildings which should be a minimum indicator at the outset.

<b>GNLP29</b>	<b>Use of greenfield land</b>	<b>To minimise the number of planning permissions granted on non-allocated sites on class 1, 2 or 3a agricultural land.</b>
---------------	-------------------------------	---

As commented in our submission during the first set of hearings under Matter 1: Issue 2: Q1, GNLP Section 2 - Greater Norwich Profile, Soils, states:

“119 Large tracts of rural Greater Norwich are valuable for their agricultural land. .... Protecting high quality soils is an important consideration both for supporting agriculture and shaping our rural landscape character. This will need to be balanced with development needs through the plan.”

We do not believe sufficient detailed soil surveys have been carried out in allocating sites to determine the whereabouts of BMV soils. If, as the quote above clearly states, high quality soils are an important consideration, then we need to identify and understand the implications of developments on these tracts of land.

A more meaningful additional indicator would be:

“The area, in hectares, of class 1, 2 or 3a agricultural land lost through permanent development.”

<b>GNLP30</b>	<b>Flood Risk</b>	<b>To minimise the number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence or water quality grounds.</b>
---------------	-------------------	--

“To minimise” is not a quantifiable indicator. What is required to be known is “how many planning permissions were granted contrary to the advice of the EA”, which we suggest should be the indicator. Ideally, the answer should be zero but, for reassurance, we suggest this indicator be included.

As commented under Matter 8 Strategic Growth Areas Allocations, Issue 1 - East Norwich Strategic Regeneration Area, the EA may “allow” developments in flood zones 3a and 3b but this does not mean the housing will be technically sustainable, from a flood point of view, or financially sustainable, from a flood insurance point of view, into the future.

For these and other reasons, the House of Commons environment committee and the Royal Institute of British Architects have raised concerns over the Government’s current planning framework. Around 5.2 million properties in England are at risk from flooding. The Environment Agency has said that if current planning outcomes continue, this number could double in the next 50 years. The EA stressed there was a risk that if planning policy was not adequately implemented and enforced, non-compliance with planning conditions could increase. The EA cautioned that this could lead to billions of pounds of extra flood damages in the long-term.

On 8 February 2021, the [House of Commons Environment, Food and Rural Affairs \(EFRA\) Committee published a report on the Government's policy on flood risk management](#) and its response to increasingly frequent severe flood events. The committee made a number of recommendations to the Government regarding England's national planning policy, including to urgently review whether planning conditions to mitigate flood risk are being fulfilled.

Given this concern we suggest an additional indicator for monitoring:

- The number of houses built in flood zones 2, 3a & 3b respectively

**GNLP Infrastructure objective - To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity to allow access to social and economic opportunities.**

The standalone use of "connectivity" includes strategic highway connections, with reference to Policy 4 'Enhancement of the Major Road Network'. In our submission to the Examination, we set out a concern that further road building would undermine the GNLP objective of supporting modal shift away from the private car. Norfolk County Council views traffic growth as an indicator of economic growth in the context of the GNLP and it intends improving the strategic road network. In our suggested changes to Policy 4, we advocated the need to develop an integrated sustainable transport system for the Greater Norwich Local Plan area. Our suggested change to this objective reflects this:

**Suggested change:**

After "connectivity", we propose the addition "of sustainable transport modes".

To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity **of sustainable transport modes** to allow access to social and economic opportunities.

**GNLP40: Highways: To minimise the number of planning approvals granted contrary to the advice of Norfolk County Council highways department, based upon access or surrounding road network constraints.**

This indicator relates to Policy 4 Transport proposal viz.

*'Protection of the function of strategic transport routes (corridors of movement).'*

The wriggle room created by use of the word 'minimise' would allow Norfolk County Council to ignore the advice of its own highways department. A recent example (April 2021) is where the High Court ruled as unlawful the decision of Norfolk County Council Cabinet to override on economic development grounds the objections of its

highways department to a new junction on the A140 at Swainsthorpe for enabling the relocation of a farm machinery company Ben Burgess.<sup>3</sup>

It is not unreasonable to expect highways department advice to be followed in 100% of cases. More generally, we do not see the indicator having much value in monitoring the delivery of the GNLP to 2038. Presumably, the GNDP has assessed the broad impact of development in selecting sites for allocations and has avoided sites which would adversely impact on the road network. It would be better to include this indicator in an LTP4 Implementation Plan which has yet to be prepared.

The Green Party would like to propose an entirely new replacement highways indicator:

**'To reduce car mileage on the highways network'.**

**The supporting target would read: annual x percent reduction compared to the baseline year of x'.**

### **Reasons**

This reflects the urgent need for climate change mitigation for transport. Transport academics conclude that climate targets will not be met unless we reduce car traffic significantly over the next ten years.<sup>4</sup>

In its advice on mapping a pathway for surface transport to meet the sixth carbon budget, the Climate Change Committee recommend a decrease in average car kilometres of 6% by 2030, increasing gradually to a 17% reduction by 2050, to be achieved through a combination of modal shift and travel behaviour and technology changes.<sup>5</sup>

The UK government has adopted the Sixth Carbon Budget for the period 2033-2037 which sets a legal limit for reducing emissions by 78% by 2035 relative to 1990.

The Transport Decarbonising Plan<sup>6</sup> aimed at aligning the transport sector with Net Zero by 2050, acknowledges that

*'We need to move away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (sometimes referred to as 'vision and validate').'*

---

<sup>3</sup> <https://www.edp24.co.uk/news/local-council/norfolk-county-council-lose-judicial-review-7920674>

<sup>4</sup> The last chance saloon: we need to cut car mileage by at least 20%, Lisa Hopkinson et al, (2021) Transport for Quality of Life. <http://www.transportforqualityoflife.com/u/files/211214%20The%20last%20chance%20saloon%20to%20cut%20car%20mileage.pdf>

<sup>5</sup> The Sixth Carbon Budget: Surface Transport, Climate Change Committee, page 33. <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Surface-transport.pdf>

<sup>6</sup> 'Decarbonising transport: a better, greener, Britain, Department for Transport (July 2022), p158.

In addition to the large menu of strategies and measures for cutting vehicles miles outlined in the Plan, more detailed follow up plans are promised, for example, the Plan will seek to improve commuter car occupancy levels through the Commute Zero programme.

GNLP Policy 4 proposal to Enhance the Major Road Network reflects Norfolk County Council's ambition for further unspecified road building. The County Council's approach to roads planning, based on predicting and providing for forecast traffic, runs counter to the Department for Transport's aspiration to move away from predict and provide at the local transport level.

Opening of new and improved road schemes in the Greater Norwich area (A11 dualling, Postwick Hub, Norwich Northern Distributor Road) have increased carbon emissions. For example, the Secretary of State accepted that a NDR would increase Norfolk's transport carbon emissions by 6.17% between 2018 and 2032.

Joint Core Strategy Annual Monitoring Reports show that carbon emissions per capita from transport rose in Broadland between 2017 and 2019. In South Norfolk, emissions from transport remained at the same high level of 3.2 tonnes per capita in 2018/19 as in 2015/16.<sup>7</sup> This level is almost double the trajectory of 1.7 tonnes per capita for 2020 that was adopted in the LTP3 Implementation Plan for 2015-21.<sup>8</sup>

Further road schemes planned in Greater Norwich would further increase transport carbon emissions.

The fall in carbon emissions in Norwich to 0.9 tonnes per capita in 2018/19 reflects the effectiveness of shifting journeys to sustainable modes. However, a fall in Broadland and South Norfolk per capita transport emissions is highly unlikely under Policy 4. We could see modal shift in Norwich and at the same time increased vehicle mileage on the major and minor road network outside the City of Norwich. The GNLP must implement traffic reduction measures across the whole Greater Norwich area. Adopting an indicator that seeks to achieve a cut in car miles would support such an approach.

**GNLP41: Transport and access to Services: To improve the district authority ranking for reducing the barriers to housing and services, taken from the English Indices of Multiple Deprivation.**

We support this objective for monitoring.

---

<sup>7</sup> Broadland, Norwich and South Norfolk Joint Core Strategy Annual Monitoring Report 2019-20, Table 3.2.

<sup>8</sup> Connecting Norfolk: Implementation Plan 2016-21, Norfolk County Council, Table 3.1 LTP Targets. [file:///C:/Users/Denise/Downloads/Connecting%20Norfolk%20Implementation%20Plan%202015%20to%2021%20\(1\).pdf](file:///C:/Users/Denise/Downloads/Connecting%20Norfolk%20Implementation%20Plan%202015%20to%2021%20(1).pdf)



**GNL42: Sustainable Transport: To monitor the percentage of major planning permissions with a planning obligation towards the provision of new footways, cycleways or public transport provision (excluding CIL).**

We have a number of concerns:

We are unclear about the value of this indicator as the sole measurement for monitoring sustainable transport as it should be axiomatic that 100% of major planning applications must include a planning obligation towards the provision of new footways, cycleways and public transport.

It is likely that this indicator will be overtaken by government planning reforms for ensuring that cycling, walking and public transport provision are placed at the heart of local plan making and decision taking for new developments.<sup>9</sup>

Should this indicator be adopted, it should seek as far as possible a planning obligation that includes the provision of new footways, cycleways and public transport provision.

However, we should like to propose a replacement indicator for Sustainable Transport aimed at achieving significant modal shift from private car to sustainable transport modes and reducing the need to travel.

“To achieve a significant shift to sustainable modes while reducing the need to travel.”

The target would be a reduction in the share for journeys to work by private car and an increase in sustainable modes and mainly working from home. This would reproduce the relevant Broadland, Norwich and South Norfolk Joint Core Strategy objective, indicator and target:

***Objective 7: to enhance transport provision to meet the needs of existing and future populations while reducing the need to travel***

***Indicator: Percentage of residents who travel to work: A. By private motor vehicles B. by public transport C. By foot or cycle D. work at or mainly at home***

***Target: Decrease in A. Increase in B, C and D.***

The supporting text notes that the data used in this indicator derives from the Census and has become outdated. However, Norfolk County Council collects large quantities of travel data which could be used in place of the Census.

Employing an indicator that monitors and measures the shift to sustainable modes would fit with the government’s ambition of making walking, cycling or public transport the natural first choice for journeys by 2030.

It would support the government’s public transport mission, one of twelve national mission statements contained in the Levelling Up White Paper<sup>10</sup> :

---

<sup>9</sup> Decarbonising transport: a better, greener Britain, Department for Transport (July, 2021), p 157

<sup>10</sup> Levelling up the United Kingdom, DLUHC, (Feb 2022).

*'By 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.'*

It would also fit with the GNLP objective of encouraging modal shift.