

### Basic Position

I strongly **object** to this application as there is insufficient information presented to adequately assess environmental issues, thereby preventing the decision-makers from formulating a rational balanced decision as they are required to do.

By the Applicant's own admission the scheme fails the 10% biodiversity net gain legislation, even before consideration of what is required for the adjacent, as yet undefined, housing proposals.

### Cumulative Environmental Assessments

The Planning Statement to the County Planning Authority (CPA) describes the application as;

A 3.5km long carriageway to the east of West Winch connecting the A47 with the existing A10, **providing access to proposed housing development.** [Emphasis Added]

It is understood that this housing development is for 4,000 new homes concerning which two Outline Planning applications have been submitted to the Local Planning Authority (LPA) – one for up to 1,100 homes (in 2013) and another for up to an additional 500 homes (in 2016), equating to 1,600 in total. Both applications pre-date the introduction of biodiversity regulations and the LPA has not yet determined either.

The National Planning Policy Framework (NPPF) requires that:

New development is appropriate for its location taking into account the likely effects (**including cumulative effects**) of pollution on health, living conditions and the **natural environment**, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. (Para. 191) [Emphasis Added]

By any interpretation this definition requires that the current application must include cumulative environmental impacts from the housing development which is dependent upon and will be unlocked by the access road, particularly noting the LPA has deferred decisions on the housing pending approval of the access road.

The access road is critical to facilitating the housing in the area and presumably would not be required if the housing does not progress. It is therefore essential that the collective implications of the development of the whole site for 4,000 homes are reflected as cumulative impacts in this planning application.

There is no definitive environmental analysis in either of the two outline planning applications or any proposals presented for the balancing 2,400 homes. The general environmental reports presented in the Local Development and Neighbourhood Plans are now out of date and are of little relevance for use by this application.

It is acknowledged that there appears to be cognisance, albeit poorly presented and badly accounted, in the application of the total 4,000 extra homes in the cumulative Greenhouse Gas (GHG) emission figures only, but not for any other environmental issues.

### **Greenhouse Gases**

The GHG emission figures purport to reflect the implications of changes in traffic from both the road and the total housing allocation. **Unfortunately, there are no details provided to check the validity of the traffic figures presented or calculations of emissions for neither of the construction and operation phases.**

The emissions set out in the application for the net changes between those arising from the Do-Something scenario (DS) (with the scheme) and Do-Minimum scenario (DM) (without the scheme) are contextualised against the 4<sup>th</sup>, 5<sup>th</sup> and 6<sup>th</sup> legislated national commitments for roads in Table 6-6 of Document ref ncc/3.14.00.

The transport 5<sup>th</sup> and 6<sup>th</sup> carbon budgets of 422MtCO<sub>2e</sub> and 254MtCO<sub>2e</sub> used in the document are confirmed as legislated by government.

Although of minor importance, I fail to see how the increase in emissions from the scheme of 1,413tCO<sub>2e</sub> in the 5<sup>th</sup> budget and 1,616tCO<sub>2e</sub> in the 6<sup>th</sup> budget can be 0.0001% and 0.0002% of the national commitment as table 6-6. My calculator suggests these should be 0.00033% and 0.00064% respectively.

Another minor point is that the emissions from construction have been contextualised against the 4<sup>th</sup> transport carbon budget which is incorrect. Emissions from construction are excluded from the national transport calculations.

Of relevance is why is the contextualisation made against budgets for the whole country, rather than those assessed for county?

The Executive of Norfolk County Council (The Cabinet) approved the details for this planning application which proposes the selfish position that any increase in emissions from this road can be ignored as insignificant against national budgets and assumes can be compensated by other authorities.

There is no justification for this position by the Cabinet.

The full Council adopted a Local Transport Plan (LTP4) in 2022, the Implementation section of which sets annual GHG emission targets for the county's road network until year 2037. This establishes an acknowledgement that the Council has a responsibility for emissions on Norfolk's roads proportionate to national targets and budgets.

Earlier correspondence from lawyers acting for the Council to me noted that LTP4 is of material consideration in planning allowing decision-makers to consider what weight should be given to it.

The WWHAR application documents references LTP4 implying that it is therefore of material consideration but inexplicably the contextualisation then ignores reference to these targets preventing the Planning Committee from consideration of the emissions against local annual targets.

The legal advice from the Council's lawyers also noted that *"performance against annual targets will help inform future delivery to achieve the end target but are not themselves the target"*.

I disagree with this position but defer to the Planning Committee to determine whether it agrees with this interpretation of how targets are perceived.

Whether or not there are specific carbon targets at regional and/or local level, it is indisputable that legislated national 5<sup>th</sup> and 6<sup>th</sup> transport carbon budgets can be apportioned as percentages across regions.

Government figures for the 2021 carbon emissions from transport for Norfolk were 1,736,200tCO<sub>2e</sub> against the national total of 109,000,000tCO<sub>2e</sub> representing a contribution of 1.59% of the 2021 transport emissions from the Norfolk road network.

The adoption of LTP4 establishes a responsibility by Norfolk County Council for the county's share of emissions which establishes 1.59% of national budgets as the comparative base position for assessing changes in emissions from transport in the county.

The criteria for contextualisation therefore must be against 1.59% of national budgets, which is 6,721,802tCO<sub>2e</sub> for the 5<sup>th</sup> and 4,045,824tCO<sub>2e</sub> for the 6<sup>th</sup> transport carbon budgets equating to revised figures of the net increases of 0.021% (5<sup>th</sup> budget) and 0.04% (6<sup>th</sup> budget).

No doubt it will be argued that even these figures are insignificant, but again this would be a flawed argument.

This is because the application is for a single scheme within the county ignoring the cumulative effect of other transport schemes which must also be considered as required by the cumulative dictate within environmental legislation.

The net change in end-user transport emissions must be the cumulative effect of **all road schemes currently planned or recently built** in Norfolk including the Northern Distributor Road; the Great Yarmouth Third River Crossing; the Long Stratton Bypass; A47 Blofield to North Burlingham; A47 North Tuddenham to Easton; A47 Thickthorn roundabout and the Norwich Western Link.

All these figures are available to the Applicant but these have been conveniently ignored or discounted as irrelevant to this application.

I suspect that impact cumulative calculation at county level for all these schemes if carried out **will be hugely significant** and contend that without both this calculation and a

quantified assessment of other compensatory impacts from adopted NCC policies is established, this planning application should be deferred.

Having noted the blinkered approach to GHG emissions and the environment adopted by the Cabinet, I am concerned that the Planning Committee may be similarly influenced.

It is noted that NCC operates a Chinese wall between its role as developer and the rest of the Council's functions to separate planning matters from its role for development.

Although Cabinet considers that as a developer the Council has no obligation to reduce Norfolk's transport emissions as a percentage of national levels to meet the legislated 5<sup>th</sup> and 6<sup>th</sup> carbon budgets, the question is whether the "independent" Planning Committee must consider the county's contribution towards its proportion of national budgets in accordance with its adopted LTP4 rather than national budgets over which it has no influence for 98%.

As the Planning Committee of a County Planning Authority it must ask itself whether it is permitted to also follow this selfish philosophy of passing the responsibility to others to compensate for excess emissions by Norfolk or whether planning decisions for the county should be made in the context of **meeting its fair contribution** to national carbon budgets for GHG emissions.

### **Conclusion**

I cannot see how a decision on the environment can be made based on the limited detail provided for the road as a stand-alone scheme without detailed assessment of up-to-date cumulative implications from the 4,000 homes which the road will expedite.

This application should either be refused or deferred pending detailed cumulative environmental information being provided.