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Dear Sir / Madam

### **Greater Norwich Local Plan (GNLP) Regulation 18 consultation**

We write to respond to the above consultation published on 29 January 2020.

In September 2019, we wrote to the Greater Norwich planning authorities about the need to integrate emissions reduction objectives throughout local plan policy. We are therefore pleased to see a commitment in the draft strategy to ensure policies in the GNLP “contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, as well as helping to meet local targets, statements and plans” (p. 40). We also welcome the statement that “policies in the GNLP will need to contribute to national targets to reduce emissions [and] plan for transition to a post-carbon economy” and that mitigating climate change is “a cornerstone of the GNLP” (paras 82 and 86).

However, we are concerned that these commitments have not in fact been met in the development of the proposed plan policies. It is not sufficient that the plan merely includes policies “which address climate change mitigation” (as suggested at para 140). Plan policies taken as a whole must be “designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of climate change”.<sup>1</sup> In this context, they must “contribute to radical reductions in greenhouse gas emissions” and “take a proactive approach” to mitigating climate change “in line with the objectives and provisions of the Climate Change Act 2008.”<sup>2</sup>

To comply with this obligation and the other law and policy requirements described in September letter, local planning authorities need to demonstrate that the proposed plan policies are expected to contribute to the mitigation of climate change. At a minimum, this means showing that the policies contribute to the delivery of the national 2050 target under the Climate Change Act 2008, which is a reduction in net greenhouse gas emissions of “at least 100%”.

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<sup>1</sup> Section 19(1A) of the Planning and Compulsory Purchase Act 2004.

<sup>2</sup> National Planning Policy Framework (NPPF), February 2019, paras 148 and 149.

Given that new development will be in place for many decades, the starting point for plan-making must be that policies and sites are as compatible with a net zero economy as possible. The plan and underlying evidence base must demonstrate that this approach has been followed and give clear reasons why any standards or approaches in the plan that are not consistent with net zero have been compelled by other policy constraints.

As set out below, there are a number of areas in the GNLP draft strategy and evidence base where this approach does not appear to have been followed. However, this list is not intended to be exhaustive, and we would urge a thorough review of the approach taken in all areas of policy that may affect the area's greenhouse gas emissions.

1. In respect of energy efficiency, we welcome the statement that “the evidence and justification establish a clear need to set a local energy efficiency policy which goes beyond 2013 Building Regulations” (p. 62). However, the accompanying statement that going further than a 20% improvement on Part L would not be viable would not appear to be supported by the Interim Viability Assessment (November 2019). In particular, it is not clear from the viability assessment that higher standards have been assessed. In this context, a zero carbon standard should be the starting point that is worked back from to the extent that any viability constraints are identified. Where there are viability constraints affecting a particular category of dwelling or scale of development, then standards should be reduced for that category or development size only, avoiding a ‘lowest common denominator’ approach. It is also not clear where the £15,000 cost per dwelling figure for higher efficiency standards (cited at page 63 of the draft strategy) is derived from or to what standard this figure relates.
2. The Energy Infrastructure report prepared in May 2019 – i.e. before the introduction of the UK's net zero target – concluded in the planning policies section and in the context of climate mitigation that “these policies represent a medium level of ambition within the context of the existing constraints and wider national policy goals.” (p. 44). This indicates that a higher level of policy ambition is possible, including in respect of renewable and low carbon energy generation, and that the proposed policies should be reviewed accordingly.
3. In respect of transport emissions, the conclusion of the Interim Sustainability Appraisal (January 2020) on the location of sites suggests that dramatic changes are required to ensure that new development has sufficient access to sustainable transport and services:

“Almost all of the sites would be likely to situate site end users in locations with poor transportation links and access to surrounding areas, and approximately half of the sites have been assessed as having poor pedestrian accessibility in terms of access to surrounding pavements, footpaths and the PRoW network. The majority of the sites have good access to the surrounding road network, however, due to the rural nature of many of the sites, the proposed development would be unlikely to locate site end users within a sustainable distance to a railway station or a bus stop providing regular services.” (p. 72)

4. The approach to assessing the emissions impact of individual development sites in the Interim Sustainability Appraisal also fails to give any meaningful guidance on the suitability of different sites, including in terms of their associated transport emissions. As explained on page 25 of the Interim Sustainability Appraisal, the report appears simply to assess sites by the number of inhabitants applying constant per capita emissions and then categorises the sites as having a “major” or “minor” negative impact depending on whether any assessed increase in the area’s emissions falls above a 1% or 0.1% threshold respectively.
5. The approach to assessing the overall emissions impacts of plan policies in the Interim Sustainability Appraisal is also incomplete, without adequate justification or explanation, contrary to the Strategic Environmental Assessment (SEA) regulations. Nonetheless, it indicates that some of the plan policies will not contribute sufficient emissions reductions. For example, it is stated:

“Policy 2 aims to meet national carbon reduction targets by facilitating a reduction in carbon emissions through the promotion of low carbon energy generation and sustainable building design. However, these policies would not be expected to fully mitigate this impact ... Policy 4 aims to encourage the integration of sustainable transport options in the design of new development and therefore contribute towards a reduction in traffic related carbon emissions. However, this policy would not be expected to fully mitigate this impact and is unlikely to facilitate significant reductions in carbon emissions, in line with objectives set under the 2018 DEFRA Clean Growth Strategy (30% reduction in carbon emissions from road transport by 2032).” (p. 62)

The Sustainability Appraisal also makes the following recommendation for plan policy:

“Policies should seek to prioritise renewable and low carbon energy sources, opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.” (p. 62)

6. While we welcome many of the objectives set out in the “climate change statement”, including contributing to the delivery of national and local emissions targets, it is not clear why these have not been given the status of strategic policies, which would ensure that they are taken into account in the determination of planning applications.
7. Finally, having an effective monitoring framework is also a key part of ensuring that plan policies are achieving their intended impact. Clearly, to be effective, monitoring indicators need to do more than aim for a simple increase or reduction. They need to specify yearly targets that have been assessed in the policy development process as representing sufficient progress in contributing to the relevant emissions reduction target. Currently, on a number of themes, such as climate change, sustainable transport, renewable energy capacity and green infrastructure, the proposed indicators in the draft strategy do not achieve this.

To comply with the applicable law and policy requirements, these issues should be addressed fully in the process of preparing the next version of the plan.

Yours faithfully

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