Response to Planning Application: FUL/2024/0022:

Land between the A1270 Broadland Northway near Ringland and the A47 near Honingham: Development of approximately 6km of the Norwich Western Link Road connecting the A1067 (Fakenham Road) with the new A47 North Tuddenham to Easton scheme (being developed by National Highways), including the construction of a new roundabout junction with the A1067 Fakenham Road, improvements to the A1067 Fakenham Road and the roundabout junction with the A1270 Broadland Northway.

Structures include a new viaduct carrying the Norwich Western Link over the River Wensum, a new underpass at Ringland Lane, the provision of a green bridge carrying the Broadway over the Norwich Western Link, three further green bridges, wildlife crossings, and culverting of a tributary to the River Tud. Related works include the stopping up, diversion, improvement and provision of side roads, new walking cycling and horse-riding provision, the stopping up, replacement and provision of new private means of access, and ancillary landscaping, ecological mitigation, surface water drainage system, flood compensation, bunds, other environmental mitigation, diversion and protection of apparatus and temporary works to facilitate construction, and the change of use of the premises known as Low Farm as offices (class E), and other ancillary works.

Introduction

Comments relate to the climate change impacts associated with proposals to address mitigating the impacts of climate change and addressing issues relating to climate adaptation and resilience associated with the Scheme. These issues are predominantly covered in the Environmental Statement (ES), Chapters 15 – 'Climate – Greenhouse Gases' and 'Climate – Climate Resilience'.

The construction of the scheme is expected to add to the prevailing level of emissions generated within the local transport network. This is due to both the construction process itself and the level traffic over the scheme's lifetime, which is in addition to the background emissions from the local transport network. Both factors, could contribute to climate change and negatively impact efforts to reduce greenhouse gas emissions when set against both national and local targets.

The road is expected to affect local ecosystems, including ancient woodlands, wetlands, and habitats of protected species. These natural areas play a critical role in climate resilience by maintaining biodiversity and regulating local climates. In addition, constructing the road could alter local hydrology, potentially increasing the risk of flooding, or indeed the impacts on public health through detrimental air quality impacts from transport. This response will not cover these areas as colleagues will be providing their own detailed responses to address these factors. This response will cover the impacts relating to construction, and the downstream impacts when the scheme becomes operational.

Policy and guidance

A number of key policies pertain to the impact that this infrastructure project will have with relation to climate change. These are duly referenced in 'Norwich Western Link' – Sections

4/5 of the submission. A key focus of this response will be around the transport and climate change documents that the local authority has adopted to address transport impacts from highway schemes, primarily the Local Transport Plan, and the Norfolk County Council Climate Strategy/Policy (the latter two evolving out of stated climate commitments in the Norfolk County Council Environmental Policy - 2019). A more detailed assessment of how this project impacts on and relates to climate change forms the basis of the response that follows. However, it is worth highlighting that from a planning perspective a key local document is the Greater Norwich Local Plan (GNLP), particularly with regard to the intersection of growth and strategic infrastructure.

The key policy requirements in the GNLP, insofar as strategic transport infrastructure is concerned, are laid out in Policy 4 which aims to align the growth identified in the plan with the transport requirements to support it. This project does not relate to the outlined transport needs to support growth. This is made clear by the Inspectors report (Feb '24). This states that the Policy would need to be make clear that the Highway Authority schemes already in development are 'contextual projects' and are not projects required as part of the GNDP to deliver the housing allocation within the Plan, but should be referenced as a strategic infrastructure projects being progressed separately by the Highway Authority.

Returning to the NWL Planning Statement, Section 5.1 draws heavily on the transport schemes that will support the growth highlighted in the GNLP, though it fails to distinguish those necessary to the success of the plan with those that are 'contextual', as flagged by the Planning Inspector.

In Section 5.6 of the Planning Statement due reference is made of the 'climate coverage' of the GNLP, in addition to the National Planning Policy Framework, paragraph 157, which includes the reference to the need to: *'… help to: shape places in ways that contribute to **radical** reductions in greenhouse gas emissions…'*. The response below will determine whether this sentiment has been addressed.

The Planning Statement also attempt to pre-empt the impacts identified in the climate modelling later in the Environmental Statement, by giving the scheme as 'pass', and treat it to that of a national scheme, as referenced in the quote on in Sections 5.6.10 to 5.6.13. The relevant quote in Section 5.6.13 from the 'Revised National Policy Statement for National Networks (2024)' captures where the government envisages leeway in emissions from national road schemes from both construction and operation, is acceptable. The concluding quote frames this around compensatory measures within the local network to offset emissions from major schemes. That also being the justification in this case. However, while in the following sections below, a modelled picture of the emissions associated with this scheme are seen, there is not an understanding of what the modelling of the wider network will be to offset any emissions generated by this scheme to offset any impacts.

<u>Climate – Greenhouse gases</u>

The evaluation of the impacts from the scheme forms two parts – those from the construction and ongoing maintenance, and beyond that, the use of the scheme by traffic over an expected 60-year timeline. To that end, the framing mechanism to contextualise the

impact of the scheme against the wider UK is as a contribution to the UK's National Carbon budget regime. The scheme is also set within additional targets as outlined within Norfolk County Council's Local Transport Plan. Carbon figures are shown interchangeably as tonnes of carbon (tC/tCO2e)) and kilotonnes of carbon (ktC/ktCO2e).

Construction impacts

The impact of construction is shown in two parts as it spans the timeline for carbon budgets 4 & 5 (2023-2027 and 2028-2-32 respectively). It is calculated by showing the net impact from construction (including loss of vegetation), set against the that 'locked up', or stored, in the vegetation (biomass) and soil. The area cover for the scheme is designated is within the red boundary of the scheme (Chap. 10 Biodiversity refers). This would determine how much of the natural environment would absorb and counteract the emissions generated through the construction of the scheme. Carbon storage refers to the amount of carbon that is "locked up" in biomass, including vegetation and soil, notwithstanding the levels of vegetation removed during construction.

The construction stage emissions in total are 129,724 tC. This is split over two National Carbon Budget timeframes to show 64,862 tC for each of the Carbon Budgets - 3 & 4. The impacts shown, as scheme contributions to the National Budget as a percentage, are: 0.003% & 0.004% respectively. When viewed in this context, it would no doubt be seen as inconsequential.

Of the total shown above, 29,608 tC is generated through the loss of vegetation from the construction process – circa 23% of the total. However, the scheme is to follow the PAS 2080 standard, which tracks the carbon impacts from all aspects of the construction process, so due note is made of the efforts to minimise the impact insofar as construction is concerned, with a reference to the final viaduct design itself saving @ 10,000tC over the earlier design. In addition, further measures are outlined to be followed by the principal contractor. However, the loss of old growth woodland, already acting as a carbon sink, will be difficult to address in the short term.

Given the commitment to follow the PAS 2080 standard, it is somewhat confusing to read in para 15.6.8 that **'No operational monitoring is proposed in relation to GHG (Greenhouse Gas) assessment'**. While modelling has been done to show construction and end user emissions to understand the impact of the scheme, this statement is somewhat confusing. Presumably this is an oversight, as long-term monitoring will be needed for tracking of emissions in line with Local Transport Plan expectations, more on that to follow.

As the planning submission states, given the wider-ranging impacts of climate change, it is not possible to link a specific project with a specific environmental impact derived from climate change impacts. A proxy would be to assess the impact of emissions generated against an established monitoring regime, in the case, the UK National Carbon Budget targets, which this scheme has done. In addition, the local targets with the Local Transport Plan to evaluate the impacts from end user emissions, through use of the transport network would likewise provide an appropriate comparison.

With regards the latter, there is a timeline of reduction targets shown for the wider impacts from transport for Norfolk, for which this scheme would contribute, therefore Key Performance Indicators (KPIs) relating to the construction process would contribute to a wider understanding of how road schemes contribute to the ambitions within the Local Transport Plan policies, and the impacts of infrastructure. How this scheme relates to this is discussed below.

Operational impacts

The NCC Climate Strategy commits to work towards carbon neutrality within the wider area of Norfolk – by 2030 (published in May 2023). 'The Climate Policy 2024', builds on this, with specific statements relating to transport but with the carbon neutrality commitment stretched out to 2050, reflecting the government's national target (overarching commitment 2). With regard to transport, the 'Climate Policy 2024' states:

'Our Local Transport Plan represents its overarching strategy in relation to transport infrastructure until 2036. This Climate Policy aligns with its goals but more specifically focuses on decarbonisation of transport…'

A number of key priorities are listed, however, the most pertinent perhaps is:

- *To **prioritise transport investment into more sustainable modes**, such as public transport and active travel including micromobility options, **to help support the journey to net zero**.*

While the UK has achieved significant carbon emissions reductions since 1990, it is currently off-track to meet its 2030 targets ('only a third of the emission reductions needed to reach the UK's 2030 target are covered by credible plans' - Climate Change Committee 18-7-24).

Projected over the lifetime of this scheme emissions are seen to increase by 1.3% against the backdrop of the local transport network, both annually and over the 60-year lifetime of the scheme (2029-2088). This will be a net increase of 294,922 toCO2e. It is worth noting that a 'do nothing' scenario identifies emissions from the transport network as already hitting levels at 536,647 tCO2e, which would rise to 543,364 tCO2e in the first year of operation of this scheme (2029). This increase remains consistent across projections going forward – tracking at 1.3% of the local emissions under a 'do something' scenario. An additional 294,922 tCO2 over the lifetime of the project, as a contribution to the expected cumulative 21,902,709 tCO2e emissions.

If these projections are made based on aligning with the target reductions seen shown in Table 15-5, page 22, then this itself may be optimistic in the short-term when the 2022 target (1657 ktCO2e) seems to have already been missed. Recent government local authority area emissions figures for 2022 (published June 2024) shows that emissions from transport for Norfolk were – 1716 ktCO2e. An increase rather than a decrease.

It is worth noting that the recent last two years' worth of data for the emissions profile from transport in the county, actually reflects a gradual year on year increase since the drop in

2020 – which in itself was likely due to transport restrictions due to covid. So, for perspective, for the years 2019, 2020, 2021 and 2022, we see emissions levels of **1993 ktCO2e**, **1563.4 ktCO2e, 1695 ktCO2e** and **1716ktCO2e** respectively. This is not a reduction trajectory.

While the modelled emissions for the scheme could be seen as relatively small when weighed against the already existing traffic emissions impacts, they are still an increase and significantly more than for the construction of the scheme, and it is difficult to see how promoted mitigation measures will address this in a meaningful way.

It is also difficult to see how the scheme aligns with ambitions expressed within policy statements in the Local Transport Plan (LTP), where there are a number of instances that flag the importance of addressing the impacts of climate change and moving towards carbon neutrality. Page 5 of the LTP flags a headline objective of:

*'Seek to achieve the environmental policy target of working towards **carbon neutrality** when we **make changes and improvements to our transport network**, and through working with users on how they choose to use the transport network.'*

Chapter 7 – 'Enhancing Norfolk's Quality of life' recognises that transport is the sector that has the highest carbon emissions, and that there is a need for intervention to ensure that it achieves the stated objective of carbon neutrality. How will this scheme contribute to that?

At various points in the LTP document, policy statements 6, 11, 21 reinforce the point around action relating climate change, including flagging the role that infrastructure plays, and the need to ensure carbon neutrality on such developments. To quote extracts from Policy statements 6 and 11:

Policy 6 - *'We will also work to ensure that the necessary infrastructure to support the transition to a clean transport network is in place. We will seek that any carbon impacts are **monitored and offset by locally applicable measures**.'*

Policy 11 - *'We need to ensure that transport infrastructure both mitigates climate change and adapts to it.'*

Overarching the above, Objective 4 of the LTP Implementation Plan states:

*We will introduce appropriate and proportionate whole life carbon assessments including construction and use of the asset for our schemes. **We will also develop suitable assessment criteria for schemes** on our project pipeline so that we consider the impact of schemes across the range of LTP4 objectives, **including carbon** and **quality of place**.*

It is difficult to see how this scheme, judging by the content submitted, resolves the acknowledged impacts that the scheme will be associated with, to fit with the objectives and policies laid out in the Local Transport Plan 4 highlighted above; alongside those ambitious commitments within the County Council's Climate Strategy and Climate Policy.

Climate change – resilience

In addressing issues relating to the resilience of the scheme, is the focus of Chapter 16 of the Environmental Statement. Due reference is made to key national and local policies around the importance of ensuring - *'New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.'* In addition, the need to embody the ambitions of Norfolk County Council's Climate Change Strategy, published in June 2023 as far as infrastructure and climate resilience is concerned. To quote:

*'Part of Norfolk County Council's response to climate change must focus on managing climate risk for Norfolk by building resilience across the local services it provides and adapting our infrastructure through nature-based and engineering solutions.'…**'new infrastructure is designed against appropriate assumptions on the future impacts of climate change.'***

With these as foundation principles, the rest of the chapter lays out the means of mitigation including addressing responses to the previous scoping exercise.

The key risks, associated with the climate variables, as far as they affect the scheme, are listed in table 16.3. A fair analysis of the climate variables insofar as they impact on the scheme are covered, particularly from an ongoing maintenance and management perspective.

It is worth noting that this Chapter assesses the potential impacts of environmental change on the proposed scheme, rather than impacts of the proposed scheme on the immediate environment. As far as mitigating for the environmental impacts are concerned more broadly, these are covered in , 'Appendix 3.10.32 Ecological Mitigation Strategy'. I do not propose to comment in detail on these as colleagues will provide a comprehensive response with regard to the wider biodiversity and landscape impacts, at the habitat and landscape level. However, it is noted that an overview is provided in Table 16.14 of the mitigation measures proposed to address the climate variables that the scheme will be exposed to over time, encapsulated within a Landscape and Ecological Management Plan (LEMP), that will be ultimately produced by the contractor.

While there are limited serious impacts on the scheme, it is projected that any mitigation measures, for those deemed significant – will be a response to extreme temperature and precipitation events. It is acknowledged that given the uncertainty around climate projections and the impacts on long term management of the road, a regular monitoring regime will be required both during construction and operation of the scheme.

Conclusion

While a comprehensive and open assessment has been presented of the impacts from the construction phase, there is no overlooking that there will be a net gain in emissions generated by the scheme from both the construction activities and the subsequent use of the scheme over its lifetime.

Given the recognition in the ES Chapter 15, of the Policies at play in shaping the climate agenda on the ground, not least the local ones, chief amongst them the Norfolk County Council Climate Strategy (2023) and the Climate Policy (2024), in addition to the Local Transport Plan, there isn't a clear path as to how a route to net zero can be seen.

Where there has been considerable work given over to identifying and mitigating the climate impacts, this has focused on the construction process, which still shows additional levels of emissions being generated, notwithstanding the adoption of the PAS2080 standard. By contrast end user/operational emissions, which are far larger, both in the short term and over the life of the project, are given a cursory treatment. There seems to be an acceptance that this is inevitable. Any emissions attributed to this project will be in addition to the background emissions identified already existing within the local transport network. These are likely to be compounded in the near future, if the latest government local authority emissions figures are any indication; which would seem to suggest that emissions are rising to pre-covid levels, thereby setting back the reduction targets referenced.

Referring back to the NWL Planning Statement, it would seem to be caveated with aligning this scheme with the importance of one on the National Network as per 'The Revised National Policy Statement for National Networks (March 2024)' refers (see comments in 'Policy and guidance' earlier in this response), as an advance justification for the emissions that will unfold associated with the construction and operational phases of the scheme, as outlined in ES Chapter 15. However, this isn't a national scheme, and local policy requirements from the applicant's stated commitments within their climate policies, and the Local Transport Plan, have stated commitments that infrastructure schemes should demonstrate how they will achieve carbon neutrality. This has not been done, and the burden of responsibility to address wider climate impacts has seemingly been passed over to unaligned transport initiatives either already in hand or in preparation, as outlined in the Transport Assessment.

When assessing schemes of this nature, whether national or local, by framing it within the context of the national carbon budget, it tends to diminish its impact. This can distract from its local impact. It is only by collectively taking responsibility for schemes at the individual level that you can address the wider regional and national impact.

In summary there are four areas of concern emerging:

- **Growth** – much is made, across a number of documents, about the importance of the scheme in support of growth, however this is far from clear. If the focus on the growth context outlined in the Greater Norwich Local Plan is pre-eminent, the Planning Inspector would seem to downplay the importance of this scheme, in comparison to other schemes highlighted, suggesting that this scheme is 'contextual' to the needs of the growth outlined with the GNLP.

- **Monitoring** – the scheme is to be supported for following best practice through the adoption of the PAS2080 climate standard, however, the wording leaves it unclear as to ongoing operational monitoring of the scheme when in use. This will be necessary to understand the continued picture that transport will play as a significant

emissions sector, and the need to meet local climate change targets, not least those adopted within the Local Transport Plan.

- **Mitigation** – there is a lack of detail and evidence as to what mitigation measures there are associated with this scheme that will compensate for the impacts generated. Links are flagged to the benefits of other transport initiatives and what they will help deliver, but no evidence as to how this scheme will address any impacts associated with it to put them on a pathway to net zero. As the Committee on Climate Change recognises, in our journey towards net zero by 2050, there will be residual emissions that will need to be offset. Given the annual emissions levels forecast to be associated with this scheme (let alone any within the wider network), no picture emerges as how this will be addressed.

- **Net Zero** – In the Planning Statement there is the expression that this scheme should be judged on a par with a national highways scheme, and that perhaps any emissions generated are therefore justified and can be overlooked. Given the importance of achieving net zero expressed in policy documents within the submission, this seems an odd approach, which perhaps accounts for there being no understanding as to how this scheme will contribute to reducing transport impacts across the network, rather than add to them, with a perception that the burden will be borne by other transport initiatives that are referred to. There is the reference in ES 15 as to the annual reduction targets locally for Norfolk as a whole, but no linkage as to how this scheme relates to them (with the initial 2022 target already missed, as mentioned in the body of this response above). Given the recognition that transport is the major emissions sector in the county, it would be useful to have a deeper understanding as where this scheme sits within the wider policy ambitions, with modelling showing the foreseen trajectory to meet net zero/carbon neutrality, or otherwise. As it stands, the picture painted seems to one of acceptance that emissions will be created over the lifetime of the scheme, without much of a focus beyond the impacts in the construction stage.

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