
The Norfolk County Council (Norwich Northern Distributor Road (A1067 to A47(T))) Order

Addendum to Examining Authority's Second Written Questions – Q9.4

Planning Act 2008

Infrastructure Planning

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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Introduction

In the applicant's response to question 9.4 of the Examining Authorities second written questions, due to a formatting error Appendix A was omitted from the main response. This appendix is in response to the key issues raised by Norwich Green Party Written Representation published on the 4th August 2014.

Appendix A – Response to Key Issues raised by Norwich Green Party in 4 August 2014 Written Representation

- 1.1.1 This Appendix provides the Applicant's responses in respect of issues raised by Norwich Green Party in their Written Representation to the Examining Authority published 4th August 2014. The main points of the Written Representation are presented along with the Applicant's response. A lack of response on any specific issue should not be taken to mean that these matters are accepted by Norfolk County Council (NCC).
- 1.1.2 It should be noted that since the response NCC/EX/30 revised calculations of carbon emissions from the scheme have been produced, updating those presented in the Environmental Statement. These are presented in NCC/EX/45 and above.
- Norwich Green Party suggest that a different approach to assessing carbon emissions is required*
- 1.1.3 NGP has accepted that the assessment of carbon for the scheme has been carried out in accordance with the applicable guidance (paragraphs 2, 5, 8 and 9 of the NGP Written Representation).
- 1.1.4 NGP argue (presented in paragraph 2 and 19 to 34 of the NGP Written Representation) that the scheme should have been assessed in a different way to that set out in the guidance and presented in the Environmental Statement, questioning the use of 'differentials' in appraising the scheme (paragraph 2 and 22 to 31). The prevailing guidance has been used to assess the potential impacts associated with the scheme, as accepted by NGP. This focusses on a comparison of the with- and without-scheme scenarios. The objective of an Environmental Impact Assessment is to determine the impact of a specific intervention, in this case the NDR. The NGP approach would be to assign all future changes in carbon emissions to the NDR.

Norwich Green Party re-states the role of the National Planning Policy Framework, and refers to a finding of the Committee on Climate Change that transport business cases should account for carbon.

1.1.5 NGP suggest that the planning system is 'charged' with producing reductions in CO2 emissions (referring to paragraph 94 of NPPF, although we believe this refers to paragraph 93). The NPPF states that the local planning authority should adopt 'proactive strategies to mitigate...climate change' (para 94), in line with the objective and provisions of the Climate Change Act 2008. This refers to spatial issues and not specific development.

1.1.6 As quoted by NGP, the observation made by the CCC in their 2014 Progress Report is as follows:

"It is important that the transport business case to be included in the application for development of road and rail networks takes full account of carbon impacts; decisions to proceed with these should be based on an economic assessment that fully values the impact of carbon emissions."

1.1.7 The CCCs observation is not at odds with this DCO application since an economic appraisal of carbon has been made. This is the only point made by the CCC in their 2014 Progress Report in relation to transport and planning and the responsibilities of the DCLG.

Norwich Green Party present an alternative Benefit-Cost Ratio based on data presented in the Environmental Statement

1.1.8 In paragraph 28 of the NGP Written Representation, NGP present an alternative BCR based on using the carbon figures presented in the Environmental Statement in the 'WNA-WebTAG' column, as opposed to using the value calculated using TUBA. Specifically, a cost of £52.7m associated with greenhouse gas emissions is presented. The 'WNA-ZERO' and 'WNA-NAT-TRENDS' columns of this table have not been addressed as these depart from the established methodology.

- 1.1.9 The assessment undertaken in the Environmental Statement uses a different methodology to that applied in TUBA. The difference arises from two principle factors: a) the Environmental Statement uses a link-based approach, where calculations are based on the traffic flow and speeds on each road link and summed across the network, whereas TUBA uses a journey based approach where average journey speeds are used with origin-destination traffic flows in the calculations; b) the TUBA method includes journeys or portions of journeys from outside of the Environmental Statement's study area (the Environmental Statement only including the portion of that journey within its defined study area). This leads to two effects: a) the total emissions calculated by TUBA in any given scenario are greater than those presented in the Environmental Statement and b) the difference between a Do Minimum and Do Something scenario is different because of the difference between the calculation methods and the data used.
- 1.1.10 The link-based approach was selected for the Environmental Statement so that the effects within a defined study area could be determined, following the guidance set out in DMRB HA207/07.
- 1.1.11 The journey-based approach is a standard TUBA calculation and is consistent with the approach in calculating other user benefits so is included in the economics appraisal, following the guidance set out in WebTAG.
- 1.1.12 It is not clear how the value of £52.7m has been arrived at by NGP (e.g. year of discount rate) and there is no accounting for the traded emissions element associated with electric vehicles. Nonetheless, based on using the original carbon Environmental Statement data we calculate the disbenefit to be £49.5m. This data has since been revised as presented in NCC/EX/45, representing a disbenefit of £42.6m. The Applicant also notes that other elements of the economic appraisal have not been included in NGPs recalculation of the scheme's BCR.

- 1.1.13 The specific data requested by NGP has been provided in the response to ExA Q3.6 and Q9.4.