


Councillor Andrew Boswell
Norfolk County Councillor and Norwich City Councillor



4th August 2014

Ms Simone Wilding,
Head of National Infrastructure Case management,
Major Applications and Plans Directorate,
The Planning Inspectorate,
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Temple Quay,
Bristol,
BS1 6PN

By email [Simone.wilding@infrastructure.gsi.gov.uk]

Dear Ms Wilding,

**National Network DCO Applications –
clarification sought on carbon and value for money appraisal**

I wish to draw your attention to the recent report from the Committee for Climate Change (CCC) to the Government “Meeting Carbon Budgets – 2014 Progress Report to Parliament, July 2014”. This was presented to Parliament on July 15th 2014, the sixth statutory report on progress towards meeting carbon budgets, pursuant to section 36(1) and 36(2) of the Climate Change Act (CCA) 2008. Under section 37(4) of CCA 2008, the Secretary of State must lay before Parliament a response to the points by October 15th 2014.

I refer to these documents for your convenience:

1. Executive Summary of the report (downloaded, 1/8/14 from: <http://bit.ly/CCC-ProgReport2014-ES>), and
2. The Full Report (downloaded, 1/8/14 from: <http://bit.ly/CCC-ProgRep2014-Full>).

On page 295 of the Full Report the following statement is made relating to the planning of transport infrastructure:

“National networks

In December 2013 government set out its vision of future policy on significant transport infrastructure projects under its National Policy Statement for National Road and Rail Networks (NN NPS). The focus of the consultation is on strategic infrastructure projects as defined under the Planning Act and relates mainly to motorways, main roads and important rail infrastructure (freight interchanges, and rail network excluding High Speed Rail 2). A final NPS will be published by the end of the year.

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.”

Under “Actions for specific departments and national authorities” on page 18 of the Executive Summary, CCC recommends:

“DCLG has an important role to play ensuring that building regulations for new homes are strong, minimum energy efficiency standards for non-residential buildings are set, and transport emissions fully accounted for as part of the planning process.”

Planning Inspectors currently undertaking Examinations of National Network DCO applications are aware of the **draft** National Policy Statement for National Road and Rail Networks (NN NPS) which at paragraph 3.4 states that increases in carbon emissions from a development “should not therefore need to be considered by the Examining Authority and the Secretary of State”. This is considered to be an emerging policy which may be given some weight.

CCC’s recommendation to Government would appear to be stating that carbon emissions should be considered by Examiners and the Secretary of State, in particular their future abatement costs and impact on overall value for money of applications.

My concern here is the weight and balance on this issue is not clear to Examiners and Interested Parties in any current examinations until the Government have clarified the position. (I am myself an Interested Party to the current Norwich Northern Distributor Road Development Consent Order Examination). This now depends on the publication of the full NN NPS, and also the Secretary of State’s response to the CCC report. The former is expected in the autumn and the latter by October 15th 2014, although the Secretary of State may delay response under section 37(5) of CCA 2008.

It would be most helpful if PINS can make clear what its approach is to handling transport carbon emissions and abatement costs within any on-going National Network examinations, pending clarification from the Government, which may be late this year.

I am writing to you to request that you can clarify the position as soon as possible. I look forward to your reply.

Yours sincerely



Councillor Andrew Boswell
Norwich City Council and Norfolk County Council

Cc:
Mark Southgate, PINS
Nicholas Coombes, PINS