

Focused Changes to the Submission Joint Core Strategy
Sustainability Appraisal Report



Revision Schedule

Sustainability Appraisal of Focussed Changes made to the Submission Joint Core Strategy July 2010

Rev	Date	Details	Prepared by	Reviewed by	Approved by
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1 Introduction

1.1 Plan-making context

- 1.1.1 The development of the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) has taken place over three years of evidence gathering, consultation and engagement. The JCS was submitted to Government in March 2010 after a period of pre-submission publication from December 2009 to January 2010. This period provided the opportunity for any interested party to challenge the “soundness” or legal compliance of the strategy.
- 1.1.2 Planning Inspectors appointed to examine the Strategy held an “exploratory” meeting on 13 May 2010 and recommended a small amount of additional work. As a result of this the Greater Norwich Development Partnership is consulting on some limited proposed changes to the submitted JCS. **The consultation period is between 19 July 2010 and 30 August 2010.**
- 1.1.3 The proposed changes broadly concern:
- The provision of Gypsy and Traveller pitches to meet need arising after 2011 (Policy 4). This change results from the revocation of the East of England Plan and the consequent lack of evidence at this time.
 - The approach to seeking a percentage of affordable housing on development sites (Policy 4) resulting from new evidence on viability issues. An overall numeric target for affordable homes (based on existing evidence of need) has also been proposed.
 - The reclassification of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle as a “strategic allocation” rather than a “strategic location”. This would mean that future work could be progressed through a Supplementary Planning Document (SPD) instead of an Area Action Plan (AAP). This is supported by a new concept statement to be included as an appendix to the Strategy. This will provide a firmer basis to move forward with more detailed planning policies.
- 1.1.4 The response to the focussed changes will be considered by the Greater Norwich Development Partnership Policy Group, and the individual local planning authorities in autumn, before a final decision is made to submit the changes to the Planning Inspector.
- 1.1.5 Other work required by the Inspectors involved providing clarity on elements of the evidence base, rather than changes to the Strategy. This work continues, but is not part of the focussed changes consultation. Details about this work can be found on www.gndp.org.uk.
- 1.1.6 Planning Inspectors will be examining the Strategy in a series of sessions starting on 8 November 2010 (details to be advised by the Programme Officer and published on www.gndp.org.uk). They will set the agenda for the examination and invite participants to attend. They will take account of the representations made during the December 2009 /January 2010 publication period to the Strategy, as well as representations regarding the Statement of Focussed Changes.

1.2 Sustainability Appraisal

- 1.2.1 Sustainability Appraisal (SA) is a mechanism for considering the impacts of a draft plan and alternative approaches in terms of sustainable development objectives. Sustainable development objectives have been developed for the purpose of guiding spatial planning in Greater Norwich. These were defined through a process of 'scoping' and are published within an SA Scoping Report.¹
- 1.2.2 The emerging JCS has been subjected to SA at a number of stages. A key stage for the consideration of alternative approaches (or options) was the 'Issues and Options' stage of plan development (2007), when options were set out in a consultation document in order to gather views on which should be selected to go forward as the 'preferred options'. The SA at this stage focussed on the relative performance of options and a brochure was produced to summarise key findings. Options for one specific issue - the strategic spatial strategy - were also presented in later consultation document (Regulation 25 Technical Consultation, 2008) and appraised through SA.
- 1.2.3 Most recently an SA Report was published in September 2009, considering the performance of the Pre-Submission JCS against sustainability objectives. The SA Report was published for consultation alongside the Pre-Submission JCS. There is now a need to undertake further SA to reflect significant changes that have been made to the plan (i.e. the focussed changes) since the previous appraisal. This report sets out the findings of this further appraisal.

Approach to SA

- 1.2.4 The aim of this SA is to highlight the key decisions that have been taking by the plan-makers as part of the process of preparing the focussed changes; and test the performance of the new policy (relative to the performance of the corresponding policies in the version of the JCS submitted in March 2010) in terms of sustainability objectives.
- 1.2.5 The appraisal focuses on the focussed changes that have been made relating to 1) affordable housing; and 2) the North East Growth Triangle. Focussed changes relating to **Gypsies and Travellers** have not been formally appraised - see discussion below.
- 1.2.6 A simple scoring system has been used - see below - to flag-up any areas of concern. Some queries have been raised regarding the approach that has been followed, and where possible (i.e. where evidence is available) alternative approaches have been recommended.

Scoring symbol	Meaning
+	Positive effect
-	Negative effect
+/-	Mixed effects
0	Neutral effect
?	Uncertain effects
N/A	Not applicable

¹ GNDP (2007). Sustainability Appraisal Scoping Report [online] available @ http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/3.-SA_SCOPING_REPORT_ADOPTED_DEC_2007.pdf (accessed 07/10)

Gypsies and Travellers

- 1.2.7 It should be noted that changes made relating to Gypsies and Travellers have not been formally appraised. The focussed changes are procedural only, with the Policy committing to identifying post 2011 targets through local evidence gathering in the absence of regional targets. As such, it has been determined that effects are not likely to be significant in terms of sustainability objectives.

Structure of this report

- Chapter 2 - Sets out the appraisal of the revised policy relating to affordable housing;
- Chapter 3 - Sets out the appraisal of the revised policy relating to the North East Growth Triangle; and
- Chapter 4 - Sets out conclusions and next steps.

2 Appraisal of Focussed Changes - Affordable Housing

SA Objective	Performance of focussed changes			Comments and recommendations
	Short-term	Medium-term	Long-term	
ENV 1 To reduce the effect of traffic on the environment.	0	0	0	No significant effects
ENV 2 To improve the quality of the water environment.	0	0	0	No significant effects
ENV 3 To improve environmental amenity, including air quality.	0	0	0	No significant effects
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	No significant effects
ENV 5 To maintain and enhance the quality of landscapes, townscapes and	0	0	0	No significant effects

the historic environment.				
ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	No significant effects
ENV 7 To avoid, reduce and manage flood risk.	0	0	0	No significant effects
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	No significant effects
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	No significant effects
SOC 1 To reduce poverty and social exclusion.	+	+	+	Affordable housing policy can have important implications in terms of this objective by helping to ensure housing need is met. Meeting acute housing needs - for example that experienced by the homeless or those that live in severely overcrowded accommodation - is particularly important in terms of reducing poverty. Securing funding for appropriate affordable housing for the elderly is also an important aspect of reducing social exclusion. Revisions to the affordable housing policy will have some implications in terms of how housing need is met - see discussion under Objective SOC4.
SOC 2 To maintain and improve the health of the whole population and promote healthy	+	+	+	Meeting housing need, particularly acute housing need, will be an important factor in terms of reducing poverty, (see discussion above) and hence issues of poor health. Revisions to the affordable housing policy will have some implications in terms of how housing need is met - see discussion under Objective SOC4.

lifestyles.				
SOC 3 To improve education and skills.	0	0	0	No significant effects
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	+	+?	+?	<p>The Pre-Submission SA Report (as part of the appraisal of the ‘Housing Delivery’ Policy) concluded that:</p> <p>“With regard to delivery of affordable housing, the headline standard that affordable housing must be provided on development sites of 5 or more dwellings (or 0.2 hectare or more) is a stringent approach. The supporting text gives a reasoned justification for the approach taken. With regard to setting requirements on developers to deliver affordable housing there has been an increasing realisation over the past year or so that Policies should also take into account issues of financial viability so as not to discourage investment from housing developers. This Policy does so by building in a degree of flexibility with regard to affordable housing requirements that are made of developers. The Policy goes into some detail on the issue (both in the Policy and background text), which should ensure that there are no ‘loopholes’ that might be exploited by developers who would seek to avoid providing affordable housing.”</p> <p>The following important points should be noted regarding the focussed changes:</p> <ul style="list-style-type: none"> • The target for affordable housing provision has been revised downwards to reflect the findings of a recent study prepared for the GNDP (Driver Jonas Deloitte, 2010), which identified that the previous target would be unachievable for reasons of financial viability. Under the previous approach, 40% of houses on sites of five or more dwellings (or 0.2ha or more) would need to be affordable. Under the revised approach, this 40% target must only be met on those sites of 16 or more dwellings (or over 0.6ha). For smaller sites (i.e. between 5 and 16 dwellings, or between 0.2 and 0.6ha) a lower percentage target is set. The most recent housing needs assessment for the three districts indicates that, in the short term, 43% of overall housing need can only be met by affordable housing. • However, a new target has been set relating to the split of tenures that must be achieved on sites of 16 dwellings or more (or over 0.6ha). For the smaller sites on which a proportion of affordable housing will be required, no targets for the split of tenure are set (i.e. tenure will be agreed on a site by site basis). • In conclusion, the effects of the focussed changes in terms of this sustainability objective are considered positive because they reflect the findings of the most up-to-date evidence on viability, which is critical to the delivery of affordable homes on mixed tenure developments. • Recommendation - Given that this Policy has been made less stringent to reflect viability, which in turn is a reflection of market conditions that may fluctuate considerably over the life-time of the plan, it is suggested

				that the following commitment be made within the policy rather than supporting text: <i>“The overall target, policy target, and balance of tenures will be kept under review in the light of updated information on housing need.”</i>
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	0	0	0	No significant effects
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	No significant effects
SOC 7 To improve the quality of where people live.	0	0	0	No significant effects
SOC 8 To improve accessibility to essential services, facilities and jobs.	0	0	0	No significant effects
EC 1 To encourage sustained economic growth.	+	+	+	The focussed changes are based on the latest evidence relating to housing development viability. As such, it should help to ensure that the policy does not have the effect of dissuading developers from investing in Greater Norwich for reasons of viability / profit. As such, the focussed changes should help to ensure that the housing needed to support planned economic growth is delivered.
EC 2 To encourage and accommodate both indigenous and inward investment.	0	0	0	No significant effects
EC 3 To encourage efficient	0	0	0	No significant effects

patterns of movement in support of economic growth.				
EC 4 To improve the social and environmental performance of the economy.	0	0	0	No significant effects
Summary				
Overall environmental effects				
The revisions to affordable housing policy have no implications in terms of environmental objectives.				
Overall social effects				
It has been determined that the overall effect of the focussed changes will be to better ensure that affordable housing need is met. Given that the focussed changes are based on the most recent evidence - which is assumed to be accurate - this conclusion is reached with a good degree of certainty. However, there is some uncertainty regarding the positive effects of the focussed changes in the longer-term. This uncertainty relates to the fact that the critical requirement that targets be kept under review and updated as necessary is less robust than might be hoped.				
Overall economic effects				
The focussed changes should help to ensure that the policy does not have the effect of dissuading developers from investing in Greater Norwich for reasons of viability / profit. As such, the focussed changes should help to ensure that the housing needed to support planned economic growth is delivered.				
Overall summary of effects				
In summary, the changes made to the policy to reflect the latest evidence on housing development viability should have positive social (relating to meeting affordable housing need) and economic effects. There is a good deal of certainty regarding these positive effects in the short-term, and a recommendation has been made to improve confidence in the long-term benefits.				
Recommendations:				
<ul style="list-style-type: none"> Given that this Policy has been made less stringent to reflect viability, which in turn is a reflection of market conditions that may fluctuate considerably over the life-time of the plan, it is suggested that the following commitment be made within the policy rather than supporting text: <i>"The overall target, policy target, and balance of tenures will be kept under review in the light of updated information on housing need."</i> 				

3 Appraisal of Focussed Changes - North East Growth Triangle

SA Objective	Performance of focussed changes			Comments / justification and recommendations
	Short-term	Medium-term	Long-term	
ENV 1 To reduce the effect of traffic on the environment.	+?	+	+	<ul style="list-style-type: none"> The first thing to point out is that the effect will be to better ensure development progresses as a coordinated whole, avoiding the situation whereby development could initially come forward only at the more isolated location of Rackheath. This should help to facilitate the early provision of necessary new transport infrastructure and public transport services, by ensuring that there is a critical mass of residents. As stated in the Concept Statement: <ul style="list-style-type: none"> <i>“Coordination between the “quarters” will be necessary to ensure the most effective connections by public transport, walking and cycling.”; and</i> <i>“In view of the need to deliver dwellings rapidly once the growth triangle gets underway, both to ensure the supply of housing land, and to limit the overall construction period, it is proposed that the development in all “quarters” should progress concurrently.”</i> The importance of ‘dove-tailing’ development of the different quarters is highlighted in terms of a number of issues throughout the Concept Statement. The ‘rationale’ section gives particular emphasis to the importance ensuring that the wider Growth Triangle benefits from the ‘attributes’ of Rackheath eco-development, including its focus on non-car travel. However, it is noted that there is little guidance given elsewhere as to precisely what ‘dove-tailing’ with the Rackheath development should seek to achieve or will mean in practice. The ‘Vision’ builds on Policy 10 by referring to ‘first rate’ transport links between the Growth Triangle and key employment locations of Broadland Business Park, the Airport Industrial Estate and Norwich City. The ‘Objectives’ build on Policy 10 by making reference to <i>“e]nsur[ing] employment growth within the Growth</i>

				<p><i>Triangle of a range and type that will give people a choice about where they can seek employment.” This should help to reduce the need to travel.</i></p> <ul style="list-style-type: none"> • It is stated that development should be at higher densities <i>“around centres and locations with particularly good access by non car modes.”</i> • The ‘Objectives’ build on Policy 10 considerably by establishing that the Growth Triangle should be designed in such a way as to <i>“allow residents to meet their day-to-day needs within their own village or quarter”</i>. The same objective also makes reference to creating <i>“good connections to less regularly used services.”</i> Another objective builds on Policy 10 slightly by stating that it should be <i>“easy to walk and cycle around the new villages or neighbourhoods.”</i> • Recommendation - It is noted that the Concept Statement emphasises the importance of green infrastructure delivering recreational / leisure and biodiversity benefits. Consider making reference to the importance of planning for green infrastructure in such a way as to maximise opportunities for walking and cycling. • Importantly, the Concept Statement identifies that 3200 dwellings may be delivered prior to the NDR being completed, assuming that the Postwick Hub improvement is delivered, the NDR is committed and 1,000 of these dwellings will be part of the Rackheath eco-development and so will generate only half the number of car-based trips than would otherwise be expected. • Recommendation - Provide further clarification regarding when the Postwick Hub improvement must be delivered (relative to housing delivery). • Importantly, where as Policy 10 committed to a Bus Rapid Transport Route in simple terms, the Concept Statement states that <i>“Full BRT will need to be introduced in stages as the development progresses, but a high quality conventional bus service should be introduced from the first phase of the project.”</i> • Importantly, where as Policy 10 committed to new rail halts in simple terms, the Concept Statement states that <i>“The Rackheath proposal concept statement includes an aspiration for the provision of a “tram – train” utilizing the existing heavy rail connection to Norwich, but with the capability of “street running” within the new community. This is likely to be dependent on overcoming operational barriers to the use of light rail rolling stock on heavy rail infrastructure. If this can be achieved it should also facilitate the provision of a station to serve Broadland Business Park. These opportunities should be exploited if possible, and safeguarded if not immediately possible.”</i> • The ‘Principles’ require that ‘full consideration’ is give to a link between the Sprowston fringe and Broadland
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				<p>Business Park.</p> <ul style="list-style-type: none"> The 'Principles' require that "[i]n all cases, movement patterns should be designed to avoid subjecting existing or new residential areas to extraneous traffic."
ENV 2 To improve the quality of the water environment.	+	+	+	<ul style="list-style-type: none"> The Concept Statement builds on Policy 10 somewhat. It identifies 'reduction in the use and discharge of water' as one of two environmental priorities for the area. It is stated that "This will require a focus on water efficiency, potentially innovative solutions to the treatment of wastewater and extensive use of sustainable drainage systems." It is stated that SuDS should consist of 'filter strips, swales and ponds' and that these features should be integrated as part of the green infrastructure. No specific issues (e.g. water bodies at risk) are referenced. It is highlighted that phasing must take particular account of strategic sewer capacity.
ENV 3 To improve environmental amenity, including air quality.	+	+	+	<ul style="list-style-type: none"> The concept statement sets the requirement that "[i]n all cases, movement patterns should be designed to avoid subjecting existing or new residential areas to extraneous traffic."
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	<ul style="list-style-type: none"> Policy 10 makes a number of specific commitments relating to biodiversity. The effect of the Concept Statement is to build on these considerably. It is clear that green infrastructure is central to planning within the Growth Triangle. Furthermore, the aims of the green infrastructure have been carefully defined. In particular, there is a focus on ensuring that green infrastructure can protect and enhance existing assets, which should lead to benefits for biodiversity (as opposed to an alternative approach, whereby green infrastructure could actually lead to the loss of characteristic habitats and hence a loss of biodiversity). There is a useful emphasis on the 'continuity' of green infrastructure. Recommendation - Include more explicit consideration of what is a 'constraint' and what is an 'opportunity'. Currently, a figure is included that does not distinguish between constraints and opportunities.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and	+	+	+	<ul style="list-style-type: none"> Policy 10 makes a number of specific commitments relating to landscape, the historic environment and achieving a high level of self containment whilst integrating well with neighbouring communities. The effect of the Concept Statement is to build on these considerably. There is a major focus on taking account of local landscape constraints and opportunities in order to ensure that local distinctiveness is protected and ensure

the historic environment.				<p>that the new communities develop a distinctive character. Landscape will be protected through the requirement that development should be within discrete areas (identified in a useful diagram), taking account of local geography / spatial constraints and opportunities.</p> <ul style="list-style-type: none"> The importance of protecting the ‘distinction between existing settlements’ is also emphasised, and a commitment is made to protecting, managing and enhancing a number of specific landscape assets (e.g. historic parkland and the setting of churches).
ENV 6 To adapt to and mitigate against the impacts of climate change.	+	+	+	<ul style="list-style-type: none"> There is a considerable emphasis on promoting sustainable patterns of travel - see discussion under ENV1. In terms of climate change adaptation, there is also a degree of further guidance relating to SuDS - see discussion under ENV2 and ENV7. In terms of promoting the use of energy from renewable and low-carbon sources, it is stated that “[<i>locally generated energy and district heating/cooling systems may be better provided in a centralized form, although a modular approach may be more effective, depending on the phasing of development across the triangle.</i>]” This is useful guidance, as it should lead to consideration being given to the costs and benefits of a centralised approach at an early stage as part of strategic masterplanning. This should help to ensure that opportunities are not missed. The Policy does not specify that the approach to sustainable design and construction of buildings within the Growth Triangle should be more ambitious than development elsewhere within Greater Norwich, although it does highlight that ‘minimisation of energy demand’ is one of the two environmental priorities.
ENV 7 To avoid, reduce and manage flood risk.	+	+	+	<ul style="list-style-type: none"> It is stated that there should be ‘extensive use of sustainable drainage systems’; that SuDS should consist of ‘filter strips, swales and ponds’; and that these features should be integrated as part of the green infrastructure. No specific flood risk constraints are referenced.
ENV 8 To provide for sustainable use and sources of water supply.	+	+	+	<ul style="list-style-type: none"> It is highlighted that “<i>Although this is a distinct proposal in its own right, it will need to dovetail with development in the rest of the growth triangle. The Rackheath development will also have attributes which will affect and influence the remainder of the growth triangle, for example aspiration towards water neutrality... This will be the subject of detailed local research in partnership with the relevant agencies.</i>” However, no further reference is made to water neutrality, although it is stated that there must be a ‘necessary focus on water efficiency’.

ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	<ul style="list-style-type: none"> There is no increased emphasis given to waste minimisation or sustainable waste management.
SOC 1 To reduce poverty and social exclusion.	+	+	+	<ul style="list-style-type: none"> The aim of the Growth Triangle is not to address existing issues of deprivation, but rather to create new communities that are mixed and inclusive. The effect of this should be to prevent issues of social deprivation developing in the future. The effect of the Concept Statement in terms of supporting the development of sustainable communities is discussed under SOC2 - SOC8. In terms of addressing existing issues of deprivation, the Policy refers to the need to <i>“examin[e] the potential for residential sites for Gypsies and Travellers”</i>. Recommendation - Give consideration to whether or not, as a large strategic development, there may be particular opportunities to integrate residential sites for Gypsies and Travellers.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	+	+	+	<ul style="list-style-type: none"> There is a considerable emphasis on promoting walking and cycling - see discussion under ENV1 - and also access to high quality green space and the countryside - see discussion under ENV4. An objective is to <i>“Create an environment where the facilities and support for healthy and fulfilling living are available.”</i> It is specified that there is a need for <i>“Primary care centres or equivalent facilities, each for 5 general practitioners and 4 dentists, and expansion of existing facilities to accommodate an additional 2 general practitioners and 3 dentists”</i> Considerable detail is given regarding requirements for open space. Minimum requirements (in terms of quantity) are specified. A requirement is set for Health Impact Assessment (HIA) to be undertaken as part of the process of Masterplan development, with the scope of the HIA established in consultation with NHS Norfolk.
SOC 3 To improve education and	+	+	+	<ul style="list-style-type: none"> Further detail is given regarding the required secondary school, including that it ‘may be best located at Rackheath’.

skills.				<ul style="list-style-type: none"> • It is specified that there is a need for <i>“Two form entry primary schools, and 1 single form entry primary school, all with associated early years facilities and 2 additional early years facilities”</i>. • No requirements are made regarding the provision of facilities to develop skills amongst adults, reflecting the fact that it is difficult or impossible to forecast skills deficiencies that might exist within future communities.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	0	0	0	<ul style="list-style-type: none"> • It is not clear whether the statements made regarding housing needs will have the effect of adding to JCS Policy 4 on Housing Delivery. Perhaps the most substantive guidance relates to the requirement that affordable housing be ‘tenure blind’, by which it is meant that all affordable housing should be of comparable quality, regardless of tenure. • The Concept Statement does not make reference to the point made in Policy 10 that <i>“To facilitate early provision the early phases of development will concentrate on family housing.”</i>
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	<ul style="list-style-type: none"> • The overriding priority is the <i>“creation of a special, distinct and exciting place to live and work, made up of communities with a strong sense of identity, respecting the features and settlements of the area and with ready access to work and facilities.”</i> • It is stated that the Growth Triangle will be divided into distinct quarters and <i>“designed to create a sense of place, balancing the need to preserve existing identities and forging new ones”</i>. • The Concept Statement promotes ‘integration’ between new and existing communities. The importance of maintaining a separate identity for Rackheath is emphasised. Elsewhere, the Concept Statement makes reference to protecting the setting and identities of Old Catton, Sprowston, Thorpe St Andrew and Thorpe End. • In terms of ensuring good governance during the masterplanning phase: <ul style="list-style-type: none"> • The Concept Statement identifies that the forthcoming Supplementary Planning Document (SPD) that will guide masterplanning across the Growth Triangle will ‘incorporate Sustainability Appraisal’. This is an important commitment, as Sustainability Appraisal (SA) of SPDs is not an automatic legal requirement. It is also identified that ‘daughter masterplans’ (i.e. those that are specific to a particular quarter) should be developed using a ‘participative process’. • Recommendation - Reword to <i>“In view of the likely issues arising and the need to ensure effective engagement through an early consideration of strategic options the SPD will be developed alongside</i>

				<p><i>processes of Sustainability Appraisal, Habitats Regulations Assessment and a Health Impact Assessment.”</i></p> <ul style="list-style-type: none"> • Recommendation - Give further detail regarding the degree/nature of participation that is necessary. For example, it might be appropriate to require that ‘key choices are informed by early and effective participation’. • In terms of ensuring good governance during the implementation phase: <ul style="list-style-type: none"> • A broad requirement is made that “<i>community assets are governed and managed appropriately to fulfil the needs of residents.</i>” More specifically, it is stated that “<i>Developers, the District and Parish Councils will need to work together to support this in a coordinated way by enabling facilities to be available and supporting community development initiatives.</i>” However, the Concept Statement does not go as far as to identify what form ‘governance arrangements’ should take.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+	+	+	<ul style="list-style-type: none"> • It is stated that “[w]ithin the Growth Triangle employment growth will have been achieved, including within green industries, building upon the eco-credential and economic attraction created by the development of the Growth Triangle. In addition, first rate connections will have been provided to the key employment locations of Broadland Business Park, the Airport Industrial Estate and Norwich City.” • Elsewhere, it is stated that employment development should be “<i>of a range and type that will give people a choice about where they can seek employment.</i>” • It is stated that an objective is to “<i>identify suitable areas for employment land as part of mixed use development or as separate industrial estates and business parks.</i>” Elsewhere, it is stated that land is required for ‘the expansion of Broadland Business Park’, and for inclusion of ‘some local employment within housing areas’.
SOC 7 To improve the quality of where people live.	+	+	+	<ul style="list-style-type: none"> • The Concept Statement sets out the housing densities that can be expected, and the amount of land that will be required for community facilities and recreation to meet recommended standards. • It is identified that there should be particular consideration paid to ‘permeability’ across the Northern Distributor Road. • The Concept Statement usefully requires that local centres are designed in such a way as to ‘maintain a level of activity throughout the day’. • An important decision is made regarding the approach to phasing. It is stated that “<i>...to limit the overall construction period, it is proposed that the development in all “quarters” should progress concurrently.</i>” It is

				important to note that progressing development concurrently could have the effect of making mitigation of construction impacts (e.g. relating to construction traffic on roads) more difficult.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	<ul style="list-style-type: none"> • The Concept Statement includes a detailed list of services and facilities that are required. • There is also an emphasis on ensuring good accessibility between key destinations within the Growth Triangle, and between the Growth Triangle and key destinations elsewhere. • It is stated that masterplans should “<i>recognize the need for a rich mixture of uses including employment, commercial and community uses close to residential areas where compatible with residential amenity, to help people access services locally, give local employment opportunities, and maintain a level of activity throughout the day. For this reason, district and local centres, schools and community facilities should be located within the “quarters”, rather than at their periphery</i>”.
EC 1 To encourage sustained economic growth.	+	+	+	<ul style="list-style-type: none"> • The concept statement should help to ensure successful delivery of the Growth Triangle, which will in turn be a key element of economic growth in Greater Norwich
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	<ul style="list-style-type: none"> • Sustainable communities with good transport links to strategic employment locations and the City Centre will play an important role in terms of attracting skilled workers and investment.
EC 3 To encourage efficient patterns of movement in support of economic growth.	+	+	+	<ul style="list-style-type: none"> • The overall effect should be to increase the sustainability of movement patterns - see discussion under ENV1.
EC 4 To improve the social and environmental performance of the economy.	+	+	+	<ul style="list-style-type: none"> • A clear commitment is made to capitalising on opportunities for ‘green’ industry where possible.

Summary

Overall environmental effects

The additional policy set out within the Concept Statement should have a range of benefits in terms of helping to ensure the achievement of environmental objectives. Effects are particularly strong in terms of biodiversity and landscape objectives and the promotion of walking and cycling. There is an open and frank discussion of how to make the most of public transport opportunities. A commitment is made to explore further the potential for locally generated combined heat and power (from low carbon sources)

Overall social effects

The additional policy set out within the Concept Statement should have a range of benefits in terms of helping to ensure the achievement of social / community objectives. In particular, the Concept Statement should help to ensure that development comes forward as an 'integrated whole', which should help to ensure an early consideration of how to maximise benefits from shared infrastructure (including community infrastructure and green infrastructure). Importantly, the Concept Statement commits to bringing forward development within the different quarters of the Growth Triangle concurrently, but does identify that phasing of development will be important within quarters.

Overall economic effects

The concept statement should help to ensure successful delivery of the Growth Triangle, which will in turn be a key element of achieving economic goals in Greater Norwich

Overall summary of effects

The additional policy set out within the Concept Statement builds on Policy 10 considerably, giving a range of useful strategic guidance that will ensure that the forthcoming Masterplan Supplementary Guidance Document (SPD) can benefit from greater focus, rather than having to consider a great range of issues from 'first principles'. In particular, there is a useful discussion of the importance of coordinating development between different quarters, in terms of a number of specific issues. A number of particularly important statements are made regarding the delivery of development alongside improvements to the transport infrastructure - see discussion of effects under Objective ENV1.

Recommendations

- It is noted that the Concept Statement emphasises the importance of green infrastructure delivering recreational / leisure and biodiversity benefits. Consider making reference to the importance of planning for green infrastructure in such a way as to maximise opportunities for walking and cycling.
- Provide further clarification regarding when the Postwick Hub improvement must be delivered (relative to housing delivery).
- Include more explicit consideration of what is a biodiversity 'constraint' and what is an 'opportunity'. Currently, a figure is included that does not distinguish between constraints and opportunities.
- Give consideration to whether or not, as a large strategic development, there may be particular opportunities to integrate residential sites for Gypsies and Travellers.
- Reword to *"In view of the likely issues arising and the need to ensure effective engagement through an early consideration of strategic options the SPD will be developed alongside processes of Sustainability Appraisal, Habitats Regulations Assessment and a Health Impact Assessment."*
- Give further detail regarding the degree/nature of participation that is necessary when developing future masterplans. For example, it might be appropriate to require that 'key choices are informed by early and effective participation'.

4 Conclusions and Next Steps

4.1.1 In conclusion:

- An important decision has been taken to revise the requirements that are place on developers in terms of the delivery of affordable housing. This decision has been taken because of evidence that suggests that a more stringent policy would be counter-productive as a result of making development non-viable and hence hindering development of housing of any sort (affordable or housing to be sold on the open market).
- Setting strategic policy relating to the North East Growth Triangle in the Joint Core Strategy - through revisions to Policy 10 and additional policy set out within a Concept Statement - is pro-active in the sense that it will allows an early consideration of key issues. A range of strategic issues have been addressed and a number of important choices made by plan-makers as part of the process of developing the Concept Statement. The appraisal has found the effect of the new policy to be overwhelmingly positive, although it will be important that stakeholders form their own views and seek to input through the consultation.

4.1.2 The following recommendations have been made, which should be taken on-board and formally considered by the GNDP alongside consultation responses received:

- In terms of affordable housing -
 - Given that this Policy has been made less stringent to reflect viability, which in turn is a reflection of market conditions that may fluctuate considerably over the life-time of the plan, it is suggested that the following commitment be made within the policy rather than supporting text: *"The overall target, policy target, and balance of tenures will be kept under review in the light of updated information on housing need."*
- In terms of the Growth Triangle -
 - It is noted that the Concept Statement emphasises the importance of green infrastructure delivering recreational / leisure and biodiversity benefits. Consider making reference to the importance of planning for green infrastructure in such a way as to maximise opportunities for walking and cycling.
 - Provide further clarification regarding when the Postwick Hub improvement must be delivered (relative to housing delivery).
 - Include more explicit consideration of what is a biodiversity 'constraint' and what is an 'opportunity'. Currently, a figure is included that does not distinguish between constraints and opportunities.
 - Give consideration to whether or not, as a large strategic development, there may be particular opportunities to integrate residential sites for Gypsies and Travellers.
 - Reword to *"In view of the likely issues arising and the need to ensure effective engagement through an early consideration of strategic options the SPD will be developed alongside processes of Sustainability Appraisal, Habitats Regulations Assessment and a Health Impact Assessment."*
 - Give further detail regarding the degree/nature of participation that is necessary when developing future masterplans. For example, it might be appropriate to require that 'key choices are informed by early and effective participation'.