

Revision Schedule

Review of the SA of the Norwich, Broadland and South Norfolk Core Strategy Technical Consultation Paper

October 2008

Rev	Date	Details	Prepared by	Reviewed by	Approved by
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1 Introduction

- 1.1.1 The Greater Norwich Development Partnership (the GNDP) planning subgroup (comprising Broadland, Norwich and South Norfolk Councils) is currently preparing a joint Core Strategy, which will form part of each local planning authority's Local Development Framework (LDF).
- 1.1.2 The Greater Norwich Development Partnership (GNDP) have been developing the core strategy since 2007. This process has included a major consultation exercise from November 2007 to February, 2008, looking at 'issues and options' for wide range of topics, including different ways of accommodating the level of new development necessary to meet the requirements of the East of England Plan. This also included looking at alternative locations where large scale development might be located in the area close to Norwich.
- 1.1.3 The intention was that this should lead to the publication of a 'preferred options' document in late summer/ autumn 2008. However, in June, 2008, new regulations governing the plan making process came into effect, removing the preferred options stage.
- 1.1.4 A considerable amount of work has already been undertaken to develop plan options and consider which options might be 'preferred'. Because a large scale public consultation exercise was undertaken only a few months ago, the GNDP has taken the view that there would be limited value in consulting individuals again at this stage, and that this would be better undertaken when the draft plan is prepared. Therefore the GNDP intends to use the present stage to consult and seek guidance from 'specific' and 'general' bodies only through a 'Technical Consultation'.
- 1.1.5 As well as seeking comments on the general approach developed to date, the current 'Technical Consultation' also presents some new options for accommodating major growth in the Norwich area.
- 1.1.6 The consideration of options to date has been supported by a process of Sustainability Appraisal (SA) undertaken by the GNDP, with Scott Wilson providing independent review and advice on the SA. SA seeks to aid the consideration of options by identifying the likely significant social, economic and environmental effects.
- 1.1.7 Further SA work has recently been undertaken by the GNDP on the new options being considered as part of the Technical Consultation. Scott Wilson have again been asked to provide an independent review of this SA work. This document sets out the outcomes of that review.

2 Review Findings

- 2.1.1 Set out in the Table below is Scott Wilson’s review of the SA work undertaken on the three Growth Options consulted on as part of the recent Technical Consultation. It is important to note that, although many of the comments made in the table below are in regard to the prediction and evaluation of impacts, these should be read as suggestions for further consideration rather than justified recommendations for change to the SA. It is recognised that SA places a heavy reliance on **expert judgement** and **use of the evidence** collected at the scoping stage. The recommendations made in this report come from Sustainability Appraisal specialists, but not from specialists in the sustainability context and baseline specific to the Greater Norwich area.
- 2.1.2 The findings of this review should be read in conjunction with the findings of the two previous reviews prepared by Scott Wilson and submitted to the GNDP.

Review of the Growth Options SA

Preferred Option under review	
Env 1	<p>The appraisal suggests that Option 1 performs better than the other two in terms of this SA Objective. Justification is given for this judgment, although it should be stated more clearly.</p> <p>For Option 2 it should be stated that “Comparing this option to Option 1, it can be seen to promote growth at Long Stratton, at the expense of growth and Wymondham. Growth at Long Stratton will be less likely to facilitate a modal shift away from dependency on the private car, and so this Option can be seen to perform less well than Option 1 in terms of this SA Objective.”</p> <p>It is reasonable to show this difference in performance graphically by assigning ++ to Option 1 and + to Option 2. However, if it is considered that this evaluation of significance is ‘a close run thing’ then it could be qualified further in the commentary by reminding readers that the difference in performance between Options 1 and 2 is quite marginal because Long Stratton only represents 8% of the total growth in the NPA.</p> <p>In terms of Option 3 it appears very reasonable to conclude that the key difference between this option and the others (in terms of this SA Objective) is the fact that this option promotes growth that is somewhat more dispersed, which will have implications in terms of delivering the infrastructure and services for sustainable travel. It might be useful to expand slightly on why increased need for investment might result in decreased potential for sustainable travel.</p> <p>Again, it is reasonable to show the relatively worse performance graphically by assigning a +, as opposed to the ++ assigned to Option 1. Again, justification relating the evaluation of significance might be added in the commentary to further qualify this judgment.</p> <p>It is also implied that it is not possible to say which performs better in terms of this SA Objective – Option 2 or 3. It is appropriate for this to remain implicit rather than explicit, as the key message for the reader to understand is that Option 1 performs slightly better and why.</p> <p>Currently, Option 2 states that “<i>Within Long Stratton there will be environmental improvements arising from removal of through traffic.</i>” And Option 3 states that “<i>Some barriers to promotion of walking and cycling, such as the Airport.</i>” It might useful to separate these statements out,</p>

	<p>and, for each, to add that <i>“in terms of considering the relative sustainability of growth options, these effects are of less strategic importance”</i>. Furthermore, the comment regarding the airport requires further clarification.</p> <p>Currently only Option 1 describes how the policy wording influences the potential for sustainable transport. This should be rectified.</p>
<p>Env 2</p>	<p>Option 2 should state that <i>“there is no indication that locating growth in these strategic locations will lead to impacts on the water environment that cannot be adequately mitigated through careful design”</i>. If there is evidence to suggest this then the effects should be scored as neutral. However, if there is ‘no indication’ because evidence is not available to indicate a problem, then effects should be scored as uncertain.</p> <p><i>If, as is stated for Options 2 and 3, the impacts on the water environment need only be considered at the design stage of planning then it should be identified in the assessment that this SA Objective is not applicable at this level of decision-making (i.e. should not be considered when choosing between options).</i></p>
<p>Env 3</p>	<p>For all three options, it should be stated that <i>“The policy wording promotes a number of measures to reduce traffic congestion (the primary source of poor air quality) including the provision of local services and a more general emphasis on a modal shift away from car use. However, the level of growth being promoted means that there is likely to be the potential for air quality to worsen nonetheless.”</i></p> <p>Option 2 should also note that <i>“There may be some local improvement in Long Stratton, although this effect alone is not of particular strategic significance”</i> (assuming that air quality in Long Stratton is not a strategic issue, i.e. there is not currently an AQMA designated there).</p>
<p>Env 4</p>	<p>The commentary against Option 1 is relatively well written. The commentary for the other two options should be consistent with this (assuming that for Options 2 and 3 the policy wording also takes account of local characteristics).</p> <p>However, for each option it might be useful to add something similar to what is suggested for ENV 2 above, i.e. that <i>“there is no indication that locating growth in these strategic locations will lead to impacts on the biodiversity that cannot be adequately mitigated through careful design”</i>.</p> <p>For Option 2, the reference to Long Stratton (that it is an issue, but not one that is of strategic importance when determining the relative merits of the options) appears to be justified.</p>
<p>Env 5</p>	<p>Currently, the appraisal suggests that no option is more likely to impact on the landscape baseline any more than another. If this is the case then this should be stated. If there is some uncertainty then this should also be stated.</p> <p>Similarly, the appraisal currently suggests that there is no difference between the options in terms of the amount of consideration given to addressing / incorporating the local characteristics/baseline.</p> <p>The value of the following statement is unclear: <i>“Unclear how Green Infrastructure in the Mangreen / Mulbarton area can be provided.”</i> It might be better to query the use of the term ‘enhance’ with reference to green infrastructure in an area that is already rural and therefore inherently ‘green’.</p>

<p>Env 6</p>	<p>It should be noted that how each option performs in terms of climate change mitigation is determined primarily by the potential for the proposed locations to facilitate sustainable transport and, therefore, the relative performance of the options in terms of this SA Objective reflects that identified by the assessment against SA Objective ENV1.</p> <p>It is not clear what is meant by (Need to specify “renewable energy under general.)</p>
<p>Env 7</p>	<p>There should be some reference to offsite flood risk, even if it is only to state that <i>“there is no evidence to indicate that this growth option would lead to any particular risks in terms of increased off-site / downstream flood-risk that cannot adequately be mitigated through good design.”</i></p>
<p>Env 8</p>	<p>The commentary should state that <i>“The absolute effect of growth at these locations will be to exacerbate the pressure on the already stretched water resources of the East of England. However, there is no indication that this option will lead to growth at locations that will have a particularly significant effect, nor are any of the locations particularly suited to the promotion of water minimisation measures (which will be an issue for consideration at the detailed design stage).”</i></p>
<p>Env 9</p>	<p>The focus of the assessment against this SA Objective should be on the degree to which the option results in the potential to maximise development on previously developed land and allows for housing at an appropriately high density. Currently it is implied that there are no inherent differences between the options in terms of these objectives.</p>
<p>Soc 1</p>	<p>This commentary is useful. Is there no evidence to suggest how housing need varies across the NPA, and therefore which option might address housing need more effectively?</p>
<p>Soc 2</p>	<p>It might be that major new greenfield developments are better suited to designing in green infrastructure and attractive opportunities for walking, cycling and outdoor recreation. Do any of the options focus more or less on large-scale greenfield developments?</p> <p>Do any of the options benefit from particularly good access to countryside that is attractive and accessible?</p> <p>In terms of Easton/Costessey it may be important to note that Options 1 and 2 promote a ‘new centre’, whilst Option 3 only promotes ‘enhanced local services’.</p>
<p>Soc 3</p>	<p>It is not thought that ‘encouraging knowledge based industries’ is a relevant consideration here.</p>
<p>Soc 4</p>	<p>It could be useful to make reference to the way in which affordable housing need varies across the NPA.</p> <p>It is useful to note that affordable housing provision might be constrained to a degree under Options 2 and 3, although the word ‘will’ could be replaced by ‘could well’ in the Option 3 commentary to reflect the uncertainty that must exist.</p> <p>It is assumed that the significance of effects is scored equally (++) for each option because, even with the constraints associated with Options 2 and 3, affordable housing need can be met. This would be an appropriate approach and can be considered consistent with the scoring of the Options against ENV1/ENV6. This is because there are no thresholds that exist beyond which enough will have been done to mitigate climate change. However, justification for the scores that have</p>

	been assigned should be given in the commentary.
Soc 5	<p>The commentary, as it currently stands, seems to suggest that the policy wording associated with Option 1 is more stringent than the wording associated with Options 2 and 3.</p> <p>However, before describing how the policy wording supports this SA Objective it should probably be noted for each option that <i>“There is no indication that development at the locations promoted by this option will lead to negative effects on community cohesion, and there should be the potential at these locations for good masterplanning and design to support community cohesion”</i> (assuming there is nothing to suggest that development at any of the locations will have the potential to impact significantly on particular communities).</p>
Soc 6	<p>It is useful to identify the differences between the options. By scoring the options the same the message that is given to the reader is that under none of the options will there be any major constraint to meeting employment need (i.e. the employment need target/threshold can be met).</p> <p>Are there any sectors of Norwich where existing employment need is particularly high?</p>
Soc 7	<p>It would be useful if, where an effect is not location dependent, but instead dependent solely on the policy wording (as is the case with this SA Objective), that effects are noted but not overstated. In particular, ++ scores should perhaps be reserved for those positive effects that are location dependent, as this will make it easier to differentiate between the relative sustainability of the options.</p> <p>It is suggested that the recommendation included as part of the commentary for Option 1 is removed as this is not something that should be addressed at this strategic level of policy-making.</p>
Soc 8	<p>Rather than access to local services and facilities, it is thought that the major factor to consider when comparing the options must be the likelihood of the locations to support good access to major employment centres and higher-order services and facilities. Although the explanation could be expanded upon, it seems reasonable that Options 2 and 3 should be shown to perform less well than Option 1.</p> <p>The reference to education within the commentary for Option 2 should be removed and considered under SOC3.</p>
Ec 1	<p>For Option 2 there should be some explanation as to why the significance of the effect in terms of this SA Objective has been evaluated to be roughly the same as under Option 1 (i.e. why they are both scored ++). If this is because Long Stratton represents only a small proportion of the housing delivery, and therefore economic growth will not be significantly hindered, then this should be stated.</p> <p>In terms of Option 3, a detailed explanation is given as to why this effect has been scored as significantly less beneficial. The implication is that, whilst suitable levels / targets / thresholds of economic growth will be achieved under Options 1 and 2, they might not be achieved in the medium-term under Option 3.</p>
Ec 2	<p>It is unclear why, for Options 2 and 3, the effects in terms of this SA Objective are deemed to relate directly to the effects described under EC1, but this is not the case for Option 3.</p>

Ec 3	No comments
Ec 4	<p>It is not clear what is meant by <i>“Will attract new investment help maintain existing businesses and employment.”</i></p> <p>It is not clear that this SA Objective is being interpreted appropriately. See the Issues and Options SA Verification Report (2007) for further discussion.</p>
<ul style="list-style-type: none"> • Only the summary of Option 1 has a focus on how the policy wording acts to improve the sustainability effects of growth at these locations, and how the policy wording might be improved. The appraisal should focus on the inherent benefits / disbenefits of the locations, as these considerations are critical to allow for an informed decision to be made between the options. Policy wording should be considered as being of secondary importance. • There is a need to clarify whether effects mentioned are absolute or relative, e.g. the summary of Option 1 mentions the greenfield nature of development as being a disadvantage, but it is unclear whether this a relative disadvantage in relation to the other two options. • In places the summary refers to predicted effects that are not referred to in the preceding assessment against the SA Objectives, e.g. use of the railway and rapid transit system, the strategic employment site referred to under Option 3 and a number of the effects relating to Long Stratton. • It is stated that <i>“Implementation of sustainable transport infrastructure and services will be key”</i>. Is this because this is a key assumption underpinning the assessment? • The summary for Option 2 needs to include an evaluation of the strategic significance that should be placed on the effects relating to Long Stratton that are described. Similarly, the summary for Option 3 refers to the limitations of the option in terms of delivering affordable housing, even though this has been evaluated as not being of strategic significance in the preceding assessment against SA Objective SOC4. • The comments made to summarise the effects of Option 3 are more useful as they identify the key areas where the sustainability of the option might differ from the other two options. However, it is not helpful to begin the summaries by stating ‘overall beneficial’ as the SA should focus on identifying trade-offs. 	