

GNDP Response to Inspectors email of 15 November 2010 about EIP14

This following elaborates the points made at the examination by Tim Horspole on November 16

1. Not a question of adding up the total positive and negative factors, and the factors are not directly comparable
2. The SA helps Members to understand the relativw factors of the option(s) at each stage. In taking their decision, members may have given their own weight to each of these factors
3. The SA has been employed at each stage as the JCS has evolved, we have not gone back and re-scored and is not compared with previous
4. The main difference in the favoured option from Option 1 is Long Stratton. Long Stratton proposals deliver important environmental improvements to Long Stratton. For example improvement of the air quality by taking out through traffic
5. If we were to go back and re-score there would very likely to be considerable differences.

For example we have better evidence to show that BRT would be possible on the reduced number at Wymondham – this conclusion is drawn from our discussions with operators.

Similarly at Long Stratton there is evidence to support improvements to bus services and increase of self contained. Both these factors are likely to reduce the negative and improve the positive for the submitted option.

Also at the time of Sustainability Appraisal we were working on the basis of the County Council's bypass scheme. This was significantly more expensive than a bypass provided as part of a development package, so had a greater negative impact on provisions of affordable housing.

Further evidence:

There is support for Long Stratton bypass from the local MP (Richard Bacon). This support acknowledges the fact that the only likely way to deliver this important piece of infrastructure.

We have also submitted evidence that gives an indication of the public support for the JCS proposals at Wymondham (RF43).

The following is the response to the Inspectors additional question Notes on SA (EiP14 April 2009) and (RF22 February 2009)

The limitations of the SA document:

1. The SAs contained in EiP 14 were undertaken entirely in-house by the GNDP, but with Scott Wilson acting as a critical friend.[as noted in 4.1.11, JCS 3 – the SA of the submitted JCS]. The final SA of the submitted JCS was assessed independently by Scott Wilson.
2. The SA has essentially involved testing the performance of the plan against a series of 21 “aspirational sustainability objectives”. It does not however cover all material planning considerations.
3. The exercise of accumulating the total ‘+’ and ‘-’ over the 21 issues is not the purpose of the SA. Indeed, it is not a valid exercise, not only given the constraints of the grading system (which runs ++, +, +/-, - and --, and are based on the assessment of the author of the document) but also because it would be – to adopt the phrase – to compare apples, pears, bread, meat and the like. A simple example is that the mixed ‘+ -’ score on ENV 1 (To reduce the effect of traffic on the environment) does not equate to the mixed ‘+ -’ score on ENV 4 (maintain biodiversity) nor is outweighed by the ‘+’ on SOC 7 (improve quality of life where people live) etc.
4. It is notable that a different marking system was used by Scott Wilson in JCS 3, which does not purport to score issues as “very positive”, but is more measured:

Table 4.1: Scoring Criteria [after 4.1.6]

Scoring symbol Meaning

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

5. The Scoring system in EiP 14 (April 09) is:
Scoring system:
++ Very positive effects
+ Positive effects
-- Very negative effects
- Negative effects
+- Mixed effects
N Neutral / insignificant effects
? Uncertain effects
Na Sustainability objective is not applicable to this option
6. If we were to apply the Scott Wilson scoring to the April 2009 document,

- a. Option 1 would be 15 '+', 2 '-', 3 mixed and 1 neutral (total: 21);
 - b. Option 2+ would be 12 '+', 2 '-' (the same 2 negatives), 4 mixed, 2 queries and 1 neutral (total: 21).
7. The SA is an incomplete picture in any event – and there is overlap between the 21 aspirations (so if you increase travel by car you score worse not just on ENV1 but also ENV 6, SOC 6, SOC 8, EC 1 and EC 3 !).
 8. The SAs were done at different times – so it is notable that JCS 3 (the SA of the submitted JCS, using the distribution in Option 2+) contains a more positive assessment. As it states:
 “The appraisal was a qualitative exercise based on the professional judgement of Scott Wilson. However, where possible, judgements were made taking into account evidence gathered at the scoping stage as well as other evidence that has come to light more recently. It was also possible to take account of comments that were made as part of the Regulation 25 Public Consultation (Spring 2009) regarding previous Sustainability Appraisal findings.” [page VI]
 9. The SA does allow the comparative merits of any particular point to be assessed across the various options. But this point about a qualitative exercise based on the professional judgement is important. It is notable that, despite the positive effect of the bypass on the Long Stratton community and conservation area and local traffic, there was no acknowledgement of this in the SA in Feb 2009 (unlike the Scott Wilson assessment of the JCS – compare SOC 7 and policy 9 and 12). Indeed, there was nothing about Option 2+ in the SA done in Feb 2009 that outscores Option 1. Others would disagree. It is also a question of weight to be attached to the various material planning considerations.

Evidence of ‘best fit’

- Additional reasons why the Members selected the option as the best fit include:
 - The importance of the Long Stratton bypass to the town and to strategic access
 - Reduced impact on Wymondham and Hethersett from lower levels of growth
 - Reduced impact on ability to maintain strategic gaps
 - Better recognition of the importance of the A140 and centrality of Long Stratton as a service centre in the District
10. The statement in TP8 is that:
 “The Greater Norwich Development Partnership (GNDP) recognises that this is a strategy that has to try to achieve a number of objectives rather than a single one, and that inevitably there are tensions between some of these. The GNDP believes however that it has promoted a strategy which is the “best fit” given the challenges it faces.