



Sustainability Appraisal of the Joint Core Strategy for Broadland, Norwich and South Norfolk, the Broadland part of the Norwich Policy Area Local Plan



Environmental Adoption Statement

January 2014

Prepared for:
Greater Norwich
Development
Partnership (GNDP)

**Strategic Environmental Assessment Directive 2001 (Article 9),
Environmental Assessment of Plans and Programmes Regulations
2004, Regulation 16 (3) and (4)**

**Joint Core Strategy for Broadland, Norwich and South Norfolk, the
Broadland part of the Norwich Policy Area Local Plan**

Environmental Adoption Statement

January 2014

Produced by URS for the Greater Norwich Development Partnership

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	January 2014	Environmental Adoption Statement' published alongside the Adopted Part JCS	Mark Fessey Senior Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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1 PURPOSE

- 1.1.1 Broadland District Council, Norwich City Council and South Norfolk Council adopted the 'Joint Core Strategy for Broadland, Norwich and South Norfolk, the Broadland part of the Norwich Policy Area' Local Plan (the part JCS) on 10th January 2014.
- 1.1.2 In accordance with the requirements of Article 9 of the Strategic Environmental Assessment Directive 2001 and regulations 16 (3) and (4 a-f as summarised below) of the Environmental Assessment of Plans and Programmes Regulations, 2004, the purpose of this Environmental Adoption Statement is to set out:
- a) How environmental considerations have been integrated into the plan;
 - b) How the environmental report (i.e. the December 2012 Sustainability Appraisal (SA) Main Report¹, with its non technical summary², technical report³ and the September 2013 SA Report addendum⁴) has been taken into account;
 - c) How the results of public consultation on the plan and sustainability appraisal have been taken into account;
 - d) How trans-boundary issues have been taken into account⁵
 - e) The reasons for choosing the plan as adopted, in the light of other reasonable alternatives;
 - f) Measures to be taken to monitor the significant environmental effects of implementation of the plan.
- 1.1.3 The purpose of SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of plans. The SA also meets the legal requirement to undertake a Strategic Environmental Assessment (SEA), which covers only the environmental considerations relating to plan making. Whilst the European legal requirement in the SEA Directive is for this Environmental Adoption Statement to cover how environmental considerations have been covered in the Environmental Report (the SA), since the national interpretation of this through the Environmental Assessments of Plans and Programmes Regulations is that social and economic considerations in decision making should also be covered, this statement focuses on all three areas. In fact, since issues determining decisions in plan making are often inter-related, this approach is necessary.
- 1.1.4 URS was commissioned to lead on undertaking SA comprising SEA.

Documents available at:

¹ <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2012/12/3.SAReport20121206.pdf>

² <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2012/12/SA-Report-NTS-Dec-2012.pdf>

³ <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2012/12/SA-Report-Technical-Annex-Dec-2012.pdf>

⁴ <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2013/09/SA-Report-Addendum-September-2013.pdf>

⁵ Since there are no European trans-boundary issues associated with the part JCS this issue is not covered further in this report.

2 BACKGROUND

- 2.1.1 Broadland District Council, Norwich City Council and South Norfolk Council, working together with Norfolk County Council as the Greater Norwich Development Partnership (GNDP) prepared a Joint Core Strategy (JCS) which covers the area of the three local authorities except for the part administered by the Broads Authority. The JCS was adopted by each of the local planning authorities in March 2011.
- 2.1.2 Following its adoption the JCS was subject to a partly successful legal challenge at the High Court in 2012 by Mr. Stephen Heard of Stop Norwich Urbanisation (SNUB). This related to how the reasonable alternatives for the major growth proposed in the Broadland part of the Norwich Policy Area (NPA), the area adjacent to Norwich to its north and east, had been reported.
- 2.1.3 As a result of this judgment the court ordered that parts of the JCS should be remitted to the regulation 19 planning stage and not be treated as adopted. The remitted parts of the JCS included major growth proposals in the Broadland part of the Norwich Policy Area (NPA) for at least 7,000 homes⁶ and 25 hectares of employment land in the Old Catton, Sprowston, Rackheath and Thorpe St. Andrew growth triangle, also known as the North East Growth Triangle (NEGT). The remittal also covered 2,000 further homes which formed a "floating allowance" in the Broadland part of the NPA.
- 2.1.4 The court order also specified a process to be followed as a result of the judgment. In summary, this process involved the councils:
- a. Preparing an SA of the remitted parts of the JCS (the part JCS), taking into account in particular the strategic growth in the NEGT and the reasonable alternatives, if any, to this;
 - b. Following consideration of the SA, publishing the part JCS and submission documents for consultation;
 - c. Following consideration of representations, either to submit the part JCS (including the SA and representations received on it) to the Secretary of State for Examination, or withdraw the part JCS;
 - d. Following any Examination, to consider whether or not to adopt the part JCS in the light of the Inspector's report and recommendations.
- 2.1.5 Since the part JCS was remitted to the regulation 19 planning stage, this Environmental Adoption Statement assesses how the requirements set out in paragraph 1.1.2 above have been achieved at the regulation 19 and subsequent stages of plan making.

⁶ Rising to 10,000 after 2026

- 2.1.6 The Statement on the earlier stages of the plan making process, and on the parts of the adopted JCS which were not remitted, is set out in the March 2011 Environmental Statement and is available at
<http://www.gndp.org.uk/content/wp-content/uploads/downloads/2011/03/Environmental-Statement-18-March-2011.pdf>
- 2.1.7 The councils resolved to adopt the part JCS in November and December 2013, in the light of the Inspector's report and recommendations, in accordance with the court order. This Environmental Adoption Statement is published alongside the Town and Country Planning Regulations adoption statement.
- 2.1.8 The statement now sets out how the legal requirements set out in paragraph 1.1.2 have been addressed for the part JCS. To enable the process to be explained chronologically, the report does not cover the regulation 16 (4a-f) requirements in sequential order. However, for clarity, the section of regulation 16 that each section of this report addresses is set out below the relevant statement headings in italics.

3 PLAN-MAKING AND SA/SEA

- 3.1.1 This section of the report primarily addresses the Regulation 16 (4a and b) requirements to set out how environmental issues have been integrated into the plan and how the environmental report has been taken into account.

3.2 Introduction

Scoping

- 3.2.1 The first stage of the SA was to identify its scope i.e. those sustainability issues facing the area which should form the focus for the appraisal. Scoping involved identifying the context and baseline for the SA, taking account of the SA Scoping Report from 2007⁷ and updates since. The scoping process is set out in detail in section 3 of the SA main report.
- 3.2.2 This established the key issues which should be the focus of the appraisal, from which sustainability objectives were derived. The sustainability objectives below, covering environmental, social and economic issues, were the framework for the SA against which the plan's policies were assessed:

⁷ http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/SA_SCOPING_REPORT_ADOPTED_DEC_2007.pdf

Table 1 Sustainability objectives identified through scoping

Environmental objectives
To reduce the effect of traffic on the environment.
To improve the quality of the water environment.
To improve environmental amenity, including air quality.
To maintain and enhance biodiversity and geodiversity.
To maintain and enhance the quality of landscapes, townscapes and the historic environment.
To adapt to and mitigate against the impacts of climate change.
To avoid, reduce and manage flood risk.
To provide for sustainable use and sources of water supply.
To make the best use of resources, including land and energy and to minimise waste production.
Social objectives
To reduce poverty and social exclusion.
To maintain and improve the health of the whole population and promote healthy lifestyles.
To improve education and skills.
To provide the opportunity to live in a decent, suitable and affordable home.
To build community identity, improve social welfare, and reduce crime and anti-social activity.
To offer more opportunities for rewarding and satisfying employment for all.
To improve the quality of where people live.
To improve accessibility to essential services, facilities and jobs.
Economic objectives
To encourage sustained economic growth.
To encourage and accommodate both indigenous and inward Investment.
To encourage efficient patterns of movement in support of economic growth.
To improve the social and environmental performance of the economy.

3.2.3 Having established these objectives, the appraisal itself involved asking to what extent the plan would have an effect, either positively or negatively.

SA inputs into plan making

3.2.4 The SA fed into and informed plan making in two key ways:

- 1 – Appraisal of alternatives informed preparation of the draft plan.
- 2 – Appraisal findings presented in the SA Report (i.e. the document published for consultation alongside the draft plan) informed consultation and plan finalisation.

3.2.5 In relation to second point, the situation is slightly complicated by the fact that, subsequent to the main draft plan / SA Report consultation, an Addendum to the SA Report was prepared and published for consultation alongside proposed modifications to the draft plan.

3.2.6 This section now considers each plan-making / SA step in turn.

3.2.7 In line with regulatory requirements set out in paragraph 1.1.2, at each step there is a focus on explaining the plan-makers' reasons for choosing the preferred approach in-light of SA findings and consultation (informed by SA findings), and hence the degree to which the outcome was the integration of environmental / sustainable development considerations.

3.3 Step 1 – Consideration of reasonable alternatives

Step 1 primarily address the requirements of regulation 16 (4e) to set out the reasons for choosing the plan as adopted, in the light of other reasonable alternatives. It does so firstly by explaining how the reasonable alternatives were identified. Secondly it summarises the results of appraisal of the three reasonable alternatives which led to the recommendation that option 1 should be taken forward for consultation.

In doing so, it also partly covers the closely linked requirements of regulation 16 (4a) to explain how environmental considerations have been integrated into the plan and (4b) to explain how the environmental report has been taken into account.

Identifying reasonable alternatives

3.3.1 As required by the court order, the issue at the heart of plan-making was the spatial approach to growth within the Norwich Policy Area (NPA), and so it was this issue that was the focus of alternatives appraisal.

- 3.3.2 Reasonable⁸ alternatives were developed on the basis of detailed discussions between GNDP officers over an extended period. As part of this process numerous alternatives were screened-out as 'unreasonable'. The process is explained over 30 pages of the SA Report (see Chapter 4 – '*What reasonable alternatives have been considered?*') and within this explanation readers are signposted to technical appendices, where background analysis is presented across several hundred pages. Efforts were made to follow a best practice approach in light of the direction provided by the court order.
- 3.3.3 The process of developing reasonable alternatives involved answering questions, including:
- Is there a limit to how much new housing can be delivered in a single location?
 - In principle, is a dispersed approach to growth, as advocated by some, reasonable?
 - If such an approach is not a reasonable means for accommodating the complete quantum of growth, is there any merit in incorporating a degree of dispersal within the strategy?
 - If concentration of some or all of the growth is regarded as more reasonable or realistic, what form should 'concentrations' take? In particular, are there any scale thresholds above which a development can lead to particular benefits / problems?
 - How can potential locations for strategic scales of growth be defined?
 - How do potential locations perform (against the JCS objectives⁹) for different scales of strategic growth? Do some perform so poorly they should not be considered further?
 - Given existing commitments (i.e. planning permissions) in Norwich and parts of South Norfolk, is it appropriate to rule out options that would focus further growth in these areas?
 - Are there any instances where combining locations would overcome difficulties, or improve the performance compared with individual locations?
- 3.3.4 The outcome of this process was the generation of the following reasonable alternatives, which were subsequently subject to detailed appraisal:
- 1 - **Growth focused in the north east** (as in the remitted parts of the JCS)
 - 7,000 homes inside and outside the line of the Norwich Distributor Road (NDR), rising to 10,000 beyond the Plan period; 25ha of employment land at Rackheath.
 - 2 - **Growth focused in the north east, inside the line of the NDR**
 - 7,000 homes rising to 10,000 beyond the Plan period; 25ha of employment land at Broadland Business Park or Norwich International Airport in addition to those in the adopted policies of the JCS.

⁸ The SEA Directive / Regulations require that only 'reasonable alternatives' should be a focus of appraisal.

⁹ The SEA Directive / Regulations identify that options that would fail to deliver on plan objectives should be ruled out as unreasonable.

3 - Growth focused in south west with the balance in the Broadland part of the NPA

- 4,600 homes in the south west sector, making a total of 7,000 at this location in the Plan period (rising to 10,000 beyond), when combined with growth identified in the adopted JCS; 2,400 homes across the Broadland part of the NPA made up of two smaller scale developments (of at least 1,000 homes) in the north east sector (inside NDR) and north west sector; an additional 25ha of employment land in the south west or at Norwich International Airport.

3.3.5 The three alternatives are represented graphically within **Appendix 1**. Also included is a map showing the location of the eleven potential locations that were evaluated (against the plan objectives; for their potential to accept strategic scale growth) as part of the process of identifying reasonable alternatives.

Appraising reasonable alternatives

3.3.6 Alternatives appraisal was undertaken in spring/summer 2012, i.e. in good time to inform determination of a preferred approach. Alternatives appraisal was led by URS, but GNDP officers were also involved. A number of appraisal workshops (attended by URS and officers) were held.

3.3.7 In practice, the appraisal involved preparing a table, or 'matrix', with space to describe the merits of each of the alternatives "to a comparable level" as required by the Directive in terms of each of the 21 sustainability objectives that together comprise the 'SA framework'.¹⁰ **Box 2.1** presents the summary appraisal findings as presented to the plan-makers in spring/summer 2012.

¹⁰ The SA framework essentially defines the 'scope' of the appraisal, and was developed through a process of 'scoping'. As part of scoping, a consultation was held in 2007 on a 'Scoping Report'. Subsequent to the Scoping Report consultation, the SA framework was put into the public domain on numerous occasions, and where comments were received these were taken into account, i.e. the scope was amended as appropriate.

Box 2.1: Summary findings of the alternatives appraisal (with ~~strikethrough~~ used to indicate text that is superseded in the SA Report Addendum, September 2013. See paragraph 3.4.8 of this statement for further detail)

In **environmental terms**, the three alternatives are fairly finely balanced. With regards to Option **(1)**, development would occur in relatively close proximity to the Broads with potentially adverse implications; but at the same time there would be the potential to design-in green infrastructure in such a way that the Mousehold Heath to Broads Green Infrastructure Priority Link is enhanced. Furthermore, the Habitats Regulations Assessment (HRA) expresses confidence that suitable mitigation can be put in place in the form of an undeveloped 'buffer zone' to ensure that **(1)** would not result in significant effects on the Broads.

Option **(2)** is similar in many respects to **(1)** but would necessitate a more intense form of development given the smaller site footprint. The intense nature of the development would make developing effective green infrastructure more of a challenge and so could lead to adverse impacts on wildlife, landscape and historic environment features. The benefit of **(2)** relative to **(1)** is that development would not extend so close to the Broads. Option **(3)** is less likely to impact on areas of biodiversity importance, but would probably mean that some opportunities to enhance the Mousehold Heath to Broads Green Infrastructure Link are foregone. Option **(3)** would also encroach on the Norwich Southern Bypass Landscape Protection Zone.

~~With respect to transport and its effects, Options **(1)** and **(2)** are considered more sustainable since they would be likely to support public transport improvements in the form of high quality bus rapid transit (BRT) in the north-eastern part of the urban area with commensurate benefits in terms of air quality, greenhouse gas emissions (responsible for climate change) amenity and health. While the SW sector would be served by a similar level of BRT under Option **(3)**, the strategic scale growth in the NE and NW would not be served by high quality BRT. Option **(3)** therefore performs relatively poorly in transport terms compared with Options **(1)** and **(2)**. There is little to differentiate **(1)** and **(2)**, although **(1)** is likely to mean that a greater percentage of new residents live close to BRT.~~

In **social terms**, development in the NE under Options **(1)** and **(2)** has the capacity to support regeneration in Norwich since development would facilitate the development of high quality BRT that would serve the Heartsease Estate, one of the most deprived parts of Norwich. This would facilitate better access for people living on the Estate to employment opportunities and other services provided in the City Centre (as well as in the growth area). Development in the NE would therefore allow poorer parts of Norwich to share in some of the benefits of new development. Although much needed new housing would be provided under all three alternatives, it is important to note that Options **(2)** and **(3)** could lead to challenges in delivering this at the rate required to combat housing need. Option **(1)** is therefore judged to perform best in social terms.

In **economic terms**, all alternatives are considered likely to support the economic well-being of the area and all would support the provision of employment opportunities alongside new housing. Development in the NE under Options **(1)** and **(2)** would be more likely to result in employment opportunities close to an existing area of relative deprivation (see above) and could therefore have regeneration benefits. Although development in the SW would be well related to major employment locations, the NE is better located and development in the NW under Option **(3)** is not well-related to major employment locations. Options **(1)** and **(2)** are therefore considered to perform better than Option **(3)**.

Determining a preferred approach in-light of the alternatives appraisal

- 3.3.8 The SA informed and assisted members' decision-making, rather than replacing it. Decision making was also informed by other evidence.
- 3.3.9 Taking into account the alternatives appraisal, the GNDP Board recommended to their constituent authorities that Option 1 should be the preferred approach. **Box 2.2** summarises the GNDP Board's reasons for selecting Option 1 as the preferred approach.
- 3.3.10 Alternatives appraisal findings and the text presented in Box 2.2 were together presented to elected members at a series of Council meetings at each of the constituent GNDP authorities (held between 25th July and 2nd August 2012) to inform debate. Councillors were also invited to scrutinise the process of reasonable alternatives identification. The outcome was that elected councillors agreed option 1 should be taken forward for pre-submission consultation.

Box 2.2: The reasons for selecting Option 1 as the preferred approach as presented to elected councillors in July / August 2012

Option **(3)** is uncertain to deliver the required growth within the plan period. It adds to existing strategic growth locations and introduces the risk that there will not be sufficient focal points of development to give market choice and enable rates of delivery. Option **(3)** would have significant impacts on the character and form of the settlements on the A11 corridor in the NPA. The growth that is focused in the Broadland part of the NPA will support some enhanced public transport but will not sustain Bus Rapid Transport (BRT) and the spread will not enable investment to be focused on one bus corridor.

Option **(3)** is the weakest of the three reasonable alternatives and it is recommended that it is rejected for the reasons above.

Options **(1)** and **(2)** are very similar in many aspects. Both are urban extensions and benefit from the proximity to employment areas, good public transport access to the city and can take advantage of the benefits to the transport network brought by the Norwich Area Transportation Strategy (NATS) and the NDR.

Option **(2)** has a number of merits. By looking to contain growth within the NDR it can be argued that it will have a lesser land take and will avoid issues of severance that it could be argued the NDR creates. While these benefits exist for Option **(2)**, looking to contain development within the line of the NDR brings its own issues. The assessment has shown that although there is physically the land to accommodate the scale of growth, it will require a more intensive form of development. This type of intensive development would have resultant impacts in terms of landscape setting, urban form and amenity. The overall shape of the growth location is dictated by its physical limits and internal constraints. The resultant spread of development is likely to take the form of a crescent shape that does not provide clear focus for development of BRT. Option **(2)** is less certain to deliver to the planned trajectory, as there are realistically only likely to be two points of focus for the development, one around North Walsham Road and the other around Salhouse Road.

Option **(1)** proposes that the major growth is not constrained by the line of the NDR. In doing so it does bring strategic growth closer to the Broads but work has shown this can be mitigated by the creation of a buffer zone within the growth location between

development and the Broads. However Option (1) overcomes some the disadvantages that have been shown to arise from Option (2). The development form can be better planned and not be compromised by the availability of developable land. Green spaces can be better planned to link environmental assets in to green corridors. The shape of the growth location is better suited to supporting high quality public transport and BRT. Deliverability is improved by bringing in a further focus of development at Rackheath, which will bring further choice and variety to the form of development in the north east. For these reasons it is recommended that Option (1) be selected as the most appropriate option, and for the reasons set out above Option (1) be rejected.

3.4 Step 2 – Appraising the draft plan and preparing the SA Report for consultation

This section deals with the draft plan and its SA report. It primarily addresses part (4b) of the Regulation 16 by setting out the stepped process of how the environmental report was taken into account. It also addresses the Regulation 16 (4a) requirement to set out how environmental considerations have been integrated into the plan and the requirements of part (4c) to set out how the results of public consultation have been taken into account.

Introduction

- 3.4.1 The decision by elected members that Option 1 should be taken forward as the preferred approach also involved approving a draft (proposed submission) plan for consultation. SA then further fed in as follows -
- Once the draft plan was finalised for consultation it was subjected to appraisal, with findings presented in the SA Report.
 - The SA Report was then published for consultation alongside the draft plan, with a view to informing the consultation.
 - The SA Report presented information besides the draft plan appraisal, including information relating to alternatives identification / appraisal.
 - Subsequent to consultation the Councils gave consideration to appraisal findings alongside consultation responses when deciding on whether to submit (to Government) the draft plan for Examination in Public (overseen by a Government appointed Planning Inspector).
 - The decision was taken that the draft plan should be submitted, i.e. the Councils determined the draft plan to be 'sound' in-light of consultation responses received. The SA Report (December 2012) was submitted alongside the draft plan. The submitted SA Report was essentially unchanged from that which had been published for consultation.
 - The Examination commenced in May 2013. During the examination hearings a considerable amount of discussion was focused on the appraisal findings presented in the SA Report.
 - The Inspector adjourned the Hearings and requested that the Councils prepare and consult on a schedule of 'modifications' to the draft plan, with an SA Report Addendum published for consultation alongside (see discussion of 'Step 3', below).

3.4.2 Set out below is:

- 1 – A summary of 'the appraisal of the draft plan' as presented in the SA Report published alongside the draft plan; and
- 2 – A discussion of issues raised through the consultation (on the draft plan / SA Report) and subsequently at the Examination hearings.

The draft plan appraisal

3.4.3 The draft plan appraisal was presented in Table 6.2 of the SA Report. As with the alternatives appraisal, the draft plan appraisal was structured using the framework of the sustainability objectives in table 1 above. **Box 2.3** presents the conclusions of the appraisal.

Box 2.3: Conclusions of the draft (proposed submission) plan appraisal

The appraisal has suggested that the spatial approach to targeting growth leads to the likelihood of significant negative effects in terms of the following environmental objectives:

- ENV 1: To reduce the effect of traffic on the environment.
- ENV 4: To maintain and enhance biodiversity and geodiversity.
- ENV 5: To maintain and enhance the quality of landscapes, townscapes and the historic environment.
- ENV 9: To make the best use of resources, including land and energy and to minimise waste production.

However, the appraisal also shows that various policy measures (put in place both through the adopted JCS and the proposed Part JCS) will help to ensure that effects are mitigated as far as possible. For example, the proposed Part JCS presents a range of policy measures that will help to ensure that opportunities for minimising car dependency / encouraging use of public transport and walking/cycling (which in some respects are inherent to the North East Growth Triangle, NEGT) are capitalised upon.

The following recommendations are made:

- Ensure that the broad spatial approach to development ('a series of inter-related new villages or quarters') is such that the number of people with good access to high quality public transport services (in particular the Bus Rapid Transit service) is maximised.
- Ensure that the choice of location for a district centre takes full account of the need to minimise car use / encourage alternatives to the car.
- Mechanisms should be put in place to ensure that a strategic approach is taken to green infrastructure planning at the scale of the NEGT. In particular, the approach to green infrastructure should be guided by an understanding of the local landscape character ('Wooded Estatelands' where particular sensitivities include the mosaic of parkland, arable field and woodlands and landscape setting of historic houses, halls, churches and the setting of villages and hamlets).
- Ensure that early guidance is provided on appropriate densities for development within the NEGT.
- The benefit of addressing surface water flooding through an overarching policy should be explored.

In relation to one environmental objective - ENV 6: To adapt to and mitigate against the impacts of climate change – the appraisal found that the proposed Part JCS will result in a significant positive effect. This reflects the fact the nature of the NEGТ development (i.e. large scale) will mean that 1) it is possible to reduce per capita greenhouse gas emissions associated with travel and transport by encouraging a modal shift to public transport, less polluting forms of private transport and walking/cycling; 2) it will be possible make the most of economies of scale to maximise provision of energy from decentralised and renewable or low carbon energy sources and 3) the proposed Part JCS is clear that development at Rackheath should come forward as an eco-community / exemplar zero carbon development, and that 'development of the rest of the area will be expected to reflect similar high standards'. With a view to maximising climate change mitigation benefits, it is recommended that:

- Reference to Rackheath being a 'low carbon development' is removed (but the reference to Rackheath as a zero carbon development is retained).

The appraisal also predicts significant positive effects in terms of the following socio-economic objectives:

- SOC 2: To maintain and improve the health of the whole population and promote healthy lifestyles.
- SOC 3: To improve education and skills.
- SOC 4: To provide the opportunity to live in a decent, suitable and affordable home.
- SOC 5: To build community identity, improve social welfare, and reduce crime and anti-social activity.
- SOC 6: To offer more opportunities for rewarding and satisfying employment for all.
- SOC 7: To improve the quality of where people live.
- SOC 8: To improve accessibility to essential services, facilities and jobs.

These benefits are predicted in light of the fact that large scale development focused on the NEGТ presents a number of inherent opportunities; and also the fact that the policies within the proposed Part JCS seek to capitalise on these opportunities. For example, the proposed Part JCS requires that: *'[The Growth Triangle will include a] new pre-school provision and up to six new primary schools plus a new secondary school with an initial phase to open as early as possible. To facilitate early provision the early phases of development will concentrate on family housing'*.

Issues raised through the draft plan / SA Report consultation

- 3.4.4 Analysis of consultation responses undertaken by the GNDP enabled issues to be grouped into five categories – see **Table 2.1**. Some issues are 'procedural' rather than 'substantive'.

Table 2.1 Main issues raised through the draft plan / SA Report consultation

	Issues
Local Democracy	<ol style="list-style-type: none"> 1. Compliance with the High Court Judgment 2. Approach to Consultation 3. Transparency in decision making 4. Legal probity
Housing Numbers	<ol style="list-style-type: none"> 5. Housing numbers
Housing delivery	<ol style="list-style-type: none"> 6. Housing delivery
Distribution of housing growth	<ol style="list-style-type: none"> 7. Option one 8. Greater dispersal of growth 9. Focus more growth in Norwich 10. Use development sites along the Drayton Road 11. Focus more of the development south/south west of Norwich. 12. Relocation of Norwich International Airport 13. Focus growth around Acle
Sustainability Appraisal	<ol style="list-style-type: none"> 14. Evidence 15. Assessing alternatives

3.4.5 The GNDP's detailed responses to the consultation comments can be found within the Report on Representations¹¹ (see table 3 of the report). The responses directly addressed issues raised and referred consultees to other sources of evidence. The following is a summary in relation to SA:

- The SA was criticised for lacking proportionate evidence including in relation to the loss of high grade agricultural land, long term water resources, surface water flood risk, biodiversity, green infrastructure and the economy. Representations also suggested that the SA should have been informed by a detailed 'carbon assessment'.
 - On these points, the GNDP responded that proportionate evidence – given the strategic nature of the plan - had been used, with several dedicated evidence studies being drawn on explicitly.
- The methodology of the SA was also criticised. Firstly, it was criticised as 'inequitable' as alternatives were not subject to equal scrutiny. Secondly, the methodology was criticised for screening out alternatives (as 'unreasonable') such as strategic growth split between non-adjacent sectors.
 - The first criticism would appear to have an unclear foundation, as the same 'framework' and evidence-base was used to appraise all three alternatives.

¹¹ <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2013/02/SDJCS7-Report-on-Representations-incl-Reg-22-Statement-FINAL.pdf>

- The second criticism raised, concerning screening, was not regarded by the GNDP as accurate as the process of identifying reasonable alternatives did comprehensively consider all potential growth locations and combinations of locations.

3.4.6 Having considered all the representations, it was concluded that the approach set out in the JCS remained the most appropriate means of dealing with development pressures locally to 2026 and there was no need to alter the conclusion previously reached that the draft plan (as published) being the most appropriate strategy and hence suitable for submission. The SA and the relevant supporting documents, as well as the plan's extensive evidence base, were then part of the range of documents submitted along with the draft plan when it was submitted to the Secretary of State for examination. Mr Vickery was appointed by the Secretary of State as the Inspector for this purpose.

Issues raised at the Examination in Public

3.4.7 As well as the draft plan and SA Report, the Report of Representations assisted the Inspector in identifying those issues that should be the focus of the Examination in Public hearings. Issues covered included:

- Overall housing need;
- Housing numbers required in the NPA;
- Identification of the "reasonable alternatives" for the location of 7,000 dwellings and 25 hectares of employment land;
- The choice of Option 1 as the most appropriate location for growth;
- Assessment of greenhouse gas emissions in selecting the most appropriate location for growth;
- Assessment of water, air, environmental amenity, heritage assets and access to key employment locations in the SA;
- SA of the Northern Distributor Road (NDR); and
- SA Monitoring.

3.4.8 As a result of the discussions at the hearings, the Inspector considered it was necessary for a number of modifications to the plan to be made, which would need to be consulted on before they could be considered for adoption as part of the plan. The Inspector was also clear that an SA Report Addendum should be published alongside with a view to informing the consultation.

3.5 Step 3 – Appraising the 'Modifications' and preparing the SA Report Addendum

Step 3 completes the Regulation 16 (4c) requirement to set out how the results of public consultation on the plan and SA have been taken into account, covering the consultation on the modifications and their SA addendum. It also confirms that the remaining part 4 requirements have been met, as stated in the Inspector's conclusions.

Introduction

3.5.1 In accordance with the inspector's requirements, a schedule comprising eight proposed modifications to the draft plan was prepared for consultation.¹² Seven of the modifications were initially proposed by the GNDP, whilst one (the insertion of new Policy 22) was proposed by the Inspector.

3.5.2 An SA Report Addendum¹³ was prepared primarily with the aim of presenting an appraisal of the proposed modifications. A secondary aim was to subject to more detailed consideration some of the appraisal findings presented in the SA Report, which had been debated (without any clear resolution) at the Examination hearings.

3.5.3 Set out below is a summary of:

- 1 – Appraisal findings in relation to the proposed modifications;
- 2 – Additional 'clarifications' presented in the SA Report Addendum; and
- 3 – Issues raised through the consultation on Modifications / the SA Report Addendum.
- 4 - Key conclusions from the Inspectors Report, including those which respond to the SA Report Addendum and issues raised through consultation.

Proposed modifications appraisal findings

3.5.4 The SA Report Addendum identified that, with the exception of the addition of new Policy 22, the majority of the proposed modifications did not affect the substance of the draft plan and hence did not need to be appraised. Clear reasons were provided (see paragraphs 2.1.2 to 2.2.1 of the SA Report Addendum) for this 'screening-out' step.

3.5.5 Proposed new Policy 22 essentially looked to ensure a positive approach to housing land supply by specifying that in the event of a significant shortfall a 'focused Local Plan' should be prepared in order to allocate additional sites. New Policy 22 was appraised, against the SA framework, with the following conclusions:

¹² <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2013/09/Final-Main-Modifications-Consultation-Document.pdf>

¹³ <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2013/09/SA-Report-Addendum-September-2013.pdf>

“A scenario whereby a focused Local Plan is triggered as a result of Policy 22 is less than ideal in terms of most SA objectives on the basis that growth could come forward in a more dispersed fashion and there could be more growth overall in the long-term. As such, it might be recommended that the Policy be modified so that the aim of the focused Local Plan is to identify an additional ‘strategic site’ rather than “additional locations within the whole NPA area for immediately deliverable housing land”. However, it is recognised that such an approach would mean that Policy 22 would perform less well in terms of the objective “To provide the opportunity to live in a decent, suitable and affordable home.” The positive performance of Policy 22 (as currently drafted) in terms of this objective is a key consideration, i.e. it is a positive effect that is of clear significance. Possible negative effects in terms of other SA objectives are a concern to a lesser extent given that there will be the potential to avoid / mitigate effects through the focused Local Plan (which would be prepared alongside a process of Sustainability Appraisal). Also, given that any focused Local Plan would only “cover such a time period as may reasonably be considered necessary for the delivery delay or shortfall (however caused) to be resolved” it may turn out to be limited in scope (i.e. it may not allocate very much land) in which case the potential negative implications highlighted by the appraisal would be fewer / less significant.”

Additional clarifications presented in the SA Report Addendum

- 3.5.6 A secondary aim of the SA Report Addendum was to supplement the appraisal of alternatives presented within the SA Report as previously published/submitted in relation to greenhouse gas emissions from transport, water quality, air quality, environmental amenity (e.g. noise, vibration and visual intrusion), designated historic assets (e.g. Conservation Areas, Registered Historic Parks and Gardens and listed buildings) and access to key employment locations.
- 3.5.7 Particular consideration was given to the issue of ‘greenhouse gas emissions from transport’. For the other issues, a much shorter discussion served only to reiterate the robustness of past appraisal findings (i.e. appraisal findings presented in the SA Report).
- 3.5.8 The conclusion reached after giving further consideration to the issue of greenhouse gas emissions from transport was that, whilst the broad finding of the SA Report - that Option 1 performs best and Option 3 performs worst in terms of all the transport related considerations - was correct, some of the detail within the appraisal was not as clear as it might have been. As a result, the relevant part of the text in the Summary findings of the alternatives appraisal from the SA Addendum Report (see the ~~struck through~~ text in Box 2.1, above) needed to be reconsidered and has been supplemented as follows:

“With respect to transport and its effects (which relate to air quality, greenhouse gas emissions, amenity and health), Option (1) is considered on balance to be most sustainable as it is likely to support good access to high quality public transport (in the form of BRT) for new and existing residents and

will lead to good potential for new residents to walk/cycle to key employment locations. There is little to differentiate Options (1) and (2), but Option (2) may perform less well on the basis that fewer residents within the new development would have good access to BRT (although it is worth noting that more residents would be in close proximity to the City Centre). Option (3) performs least well on the basis that: there would be less opportunity for residents of new development to walk/cycle to key employment locations; some residents of new development (i.e. the 'at least 1,000 home' new development in the NE sector) would not have access to BRT (although residents of the 7,000 home new development in the SW sector would likely have access to a particularly high quality BRT); fewer existing residents would have access to a BRT (on account of there being no Salhouse Road BRT route linking the City Centre with the NE sector) and residents of the new development would live some distance from the City Centre and other destinations in the Norwich Urban Area."

Issues raised through the consultation on Modifications / the SA Report Addendum

3.5.9 Consultation on the proposed modifications / SA Report Addendum ran from 9th September to 21st October 2013. A summary of consultation responses received is presented in **Table 2.2**.

Table 2.2: Issues raised through the consultation on Modifications / the SA Report Addendum

Broad issue	Detailed objection (paraphrased)
<p>Non-compliance with the SEA Directive / Regulations in relation to climate change considerations and methods of assessment</p>	<p>The SA Addendum has not effectively assessed greenhouse gas emissions from transport in relation to the reasonable alternatives, providing only a qualitative narrative rather than a quantitative assessment. Current methods of quantitative assessment have been ignored. Data available is in NDR modelling assessments.</p> <p>To accord with SEA regulations, the SA report should include all of the information referred to in Schedule 2, including climatic factors, taking account of current knowledge and methods of assessment. Breaching this requirement has the knock-on result of breaching requirements into the contents and level of detail in the plan or programme, the stage of the plan or programme in the decision-making process, and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</p>
<p>Non-compliance with Climate Change Act</p>	<p>There is a legal requirement to achieve carbon reductions of 34% by 2020 and 80% by 2050, and all organisations are required to demonstrate how this reduction is being measured, monitored and managed. There is also a climate change adaptation requirement in the Act which is not addressed through the plan.</p> <p>The likely impacts of climate change, using a quantifiable available evidence, have not been considered for planned growth in the NEGTT including the NDR.</p>

MM1 including Norwich Area Transport Strategy (NATS), Postwick Hub and NDR	Question the role of the NATS and its relationship to the part JCS on a number of grounds. Alternative transport solutions to the NDR, such as rail and tram, have not been considered. Concerns over consultation process over the link between new road and growth proposals, therefore there is a need for further consultation. Development should be focused close to the roads after they are built.
Proposed new housing trajectory (Modification 5)	The new trajectory results in a high proportion of the planned housing growth being at risk of not being delivered. The trajectory relies on optimistic building rates and there is a risk of local housing market saturation. Additional sites should be allocated through the emerging Broadland Site Allocations DPD.
New Policy 22	Objections to Policy 22 requiring additional growth if housing delivery in the NEGTS falls below the 90% threshold.
Appendix 8a	English Heritage suggest that impacts on Conservation Areas and Registered Parks and Gardens should also be monitored.
Water supplies, quality and flood risk	Issues have not been adequately covered through the plan making process. Strategic Flood Risk Assessment inadequate.
Environmental quality	Need to protect valued habitats and landscapes in the north east.

The Inspector's Report

- 3.5.10 The matters raised in the consultation were taken account of by the Inspector in making his report. He determined that it was possible to draw a conclusion on the Plan's soundness without reconvening the Examination hearings. The Inspector's Report¹⁴ was published on 13th November 2013, concluding that the plan (as submitted and then modified) satisfies legal requirements and is 'sound', i.e. meets the tests of soundness presented in the National Planning Policy Framework (NPPF).
- 3.5.11 Table 2.3 presents conclusions from the Inspector's Report in relation to sustainability issues. Many of these directly address the issues raised in the Modifications and SA report addendum consultation, whilst others reflect debate on sustainability issues throughout the examination.

¹⁴ <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2013/11/Final-Greater-Norwich-Report.pdf>

Table 2.3: Inspector's conclusions on sustainability issues

Issues raised through examination / modifications consultation	Inspector's conclusions
Housing numbers required in the NPA	The floating small sites allowance of 2,000 is appropriate for the Broadland part of the NPA, leaving 7,000 new homes to be located elsewhere within the whole NPA.
Identification of the 'reasonable alternatives' for the location of 7,000 dwellings and 25ha of employment land.	The GNDP provided sound reasons for the choice of the reasonable alternatives and why other alternatives were not reasonable. Other approaches proposed by objectors, such as focusing growth at Acle and the south-west including Wymondham, were not supported by evidence that they could be delivered and thus were not "reasonable alternatives".
The choice of Option 1 as the most appropriate location for growth	<p>The SA carried out this difficult task "rigorously, logically and clearly" and provides "clear reasons" why the north-east was chosen as the most appropriate location for the growth.</p> <p>The Inspector supported the view presented in the SA that school capacity, landscape setting and historical character issues constrained additional growth in the south-west.</p>
Consideration through the SA of issues relating to water, air, environmental amenity, heritage assets and access to key employment locations	The SA Report Addendum now makes it absolutely clear how these issues were addressed.
Consideration through the SA of issues relating to greenhouse gas emissions	The SA Report Addendum clearly shows how the three alternative growth locations perform and why the north-east is the best choice in relation to greenhouse gas emissions.
SA of the NDR	The NDR is an adopted scheme, which has already been subject to SA/SEA. It is essential to take the NDR into account [as an aspect of the future baseline] when assessing the best location for growth.
Additional Policy 22 to ensure the delivery of housing land	<p>Note that the SA highlights likely negative effects associated with more dispersed growth and more growth overall.</p> <p>This is outweighed by the key consideration of providing decent, suitable and affordable homes and the fact that any additional allocations could well be limited in scale to that necessary to overcome short-term delivery issues.</p>
SA Monitoring	Additional indicators required covering heritage at risk, work travel mode, unfit housing, and housing land supply in Broadland NPA.

3.5.12 In relation to the key procedural matter of **alternatives consideration**, the Inspector reported that:

“The requirements and objectives of the adopted JCS and the Plan, and the varied possible permutations of development locations make the task a difficult one. I consider that the SA has carried out that task rigorously, logically and clearly. The three reasonable alternatives selected were the only ones which might have the potential to meet all of these requirements, objectives and base parameters. The GNDP has given good and sound reasons for the selection of the reasonable alternatives and why other alternatives were not reasonable ones and its constituent LPAs have given clear reasons for the final selection of the preferred option...”

3.5.13 In relation to **public consultation**, the Inspector concluded that:

“Overall, I am satisfied that the public consultation requirements for this Plan were fully and properly carried out. The Plan complied with all UK legislation in this regard, and therefore it also complied with the relevant Articles in the Aarhus Convention (a consideration mentioned by one representor) because effective public participation was carried out.”

3.5.14 Subsequent to the Inspector's Report, the three districts resolved to adopt the part JCS at meetings held in December 2013, with adoption taking place on 10th January 2014.

3.6 Conclusions

3.6.1 The discussion presented above is a summary of the stepped approach taken to SA. At each stage, appraisal findings were made available to plan makers and to elected members, stakeholders and the public as appropriate. As such, the SA process served to ensure more transparent and ultimately more informed plan-making. As explained in this statement, the approach taken to assessing the part JCS meets the requirements of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations.

4 MEASURES DECIDED CONCERNING MONITORING

Section 4 meets the Regulation 16 (4f) requirement to set out the measures to be taken to monitor significant environmental effects of implementation of the plan.

- 4.1.1 Appendix 8 of the adopted JCS contains indicators for monitoring the environmental, social and economic performance of the plan against the 2008 baseline. Some indicators are locally derived and some nationally derived, many from the SA. The authorities have committed to monitoring these indicators to 2026 through a joint Annual Monitoring Report (as discussed in paragraph 7.9 of the JCS).
- 4.1.2 Indicators are arranged under spatial planning objectives, with references to specific policies. Whilst the majority of the indicators and the spatial planning objectives cover sustainability issues (i.e. issues that were a focus of the SA) to some extent, the most directly relevant indicators covering environmental issues are under objective 1, relating to climate change, and objective 9, covering the natural, built and historic environment. These cover a variety of sub-issues, ranging from per capita CO₂ emissions to the condition of protected habitats.
- 4.1.3 Measures for monitoring were decided in light of the measures 'envisaged' for monitoring listed in Table 7.1 of the SA Report. Indeed, 'SA Indicators' (covering heritage at risk, work travel mode, unfit housing and housing land supply in Broadland NPA) were consulted on as Modifications to the Part JCS, and then subsequently incorporated into the Plan.

APPENDIX 1 – KEY FIGURES FROM THE SA REPORT

Figure A presents the eleven locations that were considered for their potential to accept strategic scale growth as part of the process of identifying 'reasonable alternatives'. Figures B – D show the three reasonable alternatives that were a focus of appraisal.

Figure A: Potential locations for strategic scale growth considered when developing reasonable alternatives

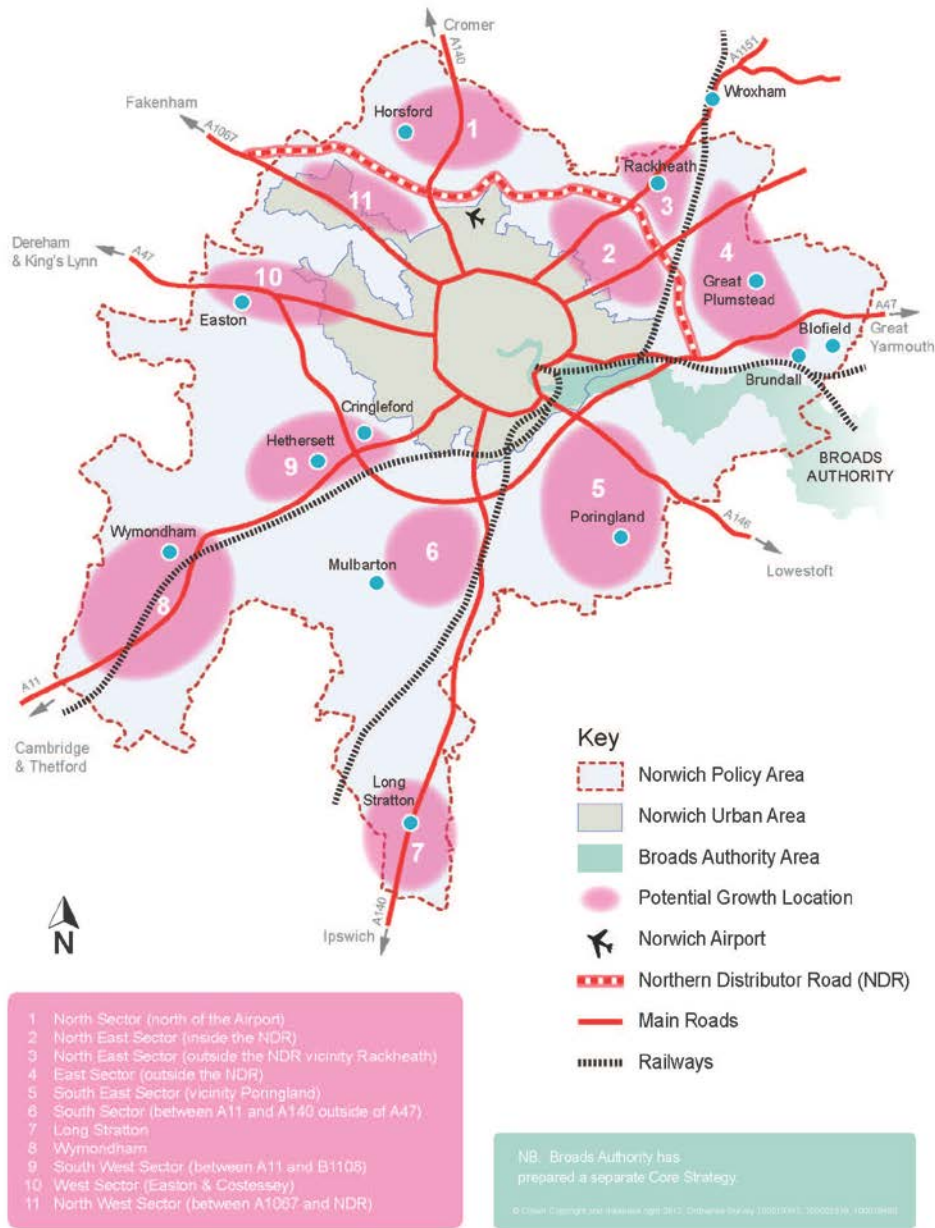


Figure B: Option 1

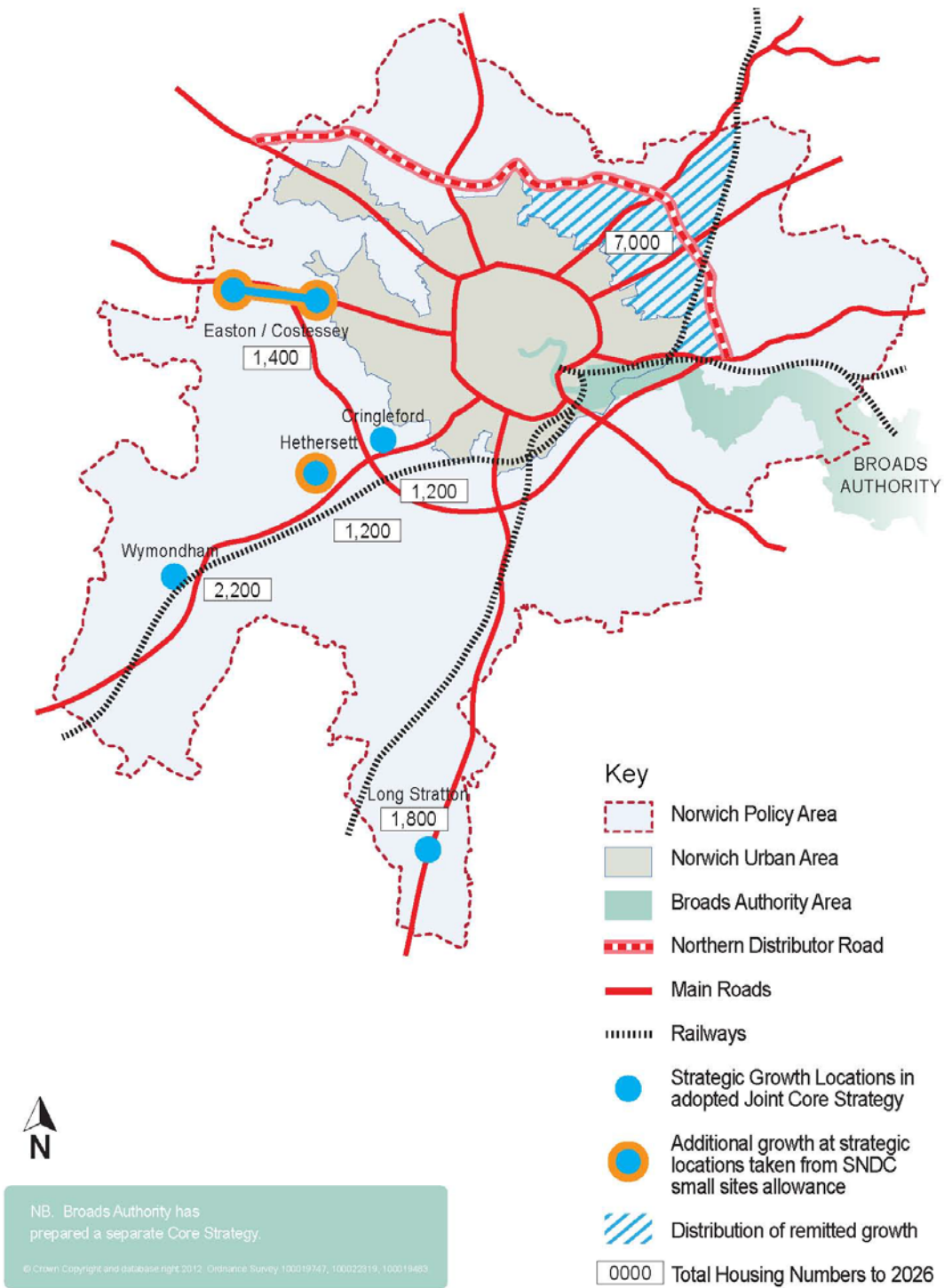


Figure C: Option 2

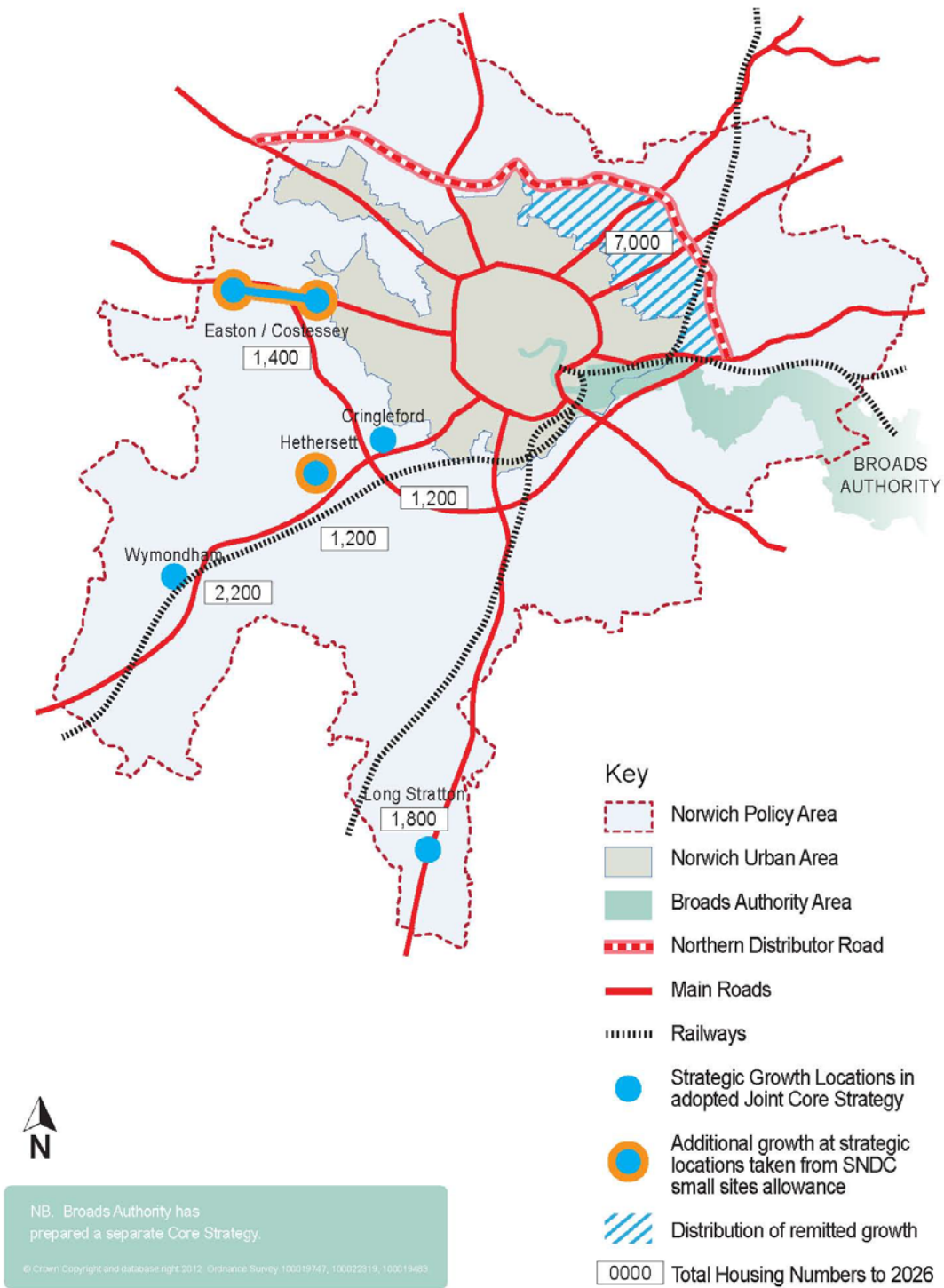


Figure D: Option 3

