

Greater Norwich Local Plan

Sustainability Appraisal Scoping Report: Report of Officer Responses to Representations Received

December 2016

The following table sets out the officer responses to representations submitted in response to consultation on the Greater Norwich Local Plan Sustainability Appraisal Scoping Report.

Reference	GNLP_SA_01
Respondent	Natural England
Officer Response	
<p>The 'Legislative Requirements' section will be amended to refer to the Birds Directive 2009/147/EC.</p> <p>The Sustainability Appraisal (SA) Scoping Report for the Greater Norwich Local Plan takes into account all relevant plans and programmes identified. Where relevant new plans and programmes emerge during the production of the SA these will be taken into account as appropriate.</p> <p>Figure 82 reflects the issues identified at the end of each thematic section. The summary of issues, and consequently table 82, will be amended broadly as recommended by Natural England. The SA intends to identify the significant effects resulting from cross-cutting issues as a result of the plan as part of its evaluation of its emerging policies. A new paragraph after 3.3.6 will be added to clarify the multi-functional benefits of a Green Infrastructure Network.</p> <p>SA Objectives</p> <p>Natural England's broad support for the over-arching objective is noted. Whilst it is recognised that for some objectives a number of issues have been identified it is not considered necessary to further sub-divide these objectives.</p> <p>The decision making criteria for: Air Quality; Health; Biodiversity; Geodiversity and Green Infrastructure; and, Landscape will be amended broadly in line with Natural England's proposed changes, although it considered that in some instances the suggestions are repetitive e.g. the proposed issues suggested for Biodiversity and Housing. For the sake of brevity this issues is proposed to be identified only once as an amendment to the issues under Biodiversity, Geodiversity and Green Infrastructure.</p> <p>An amendment to Transport and Access to Services will be included, however, it should be noted that the GNLP does not represent the Transport Strategy for Greater Norwich, which remains separate and within the legal competence of Norfolk County Council as Highway Authority not the Greater Norwich districts. Thus the key issue issue for the GNLP SA will relate to transport infrastructure which is a direct consequence of development promoted within the plan and transport issues related to the scale and distribution of development not wider transport policy or issues, which likely falls outside the scope of this plan.</p> <p>The comments provide in relation to Water efficiency appear to be more directed to policy development rather than evaluating the effects of the GNLP or monitoring the Sustainability Baseline and will be considered in this context.</p>	

Monitoring Indicators

Biodiversity

It is accepted that the current indicators for biodiversity are not directly related to the likely impacts of the plan. However, they are useful information giving an overview of the state of important sites and are thus considered to remain appropriate as part of the monitoring framework.

The suggested indicator relating to adverse impact on sites of acknowledged biodiversity importance is not considered appropriate as currently written because it will be a development not be an application that will have an impact on biodiversity nor does it seem useful to measure effects which might be minor and fully mitigated. In the spirit of the proposed modification it is suggested that a better worded indicator would be *“Number of Planning Approvals granted contrary to the advice of Natural England or Norfolk Wildlife Trust (on behalf of the County Wildlife Partnership) or the Broads Authority on the basis of adverse impact on site of acknowledged biodiversity importance”*.

There are significant concerns with the other two proposed indicators for Biodiversity. This is on the basis of the inherent complications with the proposed approach and resultant potential to give a false perception of success or failure. Issues that are likely to arise from the advocated approach are how to compare biodiversity enhancements for abundant species such as blackbirds, which may see a net benefit as a result of garden land and recreational open space through new development, against the loss of habitat for less abundant species, such as sky larks as a result of the loss of agricultural land. Similar issues arise in terms of measuring hectares of biodiversity habitat. Consequently it is not considered appropriate to add this indicators to the SA report at this stage, although if a solution to these issues can be found then the indicators could be introduced at a later stage.

Landscape

The indicator “percentage of new and converted dwellings on Previously Developed Land” for monitoring landscape impact was proposed on the basis that the effective use of previously developed land, which is mainly to be found in built up areas, is likely to be effective in terms of minimising impacts on landscape sensitivities. It is considered to remain appropriate to monitor landscape impact, in part, by using this indicator.

Natural England’s alternative indicator of “new development within the setting or on the boundary of the Broads with commentary on likely impact” is considered somewhat unwieldy, with the potential for quite long commentaries on how the extent of landscape impact was evaluated. The indicator is also somewhat imprecise it does not define what would be considered to be “within the setting” of the Broads. Consequently it is suggested this issue is addressed by the following indicator, which is considered to retain the spirit of Natural England’s intention:

“Number of Planning Approvals granted contrary to the advice of the Broads Authority on the basis of adverse impact on the Broads landscape”.

Green Infrastructure

Natural England’s propose monitoring the “number of planning approvals that generated loss of existing strategic Green Infrastructure”. There are however concerns that this will be impractical as a measure due to both difficulty of establishing a reliable baseline and effectively defining what could be termed “strategic green infrastructure”. Consequently it is not considered that it would be appropriate to incorporate this indicator at this stage. Notwithstanding the above, if a solution to these issues can be found then the indicators could be introduced at a later stage.

The proposed indicator “percentage of the population living within 400 metres of a natural green space” is considered to have some merit. As currently drafted however it is not well related to the effect of the plan and it is imprecise in terms of what would be considered to be a natural green space. Therefore it is proposed that the following indicator be used which addresses some of these concerns but retains the spirit of the new indicator: “Percentage of allocated residential developments sites, or sites permitted for residential development of 10 or more homes, that have access to a semi-natural green space of at least 2ha within 400m”.

There are also concerns with the proposed indicator monitoring the “length of new greenways constructed or protected”. This is again because it is to some degree imprecise as it does not necessarily directly relate to the plan, the overall state of any greenway network and could give a false impression i.e. Xkm of greenway “protected” but against no pressure for its loss. Therefore it is proposed that the following indicator be used which addresses some of these concerns but retains the spirit of the new indicator: “length of new greenway (defined as a shared use, car-free off-road route for a range of users and journey purposes) provided as a consequence of a planning condition, S106 obligation or CIL investment”.

The final suggested indicator “hectares of accessible open space per 1,000 population” would have benefit in terms of the overall state of the sustainability baseline, but as currently written could make it difficult to ascertain the relative success of the plan e.g. quantitative losses or gains as a result of new development would be masked as a result of being averages across the whole population. Therefore it is proposed that a better indicator for the plan in the spirit of what is proposed would be “Total hectares of accessible public open space (cumulative) provided as a consequence of a planning condition, S106 obligation or CIL investment within the plan period”.

Soils

The proposed monitoring indicator for soils appears generally appropriate although data is generally available on the occurrence of Grade 3a agricultural land. Consequently it is suggested that, unless a reliable source of information on the abundance of Grade 3a can be found, that it is not included in the monitoring

target. It is also likely to be more user friendly to relate the indicator to allocation or “Percentage of land allocated for development or subject to an extant planning permission for 5 or more dwellings that is of identified as Grade I or II agricultural land value”

Habitat Regulations Assessment

As per Natural England’s expectations, a separate Habitats Regulations Assessment (HRA) is being undertaken for the Greater Norwich Local Plan, and the recommendation of this assessment will be used to inform the Sustainability Appraisal.

Reference	GNLP_SA_02
Respondent	Environment Agency

Officer Response

As recently agreed with the Environment Agency, there will be a level 1 SFRA for the whole of Norfolk. This will address fluvial and surface water flood risk issues taking account of climate change. A level 2 SFRA will be undertaken if development is proposed in areas where there is a requirement for the exceptions test to be undertaken.

Policy alternatives for climate change mitigation and adaptation will be developed as part of the plan making process and considered within the SA report. The potential for an increase in frequency and intensity of extreme weather events is identified as a climate change issue in section 2.5.

In accordance with the request of the EA further emphasis will be added to Section 5 of the SA report to specifically address the Anglia River Basin Management Plan, and its 2015 update. Specifically, paragraphs 5.2.7 and 5.2.9 will include an explanation of the role of the Anglian River Basin Management Plan (RBMP), the role of the Broadland catchment partnership and the need to consider impact on an area wider than the GNLP covers. A paragraph will be added to the baseline to summarise the issues in the Broadland rivers catchment, and an issue will be added to consider the measures of the RBMP and the issues in the Broadland Rivers Catchment Plan. See actions.

Whilst the overarching objective for SA16 is considered to remain appropriate, dealing with both water quality and the efficient use of water, to address the issue raised by the EA a new bullet point will be added to the decision making criteria asking the question “will it contribute to achieving the River Basin Management Plan actions and objectives”.

To address issues raised by EA in regards to recognising the importance of other water courses alongside the Wensum, paragraph 5.3.15 will be broadened as recommended.

Reference	GNLP_SA_03
Respondent	Campaign to Protect Rural England (CPRE) (Norfolk)

Officer Response

Covering email

National Planning Practice Guidance clearly states that “*Plan makers should not apply constraints to the overall assessment of need*” (for housing). This includes things such as environmental constraints”. This does not mean that environmental constraints are not an essential consideration in plan making, nor that where there are very significant detrimental impacts, or insurmountable local constraints, that the overall need must always be met. It does, however, mean that the starting point for any local plan making process should be to evaluate whether the overall need for development, as established through relevant fact finding and research studies, can reasonably be met.

It is not within the remit of the SA scoping report to consider the Greater Norwich Local Plan (GNLP) policy alternatives, including how it proposes to deal with the need for development, the retention of the NPA/RPA, the settlement hierarchy or a potential green belt. Policy alternatives will be developed as part of the plan making process and considered appropriately in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. For the purposes of transparency it should be noted that, to date, whilst a number of issues exist, no constraints have been identified which are considered to indicate that Greater Norwich will not be able to accommodate its need for development.

The Strategic Housing Market Assessment (SHMA), which identified the need for housing, was produced in accordance with accepted practice. The robustness of the assessment will be tested through an independent examination and stakeholders will have the opportunity to comment on the robustness of the housing figures during the production of the GNLP.

Independent Inspectors have obligated South Norfolk and Broadland to review their current local plans by 2020 and 2021 respectively. For the reasons set out above, these local plans must consider if and how the objectively assessed need for development can be met. Therefore the Council’s consider it untenable to adopt an approach where they refuse to plan for growth until existing commitments are developed. In reality, should the Councils refuse to plan for identified development needs new development would still come forwards as planning applications. In the absence of a coherent strategy the Councils’ would be less able to effectively manage this development in a manner which best aligns with the availability of infrastructure and services.

Section 2: Climate Change (and Flood Risk)

CPRE’s statement that there is no issues list at the end of section 2 is incorrect. The issues relating to section 2 are set out in paragraph 2.5 of the scoping report.

Bullet point of 2.2.2 is considered to be an accurate reflection of the core policy set out in paragraph 100 of the NPPF. The procedures for avoiding flood risk both within the JCS, and in general across the planning function of the Greater Norwich Authorities is considered effective. The CPRE offer no evidence of their assertion to the contrary. It should be noted that there will be an update to the Strategic Flood Risk Assessment (SFRA) for Greater Norwich will be prepared during the production of the GNLP: there will be a level 1 SFRA for the whole of Norfolk. This will address fluvial and surface water flood risk issues taking account of climate change. A level 2 SFRA will be undertaken if development is proposed in areas where there is a requirement for the exceptions test to be undertaken. Notwithstanding the above, it is not within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and the CPRE will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

There is no justification provided that would support the CPRE's opinion that incorporating site allocation into a local plan would risk only a superficial attention to environmental considerations, such as flood risk and water supply". Sites will be allocated following an evaluation which will consider all relevant matters. The reasoned justification for the selection of site allocations and reasonable alternatives, including support site evaluations will be set out at future points of the plan making process and the CPRE will have an opportunity to make representations should they consider this to be flawed.

Section 3: Biodiversity, Geodiversity, and Green Infrastructure

The importance of water quality in terms of biodiversity is set out in 3.3.1 and 5.3.15. The requirements of the WFD is specifically identified in paragraph 5.2.2. The issues relating to recreational pressure is set out in paragraph 3.2.19. Issues relating to water abstraction to serve new development, whilst protecting environmental interests, specifically the River Wensum SAC is set out in paragraph 5.3.7. Therefore the broad range of the interrelated issues between biodiversity, water and housing are considered to be covered by the SA scoping report. The matters identified in paragraph 3.5 are considered to accurately reflect the key biodiversity issues for the plan whilst reflecting the hierarchy of international, national and locally designated sites ensuring that protection is commensurate with their status and gives appropriate weight to their importance.

Notwithstanding the above the reference in 5.3.15 will be broadened to regards to recognising the importance of other water courses alongside the Wensum

Section; 5 Water

The SA scoping is considered to effectively set out the key range of issues in regards to water. Notwithstanding the above, the first bullet under paragraph 5.5 will be broadened to more explicitly reference the range of factors set out by the CPRE.

The relocation of the Costessey abstraction point was determined to be an effective solution to the issues confronted within the area. This solution was

establish through Anglian Water's Water Resource Management Plan (WRMP), which was developed in discussion with statutory regulators and subject to all necessary environmental assessments. The GNLP SA Scoping recognises this reality.

In regards to water efficiency policies, it is not within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and the CPRE will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

Whilst CPRE suggest Long Stratton is one "of many" cases where the capacity of waste water treatment works will constraint planned growth, no other examples are actually cited. All of the allocations made in accordance with the requirement of the JCS, including the Local Stratton area action plan were subject to Independent Examination and found to be an appropriate basis on which to plan for the area. Considerations at the examination included deliverability.

Section 12: Transport and Access to Services

The local context section accurately describes the transport plan, its objectives and the key issues for Greater Norwich. Major road schemes do form part of this strategy and these are listed in the first three bullet points under 12.2.10. Norfolk County Council, as Highway Authority, are investigating the potential for a "western link" between the A1067 and A47, however this does not form part of the adopted local transport plan, or Norwich Area Transport Strategy. Consequently it is not reflected in the Local context section.

Whilst road scheme are a key part of the transport plan, it is not true to say that they are its sole focus. For example, 12.2.11 identifies that "promoting active and healthier travel options for short journeys to schools, services and places of employment" is also a specified transport plan priority. Paragraphs 12.3.13 to 12.3.18 details actions undertaken or underway to improve cycling facilities, public transport services and the city centre.

The importance of connections to the countryside for health and wellbeing is accepted. To this end a further issue will be added to Health section of the SA at paragraph 9.5: **"it will be important to maintain and enhance links to the countryside and semi-natural open spaces to encourage physical activity and mental well-being"**.

CPREs comments in regards to the desirability/need for the western link are noted. The Highway Authority will continue to consider options for a western link as part of the evolution/revision of their transport plan. The GNLP will react as appropriate to the Western Link if and when further progress is made. It is not within the remit of the SA scoping to consider how the GNLP will react to the Western Link. Policy alternatives will be considered in later iterations of the SA and the CPRE will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

Section 14 Employment and the Economy

The general approach to assessing the need for development is addressed in the response to CPREs covering email. For the sake of brevity this discussion is not repeated here. The jobs ambitions of the LEP economic plan and Greater Norwich City Deal are relevant to the development of the GNLP, and are appropriately taken into account in the SMHA. It is not within the remit of the SA scoping to consider the GNLP policy response to these matters. Policy alternatives will be considered in later iterations of the SA and the CPRE will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

Reference	GNLP_SA_04
Respondent	Cllr A Boswell (Green Party Norfolk County Council)

Officer Response

The purpose of the SA Scoping is not to address the decision making processes as they relate to the production of the GNLP. However, for the sake of clarity, it should be noted that the SA Scoping Report was considered by Broadland District Council's Place Shaping Committee, Norwich City Council's Sustainable Development Panel and South Norfolk Council's Cabinet prior to its publication. All of these meetings were held in public. The revised scoping report, amended as appropriate taking account of representations will also be reported to the appropriate committee of each of the councils.

The concerns raised about the scoping report exaggerating, or misrepresenting the Councils achievements in relation to the success of the environmental policy are noted. Every effort is made to ensure information provided is reliable. Where concerns have been raised with a specific statement then these will be addressed in this response.

It is agreed that the SA should appraise and document the significant effect of the Greater Norwich Local Plan in an honest way and every effort will be made to do so. To this end an expert consultant, LEPUS, has been appointed to advise on the production of the SA including reviewing alternatives, verifying appraisals and ultimately preparing the final SA report to accompany submission of the final plan for independent examination.

Energy

Whilst it is accepted that energy is an important issue it is not considered that it is necessary to identifying energy as a separate section, as issues can be appropriately identified within the climate change chapter.

Air Quality and Noise

The heading to the Air Quality and Noise section will be amended to read **“International and National”** as suggested.

The national context section will be amended to identify the implications of the 2015 Supreme Court and 2016 High Court judgements related to Air Quality as set out in the proposed actions below.

Issues relating to the impact of (poor) air quality on human health will be added to Section 9 Health as set out in the proposed actions below.

As suggested, regard will be given to the Mayor of London's Clean Air Action Plan in developing the policies of the GNLP. It is not, however, within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are

evaluated in the SA report. It should be noted that it will be more appropriate to address certain matters relating to Air Quality during a review of the Transport Plan or Norwich Area Transport Strategy.

Paragraph 1.3.1 of the SA report does acknowledge that road infrastructure changes along with longer term measures such as travel planning (emphasis added) are necessary to address the air quality issues. Notwithstanding the above paragraph 1.3.1 will be amended as set out in the actions section to reflect concerns raised.

The further measures, that in the respondent's view, may reap rapid enhancements and sustained improvements to air quality, are not those which can be addressed through a Local Plan e.g. greater priority for bus emission standards in awarding contracts for bus services.

It is noted that the respondent wishes to see more stringent targets be put in place in regards to NO₂ levels and Particulates (PMs). At the scoping stage it is considered inappropriate to set out targets, as this is a matter that would be more appropriate to address through a review of the Transport Plan, Norwich Area Transport Strategy and/or City of Norwich Air Quality Action Plan. These are the plans which cover the largest range of issues that will affect the Norwich AQMA. Notwithstanding the above, Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP, whether they consider there are any omissions from policy and how they are evaluated in the SA report.

The first bullet point under 1.4 will be amended to remove the generalised reference to air quality across the Greater Norwich area as set out in the actions section below.

Climate Change

The heading to the Climate Change section will be amended to read "International and National" as suggested.

It is unclear what is meant by making use of the UK Climate Change Act CCA in a "creative way". It is the intention of the SA scoping report to establish the relevant legislative and policy context in which the GNLP is being produced in so far as it relates to the assessment of significant effects of the plan on Social, Environmental and Economic factors.

The respondents concern about referring to the 2020 target as "interim" it noted. It should be noted that it is also referred to as an interim target in DECCs Annual Statement of Emissions for 2014, published in March 2016. Also this statement refers to the reduction required by 2020 (relative to 1990 levels) being 34% rather than the 35% reduction stated on the Committee on Climate Change website. The Planning Policy Guidance also refers to 34%. Notwithstanding this there is no objection to removing the interim reference and also providing further specificity in terms of the carbon budget for the periods 2018-2022 and 2023-2027. As such the current baseline section will be amended as set out in the actions. It should further

be noted that the reference to the reduction required by 2020 (relative to 1990 levels) being 34% is taken directly from the governments Planning Policy Guidance, which is of course different to the 35% reduction stated on the Committee on Climate Change website.

The request for the GNLP to enshrine the highest aspirations possible in terms of the local contribution to the CCA is noted. It is not, however, appropriate for the SA scoping to seek to establish the objectives, or policy ambitions of the GNLP. Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

It is recognised that some of the documents and strategies listed in the local context section are either dated, or have passed the stated lifespan. Nonetheless they remain document that have been produced and adopted by a relevant body in the recent past. Consequently it is considered to remain appropriate to reference these documents in the sections which sets out the local context.

The concern of the respondent in relation to Norwich City's support for the NDR is noted. This does not, however, indicated that, as part of the local context, Norwich City Council's Carbon reduction target should not be referenced as a relevant plan or programme for the purposes of the SA scoping report.

The concern that support for the NDR may have undermined local improvement to transport emissions is also noted. It is also true to say that the Examining Authorities Report acknowledged that the scheme would lead to an immediate and on-going increase in carbon emissions as compared with the 'Do-Minimum' scenario. However, the Examining Authority also noted that these increases may be mitigated in future by efficiency improvements promoted in future carbon budget rounds and that the evidence does not show that the impact of the scheme will, in isolation, affect the ability of the Government to meet its carbon reduction targets, nor the fulfilment of the overarching national carbon reduction strategy.

Taking the above points into account paragraph 2.39 will be amended to more fully explain the findings of the Examining Authorities in terms of the NDR, its effect on emissions and the relationship to the national carbon reduction strategy.

The reference to other transport scheme, which the respondent considers to be high carbon (A47 and Western Link), are noted. As evidence emerges in relation to the impact of these schemes then this can be related in future iterations of the SA scoping report.

As acknowledged in this proposed new text at 2.2.6 government is currently working on its emissions reduction strategy. This will set out how the UK intends to decarbonise, including in regards to transport, over the 2020s to meet its carbon budgets. In recognition of this emerging strategy a new issue is identified under 2.5.

Energy

It is noted that the respondent considers that current policy JCS3 should be formed into a scoping criteria, that policy should set a higher target and that there should be active promotion of certain technologies. It is considered to be inappropriate for the SA scoping report to use a current policy, that is under review, as a scoping criteria. As previously identified Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. It should be noted that it will be more appropriate to address certain matters relating to Air Quality during a review of the Transport Plan or Norwich Area Transport Strategy.

Baseline

It is noted that the respondent considers that there should be numerically credible carbon footprinting, carbon accounting and carbon appraisal underpinning policy development. In support of this position the respondent refers to statements made by Inspector David Vickery during the examination of the resubmitted JCS.

Whilst it is true to say that additional work was required to show the likely relative performance of reasonable alternative distributions in terms of vehicle (road transport) emissions, this did not take the form of the numerical assessment suggested. Indeed within the document referred to by the respondent the Inspector acknowledges that the inappropriate use of numeric models could give rise to fictitious precision. This is within the part of the quote from the document omitted by the respondent in his representation.

Such work as may reasonably be required will be include in the SA report, and it is likely that this would include the type of analysis provided in the SA Report Addendum, September 2015, which was provided to meet the expectations of Inspector Vickery. However, it is not currently considered that a full numerical carbon assessment, as promoted by the respondent, is reasonably required as part of the Sustainability Appraisal of the GNLP.

The respondent's further comments in terms of the judicial review of the JCS as originally adopted are acknowledged. In particular the concern that alternatives were based on a singular model for transport. It is of course the case the relationship of the JCS to the proposed Norwich Northern Distributor Road was considered by Mr Justice Ousely as part of the judicial review. In particular Mr Justice Ousely concluded that it was for the highway authority to plan and promote the NDR through its plans and that as such there were no reasonable alternatives for the District Councils to consider, since transport was not within their statutory competence¹.

Moreover, Mr Justice Ousely suggests that It would be unwise, if not impossible, to create a coherent strategy for any plan if the proposals for major infrastructure were ignored¹.

¹ Approved Judgement, Heard V Broadland District Council, South Norfolk District Council, Norwich City Council, paragraphs 76, 79 and 78

The respondent asks how the potential for increased renewables will be realised and his concerns about biomass. As has been previously stated It is not considered to be within the remit of the SA scoping report to consider policy alternatives. Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. This will include policies related to renewable energy.

Finally, the concern that the importance of Climate Change is not properly reflected in the SA report is noted. Elsewhere in this response the proposed changes to the section on climate change has been sign posted, which have taken into account representations submitted. This includes an amendment to 2.2.2 quoting from the HM Government response to the Committee on Climate Change's progress report which acknowledges climate change "as one of the most serious risks we face.

Reference	GNLP_SA_05
Respondent	Cllr D Carlo (Green Party Norwich City Council)

Officer Response

Air Quality

The reference in paragraph 1.3.8 that air quality is likely to remain a major issue is not intended to suggest that air quality will continue to exceed nitrogen dioxide limits throughout the plan period but rather that, as a focus of travel movements, it is likely that continued monitoring and interventions will need to be made to ensure that there is no regression from the impact of planned actions.

The Council's note the comments in regards to the health impacts of particulate matter and a further paragraph will be added to the baseline in the Health section of the report to reflect this issue. See actions.

Whilst it is accepted that the impact of the GNLP in regards to air quality is an important consideration, the primary mechanisms through which issues of air quality addressed with be the Local Transport Plan and any related strategy of the Highway Authority, and through the measures identified within Air Quality Action Plans.

Climate Change

The climate change section will be revised taking into account this and other comments. See actions.

The comments made in terms of the current JCS objectives, and proposed replacement objectives in the GNLP are noted. It is not within the remit of the SA scoping to consider the GNLP objectives. Plan objectives will be considered evaluated against the SA framework in to help maximise benefits and minimise detrimental effects. Stakeholders will have the opportunity to both comment on the draft Objectives of the GNLP and how they are evaluated in the SA report.

The SA report includes a map of flood risk zones 2 and 3, which take account the effects of climate change and forms the current baseline for the plan. A stage 1 Strategic Flood Risk Assessment will be updated as part of the production of the GNLP and the implications of this update will be taken into account as part of plan production.

To give carbon emission greater prominence, paragraphs 2.3.8 and 2.3.9 and figures 12 and 13 will be moved to the beginning of the Baseline section to be renumbered 2.3.1 and 2.3.2.

Cllr Carlo's view that a plan is required to drastically reduce emissions in line with the legally binding Climate Change Act target of at least 80% on 1990 levels by 2050 (emphasis added) is noted. Whilst the CCA is clearly a relevant plan and programme it is not considered that the GNLP could reasonably be required under the Act to deliver a reduction commensurate with the CCA carbon budgets, which

are understood to be only binding at the national level. Indeed, given the defined scope of a Local Plan it would be unreasonable to expect it to achieve a target which relates to the full range of government policy.

The additional issues identified are noted. The second bullet under 2.5 is considered to sufficiently address issues related to coastal flooding.

It is considered that the proposed issue “The creation of infrastructure for facilitating the transition to zero carbon transport” could be more appropriately expressed if defined in relation to the forthcoming emissions reduction plan. Therefore an additional issue will be added along these lines.

The issue identified in relation to brownfield sites is considered better located within the natural resources, waste and contamination section. Therefore an addition is proposed to 13.5

Transport and Access to Services

The Highway Agency will be consulting on potential improvements to the A47 in the near future. This is a result of the recognition of issues that need to be addressed and the SA Scoping reports reference is considered to be appropriate in this context.

The reference to completion of the NDR means that as described in the Development Consent Order. For the avoidance of doubt there will be an amendment to the issues under 12.5. See actions.

The first three additional issues proposed are considered to be covered by the first issue under 12.5.

The third bullet point will be amended to reference local rail services.

The fourth bullet point addressed rural transport issues appropriately.

The final propose issue is not considered to be justified. It is not a foregone conclusion that economic development will be linked to the need to build additional roads. However, in certain circumstances it may be that this is the appropriate response and to address this as an issue would be presumptive. Notwithstanding it will be for the Highway Authority or Agency to promote major road schemes as part of their transport strategy.

Reference	GNLP_SA_06
Respondent	Norwich Green Party

Officer Response

The comments in regards to air quality and climate change are noted. As a result of representations on the plan, amendments have been made to a number of sections including air quality and climate change section.

Air Quality

Paragraph 1.3.1 identifies the air quality management area within Norwich. It is recognised that the national context section does not refer to the 2015 supreme court judgement or the 2016 high court judgement or their implications. Therefore The national context section will be amended to identify the implications of the 2015 Supreme Court and 2016 High Court judgements related to Air Quality as set out in the actions section.

The Council's note the comments in regards to the health impacts of particulate matter and a further paragraph will be added to the baseline in the Health section of the report to reflect this issue. See actions.

Whilst it is accepted that the impact of the GNLP in regards to air quality is an important consideration, the primary mechanisms through which issues of air quality addressed with be the Local Transport Plan and any related strategy of the Highway Authority, and through the measures identified within Air Quality Action Plans.

Paragraph 1.3.1 of the SA report does acknowledge that road infrastructure changes along with longer term measures such as travel planning (emphasis added) are necessary to address the air quality issues. Notwithstanding the above paragraph 1.3.1 will be amended as set out in the actions section to reflect concerns raised.

Climate Change

At 2.3.8 and 2.3.9 the report defers to DECC and ONS and ONS statistics on per capita emissions. Those statistics are considered reliable and, as stated in the report, show that there have been reductions in per capita CO2 emissions at all geographic levels.

Notwithstanding the above a series of amendments are proposed to the climate change section to take account of these and other comments. See actions. These amendments provide greater specificity about the carbon budget requirements, the Committee on Climate Changes 2016 progress report and governments response

to it and the findings of the NDR DCO examination in regards to emissions and the relationship of the scheme to carbon budget requirements.

The SA report includes a map of flood risk zones 2 and 3, which take account the effects of climate change and forms the current baseline for the plan. A stage 1 Strategic Flood Risk Assessment will be updated as part of the production of the GNLP and the implications of this update will be taken into account as part of plan production.

Housing

The Council's note the Green Party's desire to see all new building meet higher building standards. In the additional commentary provided in regards to climate change the Government's position in regards to the need to continue improving building standards is reflected. It should however be noted that the Deregulation Act 2015 (s43) amended the Planning and Energy Act 2008 so that local plan energy efficiency standards for housing will not be able to exceed building regulations. This is a further demonstration that it is not Government's intention that the challenge set by the Climate Change Act will be met across a range of policy stands, not just planning.

Notwithstanding the above, it is not within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and the Green Party will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

The issue identified in relation to minimising the release of greenfield sites is addressed by an additional issue set out under 13.5 the natural resources, waste and contamination section.

Transport

The objections in regard to the statements in relation to the NDR are noted but are considered to be an accurate reflection of the Transport Plan and Norwich Area Transport Strategy's position and intent. Therefore it is not considered that any change is necessary.

The reference to completion of the NDR means that as described in the Development Consent Order. For the avoidance of doubt there will be an amendment to the issues under 12.5. See actions.

The third bullet point under 12.5 is considered to sufficiently cover the necessary reference to walking, cycling and public transport.

People and Communities

The Green Parties comments in terms of community-led initiatives is noted. They are, however, felt to be more directly related to the form and remit of policies within the plan. Indeed, the concern raised in the response refers to an opportunity being missed to write important issues into planning policy. It is not within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and the Green Party will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

Health

It is accepted that, alongside access to health care services, strong communities, well-designed places and access to green spaces are important to health and wellbeing. Indeed the Sustainability Framework objective under SA8 specifically focuses on healthy lifestyles.

In particular, the importance of connections to the countryside and open spaces for health and wellbeing and that new development should contribute to active and healthy lifestyles is accepted. To this end two further issues will be added to Health section of the SA at paragraph 9.5, see actions.

Reference	GNLP_SA_07
Respondent	Cllr S Jackson (Green Party Norwich City Council)
Officer Response	
<p>It is agreed that town planning has a significant impact on the opportunities afforded to people. The sustainability appraisal would however be better described as a document which seeks to set a framework that enables the systematic appraisal of the significant environmental, social and economic effects of a plan (in order to help maximise benefits and minimise negative effects), rather than one that talks about the “tactics” of trying to achieve sustainability.</p> <p>The draft SA Framework, with modifications as a result of consultation, is considered to be suitable for this purpose.</p> <p>The issues section has been amended to provide more detail around air quality, see actions. In addition the Sustainability Appraisal Framework, under SA1, will require local plan policies to be assessed as to their significant effects in relation to the objective to “minimise air, noise and light pollution to improve well-being.</p> <p>The issues section has been amended to provide more detail around climate change, see actions. Under SA2 policies will be assessed as to their significant effects in relation to the objective to “Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change”. Specific decision making criteria include whether a policy would support decentralised and renewable energy generation. It should however be noted that the Deregulation Act 2015 (s43) amended the Planning and Energy Act 2008 so that local plan energy efficiency standards for housing will not be able to exceed building regulations.</p> <p>Under SA12 policies will be assessed as to their significant effects in relation to the objective to “Reduce the need to travel and promote the use of sustainable transport modes”.</p> <p>Under SA8 policies will be assessed as to their significant effects in relation to the objective “To promote access to health facilities and promote healthy lifestyles”.</p> <p>Under SA9 policies will be assessed as to their significant effects in relation to the objective “To reduce crime and the fear of crime”, with a specific decision making criteria being “Will it help design out crime from new development?”</p> <p>In doing so the evaluation of the significant effect of policies against the SA Framework will address exactly the issues raised in the representation.</p> <p>The objection to the NDR as part of a sustainable transport strategy is noted. It is however considered to be an accurate reflection of the Transport Plan and Norwich Area Transport Strategy’s position and intent. Therefore the situation is deemed to have been appropriately reflected in the SA Scoping Report.</p>	

Reference	GNLP_SA_08
Respondent	Hempnall Parish Council

Officer Response

National Planning Practice Guidance clearly states that “*Plan makers should not apply constraints to the overall assessment of need*” (for housing). This includes things such as environmental constraints”. This does not mean that environmental constraints are not an essential consideration in plan making, nor that, where there are very significant detrimental impacts, or insurmountable local constraints, that the overall need must always be met. It does, however, mean that the starting point for any local plan making process should be to evaluate whether the overall need for development, as established through relevant fact finding and research studies, can reasonably be met.

It is not within the remit of the SA scoping report to consider the Greater Norwich Local Plan (GNLP) policy alternatives, including how it proposes to deal with the need for development or the retention of the NPA/RPA or the settlement hierarchy. Policy alternatives will be developed as part of the plan making process and considered appropriately in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. For the purposes of transparency it should be noted that, to date, whilst a number of issues exist, no constraint has been identified which are considered to indicate that Greater Norwich will not be able to accommodate its need for development.

The Strategic Housing Market Assessment (SHMA), which identified the need for housing, was produced in accordance with accepted practice. The robustness of the assessment will be tested through an independent examination and stakeholders will have the opportunity to comment on the robustness of the housing figures during the production of the GNLP.

Landscape impacts will be one of a number of key considerations. Section 4 of the SA Scoping Report deals specifically with landscape issues, and the Sustainability Appraisal Framework contains a specific objective relating to Landscape. Policies of the emerging local plan will be assessed against the SA Framework to establish any significant effect and to help maximise benefits and minimise negative effects. One of the specific decision making criteria under the landscape objective is to minimise impact on landscape character.

Reference	GNLP_SA_09
Respondent	Historic England

Officer Response

Regard will continue to be had to published guidance on the Sustainability Appraisal (SA) during its production, this will include the guidance published by Historic England.

Built Heritage

The heading of section 6 will be changed to Historic Environment

Key Plans and Programmes

Relevant ‘Plans and Programmes’ will continue to be reviewed during the production of the SA, including those listed by Historic England, and taken into account a future iterations to be published at the same time as the issues and options consultation on the Greater Norwich Local Plan (GNLP) and the final report to be published alongside the submission of the GNLP for Independent Examination.

Baseline Information

Both statutory Historic Parks and Gardens and Locally Designated Historic Parks and Gardens are identified and mapped in Section 4: Landscape. See paragraph 4.3.7 and figures 29-32.

Section identifies mapped information on locally designated heritage assets as a key data limitation. This continues to be the case. Area which may have the potential for historic or archaeological interest which are currently unidentified is another, not currently unacknowledged, data limitation. As part of the production of the SA for the GNLP work will towards addressing current data limitations in future iterations of the SA. The data limitation section will be amended reflect unidentified heritage assets.

Conservation Area Appraisal and Management Plans, Local Lists and Historic Characterisation Assessment, where available, will be taken into account as appropriate when policies are evaluated against the SA Framework.

Key Sustainability Issues

The issues identified will be added under 6.4 where appropriate, see actions. It should be noted that landscape issues are considered in section 4 of the report not in section 6. Therefore issues relating to the historic landscape will be dealt with in that section.

Figure 82 is a summary of all of the issues identified throughout the report. The SA Framework includes objectives on Cultural Heritage, this will be amended to refer

to the Historic Environment. The appraisal of policy alternative will consider the significant effects of the plan, both positive and negative, in relation to the SA objectives. This process will help benefits of the plan to be maximised and detrimental effects minimised. It is through this process that opportunities offered by the historic environment can be established and any benefits maximised.

The Sustainability Framework

SA13 will be retitled Historic Environment

The overarching objective will be revised taking into account Historic England's comments

The word "designated" will be deleted from the first bullet point of the decision making criteria under SA13.

Relevant stakeholders will be engaged during the production of the Greater Norwich Local Plan, this engagement will include, as appropriate local conservation officers, archaeological officers and local heritage groups.

Reference	GNLP_SA_10
Respondent	Norfolk County Council

Officer Response

The Greater Norwich Local Plan will appropriately consider infrastructure issues, and these issues are covered in a proportionate manner within the SA scoping report. Specifically SA Objective 12 addresses transport issues. Green Infrastructure is already considered to be adequately addressed under objective SA3. An additional criteria will be added to SA14, see actions. The objectives and decision making criteria relations to SA5, SA6 and SA8 are considered to adequately address likely Adult Social Care requirements. SA10 directly deals with education.

Section 4 will be retitled Historic Environment.

Reference	GNLP_SA_11
Respondent	A Member of Wensum Valley Alliance (WVA)
Officer Response	
<p>The consultation on the scope of the Sustainability Appraisal (SA) exceeded the legal obligation. The Councils are only obliged to consult with Natural England, the Environment Agency and Historic England on the scope of the SA. A full public consultation on the Greater Norwich Local Plan, accompanied by an interim sustainability appraisal, will be undertaken in due course and all stakeholders will have the opportunity to response to both the emerging policy alternatives and how they are being appraised through the SA at this point.</p> <p>National Planning Practice Guidance clearly states that “<i>Plan makers should not apply constraints to the overall assessment of need</i>” (for housing). This includes things such as environmental constraints”. This does not mean that environmental constraints are not an essential consideration in plan making, nor that, where there are very significant detrimental impacts, or insurmountable local constraints, that the overall need must always be met. It does, however, mean that the starting point for any local plan making process should be to evaluate whether the overall need for development, as established through relevant fact finding and research studies, can reasonably be met.</p> <p>The Strategic Housing Market Assessment (SHMA), which identified the need for housing, was produced in accordance with accepted practice. The robustness of the assessment will be tested through an independent examination and stakeholders will have the opportunity to comment on the robustness of the housing figures during the production of the GNLP. Further evidence is being development in respect to the land requirements for employment land.</p> <p>It is not within the remit of the SA scoping report to consider the Greater Norwich Local Plan (GNLP) policy alternatives, including how it proposes to deal with the need for development, transport (in so far as transport matters fall within the remit of the local plan). Policy alternatives will be developed as part of the plan making process and considered appropriately in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. For the purposes of transparency it should be noted that, to date, whilst a number of issues exist, no constraint has been identified which are considered to indicate that Greater Norwich will not be able to accommodate its need for development.</p> <p>The reference to completion of the NDR means that as described in the Development Consent Order. For the avoidance of doubt there will be an amendment to the issues under 12.5. The Greater Norwich Local Plan will have regard as appropriate to the progress of current investigation into the Western Link during the production of the plan.</p> <p>Figure 19 shows SSSIs, Figure 20 shows CWS, as well as National Nature Reserves, Local Nature Reserves, Roadside Nature Reserves. Figure 30 shows</p>	

ancient woodlands. Whilst these are at a large scale they include all relevant designated sites.