

Non-Technical Summary

Introduction

The Greater Norwich Joint Core Strategy (JCS) is currently being prepared by the Greater Norwich Development Partnership (GNDP) on behalf of Norwich City Council, Broadland District Council and South Norfolk District Council.¹ Scott Wilson is commissioned by the GNDP as independent consultants to undertake a Sustainability Appraisal (SA) of the JCS. The SA seeks to identify the economic, social and environmental impacts of the emerging JCS and suggest ways to avoid or minimise negative impacts and maximise positive impacts.

The JCS is now nearing completion and the point when it will be submitted to Government for approval. The latest version of the JCS is known as the pre-submission version. This SA Report sets out SA findings relating to the Pre-Submission JCS. This SA Report has been taken into account by the GNDP as they have finalised the Pre-Submission JCS. It is also aimed at a wider audience so that it can be read alongside the Pre-Submission JCS and so help consultees to make more informed responses. In these ways it can be seen that the SA seeks to ensure that the plan-making process is suitably scrutinised. Following the consultation, the GNDP will look to openly and transparently finalise the JCS taking account of consultation responses as well as the findings of the SA. It is also important to note that this is not the first stage of SA, but rather SA was also used as a tool to challenge the plan-making process at earlier stages of plan production.²

The SA has essentially involved testing the performance of the plan against a series of 21 aspirational sustainability objectives. As well as simply setting out to identify positive and negative effects with respect to individual objectives, a key aim of the SA is to highlight instances where the plan results in tensions between objectives (for example, there can often be tensions between environmental and economic objectives) and where implementation of the plan may mean that one objective must be 'traded-off' against another.

Where the SA has identified the potential for negative effects or tensions between objectives recommendations have been made that might improve sustainability performance. These recommendations are designed to 'challenge' the plan-makers and increase the transparency of the plan-making process. The Greater Norwich Development Partnership is incorporating as many of them as it can, but if a recommendation is not accepted it does not imply the JCS is "unsound" without the change. The GNDP is having to balance a range of interests, and take into account a range of evidence (of which the SA is only one element) as it determines the most appropriate approach to growth in Greater Norwich.

It is also important to note that the 21 SA objectives were developed following a consideration of local sustainability issues at the SA 'scoping stage'. A range of evidence was considered as part of the Scoping Stage, including evidence from a review of those Policies, Plans, Programmes, Strategies and Initiatives (PPPSIs), produced at all scales from the national down to the local, which set the 'sustainability context' for the JCS. The scoping stage was primarily undertaken in 2007, and resulted in the publication of a Scoping Report. However, further scoping has also been undertaken to inform this latest iteration of the SA, reflecting the fact that a range of new evidence has come to light since 2007 that changes our understanding of the sustainability context.

¹ Norwich City Council, Broadland District Council and South Norfolk District Council are each developing their own individual Local Development Framework, but have chosen to develop and adopt a *joint* Core Strategy (the JCS).

² In particular, SA findings were made available alongside the Issues and Options and Regulation 25 Consultation Versions of the JCS.

The **Table** below sets out the objectives identified for the SA of the JCS. These objectives should ensure that the assessment is focused on only those effects that are most likely to be significant. To further focus the scope of the assessment a number of additional decision-making criteria in the form of questions / prompts were also developed at the scoping stage.

SA objectives and sub-objectives

Environmental objectives:	
ENV 1 To reduce the effect of traffic on the environment.	<p>Will it reduce traffic volumes, ease the flow of traffic and reduce congestion?</p> <p>Will it increase the proportion of journeys using modes other than the car?</p> <p>Will it reduce the effect of HGV traffic on people and the environment?</p> <p>Will it encourage more benign modes of travel?</p> <p>Will new development be located such to reduce the need for people to travel?</p>
ENV 2 To improve the quality of the water environment.	<p>Will it improve the quality of the water environment (streams, rivers, lakes etc)?</p> <p>Will it help to support wetland habitats and species?</p>
ENV 3 To improve environmental amenity, including air quality.	<p>Will it improve air quality?</p> <p>Will it reduce the emission of atmospheric pollutants?</p>
ENV 4 To maintain and enhance biodiversity and geodiversity.	<p>Will it conserve / enhance natural or semi-natural habitats, and promote habitat connections?</p> <p>Is it likely to have a significant effect on sites designated for international, national or local importance?</p> <p>Will it conserve / enhance species diversity, and in particular avoid harm to protected species?</p>
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	<p>Will it protect and enhance the quality of landscapes, townscapes and countryside character, including the character of the Broads and its setting where relevant?</p> <p>Will it maintain and enhance the distinctiveness of the landscapes/townscapes and heritage?</p> <p>Will it reduce the amount of derelict, underused land?</p> <p>Will it protect and enhance features of historical, archaeological and cultural value?</p>
ENV 6 To adapt to and mitigate against the impacts of climate change.	<p>Will it reduce emissions of greenhouse gases by reducing energy consumption?</p> <p>Will it lead to an increased proportion of energy needs being met from renewable sources?</p> <p>Will it increase the capacity of the area to withstand the effects of climate change?</p>

	Will it ensure that the risks to lives, land and property are minimised?
ENV 7 To avoid, reduce and manage flood risk.	Will it minimise the risk of flooding to people and property? Can it incorporate new designs to adapt to possible flood risk? Will it promote the use of sustainable drainage systems to reduce run off?
ENV 8 To provide for sustainable use and sources of water supply.	Will it conserve groundwater resources? Will it minimise water consumption?
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	Will it minimise consumption of materials and resources? Will it promote the use of land in sustainable locations that has been previously developed? Will it use land efficiently? Will it minimise the loss of "greenfield" land? Will it avoid the loss of good quality agricultural land and preserve soil resources? Will it minimise energy consumption and promote energy efficiency? Will it promote the use of renewable energy sources? Will it lead to less waste being produced? Will it lead to less waste being disposed, by promoting more recycling and composting? Will it increase waste recovery for other means eg. Energy generation?
Social objectives:	
SOC 1 To reduce poverty and social exclusion.	Will it reduce poverty and social exclusion in those areas most affected? Will it help to reduce deprivation levels? Will it help meet the needs of residents most effectively?
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	Will it improve access to high quality health facilities? Will it encourage healthy lifestyles? Will it provide adequate health infrastructure for existing and new communities? Will the links between poorer health and deprivation be addressed? Will links to the countryside be maintained and enhanced?
SOC 3 To improve education and skills.	Will it improve qualifications and skills for both young people and amongst the workforce? Will it help to retain key workers and provide more skilled workers from school leavers? Will adequate education infrastructure be provided for existing and new

	<p>communities?</p> <p>Will it promote lifelong learning and skills training?</p> <p>Will links between lower levels of education and deprivation be addressed?</p>
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	<p>Will it increase the range of types, sizes and affordability of housing for all social groups?</p> <p>Will it reduce the housing need and ensure that housing provision addresses the needs of all?</p> <p>Will it provide the most appropriate solutions to address the housing requirements needed for creating sustainable communities?</p> <p>Will it make best use of existing housing stock?</p>
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	<p>Will it encourage engagement in community activities?</p> <p>Will it contribute to the achievement of a mixed and balanced community?</p> <p>Will it reduce actual levels of crime?</p> <p>Will it reduce the fear of crime?</p>
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	<p>Will it reduce unemployment overall?</p> <p>Will it help to improve earnings?</p>
SOC 7 To improve the quality of where people live.	<p>Will it improve the quality of dwellings?</p> <p>Will it improve the quality of local open space?</p> <p>Will it improve the satisfaction of people with their neighbourhoods?</p>
SOC 8 To improve accessibility to essential services, facilities and jobs.	<p>Will it improve accessibility to key local services and facilities (including health, education, leisure, open space, the countryside and community facilities)?</p> <p>Will it improve accessibility for all whilst reducing dependency on the private car?</p> <p>Will it improve access to jobs and services for all?</p>
Economic objectives:	
EC 1 To encourage sustained economic growth.	<p>Will it assist in strengthening the local economy?</p> <p>Will it improve business development and enhance competitiveness?</p> <p>Will it reduce vulnerability to economic shocks?</p> <p>Will it promote growth in key sectors?</p> <p>Will it increase vitality & viability of town centres and improve economic diversity?</p>
EC 2 To encourage and accommodate both indigenous and inward investment.	<p>Will it encourage indigenous businesses?</p> <p>Will it encourage inward investment?</p>

	<p>Will it make land and property available for business?</p> <p>Will it improve economic performance across the Greater Norwich area?</p> <p>Will it support / encourage rural diversification?</p> <p>Will it support / encourage small city businesses?</p>
EC 3 To encourage efficient patterns of movement in support of economic growth.	<p>Will it improve provision of local jobs?</p> <p>Will it improve accessibility to work, particularly by public transport, walking and cycling?</p> <p>Will it reduce journey times between key employment areas and key transport interchanges?</p> <p>Will it improve efficiency and sustainability of freight distribution?</p> <p>Will it support provision of key communications infrastructure?</p>
EC 4 To improve the social and environmental performance of the economy.	<p>Will it reduce the impact on the environment from businesses?</p> <p>Will it reduce the impact on residents from businesses?</p> <p>Will it attract new investment and skilled workers to the area?</p> <p>Will it maintain existing business and employment provision?</p> <p>Will it provide employment in the best locations to serve urban and rural residents?</p>

The SA objectives have been used to appraise the sustainability of the draft policies set out the in the Pre-Submission Joint Core Strategy. The policies are listed in the table below, and described in full in the Pre-Submission JCS Document.

Full list of preferred options / draft policies from the Pre-Submission JCS

Vision and objectives
The spatial vision
Spatial planning objectives:
Area wide policies
Policy 1 - Promoting sustainability and addressing climate change
Policy 2 - Promoting good design
Policy 3 - Energy, water and ICT
Policy 4 - Culture, leisure and entertainment
Policy 5 - Supporting communities
Policy 6 - The economy
Policy 7 - Housing delivery
Policy 8 - Access and transportation

Policies for places

Policy 9 - Strategy for growth in the Norwich Policy Area (NPA)

Policy 10 - Norwich City Centre

Policy 11 - The remainder of the Norwich urban area, including the fringe parishes

Policy 12 - Locations for major new or expanded communities in the Norwich Policy Area

Policy 13 - Main Towns

Policy 14 - Key Service Centres

Policy 15 - Service Villages

Policy 16 - Other Villages

Policy 17 - Smaller rural communities and the countryside

Policy 18 - The Broads

Policy 19 - The hierarchy of centres

A brief summary of appraisal findings is set out below. The appraisal was a qualitative exercise based on the professional judgement of Scott Wilson. However, where possible, judgements were made taking into account evidence gathered at the scoping stage as well as other evidence that has come to light more recently. It was also possible to take account of comments that were made as part of the Regulation 25 Public Consultation (Spring 2009) regarding previous Sustainability Appraisal findings.

Summary of appraisal findings

The Joint Core Strategy (JCS) essentially sets out a spatial strategy and a range of thematic policies to guide how the strategy is implemented. The spatial strategy and thematic policies have been developed with the aim of achieving an aspirational vision and set of objectives. The vision and objectives were themselves developed by the GNDP specifically for the purpose of the JCS, and so have been subject to SA. The appraisal found them to be appropriate and robust, predicting that they should go some way towards ensuring that the JCS capitalises on the opportunities that present themselves in Greater Norwich.

The JCS aims to implement the housing targets for the area set by the East of England Plan and a key task is to develop a spatial strategy for distributing this development. The proposed spatial strategy has been given particular attention through the SA as a result of the potential for significant sustainability effects and the likelihood of trade-offs having to be made between sustainability objectives. The proposed housing growth strategy essentially consists of:

1. Development within the existing built-up area of Norwich;
2. A new large-scale urban extension to the North East of Norwich;
3. Major expansion of a number of existing communities in South Norfolk; and
4. Lesser expansion of other communities

The first element of the strategy involves accommodating a considerable amount of development within the existing urban area of Norwich. This has been found to have a range of sustainability benefits, including making good use of previously developed land, reducing car dependency, supporting the continued prosperity of the City Centre as a whole; and supporting the regeneration of some specific areas that have been identified as being less prosperous.

The second element of the spatial strategy involves a major urban extension to the North-East of the City, based around two or three centres either side of the proposed Northern Distributor Road (NDR). This has also been highlighted as likely to have broadly positive sustainability effects. This is particularly the case as growth here should afford plenty of opportunities for accessing Norwich and major employment locations by sustainable modes of transport. Also, the scale / concentrated nature of the growth proposed here should mean that it should be possible to achieve a high degree of self-containment (e.g. employment, services and facilities will come forward as part of the development, and thus will be accessible to residents by walking or cycling). The SA does highlight that growth in such close proximity to the NDR may encourage car-based trips, but this potential negative effect is uncertain. The SA recommends that, when considering the case for the NDR, it should be possible to assume minimal use of this road by residents of the Growth Area.

The third element of the strategy has some of the most important implications in terms of sustainability effects and trade-offs. Many of the effects relate to the fact that there is little or no potential for an urban extension to the south similar to that which is promoted to the north (because of environmental constraints, in particular the floodplain of the River Yare), and so a much more dispersed approach to growth is promoted. Dispersing growth results in a number of sustainability considerations such as the potential effects on the receiving settlements (e.g. the character, distinctiveness and quality of the local environment); and the increased difficulty of achieving a degree of self-containment and providing attractive public transport options that encourage people to use their cars less. Another issue stemming directly from the dispersed nature of the growth relates to secondary school provision. There are a range of options that might meet educational requirements, but there is no single agreed plan at present. The current proposal is that options will be kept under review as part of the implementation plan of the Joint Core Strategy.

For the majority of these major growth locations the SA has not predicted significant negative effects that cannot be adequately mitigated through careful planning. Indeed, it is the case that many of the supporting policies within the JCS (discussed further below) should go some way to avoiding or mitigating potential negative effects and capitalising on specific opportunities. For example, policies recognise that both Long Stratton and Wymondham are historic settlements that sit within a sensitive landscape setting, and set out how negative effects can be avoided and the potential positive effects of growth realised.

Some of the most significant positive effects associated with the spatial strategy promoted for South Norfolk relate to the fact that much of the growth is concentrated in areas where there is good potential for encouraging sustainable patterns of travel by public transport to Norwich City Centre and the major employment locations (although not the same potential that exists with the urban extension to the North East). In particular, the SA notes that growth is focused along the A11 corridor (Wymondham, Hethersett and Cringleford) and at Costessey/Easton to the West, both of which are areas where there should be the potential to connect to Norwich via a 'bus rapid transit' service³ (although it is difficult to be completely certain about deliverability / financial viability at this stage).

However, one of the major growth locations – Long Stratton – does stand out as being less suited to encouraging more sustainable patterns of travel. This relates to the fact that Long Stratton is geographically isolated from Norwich and major employment locations in comparison to the other major growth locations; and to the fact that there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars. This is undoubtedly a significant negative effect of the spatial strategy, and probably the key issue that has been highlighted through this SA. However, it is important to bear in mind that the scale of growth promoted at Long Stratton (1,800 homes out of 14,200 that are promoted at major growth locations outside Norwich) is not such that these

³ A bus rapid transport service is essentially one that gives a considerable degree of priority to buses, rather than to cars, leading to attractive frequencies, reliability and journey times.

negative effects place in question the overall sustainability of the JCS in terms of achieving sustainable patterns of travel (and addressing climate change mitigation).

Furthermore, it is important to point out that, although there are some negative effects associated with growth at Long Stratton, there is the potential for significant positive effects. In particular, growth at Long Stratton is (in all likelihood) the only route in the short to medium term to securing funding for a bypass of the town. A bypass is strongly desired in order to reduce through-traffic and so bring about environmental improvements. The evidence does point to existing problems of environmental quality in the centre of Long Stratton, particularly in terms of air quality, and so there is some certainty that a bypass could lead to significant benefits. However, it is more difficult to say whether the 'local level' benefits associated with growth at Long Stratton outweigh the more 'strategic' disbenefits (as the GNDP consider to be the case). Irrespective of the answer to this question, there must be focused efforts to mitigate negative effects. The plan does set out the intention of delivering new services, facilities and employment opportunities in Long Stratton, ancillary to the housing growth, but a recommendation of the SA is that there is justification for going further, perhaps developing a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton.

In terms of the fourth element of the growth strategy, the SA has generally predicted positive effects. This conclusion relates to the broad implications of the settlement hierarchy that is proposed through the JCS (it has not been possible to consider each settlement individually in a similar fashion to the major growth locations). The hierarchical approach that is promoted should generally ensure that the amount of growth targeted to a settlement is directly dependent upon the size of the existing settlement, and, more specifically, the availability of local services, facilities and employment opportunities. This is a sensible approach that should help to reduce car dependency. However, it is noted that some smaller settlements (key service centres) may be required to deliver more houses than would ideally be the case taking into account access to local services, facilities and employment opportunities.

In terms of many of the other Policies that seek to guide *how* development should come forward, the SA is able to conclude that they generally represent a range of sensible proposals that will address many of the sustainability constraints and opportunities presented by the spatial strategy. These Policies have been developed taking account of a range of evidence base studies. There is a considerable emphasis on implementing the Green Infrastructure Strategy, and the findings of the Energy Study have largely fed through into Policy. The 'housing delivery' Policy is also carefully thought out, with considerable justification given regarding the approach that will be taken to delivering affordable housing. Reference to background evidence helps to increase the robustness of the policy-making process and demonstrate that Policies have been developed to address the issues that are specific to the Greater Norwich Area. Another example is the 'Economy' Area Wide Policy, which has a focus on developing the tourism, leisure, environmental and cultural industries. This is supported by a Policy that is devoted to capitalising on Norwich's regional role as a centre for 'culture, leisure and entertainment'. There is also a major focus on developing the 'knowledge economy', including through promoting a number of strategic employment locations (which are all well located, with good access to the major growth areas).

As a final point, it is important to note that, at the time of preparing this SA, the GNDP were still awaiting the publication of a study into Infrastructure Need & Funding. This will be a crucial part of the evidence base (that will be taken into account by the GNDP and can also inform SA). Another important evidence base study that was still unfinished at the time of preparing this SA was the Water Cycle Study Stage 2b.