

Annex 2:

- (a) Non-Technical Summary of Sustainability Appraisal for Site Allocations Development Plan Document (Land Use Consultants, June 2012).**

Non-technical Summary

What is the purpose of Sustainability Appraisal?

- 1 When preparing the Site Allocations and Site Specific Policies Development Plan Document (DPD) (hereafter referred to as the “Site Allocations DPD” for simplicity), Norwich City Council is required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA). The Government recommends that both SA and SEA are undertaken in one process to meet the legal requirements and this process is referred to as the “SA”, with the overall aim of achieving sustainable development.
- 2 The purpose of the SA was to assist Norwich City Council in preparing the Site Allocations DPD by identifying the key sustainability issues facing the city, to predict what would be the likely effects of the Site Allocations DPD on these issues, and to put forward recommendations to improve it. The aim was to ensure that the proposed Site Allocations have as many positive effects as possible, and that any potential negative effects are avoided if housing and employment development is delivered on the allocated sites.

What is in the Site Allocations DPD?

- 3 In addition to the Joint Core Strategy that covers Norwich along with Broadland and South Norfolk, Norwich City Council is continuing the approach of setting out local planning policies in two separate development plan documents:
 - The Site Allocations DPD, which contains detailed, site specific policies and proposals for sites where a change of use is anticipated.
 - The Development Management Policies DPD which sets out general policies to guide development, which apply across the whole city.
- 4 The Site Allocations DPD sets out detailed policies and site allocations to meet the level of housing, employment and mixed use development required over the plan period. It also includes sites where change of use is anticipated or proposed. The DPD allocates a total of 82 sites for development in the plan period for a mix of uses. Approximately 3,450 new units of housing and 7 hectares of employment land are proposed.

How was the Sustainability Appraisal carried out?

- 5 The SA of the Site Allocations DPD has been undertaken independently by consultants (LUC), with some input from Norwich City Council officers. Since 2010, LUC has provided advice to Norwich City Council during the preparation of the Site Allocations DPD.
- 6 The SA has comprised five main phases of work:

SA Stage A: Deciding the scope of the SA

- 7 The first stage of the SA process, setting the context and objectives, establishing the baseline and deciding the scope of the SA, was undertaken by Norwich City Council and presented in the 2009 Site Allocations DPD SA Scoping Report. The SA Scoping Report was published for consultation alongside the first Regulation 25 draft of the Site Allocations DPD (November 2009 – February 2010).
- 8 The Scoping Report presented the outputs of the scoping phase of the SA and development of the SA Framework (a set of sustainability objectives and criteria) against which the various components of the Site Allocations DPD have since been appraised. Two consultation responses were received from the RSPB and The Greenhouse Trust on the SA Framework following the publication of the SA Scoping Report. These comments have been taken into account in this SA report.

SA Stage B: Developing and refining options and assessing effects

- 9 Developing options for a plan is an iterative process usually involving a number of consultations with public and stakeholders. The SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. 'Reasonable alternatives' is a term used in the SEA Directive and Regulations, and is therefore legally required to be considered when preparing a plan. The options for the Norwich Site Allocations DPD included consideration of a range of potential sites for development. There have been a number of stages in developing and refining the site options as summarised below. More explanation about the actual site options is provided further on in this Non-technical Summary.
 - 'Call for Sites' (February to April 2009).
 - First stage of 'Regulation 25' (now known as Regulation 18) consultation: potential development sites (November 2009 to February 2010).
 - Second stage of 'Regulation 25' (now known as Regulation 18) consultation: shortlisted sites (January to March 2011).
 - Additional stage of 'Regulation 25' (now known as Regulation 18) consultation (July to September 2011).
 - Regulation 19 (Pre-submission) consultation (anticipated August to October 2012).

SA Stage C: Preparing the sustainability appraisal report

- 10 This SA Report details the process undertaken to date in conducting the SA of the Norwich Site Allocations DPD (Pre-Submission Version) as well as setting out the findings of the appraisal.

SA Stage D: Consultation on the Site Allocations DPD (Pre Submission Version) and this SA Report

- 11 Norwich City Council is inviting representations on the 'soundness' of the Site Allocations DPD (Pre Submission Version) and this SA Report in accordance with Regulation 19 of the Planning and Compulsory Purchase Regulations.

SA Stage E: Monitoring Implementation of the DPD

- 12 This SA Report sets out recommendations for monitoring the social, environmental and economic effects of implementing the Site Allocations DPD. These monitoring proposals should be considered within the context of the broader monitoring framework for the Local Development Framework and the Norwich City Council Annual Monitoring Report.

Character of the City of Norwich

- 13 Norwich is characterised largely by its historic townscape and its green setting with significant areas of trees and woodland, some of which form green links into the surrounding countryside. To the west of Norwich, there are extensive areas designated as county wildlife sites associated with the floodplains of the Rivers Wensum, Tud and Yare. Norwich has been able to meet many of its recent housing development needs by utilising brownfield or previously developed sites. The 'fringe' area around Norwich benefits from a number of schemes that seek to improve its habitats, landscapes and recreational attractions. Further development of this green infrastructure could play an important role in helping to avoid increased flood risk and harm to wildlife as a result of climate change. Important wildlife sites in the city consist mainly of marshland and meadows in the river valleys and wooded former chalk pits. Norwich's distinctive townscape contains conservation areas covering 17 per cent of the total area of the city, including virtually the whole of the city centre whilst important historic features include the medieval cathedral, castle, city walls, historic parks and archaeological sites.
- 14 East Anglia is recognised as one of the driest areas of the country, with pressure on water resource supplies being linked to low rainfall, widespread agricultural water use and new residential and employment growth. Whilst it is important that new development is water efficient Anglian Water Services and the Environment Agency have stated that there are sufficient water resources to meet the growth demands until 2031. Additional wastewater treatment capacity and strategic sewers will be needed in some areas to support new development and some freshwater wildlife sites suffer from poor water quality.
- 15 Studies show that significant areas of Norwich City are at risk from flooding and that regional housing targets cannot be met by only developing in low risk areas of the city.
- 16 Norwich has successfully reduced the amount of rubbish it sends to landfill sites in recent years and Norwich City uses fewer resources and produces fewer greenhouse gases per person than greater Norwich.
- 17 Greater Norwich has the theoretical potential to meet all of its current energy needs from renewable sources with local biomass and wind generation offering the lowest cost solutions.
- 18 The Norwich area provides the largest concentration of jobs in the eastern region and the economy of Norwich is characterised by a high proportion of jobs in large businesses and in professional positions. The financial sector is a particularly important employer in Norwich City, whilst public administration, education and health are the second largest sector. Employment growth should focus on its strengths in relation to an attractive environment and knowledge based industries.
- 19 Norwich's entertainment, leisure, retail and cultural offerings are also important to its economy as are its higher education facilities. Norwich city centre has a strong regional role and a relatively strong and attractive retail offer. There is a need to maintain this competitive position by continued investment in the retail centre, including the historic environment and tourist attractions of the centre.

- 20 Although public transport is generally available across the city, approximately half of its residents travel to work by private car with travel by foot or cycle also high. Approximately 72% of Norwich's working residents work in the local area and approximately 42% of its workforce lives locally. An increasing quality of bus provision and expansion of a park and ride service to the city centre have seen some success in reducing private car use. Future proposals exist for a new road to address orbital traffic congestion as well as public transport improvements. A number of areas of poor air quality exist within the city, mainly as a result of traffic pollution. Norwich International Airport, which carries over 400,000 passengers a year, lies in Norwich City and neighbouring Broadland district.
- 21 There were an estimated 144,000 people living in Norwich in 2010 with 72% of working age and 14% pensionable age. The black and ethnic minority proportion of Norwich's total population is only half that of the regional average. Despite being an urban area, Norwich contains significant number of groups of gypsies and travellers. Norwich ranks as significantly more deprived than neighbouring authority areas or the English average and has considerably lower educational attainment at GCSE level than the national average.
- 22 Norwich has extensive areas of terraced housing adjacent to the city centre, which, being older properties, comprise the largest proportion of homes that fail to meet the 'decent home' standards. There are higher-than-average numbers of 'vulnerable' residents in Norwich residing in non-decent homes. Norwich also contains higher proportions of households living in accommodation that is unsuitable for their needs. Norwich provides the most affordable homes in greater Norwich and contains the largest proportion in the East of England; some 36 per cent of the housing stock is social housing. Housing affordability is a problem, especially for first time buyers.

Review of other plans, policies and programmes

- 23 The Site Allocations DPD is influenced by many other plan, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level.
- 24 As part of the SA, a review was undertaken of other relevant plans, policies and programmes to establish their objectives, and their implications for the Site Allocations DPD and SA. The review is detailed in the main SA Report. The most significant development for the Site Allocations DPD has been the recent publication of the new National Planning Policy Framework (NPPF) in March 2012, which replaced the existing suite of Planning Policy Statements (PPSs) and Planning Policy Guidance documents (PPGs). The NPPF is intended to streamline national planning policy, having reduced over a thousand pages of policy down to around 50 pages. Although most of the objectives within the NPPF are similar to those they replaced, there is now a strong 'presumption in favour of sustainable development'. In addition to the new NPPF, the Localism Act 2011 abolished the regional tier of the planning system such that the former Regional Assemblies and Regional Development Agencies no longer exist. However, until central Government has formally revoked the Regional Strategies they remain relevant when preparing local planning documents.

What are the key sustainability issues facing Norwich?

- 25 Reviewing the relevant plans, policies and programmes, and considering the baseline character of the area has highlighted a number of key sustainability issues facing Norwich, as set out in **Table 1** which also sets out how they are likely to change without the Site Allocations DPD. These give an indication of the environmental, social and economic character of the city of Norwich and the areas most likely to be affected by the plan. Many of the issues identified are influenced by a wide range of factors, including those outside of the control of the planning system (e.g. the state of the wider economy), but in general they are likely to continue without the combined intervention of the Joint Core Strategy, the Development Management Policies DPD, and the Site Allocations DPD, which is the subject of this SA report.

Table 1: Sustainability issues identified for Norwich

Key Sustainability Issues	Likely Evolution without the Plan
Natural and Built environment	
Pressure on the character/quality of the natural and built environments from widespread development	Likely to continue and may be exacerbated without a planned approach to development
Requirement for green spaces and green corridors in and improved walking and cycling networks	Less opportunity to adopt a co-ordinated approach to the development of green spaces/green networks and walking and cycling networks without the Plan.
Requirement to enhance the historic core of Norwich and other distinctive heritage features, by making them more able to withstand development pressures in the immediate future such as traffic growth	National policy should help to protect and enhance heritage assets but whether or not this will help specific sites is uncertain
Climate change	
Significant areas in the city are at risk of flooding, including previously developed areas	The areas at risk of flooding will increase with climate change
Flood risk in areas like the Broads can also be exacerbated by developments upstream causing a change to natural watercourses and the water cycle	Without the Plan it will be more difficult to manage the effects of developments on flood risk, although all developments would need to take account of National policy on flood risk
Adapting to the effects of climate change will need to include the ability to design developments that are water efficient and recycle water resources as Norfolk is one of the drier parts of the country	Without the Plan it will be more difficult to adopt a co-ordinated approach to adapting to climate change. Conversely, new development needs to meet higher water efficiency standards and water companies must plan to reduce leaks from the water supply network as well as improve

Key Sustainability Issues	Likely Evolution without the Plan
	water efficiency
New developments in all sectors, land uses and activities will need to minimise their carbon emissions. The growth in the popularity and use of Norwich Airport will also need to be addressed through carbon-saving elsewhere	<p>Emissions from new development are likely to be progressively reduced due to initiatives such as the Code for Sustainable Homes.</p> <p>Growth in use of the airport and consequent need for airport expansion is likely to be outside the direct control of local planning policy</p>
Natural Resources	
There is increasing pressure on the natural resources needed to facilitate new development, which will impact on water quality and supply, air quality, energy and minerals use	This pressure will continue in the absence of the Plan
There is a need to reduce the amount of waste sent to landfill sites, and find alternative methods of disposal	Management of waste will be co-ordinated and planned for separately
Transport	
Over-reliance on the car to access facilities and services	Likely to continue in line with national trends.
Access to jobs needs to be improved; this includes provision of jobs closer to centres of population	Access to jobs is likely to remain at odds with the key centres of population
Population, Access to Services and Community	
Requirement to meet the needs of an increasingly ageing population	Responding to the needs of an ageing population may be less co-ordinated in the absence of the Plan. However, all new housing developments would need to meet the requirements of Lifetime homes.
Need to create balanced and integrated communities	Creation of genuinely balanced and integrated communities may be more difficult to achieve in the absence of a Planned approach
Household sizes are becoming smaller as more people remain single for longer or become single, as a result require more homes to cater for this trend	Likely to continue in line with national trends
Deprivation	
Deprivation is highest in urban areas	Likely to continue without appropriate

Key Sustainability Issues	Likely Evolution without the Plan
	Policy response although this is recognised in the JCS
Health	
Promoting healthy lifestyles will be important	Consideration of healthy lifestyles (including responding to issues such as obesity) will occur at the National level. Local level initiatives e.g. public health strategies will seek to respond to Norwich-specific issues
Health infrastructure required to meet increasing overall population and increasingly ageing population	Trend likely to continue
Traffic-related emissions are having an effect on the population of Norwich's health and wellbeing	Trend likely to continue, although future designation of city centre-wide AQMA may prevent worsening of the issue
Need for permanent gypsy and traveller sites to improve access to key facilities such as healthcare and education	Likely to continue because of the difficulty of finding suitable sites
Crime	
Some higher crime levels exist in the urban areas, particularly the more deprived wards	Likely to continue, linked to employment opportunities, education and skill levels
Leisure, culture and recreation	
Need to provide access to a good range of cultural and leisure facilities, including improved access to local green spaces	Likely to continue. Delivery may be less co-ordinated in absence of the Plan.
Education, Skills and Employment	
The retention and attraction of young people through jobs provision and access to the housing market will be a key priority	Retention/attraction of young people to Norwich may continue to be difficult, linked to accessible employment and affordable housing
Employment businesses need support to diversify (large employers tend to be located in the city and small employers in neighbouring districts). This will be particularly important to strengthening the tourism industry, although promoting the tourism product of the area will need to be done in a sustainable way	Employment trends likely to continue

Key Sustainability Issues	Likely Evolution without the Plan
Housing	
Difficulties in accessing the housing market	Likely to continue
Requirement for housing of all types and tenures	Likely to continue, although recognised through JCS.
Existing housing stock is of poor quality	Likely to continue, although JCS is now in place and its emphasis on urban and suburban regeneration alongside specific initiatives for neighbourhood renewal will help to address this issue.

What are Norwich's sustainability objectives?

- 26 The review of other policies, plans and programmes and the identification of sustainability issues during Stage A of the SA provided the basis for a set of sustainability objectives to be developed. The sustainability objectives have been the main tool at each stage of the SA for assessing the options for the Site Allocations DPD, and comprised a number of environmental, social and economic objectives, and are shown below in **Table 2**.

Table 2: List of SA objectives

SA objective
Environmental
ENV 1 – To reduce the effect of traffic on the environment
ENV 2 – To improve the quality of the water environment
ENV3 – To improve environmental amenity, including air quality
ENV4 – To maintain and enhance biodiversity and geodiversity
ENV5 – To maintain and enhance the quality of landscapes, townscapes and the historic environment
ENV6 – To adapt to and mitigate against the impacts of climate change
ENV7 – To avoid, reduce and manage flood risk
ENV8 – To provide for sustainable use and sources of water supply
ENV9 – To make the best use of resources, including land and energy and to minimise waste production
Social
SOC1 – To reduce poverty and social exclusion
SOC2 – To maintain and improve the health of the whole population and promote healthy lifestyles
SOC3 – To improve education and skills
SOC4 – To provide the opportunity to live in a decent, suitable and affordable home
SOC5 – To build community identity, improve social welfare and reduce crime and social activity
SOC6 – To offer more opportunities for rewarding and satisfying

employment for all
SOC7 – To improve the quality of where people live
SOC8 – To improve accessibility to essential services, facilities and jobs
Economy
EC1 – To encourage sustained economic growth
EC2 – To encourage and accommodate both indigenous and inward investment
EC3 – To encourage efficient patterns of movement in support of economic growth
EC4 – To improve social and environmental performance of the economy

How did the Sustainability Appraisal influence the Site Allocations DPD?

- 27 The SA was carried out at all key stages of the site selection process from the long list of sites to the final allocations. Norwich City Council took into account the findings of the SA at each stage along with consultation responses. Recommendations arising from the SA were considered by Council Officers when preparing the final Site Allocations DPD and were also reported to Council Members as appropriate.

What are the sustainability effects of the Site Allocations likely to be?

- 28 The Site Allocations DPD proposes allocating 36 sites in the City Centre, these are numbered CC1-CC35 (with CC19a and CC19b in two parts) and 46 sites in the remainder of the city outside the defined City Centre area (site references R1-R46). A summary of the potential sustainability effects of the sites is provided below in **Tables 3 to 5**. The site codes are shown in the left-hand column. Likely sustainability effects are highlighted under the relevant SA Objective using the colours and symbols shown in the key below.

Key	
Score	Effects
++	Significant positive effect
+	Minor positive effect
0	Neutral or no effect
-	Minor negative effect
--	Significant negative effect
/	Mixed effects (e.g. -/++ minor negative effects and significant positive effects)
?	Uncertain effect

Table 3: Summary of SA scores for the sites allocated for housing in the Site Allocations DPD

Site Reference	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV9	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	SOC8	EC1	EC3
CC3	+	0	0	+/-/?	+	+	0	+	+	+	+/?	+	+	+	+	+	+/-/?	+
CC12	+	-/?	0	+/-/?	+/?	+	0	+	+	+	+/?	+	+	+	+	+	+/?	+
CC13	++/?	-/?	+/?	+/-/?	+	++/?	-/?	+	+	+	+/?	+	+	+	+	+	+/?	+
CC14	++/?	0	+/?	+/-/?	+	++/?	0	+	+	+	+/?	+	+	+	+/-/?	+	+/?	+
CC15	++/?	0	+/?	+/-/?	+	++/?	0	+	+	+	+/?	+	+	+	+	+	+/-/?	+
CC18	++/?	0	+/?	0	+	++/?	-/?	+	+	+	+/?	+	+	+	+/-/?	+	+/?	+
CC20	+	-/?	0	+/-/?	++	+	0	+	+	+	0	+	+	+	+	+	+/-/?	+
CC21	+	-/?	0	+/-/?	++	+	0	+	+	+	0	+	+	+	+	+	+/-/?	+
CC22	+	-/?	0	+/-/?	++	+	0	+	+	+	0	+	+	+	+	+	+/-/?	+
CC35	++	-/?	+/?	-/?	+	++	-/?	+	+	+	+/?	+	+	+	+/-/?	+	+/?	+
R2	+	+/-/?	0	+/-/?	+	+	0	+	0	++	0	+	+	+	+/-	+/-/?	+/-/?	+
R4	+	+/?	0	+/-/?	+/-	+	0	+	+	+	+/?	+	+	+	+/-/?	+	+/-/?	+
R6	+	0	0	+/-/?	+	+	0	+	+	+	+/?	+	++	+	+	+	+/?	+
R7	+	+/?	0	0	+	+	0	+	+	+	+/?	+	+	0	+	+	+/?	+
R8	+	+/?	0	+/-/?	+	+	0	+	0	+	+/?	+	++	+	+	+	+/-/?	+
R9	++/?	+/?	+/?	+/-	+	++/?	0	+	+	+	+/?	+	+	+	+	+	+/?	+
R14	+	-/?	0	+/-/?	+	+	0	+	+	+	+/?	+	+	+	+	+	+/?	+
R15	+	+/-	0	+/-/?	+	+	0	+	+	+	+/?	+	+	+	+	+	+/?	+
R16	+	+/-	0	+/-/?	+	+	0	+	+	+	+/?	+	+	+	+/-/?	+	+/?	+
R17	++/?	-/?	+/?	+/-/?	+	++/?	0	+	+	+	+/?	+	+	+/-	+/-/?	+	+/?	+
R18	++/?	+/?	+/?	0	+	++/?	-/?	+	+	+	+/?	+	+	+/-	+/-/?	+	+/-/?	+
R19	+	+/?	0	+	+/-	+	0	+	+	+	+/?	+	+	+/-	+	+	+/-/?	+
R20	+/?	0	0	+/-/?	+	+/?	0	+	+	+	0	+	+	0	+/-/?	+	+/?	+
R22	+	+/?	0	0	+	+	-/?	+	+	+	+/?	+	+	+/-	+/-/?	+	+/-/?	+
R25	+	0	0	+	+/?	+	0	+	+	+	+/?	+	+	+/-	+/-/?	+	+/-/?	+
R26	+	+/-/?	0	+/-	+	+	0	+	+	+	+/?	+	+	+	+/-/?	+	+/?	+
R27	+	+/?	0	+/-/?	+	+	0	+	+	+	+/?	+	+	+/-	+/-/?	+	+/?	+
R28	+	-/?	0	+/-	+	+	-/?	+	+	+	+/?	+	++	+/-	+/-/?	+	+/-/?	+
R29	+	+/?	0	+	++	+	-/?	+	+	+	+/?	+	+	+/-	+	+	+/?	+/-
R30	+	+/-	0	+/-	+	+	-/?	+	+	+	+/?	+	+	+/-	+/-/?	+	+/?	+
R34	+	+/?	0	0	++	+	0	+	+	+	+/?	+	+	+	+	+	+/-/?	+
R35	+	+/?	0	0	++	+	0	+	0	+	+/?	+	+	+	+	+	+/-/?	+
R36	+	0	0	+/-/?	+	+	0	+	0	+	+/?	+	+	+	+/-/?	+	+/?	+
R37	+	+	0	+/-/?	+	+	0	+	0	+	+/?	+	+	+	+	+	+/?	+
R38	+	+/-/?	0	+/-/?	++	+	-/?	+	+	+	0	+	++	+	+	+	+/-/?	+
R40	+	0	0	+/-/?	+	+	0	+	0	+	+/?	+	+	+	+	+	+/?	+
R41	++	+/-/?	0	+/-/?	+	++	-/?	++/-	+	+/-	+/?	++	+	+	-/+	+	+/?	+
R44	+	-/?	0	+/-/?	-/?	++/?	+	-/+	0	+/-/?	+	+	+	0	-/+	+	+/?	0
R45	+	-/?	0	+/-/?	-/?	+	-/?	-/?	0	+	0	+	+	0	+	+	+/?	+
R46	+	0	0	+/-/?	+/-	+	-/?	--	+	+/-	+/?	+	++	+	+/-	+	+/?	+

Table 4: Summary of SA scores for the sites allocated for mixed use in the Site Allocations DPD

Site Reference	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV9	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	SOC8	EC1	EC2	EC3	EC4
CC1	+	0	0	+/-/?	++	+	0	+	+	+	+/?	+	+	+	+	+	+/-/?	+/?	+	+/-/?
CC2	1 1/?	1	1/?	/?	11	11/?	0	1	1	1	1/?	1	1	1	1	1	1/?	1/?	1	1/?
CC4	++/?	0	+/?	-/?	++	++/?	0	+	+	+	+/?	+	+	+	+	+	+/-/?	+/?	+	+/-/?
CC5	++/?	-/?	+/?	+/-/?	+/?	++/?	-/?	+	+	+	+/?	+	+	+	+/-/?	+	+/-/?	+/?	+	+/-/?
CC6	+	0	0	0	+	+	0	+	+	+	?	+	+	+	+/-/?	+	+	+/?	+	+/-/?
CC7	++/?	-/?	+/?	+/-/?	++	++/?	-/?	+	+	+	+/?	+	++	+	+	+	+	+/?	+	+/-/?
CC8	++/?	-/?	+/?	+/-/?	++	++/?	-/?	+	+	+	+/?	+	++	+	+	+	+	+/?	+	+/-/?
CC9	+	-/?	0	-/?	+/?	+	-/?	+	+	+	+/?	+	++	+	+	+	+/-/?	+/?	+	+/-/?
CC10	+	-/?	0	+/-/?	+	+	+	+	+	+	+/?	+	+	+	+	+	+	+/?	+	+/-/?
CC11	+	0	0	+/-/?	++	+	0	+	+	+	+/?	+	+	+	+	+	+/-/?	+/?	+	+/-/?
CC16	+	0	0	+/-/?	+	+	0	+	+	+	+/?	+	+	+	+/-/?	+	+	+/?	+	+/-/?
CC17	++	+/-/?	+/?	+/-/?	+	++	-/?	+	+	+	?	+	+	+	+/-/?	+	+	+/?	+	+/-/?
CC19a	+	+/-/?	0	0	++	+	-/?	+	+	+	+/?	+	+	+	+/-/?	+	+	+/?	+	+/-/?
CC23	+	+/-/?	0	0	+	+	-/?	+	+	+	?	+	+	+	+	+	+	+/?	+	+/-/?
CC24	++/?	0	+/?	-/?	+/?	++/?	0	+	+	+	+/?	+	+	+	+/-/?	+	+	+/?	+	+/-/?
CC25	++	+	+/?	0	+	++	0	+	+	+	?	+	+	+	+/-/?	+	+/-/?	+/?	+	+/?
CC26	++	0	+/?	0	+	++	0	+	+	+	?	+	+	+	+/-/?	+	+	+/?	+	+/?
CC27	++/?	0	+/?	0	+	++/?	0	+	+	+	+/?	+	+	+	+	+	+	+/?	+	+/?
CC28	1 1/?	0	1/?	0	1	11/?	0	1	1	1	1/?	1	1	1	1	1	1	1/?	1	1/?
CC29	++/?	0	+/?	+/?	++	++/?	0	+	+	+	+/?	+	+	+	+	++	+	+/?	++	+/?
CC31	++/?	0	+/?	0	++	++/?	0	+	+	+	+/?	+	+	+	+	++	+	+/?	+	+/?
CC32	+	0	0	0	++	+	0	+	+	+	+/?	0	++	+	+	++	+	+/?	+	+/?
CC33	++/?	0	+/?	-/?	++	++/?	0	+	+	+	+/?	+	++	+	+	++	+/-/?	+/?	++	+/-/?
CC34	++/?	0	+/?	+/-/?	+/?	++/?	0	+	+	+	+/?	+	+	+	+/-/?	+	+	+/?	+	+/-/?
R3	+	+/?	0	+/?	+/?	+	+	+	+	+	+/?	+	+/?	+	+	+	++	+/?	+	+/?
R5	+	0	0	0	-/?	+	0	-/?	+	++/-	0	0	+	+	-/+	+	+	0	+	+/-/?
R10	++/?	+/-/?	?	+/-/?	++	++/?	-/?	++	+	+/?	?	++	+	+	+/-/?	+/?	+	+/?	+/?	+/-/?
R11	++/?	+/-/?	+/?	+/-/?	++	++/?	-/?	++	+	+	?	+	+	+	+/-/?	+/?	+	+/?	+/?	+/-/?
R12	+/?	+/-/?	0	0	+/?	+/?	-/?	+	+	+	?	+	+	+	+/-/?	+	+/-/?	+/?	+	+/-/?
R13	+	0	0	0	+	+	0	+	+	+	+/?	+	+	+	+/-/?	+	+/-/?	+/?	+	+/?
R21	+	0	0	+/-/?	+/?	+	0	+	+	+	?	+	+	+	+/-/?	+	+/-/?	+/?	+	+/-/?
R23	+	0	0	0	+	+	0	+	+	+	+/?	+	+	+	+/-/?	+	+/-/?	+/?	+	+/?
R24	+	0	0	0	+/?	+	0	+	+	+	+/?	+	++	+	+/-/?	+	+/-/?	+/?	+	+/?
R33	+	-/?	-/?	+/-/?	++	+	-/?	-/?	+	+	+/?	+	+	+	+	+	+/-/?	+/?	+	+/-/?
R39	1	1/?	/?	1/?	1	1	/?	/?	1	1	1/?	1	1	1	1/?	1	1/?	1/?	1	1/?
R43	+	0	0	+/-	+	++/?	+/?	+/-/?	+	+	++	0	+	+	+/-	+	++	+	+	+/-/?

Table 5: Summary of SA scores for the sites allocated for employment in the Site Allocations DPD

Site Reference	ENV1	ENV2	ENV3	ENV4	ENV6	ENV7	ENV9	SOC1	SOC2	SOC3	SOC5	SOC6	SOC7	SOC8	EC1	EC2	EC3	EC4
CC19b	+/?	-/?	+/?	0	+/?	-/?	+	+	+	?	0	+	+	+	+	+/?	+	+/-/?
CC30	+	0	0	+/-/?	+	0	+	+	+	?	+	+	+	+	+	+/?	+	+/-/?
R1	+	+/-/?	0	+/-/?	+	+	+/-	+	+	0	+	+	+/-/?	+	+	+/?	+	+/-/?
R31	++	0	0	+/-/?	++	+	+	+	+	0	+	+	+/-/?	++	+	++/?	++	+/-/?
R32	+	0	?	-/?	+	+	--	+	+	0	+	+	-/?	+	+	++	+	+/-/?
R42	+	+/-/?	0	+/-/?	++/?	+	++	+	+/-	++	+	+	+	++	++	++	+	+/-/?

- 29 In general, it is considered there will be a wide range of positive and significant positive effects associated with the development of many of the sites. However, a number of potentially adverse and significant adverse effects were also identified.
- 30 In overall terms, development of the proposed housing, employment, mixed use allocated sites are likely to have **significant positive effects** on the following SA objectives, with sites with the potential for significant positive effects shown in brackets:
- ENV1 - To reduce the effect of traffic on the environment (*sites: CC13, CC14, CC15, CC18, CC35, R9, R17, R18, R41, CC2, CC4, CC5, CC7, CC8, CC17, CC24, CC25, CC26, CC27, CC28, CC29, CC31, CC33, CC34, R10, R11 & R31*).
 - ENV5 - To maintain and enhance the quality of landscapes, townscapes and the historic environment (*sites: CC20, CC21, CC22, R29, R34, R35, R38, CC1, CC2, CC4, CC7, CC8, CC11, CC19a, CC29, CC31, CC32, CC33, R10, R11, R33 & M008*).
 - ENV6 - To adapt to and mitigate against the impacts of climate change (*sites: CC13, CC14, CC15, CC18, CC35, R9, R17, R18, R41, R44, CC2, CC4, CC5, CC7, CC8, CC17, CC24, CC25, CC26, CC27, CC28, CC29, CC31, CC33, CC34, R43, R10, R11, R31 & R42*).
 - ENV9 - To make the best of resources, including land and energy to minimise waste production (*sites: R41, R10, R11 & R42*).
 - SOC2 - To maintain and improve the health of the whole population and promote healthy lifestyles (*site: R5*).
 - SOC3 - To improve education and skills (*sites: R43, R42*).
 - SOC4 - To provide the opportunity to live in a decent, suitable and affordable home (*sites: R41 & R10*).
 - SOC5 - To build community identity, improve social welfare and reduce crime and social responsibility (*sites: R6, R8, R28, R38, R46, CC7, CC8, CC9, CC32, CC33 & R24*).
 - SOC8 - To improve accessibility to essential services, facilities and jobs (*sites: CC29, CC31, CC32, CC33, R31, R42*).
 - EC1 - To encourage sustained economic growth (*sites: R3, R43 & R42*).
 - EC2 - To encourage and accommodate both indigenous and inward investment (*sites: R31, R32 & R42*).
 - EC3 - To encourage efficient patterns of movement in support of economic growth (*sites: CC29, CC33 & R31*).
- 31 It is considered that some **significant negative effects** may occur for the following SA objectives, with sites with the potential for significant negative effects shown in brackets:
- ENV5 - To maintain and enhance the quality of landscapes, townscapes and the historic environment (*site: R45*).
 - ENV7 - To avoid, reduce and manage flood risk (*sites: CC18, R22 & R46*).
 - ENV9 - To make the best of resources, including land and energy to minimise waste production (*sites: R46, R41, R44, R5 & R32*).

- SOC7 - To improve the quality of where people live (*sites: R41, R44 & R5*).
- 32 Whilst the above list highlights a number of significant negative effects on the SA Objectives, there are several ways in which the effects could be avoided or mitigated at the planning application, construction and operational phases.
- 33 Provided the mitigation measures proposed through the Joint Core Strategy and Development Policies DPDs, as well as the Site Policies in the Site Allocations DPD are successfully implemented, the likelihood and number of significant negative effects identified for the allocated sites should be reduced.

What alternatives were considered during preparation of the Site Allocations DPD?

- 34 A large number of alternative sites for the development of new housing, employment and mixed uses have been considered by Norwich City Council during preparation of the Site Allocations DPD. There have been a number of stages in developing and refining the site options as described below.
- 35 Developers, agents, community groups and the public were asked to suggest sites for development or change of use. These sites were proposed for a variety of uses, including housing, employment, and mixed uses. The process identified approximately 170 sites.
- 36 A public consultation exercise on the initial long list of around 170 potential sites which could be developed for housing, business, retail, leisure or mixed use, took place between November 2009 and February 2010, involving a wide range of consultees, including statutory and special interest bodies and residents across the city. Three of the sites were ruled out by NCC as not being reasonable alternatives (one due to its location in neighbouring South Norfolk district and two as being too small to allocate for development).
- 37 Following the first stage of Regulation 25 consultation, and the consideration of consultation responses, a shortlist of sites was then assessed against three key objectives - suitability, sustainability and availability.
- 38 As part of the Council's assessment process, a number of sites which were included in the first round of Regulation 25 consultation were not carried forward into the second stage of Regulation 25 consultation, or were carried forward but with amended boundaries. The reasons given by Norwich City Council as to why particular sites were not carried forward were:
- Sites more appropriate for inclusion in the Development Management Policies DPD or the Northern City Centre Area Action Plan: for example where proposed sites do not involve a change of use from their current use (e.g. a site currently in employment use proposed to be allocated for employment use).
 - Sites integrated into a larger site: for example sites constrained by size and/or shape, unsuitable for development on their own but acceptable if integrated with neighbouring sites to form a better comprehensive scheme and to avoid piecemeal and stand-alone development.

- Sites assessed to be 'unsuitable' or 'less suitable' for development, on the basis of suitability or sustainability. (A list of these sites and reasons for discounting them is contained in Appendix 4 of the Pre-submission version of the Site Allocations DPD.)
- Sites too small to allocate: the original cut-off point for allocation was sites under 0.1 hectare in the city centre or under 0.2 hectares in the rest of the city. However, as some smaller sites can deliver relatively high density development, the threshold was relaxed to include any site that could provide 10 or more dwellings even if under the size threshold. Sites below the size threshold which can only provide less than 10 dwellings have not been carried forward; they will be treated as windfall sites.

- 39 The number of sites was reduced to 124 before the suitability, availability and sustainability assessments were undertaken. Given the potential for sites to be allocated for different uses, all the 124 sites were considered for SA and 82 sites were subsequently shortlisted, i.e. being suitable, available and sustainable.
- 40 Council officers carried out the suitability and availability assessments in-house, while LUC was commissioned to undertake the SA, the results of which informed the Council's shortlisting process, and were published in the December 2010 SA Report as part of the second stage of Regulation 25 consultation.
- 41 At this stage, given the large number of potential sites under consideration, the SA was undertaken at a high level. Each of the sites put forward for consultation was subject to systematic assessment using a Geographical Information System (GIS). A range of criteria were used to determine potential constraints and opportunities relating to development of the sites, taking into account their proposed uses. Each criterion related to a specific SA objective or sub-objective.
- 42 The second stage of Regulation 25 consultation, on the shortlisted sites (i.e. those not discounted for the reasons summarised above), took place between January and March 2011. The December 2010 SA Report was published at this stage.
- 43 Following the second stage of Regulation 25 consultation, a number of significant changes were proposed to a number of sites which included proposed amendments to site boundaries or proposed alternative uses with some merit to be carried forward for additional consultation. A further stage of Regulation 25 consultation was then carried out between July and September 2011 for these sites. These sites were also assessed against the suitability, sustainability and availability criteria and therefore had the same status as the other shortlisted sites in the second stage of Regulation 25 consultation.
- 44 An addendum to the December 2010 SA Report was prepared by LUC and published in July 2011 to set out the findings of the SA of these additional sites.
- 45 Following on from the Regulation 25 consultation, a total of 82 sites have been included in the Regulation 19 Site Allocations DPD as described above. The majority of these sites are for housing and mixed use development with a small number of sites allocated for employment and other uses. Reasons given by Norwich City Council as to why other sites were not carried forward include:
- Sites that have been granted planning permission and are now developed or sites that have changed ownership and are no longer available for development.

- Sites that are no longer available for development following consultation with landowners.
- Sites more appropriate for inclusion in the Development Management Policies DPD.
- Sites integrated into a larger site: for example sites constrained by size and/or shape, unsuitable for development on their own but acceptable if integrated with neighbouring sites to form a better comprehensive scheme and to avoid piecemeal and stand-alone development.
- Sites assessed to be 'unsuitable' or 'less suitable' for development, on the basis of suitability or sustainability.
- Sites too small to allocate.

46 This process led to their being 17 reasonable alternative sites which were not included in the Site Allocations DPD but which were subject to detailed SA. A summary of the potential sustainability effects of the reasonable alternative sites is provided below in **Table 6**.

Table 6: Summary of SA scores for the 'reasonable alternative' sites

Site Reference	ENV1	ENV2	ENV3	ENV4	ENV5	ENV6	ENV7	ENV9	SOC1	SOC2	SOC3	SOC4	SOC5	SOC6	SOC7	SOC8	EC1	EC2	EC3	EC4
Alternative housing sites																				
H004	+	-/?	0	-/?	-	+	--/?	+	+	+	+/?	+	+	0	+/-	+	+/?	N/A	+	N/A
H008	+	0	0	0	+	+	0	+	0	+	+/?	+	+	+	+	+	+/-/?	N/A	+	N/A
H011	+	-/?	0	-/?	-	+	0	--	0	+/-	0	+	+	+	--/+	+	+/?	N/A	+	N/A
M052	+	0	0	0	+	+	--/?	+	+	+	+/?	+	+	+	+	+	+/?	N/A	+	N/A
NOR0005	+	0	0	-/?	+	+	0	+	0	+	+/?	+	+	+	+	+	+/?	N/A	+	N/A
NOR0128	+	0	0	-/?	+	+	0	+	+	+	+/?	+	+	+	+	+	+/?	N/A	+	N/A
Alternative mixed use sites																				
E002	+	0	0	0	+/?	+	0	+	+	+	+/?	0	+	+/?	+	++	+	+/?	+	+/?
M001	+	0	0	0	--	+	--/?	+	+	+	++	+	+	+	+	+	+	+/?	+	--/+
M002	+	0	0	-/?	--	+	--/?	--	+	++/-	+	+	+	+	--/+	+	+	+/?	+	--/+
M003	+	-/?	-/?	-/?	-/?	+	--/?	+	+	+	++	+	+	+	+	+	+	+/?	+	--/+
M004	+/?	0	0	-/?	?	+/?	--/?	+	+	+	?	+	+	+	+	+	+	+/?	+	+/-/?
M005	+	0	0	-/?	+	+	0	+	+	+	+/?	0	+	+	+	+	+	+/?	+	+/-/?
M008	+	0	0	-/?	++	+	0	+	+	+	+/?	+	+	+	+	+	+/-/?	+/?	+	+/-/?
M009	+	-/?	0	-/?	--/?	+	--/?	-/?	0	+	0	+	+	+/?	+	+	+/-/?	0	+	--/+
M048	+	-/?	0	-/?	?	+	0	+	+	+	0	+	+	0	+/-	+	+/-/?	+/?	+	+/-/?
M056	+	0	0	-/?	+	+	0	+	+	+	+/?	+	+	+	+/-	++	+	+/?	+	+/-/?
Alternative employment sites																				
E002	+	0	0	0	+/?	+	0	+	+	+	?	N/A	0	+	?	+	+	+/?	+	+/?

What could be done to make the Site Allocations DPD even better?

47 A number of recommendations have been made with regard to improvements or amendments that could be made to the site policies in order to strengthen and improve the sites likely sustainability effects. A summary of recommendations, by SA Objective, is set out below:

- **ENV1, ENV3 and ENV 6** - It is recommended that where sites are proposed to be car free, the intention to develop car free developments is stated specifically in the site policies. This would strengthen the likelihood of car free development occurring. It is recognised that Development Management Policy DM32 sets out criteria for residential development to be car free or acceptable as car free or low car housing which should help to ensure positive effects associated with car free or low car development occur.
- **ENV4** - In order to strengthen the likelihood of positive effects on biodiversity, we recommend that where intentions to maintain, protect or enhance biodiversity is stated in the supporting text to a site policy, the policy itself makes this explicit. In particular, it is recommended that site Policy CC1 is expanded to make reference to retaining and enhancing the wooded ridge which is located on part of the site and forms part of Richmond Hill. It is considered that all policies for development of sites on greenfield land should be amended to include measures to avoid, reduce or compensate for the loss of biodiversity.
- **ENV5**- a number of site specific recommendations have been made in relation to this objective, which would involve adding text to the policy as follows:
 - **CC12** – The need to respect the setting of neighbouring listed and locally listed buildings.
 - **CC5** –The need to respect the setting of on site listed buildings.
 - **CC24** –The need to respect the setting of nearby listed and locally listed buildings and the City Wall.
 - **CC34** - The need to respect the setting of nearby locally listed buildings and the line of the City Wall.
 - **R3** - The need for the development not to be dominated by car parking.
 - **R13** – The need to create a street frontage to Aylsham Road.
 - **R24** –The need to create a street frontage to Aylsham Road.
- **ENV5** – It is recommended that where sites are within close proximity to the Broads National Park relevant site policies or the supporting text to the policy should make reference to the need to protect the setting of the National Park.
- **ENV7** - It is recommended that a commitment to mitigate flood risk at sites located in a Critical Drainage Area is included as a requirement in the relevant site policies.
- **SOC7** - it is considered that where noise has been identified as a potential issue, the requirement for a noise assessment and appropriate mitigation should be set out in the site policy.
- **EC4** - Site policy recommendations set out under SA Objective ENV3, ENV4, ENV5 and ENV7 will also apply to SA objective EC4 – To improve the social and environmental performance of the economy.

How will the sustainability effects of the Site Allocations DPD be monitored?

- 48 Monitoring of the Site Allocations DPD will be focussed on:
- The significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused).
 - The significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken.
- 49 It will be conducted as part of an overall approach to monitoring the sustainability effects of the Site Allocations DPD alongside the Joint Core Strategy and Development Management Policies DPD, and should be incorporated within other monitoring requirements (i.e. the Annual Monitoring Report).
- 50 A table is included within the full SA Report, which summarises the significant effects (both positive and negative) to be monitored for Norwich's Site Allocations DPD and the suggested indicators or datasets that may be able to provide an indication of the extent of those effects.

What are the next steps in the preparation of the Site Allocations DPD and its Sustainability Appraisal?

- 51 This SA Report will be published for consultation alongside the Pre Submission Site Allocations DPD. Norwich City Council is inviting consultation responses (or 'representations') on the 'soundness' of the DPD and this SA Report. The DPD will then be revised to take into account the consultation responses, and make it ready for Submission to the Secretary of State. Any significant changes to the DPD will need to be subject to SA, and if so, a revised SA Report (or addendum to this report) will be prepared. A public examination will then be held to decide if the DPD is 'sound'.

Where can I find out more about Sustainability Appraisal?

- 52 More information about SA can be found in the SA Report which follows, and on the Planning Advisory Service website: www.pas.gov.uk.

(b) Norwich City Council's proposed responses to recommendations

Sustainability objective	Recommendation	Proposed council response
ENV1, ENV3 and ENV 6	It is recommended that where sites are proposed to be car free, the intention to develop car free developments is stated specifically in the site policies. This would strengthen the likelihood of car free development occurring. It is recognised that Development Management Policy DM32 sets out criteria for residential development to be car free or acceptable as car free or low car housing which should help to ensure positive effects associated with car free or low car development occur.	Noted. No change is proposed in relation to this recommendation. This approach is consistent with policy DM32 in the Development Management Policies DPD which requires car free development in certain circumstances: where it is required this is set out in the site specific policy. However where car free housing is considered acceptable or desirable this is referred to in the explanatory text.
ENV4	In order to strengthen the likelihood of positive effects on biodiversity, we recommend that where intentions to maintain, protect or enhance biodiversity is stated in the supporting text to a site policy, the policy itself makes this explicit. In particular, it is recommended that site Policy CC1 is expanded to make reference to retaining and enhancing the wooded ridge which is located on part of the site and forms part of Richmond Hill. It is considered that all policies for development of sites on greenfield land should be amended to include measures to avoid, reduce or compensate for the loss of biodiversity.	Noted. Specific change to policy CC1 is accepted. All relevant site specific policies will be reviewed and amended to reflect recommendation where appropriate.
ENV5	A number of site specific recommendations have been made in relation to this objective, which would involve adding text to the policy as follows: CC12 – The need to respect the setting of neighbouring listed and locally listed buildings. CC5 –The need to respect the setting of on site listed buildings. CC24 –The need to respect the	All site specific recommendations for changes to policies are accepted. Please note however that no change is required for policy R13 as it already refers to the need to create a street frontage to Aylsham Road.

	<p>setting of nearby listed and locally listed buildings and the City Wall.</p> <p>CC34 - The need to respect the setting of nearby locally listed buildings and the line of the City Wall.</p> <p>R3 - The need for the development not to be dominated by car parking.</p> <p>R13 – The need to create a street frontage to Aylsham Road.</p> <p>R24 –The need to create a street frontage to Aylsham Road.</p>	
ENV5	<p>It is recommended that where sites are within close proximity to the Broads National Park relevant site policies or the supporting text to the policy should make reference to the need to protect the setting of the National Park.</p>	<p>This is covered by policy DM6 in the Development Management Policies DPD.</p>
ENV7	<p>It is recommended that a commitment to mitigate flood risk at sites located in a Critical Drainage Area is included as a requirement in the relevant site policies.</p>	<p>Accepted: all relevant site specific policies will be amended accordingly.</p>
SOC7	<p>It is considered that where noise has been identified as a potential issue, the requirement for a noise assessment and appropriate mitigation should be set out in the site policy.</p>	<p>Accepted: all relevant site specific policies will be reviewed and amended accordingly.</p>
EC4	<p>Site policy recommendations set out under SA Objective ENV3, ENV4, ENV5 and ENV7 will also apply to SA objective EC4 – To improve the social and environmental performance of the economy.</p>	<p>Noted: see responses set out above.</p>