

**Norwich Site Allocations DPD:
2nd Draft Sustainability Appraisal Report**

Prepared for Norwich City Council
by
Land Use Consultants

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NON-TECHNICAL SUMMARY

What is Sustainability Appraisal?

The Planning and Compulsory Purchase Act, 2004 (as amended by the Planning Act in 2008) in England and Wales sets out the requirement for Development Plan Documents (DPD) to be subject to Sustainability Appraisal (SA). SA aims to assess the impacts of a plan on social, economic and environmental issues. SA must also meet the requirements of the Strategic Environmental Assessment (SEA) Directive, a European Directive, transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004.

This Non-Technical Summary is a summary of the SA report prepared to accompany the second round of Regulation 25 consultation on the Draft Site Allocations DPD for Norwich City Council (NCC). NCC commissioned Land Use Consultants (LUC) to undertake this work in September 2010.

SA comprises a number of Stages from A-D. Stage A defines the Scope of the SA and is used to consult on a framework of objectives which will subsequently be used to appraise the Plan (in this case, appraise sites). The various elements of Stage A are combined into a 'Scoping Report' which is then consulted upon – the views of the statutory environmental bodies (Natural England, Environment Agency and English Heritage) must be taken into account at this stage. A Scoping Report was prepared and consulted upon in 2009. This Scoping report set out the SA Framework. There are 21 headline SA objectives and sub-objectives therein which cover Environmental, Social and Economic themes. The 21 headline objectives are reproduced below:

SA Objective
ENV 1: To reduce the effect of traffic on the environment.
ENV 2: To Improve the quality of the water environment.
ENV 3: To Improve environmental amenity, including air quality.
ENV 4: To maintain and enhance biodiversity and geodiversity.
ENV 5: To maintain and enhance the quality of landscapes, townscapes and the historic environment.
ENV 6: To adapt to and mitigate against the impacts of climate change.
ENV 7: To avoid, reduce and manage flood risk.
ENV 8: To provide for sustainable use and sources of water supply.
ENV 9: To make the best of resources, including land and energy and to minimise waste production.
SOC1: To reduce poverty and social exclusion.
SOC 2: To maintain and improve the health of the whole population and promote healthy lifestyles.

SOC 3: To improve education and skills.
SOC 4: To provide the opportunity to live in a decent, suitable and affordable home.
SOC 5: To build community identity, improve social welfare and reduce crime and anti-social activity.
SOC 6: To offer more opportunities for rewarding and satisfying employment for all.
SOC 7: To improve the quality of where people live.
SOC 8: To improve accessibility to essential services, facilities and jobs.
EC 1: To encourage sustained economic growth.
EC 2: To encourage and accommodate both indigenous and inward investment.
EC 3: To encourage efficient patterns of movement in support of economic growth.
EC 4: To improve the social and environmental performance of the economy.

This report represents part of Stage 'B' of the SA process which is about appraising options and assessing effects. SA is an iterative process and the results of this report (as well as earlier parts of the process, such as Scoping) will be drawn together into a final SA report which will be submitted with the final version of the Site Allocations DPD. The final SA report will be compliant with all aspects of the SEA Directive.

Site Allocations DPD

The emerging Site Allocations DPD builds on the Joint Core Strategy and will establish policies applying to specific sites across the city of Norwich which will be allocated for housing, employment and open space. A total of 170 potential sites were put forward for development in early 2009 and were consulted upon between November 2009 and February 2010. Subsequently, the 170 sites were reduced to 124 reflecting the consultation comments, sites which have merged (i.e. sites close to one another have been combined to create a single, larger site), and removal of sites which would be more appropriately dealt with in other planning documents such as the Development Management DPD and Area Action Plans.

Sustainability Appraisal Approach

The 124 remaining sites were subject to SA (the main output of this SA report) using a Geographical Information Systems (GIS) based approach. As part of this approach, each SA objective (within the broad SA framework) was reviewed to ensure it was relevant to the Site Allocations DPD (i.e. 'is it spatial?'); the remaining objectives were then assigned criteria to enable systematic appraisal by GIS. For example, SA objective *ENV 3: 'To improve Environmental Amenity, including air quality'* was assessed by measuring each Site's proximity to Air Quality Management Areas. By assigning Sustainability Criteria to each SA objective it was possible to measure the sustainability performance of each Site in a clear and consistent way.

Not all information was available in the appropriate format for GIS analysis and is recognised as a limitation to this SA. The unavailable data includes: Post Offices; GP surgeries; Community Centres/Village Halls; Previously Developed Land and Regionally Important Geological or Geomorphological Sites (RIGs).

It should be noted that the SA criteria are indicative and do not represent absolute constraints or opportunities. They have been developed as a guide to determine which Sites have reasonable potential of achieving sustainability objectives.

Sustainability Appraisal Results

Each Site was appraised against the GIS-based criteria with the results published as a series of Excel spreadsheets. These data outputs were then interpreted, and written commentary provided, structured by Norwich City's Neighbourhood Areas (there are four in Norwich – North, South, East and West). A broad summary of the results is provided below.

With respect to sustainable access to jobs and services (relevant SA objectives include ENV 1; SOC 2; SOC 3 and SOC 8), the proposed **Housing Sites** are all within 300m of a bus stop, rail station, strategic cycle route or Green Links Network. Access to schools is variable, with Housing Sites in the Northern and Western Neighbourhood Areas less likely to be within 600m of a primary or secondary school. Housing sites within the Eastern Neighbourhood Area perform best in terms of access of a Central Shopping Area and Leisure Area (this makes sense as the main shopping and leisure areas are located within this Neighbourhood Area). Most the Housing sites are close to employment sites (i.e. within 600m walking distance). This makes sense in sustainability terms – new housing should be close to existing employment to discourage the need to travel further afield for jobs.

In terms of proximity to environmental constraints (relevant SA objectives include ENV 3; ENV 4; ENV5; ENV 7; SOC 1 and SOC2), the performance of Housing Sites varies depends upon the Neighbourhood Area into which it falls. The Historic Core of the City lies in the Eastern Neighbourhood and consequently Sites proposed within this area lie close to historic, cultural or archaeological interest (e.g. Conservation Areas, Listed Buildings, Scheduled Monuments etc). There is, however, historic interest throughout Norwich City Area and only seven (of the 107) housing sites proposed are located more than 250m from any such interest.

Nature conservation interest (e.g. SPAs, SACs, SSSI, LNR etc) are located around the periphery of the City Boundary and consequently only a few of the proposed Housing Sites lie within 250m of such sites.

Flood risk is a potential issue for Housing Sites proposed within the Eastern Neighbourhood Area (reflecting the location of the River Wensum and its floodplain).

There are four Air Quality Management Areas (AQMAs) within Norwich, all within the Eastern Neighbourhood Area. The majority of Housing Sites (65 no.) are proposed within this Neighbourhood, however, none lie within an AQMA. Proximity to AQMAs should also be considered as site selection progresses.

There are 66 proposed **Employment Sites** and these all generally perform well against the GIS SA criteria. All proposed Employment Sites lie within 300m of some form of sustainable transport mode and no Sites lie within 250m of a Nature Conservation Site. Whilst most of the Sites are close to some form of cultural or archaeological interest, this need not form an absolute constraint – the type of employment proposed and the development design will also be important. A number of proposed Employment Sites (23 no.) are located within a medium or high flood risk area; In order to minimise effects on SA objective ENV 7, Sites which fall outside of flood risk areas should be prioritised. No Employment Sites lie within an AQMA.

The proximity of an Employment Site to a waste management facility can be positive or negative in sustainability terms – close access to waste sites could facilitate improved recycling and/or reduce waste transport distances; however, potential noise and odour issues and the impact on future employees should also be considered.

The majority of proposed employment sites are within areas defined as being within the highest percentile of indices of multiple deprivation. Allocating employment in such areas could lead to positive sustainability effects on many of the Social and Economic objectives (e.g. SOC1; SOC6; EC1 and EC2).

The proposed list of sites includes a single open space site. The proposed use will be important in considering its potential location, however, it is within 300m of sustainable transport nodes (potentially facilitating access to all – with positive impacts on SOC8), it is close to other green spaces and within 300m of a green transport spine/green links network (suggesting potential for a link to these – ENV4). It does lie within 250m of Eaton Chalk Pit SSSI; this could be viewed positively as it may relieve recreational pressure on this existing site; furthermore it lies out with any flood risk zone (ENV 7) and is not within an AQMA or within 250m of a waste management facility contributing positively to health-based objectives (ENV3; SOC1; SOC 2).

Next Steps

Appendix 5

Informed by the Regulation 25 consultation, the sustainability appraisal and supporting evidence such as employment and open space studies, NCC will provide a preferred list of sites for consultation. This document will set out those sites that NCC recommends are taken forward into the final DPD.

The preferred sites document will also be subject to SA and public consultation. The SA will provide more detailed appraisal of the preferred sites and their proposed end uses, both on their own merits and also with reference to the alternatives not taken forward as preferred sites. As part of the appraisal process, NCC will need to record their reasons for selecting the preferred sites, and in particular the reasons for rejecting any sites that appear from the SA process to offer sustainability advantages at least as significant as the preferred sites.

The final Site Allocations DPD is scheduled for adoption in April 2012.