

## APPENDIX 2

### NORWICH DEVELOPMENT MANAGEMENT DPD; DRAFT SUSTAINABILITY APPRAISAL REPORT

PREPARED FOR NORWICH CITY COUNCIL BY LAND USE  
CONSULTANTS, NOVEMBER 2010

#### 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 in the UK incorporates Strategic Environmental Assessment (SEA). This is a requirement of the 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 assist with the development of preferred policies for the Development Management policies DPD which will be consulted upon as part of Regulation 25 consultation in early 2011. 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. 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 2010. 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, townscape 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 Development Management Policies DPD. The final SA report will be compliant with all aspects of the SEA Directive.

### **Development Management Policies DPD**

In line with the Government's new format for development plans, Norwich City Council (NCC) is preparing a folder of planning documents for the city of Norwich called a Local Development Framework (LDF). The LDF will contain a number of plans and strategies about land use and spatial planning in Norwich, and will provide the basis for determining planning applications and future development. The LDF is composed of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The Councils of Broadland, Norwich and South Norfolk, supported by Norfolk County Council, have prepared a single Joint Core Strategy DPD. The plan provides the strategy to guide, manage and deliver the growth deemed necessary for the entire area and is currently in the final stages of its preparation; the Examination in Public was held in November 2010. The Development Management policies DPD builds on the Joint Core Strategy DPD, and, alongside the proposals map, will set out more detailed guidance on a range of policy issues for the management of development in Norwich. There are 33 proposed

development management policies covering a broad range of policy topics.

### Sustainability Appraisal Approach

The approach to SA of the Development Management Policies DPD has been firstly to review the detailed SA framework and ensure it is fit for purpose for appraising this DPD. Most of the objectives and sub-objectives therein were considered relevant with the exception of a small number which have been discounted from further appraisal work. These are set out in the table below together with the reasons for screening them from the appraisal:

SA Objective	SA Sub-objective	Reasoning
<b>ENV 9 To make the best use of resources, including land and energy and to minimise waste production</b>	ENV9 (b) Will it promote the use of land in sustainable locations that has been previously developed?	Use of land in sustainable locations that has been previously developed is most likely addressed by Joint Core Strategy policies regarding the efficient use of land, and through the Site Allocations DPD.
	ENV9 (e) Will it avoid the loss of good quality agricultural land and preserve soil resources?	Avoiding the loss of good quality agricultural land and preserving soil resources are most likely addressed by Joint Core Strategy policies, and through the Site Allocations DPD.
	ENV9 (j) Will it increase waste recovery for other means e.g. Energy Generation?	Increasing waste recovery for other means is most likely to be addressed by waste planning policies.
<b>SOC 1 To reduce poverty and social exclusion</b>	SOC1(a) Will it reduce poverty and social exclusion in those areas most affected?	Reduction of poverty and social exclusion is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities', 'The economy', and 'Access', and through the Site Allocations DPD.
<b>SOC 3 To improve education and skills</b>	SOC3 (a) Will it improve qualifications and skills for both young people and amongst the workforce?	Improving qualifications and skills for both young people and amongst the workforce is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (b) Will it help to retain key workers and provide more skilled workers from school leavers?	Helping to retain key workers and provide more skilled workers from school leavers are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.

SA Objective	SA Sub-objective	Reasoning
	SOC3 (d) Will it promote lifelong learning and skills training?	The promotion of lifelong learning and skills training are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (e) Will links between lower levels of education and deprivation be addressed?	The links between lower levels of education and deprivation are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
<b>SOC 6 To offer more opportunities for rewarding and satisfying employment for all</b>	SO6 (b) Will it help to improve earnings?	Improving earnings overall is most likely to be addressed by Joint Core Strategy policies regarding 'The economy'.
<b>EC1 To encourage sustained economic growth</b>	EC1(c) Will it reduce vulnerability to economic shocks?	Reducing vulnerability to economic shocks is most likely to be addressed by Joint Core Strategy policies regarding 'The economy'.
<b>EC 2 To encourage and accommodate both indigenous and inward investment</b>	EC2 (e) Will it support/encourage rural diversification?	Support/encouraging rural diversification is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting communities' and 'The economy'.
<b>EC 3 To encourage efficient patterns of movement in support of economic growth</b>	EC3(c) Will it reduce journey times between key employment areas and key transport interchanges?	Reducing journey times between key employment areas and key transport interchanges is most likely to be addressed by Joint Core Strategy policies regarding 'Access and Transportation' and in the Site Allocations DPD regarding new sites for employment uses.
	EC3 (d) Will it improve efficiency and sustainability of freight distribution?	Improving efficiency and sustainability of freight distribution is most likely to be addressed by Joint Core Strategy policies regarding 'Access and Transportation' and in the Norwich Area Transportation Strategy.

The Development Management policies were then grouped in 'clusters'; each cluster corresponding to a specific theme – Planning Statements, Environment and Design, Telecommunications, Housing, Economy, Communities, University of East Anglia, Norwich Airport and Transport. An appraisal was undertaken of each policy cluster focusing on any likely significant effects (both positive and negative) arising from their implementation. Recommendations were made to improve policies in the light of this appraisal.

The appraisal also provided an assessment of any reasonable alternatives to the published policies, in line with the requirements of the SEA Directive.

## **Sustainability Appraisal Results**

### **Planning statements**

The proposed policy framework regarding planning statements should enable a clear and efficient development management process, and ensure that proposals are accompanied by appropriate assessments and mitigation proposals (positive effects on ENV1-7, ENV9, SOC1-2, SOC4, SOC7 and EC1-4). No significant negative effects are anticipated.

It is recommended that a 'sustainability statement' is added to the list of required supporting documents.

### **Environment and design**

The proposed policy framework regarding environment and design should support: future development that meets the needs of all of its users and is conducive to promoting safe (in relation to crime, environmental protection and flood risk) (positive effect on SOC1, SOC4, SOC5, ENV6, and ENV7), healthy and high quality communities (positive effect on SOC1, SOC2, SOC4, SOC7, and SOC8); the protection of the natural and built environment, and where possible enhancement through new development (ENV1, ENV2, ENV4, and ENV5); and minimisation of the extra pressure placed by new development on existing energy resources, with energy efficiency, the development of renewable energy and enabling sustainable modes of travel proposed (positive effect on ENV6, ENV8 and ENV9). Potential negative effects are noted in relation to development in areas prone to flood risk in regeneration areas (negative effect on ENV7).

**Recommendations** for this policy cluster include: greater support for the upgrading of poor quality housing; greater detail regarding how development design will address fear of crime; landscaping criteria that support multi-functional usage; and clearer articulation regarding positively involving the local community in developing appropriate solutions for open space provision.

### **Telecommunications**

The proposed policy framework regarding telecommunications should enable the delivery of sufficient telecommunications infrastructure to meet a future growth in community demand (positive effect on SOC1 and EC2). Whilst development is recognised as having inherent visual and landscape impacts, and potentially amenity (negative effect on ENV5, SOC1 and SOC7), it is not considered that such impacts would be unreasonable. No significant negative effects are anticipated.

## Housing

The proposed policy framework regarding housing should ensure housing delivery: meets identified levels and types of demand (positive effect on SOC4 and SOC7); is adaptable and sensitive to the needs of its residents (positive effect on SOC1, SOC4 and SOC7); is sensitive to the environment, townscape and landscape (positive effect on ENV4 and ENV5); and promotes mixed communities (positive effect on SOC5). Whilst the framework seeks to limit negative effects, inherent negative effects are recognised: extra pressure on resources within and supplying the plan area (negative effects on ENV1, ENV2, ENV3, ENV8 and ENV9) and extra pressure on local facilities and services (negative effect on SOC8). No significant negative effects are anticipated.

**Recommendations** for this policy cluster include: greater detail regarding how affordable housing will be positively delivered; greater support for the upgrading of existing housing stock of a poor quality; support for the provision of gypsy and traveller and travelling showpeople sites that are large enough to enable mixed residential and business use; and clearer articulation regarding positively involving the local community in developing appropriate solutions for housing provision.

## Economy

The proposed policy framework regarding the economy should: support economic growth and related development within the plan area, including small and medium sized businesses (positive effect on EC1 and EC2); concentrate growth in accessible locations (i.e. town and local centres) which will enable people to choose more sustainable modes of transport, and support and protect the vitality and diversity of town and local centres, including through seeking a balance between different centre uses (positive effect on EC1, EC2, EC3 and EC4). Negative effects are noted in relation to economic growth, and a subsequent increase in traffic and vehicle emissions as a result of increased passenger miles (negative effect on ENV1, ENV2, ENV3, ENV6 and EC4) and extra pressure being placed on energy and water resources (negative effect on ENV8 and ENV9). No significant negative effects are anticipated from this policy cluster.

**Recommendations** for this policy cluster include: greater support for street and farmers markets; greater support for creative and innovative uses of vacant sites (e.g. pop-up shops); greater recognition of the role of 'neighbourhood centres' in meeting retail need; and clearer articulation of how opportunities to support growth within deprived areas will be sought.

## Communities

The proposed policy framework regarding communities should: protect and improve the provision of community facilities (positive effect on

SOC8); support a diverse and vibrant range of leisure, evening and night-time uses which do not negatively impact on the character, amenity and vitality of the city centre, bringing both social benefits and economic benefits to the community (positive effect on ENV5, SOC1, SOC8, EC1, EC3 and EC4); ensure that any future expansion of hot food takeaways in identified centres does not negatively impact amenity and the vitality within these areas (SOC2, SOC7, EC1, EC2 and EC4); and restrict further expansion in retail warehouses and the sale of non-bulky goods from existing warehouses in Norwich such that the vitality and viability of the city centre is supported through ensuring these retail spaces do not draw consumers away from the city centre (positive effect on EC1 and EC3). Inherent negative impacts are noted resulting from the enhancement of the evening, leisure and late night economies (negative effect on ENV1, ENV3, ENV6, ENV9, SOC7 and EC4) and potential negative impacts on employment within Black and Minority Ethnic (BAME) communities resulting from restrictions on hot food takeaways (negative effect on EC2)<sup>1</sup>. No significant negative effects are anticipated from this policy cluster.

It is **recommended** that the quantitative and qualitative need for additional floorspace for different types of retail and leisure developments is included in any related needs assessment.

### **University of East Anglia**

The proposed policy framework regarding the University of East Anglia should result in positive economic impacts for the plan area resulting from employment opportunities within the University and a potentially higher number of students (positive effect on EC1 and EC2) and in relation to improving education and skills (positive effect on EC3). Whilst this policy seeks to manage any growth in vehicle numbers, potential negative effects are noted (negative effect on ENV1, ENV3, ENV6 and ENV9). No significant negative effects are anticipated from this policy.

**Recommendations** for this policy cluster include: reference made to protecting local undesignated biodiversity assets; and greater detail regarding how public access to open space will be delivered.

### **Norwich Airport**

The proposed policy framework regarding Norwich Airport Expansion should support positive effects with regards employment (SOC8) and economic development (EC2 and EC4), but a significant negative effect is noted with regards the growth in the use of an unsustainable

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<sup>1</sup> The text says that it 'may' have an impact as data is not available regarding the nature of employment within hot food takeaways in Norwich; however, it is often the case that hot food takeaway units are owned or provide employment primarily for BAME communities. Refer to Appendix 1: Barking and Dagenham LDF: Representations from the Mayor of London: [www.london.gov.uk/.../barking\\_&\\_Dagenham\\_LDF\\_pre\\_submission\\_of\\_core\\_strategy\\_appendix.rtf](http://www.london.gov.uk/.../barking_&_Dagenham_LDF_pre_submission_of_core_strategy_appendix.rtf) and the Equality Impact Assessment for Waltham Forest's SPD on Hot Food Takeaways: <http://www.pas.gov.uk/pas/aio/590466>

mode of travel with subsequent increases in the emission of greenhouse gases (significant negative effect on ENV9). A cumulative significant negative effect, as a result of airport development combined with general transport growth, is predicted with regards the emission of atmospheric pollutants (negative effect on ENV3). There are also potential subsequent impacts on biodiversity (negative effect on ENV4) and health (negative effect on SOC2).

**Recommendations** for this policy cluster are: Provision of greater detail regarding how the potential positive economic effects of airport growth are to be balanced with the potential significant negative environmental impacts; and that a Sustainability Appraisal / Strategic Environmental Assessment of Norwich Airport Masterplan should be undertaken.

### **Transport**

The proposed policy framework regarding transport should: enable the use of sustainable modes of transport through using development design and layout, and restricting car use in areas well serviced by public transport, whilst ensuring less mobile members of society are not penalised (e.g. parking provision for disabled drivers) (positive effect on ENV1, ENV3, ENV6, ENV9, SOC1 and SOC8); restrain commuting by car through controlling city centre parking (positive effect on ENV1, ENV3, ENV6 and ENV9); ensure access from new development is sensitive to the urban environment and safety issues (positive effect on SOC1 and SOC4); ensure development includes appropriate levels of parking for residents and servicing activities (positive effects on SOC1 and SOC4); support car free or low car housing (positive effect on ENV1, ENV3, ENV6, and ENV9); and ensure the additional demand placed by new development on transport infrastructure and servicing is addressed through development contributions (positive effect on SOC1, SOC4, SOC8 and EC3). Potential negative effects are noted with regards parking provision enabling continued car use (negative effect on ENV1, ENV3, ENV6, and ENV9), with the potential for air pollution to be exacerbated particularly in identified air quality management areas in and around the city centre. No significant negative effects are anticipated from this policy cluster.

**Recommendations** for this policy cluster include: greater support for the provision of electric car charging points in new developments; priority given to car club parking spaces in public parking; and greater support given to car free housing developments.

### **Next Steps**

The Council is currently gathering evidence to help inform development of the Development Management Policies. This includes the conclusions and recommendations arising from this SA report.



There will be an opportunity for individuals, organisations and stakeholders to have their say on the draft policies. This consultation is anticipated in early 2011. The Regulation 25 document will be accompanied by a draft SA report, setting out the likely sustainability effects of the preferred policies as well as any reasonable alternatives. Comments will be welcome on the draft SA report.