

**Interim Sustainability Appraisal of the
Greater Norwich Local Plan for
Broadland, Norwich and South Norfolk**

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1. Introduction

Background

- 1.1. Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council, have agreed to work together to prepare the Greater Norwich Local Plan (GNLP).
- 1.2. The Greater Norwich Local Plan will build on the long-established joint working arrangements for Greater Norwich, which have delivered the current Joint Core Strategy (JCS) for the area. The JCS plans for the housing and jobs needs of the area to 2026 and the GNLP will ensure that these needs continue to be met to 2036.
- 1.3. Like the Joint Core Strategy, the GNLP will include strategic planning policies to guide future development, and plans to protect the environment. It will look to ensure that delivery of development is done in a way which promotes sustainability and the effective functioning of the whole area.

Sustainability Appraisal

- 1.4. Development Plan Documents (DPDs) – the statutory parts of the Local Plan – must undergo a Sustainability Appraisal (SA). The GNLP will form part of the statutory Local Plan for Broadland, Norwich and South Norfolk. SA involves identifying the likely effects of a DPD on the economy, the community and the environment with a view to avoiding and mitigating adverse impacts and maximising positive ones.
- 1.5. In developing DPDs, local planning authorities must also undertake a Strategic Environmental Assessment (SEA) to identify and address the likely effects of the plan on the environment. The SEA for the GNLP is being undertaken as part of the wider SA.
- 1.6. The SA for the GNLP will assess the “likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated”. Furthermore, the SA will set out “an outline of the reasons for selecting the alternatives dealt with”, i.e. the rationale behind the alternatives considered and the rationale for selecting preferred alternatives.

SA process and the GNLP

- 1.7. The SA process has been integrated into the development of the GNLP. The following steps were taken as part of the process that led to the preparation of this interim SA report.
 - Between 20 June and 15 August 2016 the authorities consulted with Historic England, Natural England, the Environment Agency and other relevant bodies on the content of the SA scoping report.
 - Having taken account of representations made in response to the consultation a series of amendments were made to the Scoping Report.

These amendments were agreed by the Councils between January and March 2017.

- In January 2017 the GNDP agreed a draft vision and set of objectives for the GNLP. An evaluation of the draft plan objectives against the draft SA objectives accompanied the report to the GNLP.
- In June 2017 the GNDP considered the emerging GNLP alternatives in regards Housing Numbers and the Growth Strategy. A high level sustainability of these alternatives accompanied the report to the GNLP.

1.8. This interim SA report accompanies the consultation on the GNLP under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The interim report has been drafted to comply with the guidance on SEA and SA published in the DCLG planning practice guidance.

1.9. A further SA document will be produced and published alongside the pre-submission version of the GNLP, currently programmed for 2019. The SA report that accompanies the final submission of the GNLP for examination will be the version intended to meet relevant legal requirements.

How to make Representations on the Interim Sustainability Appraisal of the Graetear Norwich Local Plan.

1.10. Representations can be submitted on this report as part of the Regulation 18 consultation. [\(Insert instructions for making representations here\)](#)

2. Sustainability Baseline

- 2.1. The scoping exercise undertaken on the Greater Norwich Sustainability Appraisal Report established the scope and level of detail of information to be included.
- 2.2. For the sake of brevity, the final SA scoping report has not been repeated here. The section below does, however, set out a summary of the baseline information and the forecast evolution of the baseline without the implementation of the plan. This information can be cross referenced with the key sustainability issues identified which are set out in chapter 3. This information has informed the evaluation of the policy alternatives considered in the emerging GNLP.

2.3. Summary of Baseline and Likely Evolution thereof without the Implementation of the GNLP

Air Quality and Noise

- 2.3.1. Air quality in Norwich city centre is likely to remain a major issue during the plan period to 2036. Improvements may result from traffic management measures set out in NATS and promoted by the JCS and by other measures prioritised by Norwich city centre AQMA Action Plan irrespective of the progress of the GNLP.
- 2.3.2. In addition, Government action is expected to increase the uptake of ultra-low emission vehicles during the lifetime of the GNLP. This may help improve air quality in Norwich (and elsewhere).
- 2.3.3. Noise from Norwich International Airport and existing and new main roads is also likely to remain a long term issue.

Climate Change

- 2.3.4. The adopted JCS contains policies to address climate change issues, including flood risk. In respect of new development these policies can reasonably be expected to continue to minimise impact on the baseline. Some of these policies have, however, already been superseded by changes in national policy and it is likely that current policies will become increasingly out-of-date, and as such, will carry less weight in the determination of planning applications. Therefore, the impact of development may not be similarly minimised in the future in the absence of the GNLP.
- 2.3.5. Also, in the absence of the GNLP there would be no strategic plan for the Greater Norwich area that manages development so as to minimise vehicular emissions by, for example, allocating land to meet development needs in locations that are well related to services, facilities, employment opportunities and sustainable transport options. In the “no plan” scenario development needs would likely be met through speculative applications, which could conceivably be poorly related to sustainable transport or a planned, and coherent, investment programme, and therefore have a greater impact on the baseline in regards to Climate Change issues.

Biodiversity, Geodiversity and Green Infrastructure

- 2.3.6. Sites of Biodiversity and Geodiversity importance are provided with a degree of protection which is proportionate to their status through both national and local planning policy. It is reasonable to expect that such proportionate protection would continue irrespective of the progress of the GNLP.
- 2.3.7. The JCS establishes a high level green infrastructure network, which has been designed taking into account both biodiversity issues and planned growth. This network is being implemented through allocated and permitted development and through investment via the Greater Norwich Infrastructure Plan. It is reasonable to expect that this green infrastructure network will continue to be implemented alongside the growth planned for in the JCS and subsequent site allocations documents, this will encompass much of the growth needed to 2036.
- 2.3.8. The absence of a further plan to 2036 would likely result in a less coordinated approach to the delivery of Green Infrastructure, with development being delivered through market driven speculative applications. The absence of planned growth to 2036 could also increase the risk of permissions being granted for speculative applications on biodiversity and geodiversity sites of lesser importance.

Landscape

- 2.3.9. Greater Norwich is a predominantly rural area with the urbanised city of Norwich and its suburbs at its centre. There is a diversity of landscape types across Greater Norwich, signified by the five nationally defined landscape character areas that are present.
- 2.3.10. Particular landscape sensitivities in the area include: the Broads, which lie along the eastern edges of Broadland, Norwich and South Norfolk; river valleys and their setting; gaps between settlements; the landscape setting of, and undeveloped approaches to Norwich; and, several historic parks and gardens, ancient woodlands, the settings of listed buildings and remnant heathlands.
- 2.3.11. The Broads area is likely to benefit from a degree of protection long term protection irrespective of the implementation of the GNLP, as would historic parks and gardens, ancient woodlands, the settings of listed buildings and remnant heathlands. Other important elements, however, could come under pressure if development occurs in an ad-hoc manner. In particular, this is likely to affect gaps between settlements and the landscape setting of Norwich.

Water

- 2.3.12. The Environment Agency classifies the Norwich and the Broads Water Resource Zone (WRZ), in which Greater Norwich lies, as an area of Serious Water Stress. Anglian Water's Water Resource Management Plan (WRMP) plans significant investment in the Norwich and the Broads WRZ to ensure that the water supply and demand balance is maintained. The disposal of waste water in a manner that maintains water quality will continue to be an issue as Greater Norwich grows. Pollution from waste water is one of the key basis management issues for the Broadland Rivers Catchment along with diffuse pollution from the rural area and physical modification of lakes and rivers.

2.3.13. Growth will still occur without the implementation of the GNLP, however: there will not be a clear strategy, as provided by the JCS, for future development that direct growth to the most appropriate places, taking into account infrastructure constraints; there will not be such a clear basis on which infrastructure providers can plan for investment; the JCS policy requiring water efficiency will increasingly become out of date, thereby potentially diminishing the weight given to it when determining applications; and, there will be no backstop position that makes clear that the release of land for development is dependent on there being sufficient infrastructure to meet demand and protect water quality.

2.3.14. Each of these impacts increases the risk that both the water supply and demand balance will not be maintained and that water quality is maintained.

Historic Environment

2.3.15. Greater Norwich has a rich historic environment. Of particular sensitivity are the many listed buildings, conservation areas and ancient monuments that are present. In addition, due to the long history of habitation in the area, there is significant potential for archaeological finds throughout Greater Norwich.

2.3.16. Those heritage assets of particular sensitivity are likely to be protected in line with their importance through national policy, legislation or regulations irrespective of the implementation of the GNLP. Without the implementation of the GNLP, however, development will still occur; but in an ad-hoc manner that might not necessarily distributed development in a manner that is most appropriate, taking into account impact on the historic environment. Thus there are greater uncertainties about impact on the Historic Environment in the absence of the GNLP.

People and Communities

2.3.17. The population of the Greater Norwich by 2036 is expected to grow to between 455,000 and 458,000.¹ This equates to an annual rate of population growth of between 0.75% and 0.78%. This is very similar to that which took place between 1971 and 2011, but slightly less than in the period 2001-2011.

2.3.18. It is also expected that the population will continue to age overall; with a higher proportion of young adults in Norwich; a higher proportion of people in older age groups in Broadland and South Norfolk; and, increasing ethnic diversity.

2.3.19. Development can reasonably be expected to occur irrespective of the implementation of the GNLP. Without the pro-active plan for growth that would result from the implementation of the GNLP, however, it is reasonable to assume that there is a greater risk that the type and distribution of homes, jobs and

¹ Population projection to 2036 455,142 (based on sub national population projection) and is 458,158 (based on 10 year migration trend) – see Central Norfolk Strategic Housing Market Assessment at http://www.south-norfolk.gov.uk/housing/media/SHMA_Central_Norfolk_Part_1.pdf

services that are needed to support this growing and changing population will not be delivered.

Deprivation

2.3.20. The highest levels of deprivation in Greater Norwich occur within Norwich City, which has a number of areas that fall within the most deprived 10% nationally. Conversely, the majority of the suburban and rural parts of Greater Norwich do not suffer from significant levels of deprivation.

2.3.21. Without the implementation of the GNLP, it is reasonable to assume that there is a greater risk that ad-hoc development would be less likely to directly benefit deprived areas. The lack of a coherent growth strategy could also reduce the potential for coordinated infrastructure investment strategies that benefit deprived areas such as occurred through the JCS e.g. planned improvement to public transport and cycling infrastructure between major growth in north east Norwich and the City Centre via the Heartsease estate.

Health

2.3.22. The health of people in Broadland and South Norfolk is generally better than the England average, whilst that in Norwich is worse. Only three districts in England had higher relative proportions of health deprived neighbourhoods than Norwich. The pattern of health deprivation in Norwich strongly correlates to that of overall deprivation.

2.3.23. The health issues that are most notably worse than the national average in Norwich are: alcohol related harm hospital stays; the rate of self-harm hospital stays; and, levels of adult smoking. The health issue in Broadland and South Norfolk that is notably worse than the national average is excess winter deaths. It is also recognised that nitrogen dioxide and other particulates are a risk to people's health.

2.3.24. There are a range of initiatives and programmes that seek to address the health issues found in Greater Norwich. Nonetheless, without the implementation of the GNLP opportunities to: enable the health services and facilities needed in the area to be effectively planned on the basis of a clear growth strategy; plan for development so as to minimise exposure to poor air quality; provide good links to open space; and, support active and healthy lifestyles are likely to be diminished.

Crime

2.3.25. Levels of crime are typically lower in rural and suburban areas than in inner urban areas. Crime rates are highest in Norfolk Constabulary's east policing area; which contains the whole of the city centre, including shopping and late night activity areas.

2.3.26. It is expected that population growth across Greater Norwich will result in an increase in the total number of incidents that the police need to attend each year, and that there will continue to be a higher crime rates in the eastern parts of the city centre.

2.3.27. It is reasonable to assume that population growth, development and a consequential increase in incidents will continue to occur irrespective of the implementation of the GNLP. Similarly, national planning policy is likely to continue to seek safe environments where crime and disorder do not undermine the quality of life. The implementation of the GNLP does, however, provide opportunities to set out locally specific requirements, or obligations for particular design standard e.g. secure by design that could help minimise the identified effects on crime.

Education

2.3.28. Norwich scores poorly in the Education, Skills and Training domain of the IMD; only three districts in England have higher relative proportions of education deprived neighbourhoods in their boundaries than Norwich. Norwich also ranks poorly for social mobility. Broadland and South Norfolk perform much better on these measures.

2.3.29. The proportion of the population with higher level qualifications in Norwich is however broadly consistent with the national average, as is the population of South Norfolk. Broadland is 5 percentage points below the national average for higher qualification attainment.

2.3.30. Without the implementation of the GNLP it will become more difficult to effectively plan for the provision of primary and secondary education, as there will be no long term strategic plan for growth. The growth of key employment sectors could also be restricted without a complementary suite of land use policies; this could have a direct impact on social mobility, getting a good job, and also the success of wider skills and training initiatives.

Transport and Access to Services

2.3.31. Dualling of the A11 has been completed in recent years and government has committed to improving the A47. The Northern Distributor Road (NDR) is due to be completed by March 2018. The Long Stratton bypass, and NDR "Western Link" have been identified as transport priorities by Norfolk County Council. Rail improvements are planned to strategic services, including from Norwich to London, via Diss. There has been growth in passenger numbers at Norwich Airport, and forecasts suggest this trend will continue. There has been investment in the Norwich Cycle Network, on Public Transport Improvements and on City Centre Measures to address current issues and support planned growth.

2.3.32. Norwich, and its immediate hinterland, strongly influences commuting patterns; the Central Norfolk Housing Market, which is based on the Norwich travel to work area extends as far as Cromer, Swaffam, Eye and the eastern fringe of Great Yarmouth. Travel to work data illustrates that walking and cycling is far more prevalent in Norwich than Broadland or South Norfolk; private motor vehicle commuting is 20 percentage points higher in Broadland and South Norfolk than in Norwich. It is reasonable to assume that this results from the rural nature of much of Broadland and South Norfolk and resultant options for alternative modes of travel. The IMD shows that the Rural areas of Broadland

and South Norfolk are much more significantly deprived than Norwich or the Urban Fringe in term of barriers to services and housing.

- 2.3.33. It can reasonably be expected that strategic improvements to the A47, completion of the NDR and progression of the Long Stratton Bypass and Western Link will continue irrespective of the implementation of the GNLP: they are key priorities of the Local Transport Authority. Similarly, there can be a strong degree of confidence that investment will continue to be directed to public transport, walking and cycling and city centre measures to support planned growth. In the absence of the GNLP, however, there is the potential that the necessary supporting infrastructure for longer term growth would not be delivered: investment and infrastructure planning will be significantly more complicated in the absence of a strategic plan for growth. There is also a risk that growth occurs in an ad-hoc manner that reinforces existing barriers to services across the rural area.

Natural Resources and Waste

- 2.3.34. 48% of waste in Greater Norwich was recycled or composted in 2014/15. This is largely delivered through a kerbside recycling scheme and the rates achieved exceed the Norfolk and England average. Norfolk's minerals and waste management local plan sets out policies relating to the use and development of land; it appropriately protected sites with the potential for mineral extraction and allocates necessary sites for mineral extraction and waste management facilities. Large tracts of agricultural land across Greater Norwich, particularly to the east of the city between Postwick and Acle, are identified as being of the best and most versatile quality.
- 2.3.35. Waste recycling rates are not expected to be affected by the implementation of the GNLP, and it is reasonable to assume that the minerals and waste strategy will continue to provide adequate safeguarding for mineral extraction sites, areas with the potential for mineral extraction and the provision of waste management sites. Failure to implement the GNLP could however increase pressure on the best and most versatile agricultural land. For example, east Norwich has been subject to a number of development sites permitted, at least in part on the basis of the absence of a five year land supply. It is therefore reasonable to assume that without the implementation of the GNLP there is a greater risk to high quality agricultural land.

Employment and the Economy

- 2.3.36. Greater Norwich is the largest economic centre in the East of England; Norwich is the largest employment centre in Greater Norwich and the 13th best performing retail centre nationally. Most market towns in Greater Norwich have a healthy retail offer and below average vacancy rates. Levels of employment in Greater Norwich² compare favourably to national averages; notably unemployment is higher in Norwich (5.9%) than in Broadland (3.1%) and South

² ONS, 2016, labour market statistics

Norfolk (3.3%). GVA is, however, lower in East Anglia compared to that of England.

2.3.37. The biggest industries in Greater Norwich are³: Wholesale, Retail and Vehicle Repairs (17%); Human health and Social work (13.6%); Education (10.3%); Manufacturing (8.3%); and, Construction (8.2%). The four largest employment sectors across the New Anglia LEP area of Norfolk and Suffolk are⁴: Agriculture and food and drink (10% of workforce; 10% of annual GVA); Financial and Insurance Services (3% of workforce; 13% of annual GVA); Ports and logistics (15% of workforce; 6% annual GVA); Tourism and culture (11% of workforce; 6% of annual GVA). The LEP Strategic Economic Plan (SEP) identifies: Advanced Manufacturing and Engineering; Agri-tech; Energy; ICT/Digital Culture; and, Life Sciences as high impact sectors with high growth potential.

2.3.38. There are a number of initiatives underneath the LEPs strategic economic plan and the economic development functions of the Greater Norwich authorities that would support economic development and promote growth in general and across high impact sectors in particular. However, economic growth could be restricted without a complementary suite of land use policies that support their needs such as could be provided by the GNLP.

Housing

2.3.39. There is a need for 39,486 homes between 2015 and 2036, 26% of which needs to be affordable housing. Overall, overcrowding in Greater Norwich increased between 2001 and 2011, however nearly 90% of properties in Broadland and South Norfolk are identified as under occupied. 2/3 of overcrowded properties are in the social or private rented sector. The ratio of house prices to earnings peaked in 2007/08 at approximately 8:1. Whilst there was a significant reduction in the ratio following financial crash, the ratio of house prices to earnings has subsequently increased. In 2013 the ratio was just under 7:1.

2.3.40. Whilst development will continue to occur without the implementation of the GNLP, such development would occur in an ad-hoc fashion in the absence of a clear growth strategy for the full development needs of the area. The lack of a plan to both guide development to the most appropriate locations, and to ensure that housing development of the appropriate type, size and tenure risks unplanned, piecemeal development which does not deliver the quantity, type and tenure of housing needed of the area. This may lead to a relative decline in the provision of social housing; diminishing the opportunities for young people to purchase their first homes and/or the creation of mixed and inclusive communities, with negative social consequences.

³ 2011 Census

⁴ New Anglia LEP: Strategic Economic Plan

3. Sustainability Issues

3.1. Taking into account the environmental, economic and social characteristics described in the baseline a number of sustainability issues that were relevant to the GNLPS were identified. These issues are set out in the table below:

Theme	Issue
Air Quality	Although air quality is generally good in the area, there are Air Quality Management Areas (AQMA) in Norwich City Centre and in Hoveton, adjacent to the plan area, along with other isolated sites of reduced air quality.
	There are high noise levels around Norwich International Airport and main roads in the area and light pollution from urbanised areas.
Climate Change	There is a need to ensure consistency with interventions proposed within Governments forthcoming emissions reduction plan, supporting the wider policy imperative to reduce carbon emissions over time.
	Climate change is expected to increase the frequency and intensity of extreme weather events such as heat waves, drought and intense rainfall.
	Fluvial/tidal flooding is a risk affecting limited parts of the area, while surface water and sewer flooding is a risk in a number of places.
	Although per capita CO ₂ emissions have been declining in line with national trends, they are above the national average in rural parts of the area.
	There is potential to increase renewable energy production chiefly from solar, wind and biomass developments, as well as from micro-renewables.
Biodiversity, Geodiversity and Green Infrastructure (GI)	There is a need to protect and enhance nationally and internationally protected nature conservation interests and geodiversity sites in and adjacent to the area, with particular emphasis on reducing visitor pressure on and improving water quality in Natura 2000 sites and the wider habitats of the Broads.
	There are a number of locally important biodiversity sites that should be protected and enhanced.

	Local changes in air quality resulting from increased emissions, such as from increased traffic movements, could affect designated sites.
	There is a need to ensure that the impact on GI from new development is minimised and benefits from new GI are maximised.
	Long term investment in improvements to the defined green infrastructure network is required.
Landscape	Development should maintain important aspects of Greater Norwich's varied landscapes, including historic parks and gardens and ancient woodlands.
	Defined strategic gaps, including those between Wymondham and Hethersett and Hethersett and Cringleford, are important to maintain the settlement pattern in rural areas.
	Regard must be had to the distinctive landscape of the Broads.
Water	Since the area suffers from water stress, effectively managing the supply and demand balance is critical, taking into account the peaks in demands from homes, jobs and agriculture and the impact of abstraction on habitats and biodiversity. Ensuring water efficiency will have a key role locally.
	Since the area has low rainfall, water efficiency is a significant issue locally.
	Water quality in Natura 2000 protected sites is an issue, particularly in relation to water abstraction from the River Wensum and water disposal at Long Stratton and into the River Yare. Consequently there is a need to improve water quality to achieve Water Framework Directive (WFD) targets and to protect habitats.
	There is a need to consider the measures within the Anglian River Basin Management Plan and the issues in the Broadland Rivers Catchment Plan.
Built Heritage	There is a great wealth of heritage assets in the area of both national and local significance. A limited number of these assets are on the heritage at risk register.

	Due to the long history of habitation in the area, there is significant potential for archaeological artefacts and finds throughout Greater Norwich.
	There is a need to conserve and enhance designated and non-designated heritage assets and the contribution made by their settings.
	There are areas where there is likely to be further significant loss or erosion of townscape character or quality, or where development has had or is likely to have significant impact (direct and/or indirect) upon the historic environment and/or people's enjoyment of it.
	Traffic congestion, air quality, noise pollution and other problems can affect the historic environment.
People and Communities	There is a need to provide for continued growth in the population of approximately 15-16% from 2012 to 2036.
	It is necessary to provide services and housing to meet the needs across the area, particularly those of younger adults in Norwich, of remote rural communities and of the growing older population throughout the area. There will be a particular need to provide services and housing to meet the needs of younger adults in Norwich and to provide for the growing older population throughout the area.
	The needs of the small but growing ethnic groups in the area will need to be taken into account.
Deprivation	There is a need to minimise socio-economic disadvantage and reduce deprivation, which particularly affects a number of areas of Norwich and some rural areas.
Health	It will be important to ensure that Greater Norwich's good levels of health are supported, with a particular focus on reducing the health gap between different areas and on providing the necessary health services and facilities for a growing and ageing population.
	It is important to consider the ways in which exposure to poor air quality can be minimised or reduced
	It will be important to maintain and enhance links, including green infrastructure links, to the countryside and semi-natural

	open spaces to encourage physical activity and mental well-being.
	It will be important to ensure new development is well related to green infrastructure.
	It will be important to ensure new development supports active and healthy lifestyles.
Crime	Although levels of crime are generally low, there are higher crime levels in inner urban wards, particularly in areas with a concentration of late night drinking establishments.
Education	The recent increase in the birth rate will increase demand for education and other children's services in the area.
	It is important to increase educational attainment and skill levels, particularly in the more deprived parts of the area. and in other areas where there is low educational attainment.
Transport and Access to Services	Development should be located where transport options are, as far as possible, not limited to using the private car, so that sustainable transport options can be promoted, and where the need for additional infrastructure can be minimised.
	There is a need to improve the strategic transport network, most particularly improvements to the rail network, to the A47 and to provide good quality public transport access to Norwich International Airport.
	Further investment is required to promote sustainable transport patterns. The completion of the NDR provides the opportunity to implement further improvements in the Norwich urban area and in the main growth locations and to reduce cross city traffic movements.
	Local rail connections could provide further opportunities for sustainable transport which should be considered.
	In rural areas, access to public transport is poor and subsidies are likely to decline, so it will be important to sustain local public transport services where possible and to support demand responsive transport.
	It will be important to improve access to high speed broadband and mobile phone connectivity, particularly in rural areas.

	Road safety should be improved.
Natural Resources, Waste and Contaminated Land	It is important to ensure waste management accords with the waste hierarchy and reduces the overall quantity of waste.
	Waste facilities will need to be provided to cater for a growing population, prevent fly tipping and increase recycling rates.
	Appropriate storage and segregation facilities for waste will need to be provided on new development.
	Mineral resources including sand and gravel and minerals and waste infrastructure should be safeguarded.
	The use of secondary and recycled aggregates in all developments to reduce the need for primary aggregate extraction and increase inert construction and demolition waste recycling should be promoted.
	There are high quality soils (grades 1, 2 and 3a) in many parts of the area and limited areas of contaminated land mainly on brownfield sites.
	There is a need to make the most efficient use of land, maximising the re-use of brownfield sites in order to minimise the loss of undeveloped land and protect soils.
Employment and the Economy	Greater Norwich is a regionally important economic centre,, with the potential for significant growth.
	Employment land provision needs to support the existing main employment sectors including retail; health; and financial services and also sectors with high growth potential including advanced manufacturing and engineering; agri-tech; energy; ICT/digital culture; and life sciences.
	Norwich city centre is a main regional focus for employment, retailing, tourism, culture, education and leisure.
	Rural enterprises remain important to the local economy and home working is likely to increase in significance.
Housing	New housing and economic growth needs to be planned together to focus housing growth in locations where it can provide the greatest benefits and sustainable access to services and jobs. It is essential to ensure the locations chosen

	for growth will result in the delivery of the amount and range of housing required to meet needs.
	The delivery of affordable housing is a priority across the whole Greater Norwich area, with a particularly high need in Norwich.
	There is a need to ensure sufficient pitches are provided to meet the needs of the Gypsies & Travellers along with those of Travelling Showpeople.

4. GNLP Objectives

- 4.1. The emerging GNLP sets out a long-term vision for Greater Norwich, a draft set of objectives for the area and a number of policy alternatives that will steer and shape development. The draft set of objectives have been taken into account when developing the different policy alternatives.
- 4.2. The draft objectives have been tested against the sustainability appraisal framework objectives. This process ensures that ways of maximizing the beneficial effects and mitigating adverse effects of the plan are considered from the outset of plan making.
- 4.3. The draft objectives and their evaluation against the sustainability framework objectives is set out below.

4.4. Vision

- 4.4.1. The vision for Greater Norwich to 2036 is:

To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment.

4.5. Objectives

- 4.5.1. The objectives for Greater Norwich to 2036 to promote sustainable development in a rapidly changing world are:

- **Economy** To support and promote the growth of an enterprising, creative, broad based economy with high productivity and a skilled workforce.
- **Communities** To grow vibrant, healthy communities giving people a high quality of life in well-designed developments and good access to jobs, services and facilities.
- **Homes** To enable delivery of high quality homes of the right size, mix and tenure to meet people's needs throughout their lives.
- **Infrastructure** To promote the timely delivery of infrastructure to support existing communities and growth; and to improve connectivity to allow access to economic and social opportunities.
- **Delivery** To promote the delivery of housing, jobs and infrastructure supported by intervention mechanisms where the market is unable to deliver.
- **Environment** To protect and enhance the built and natural environment, make best use of natural resources, minimise contributors and adapt to climate change.

4.6. Evaluation of Proposed GNLP Objectives against the Sustainability Appraisal Objectives

- 4.6.1. The GNLP Objectives have been evaluated against the sustainability objectives in order to ensure that ways of maximising the beneficial effects and mitigating adverse effects of the plan are properly considered.

4.6.2. The results of this evaluation indicates that whilst there are a number of conflicts, which are typical of a plan of this type, overall there is a broad compatibility between the plan objectives and sustainability objectives.

4.6.3. Particular issues to consider will be how to distribute and design the required housing and employment sites in a manner which minimises impact on the environment and maximizes benefits in terms of new services, facilities and infrastructure.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
Economy	- -	-	~	-	+	~	+	~	0	0	++	~	-	~	-
Communities	+	0	0	0	+	+	+	+	+	+	+	+	+	0	0
Homes	-	-	~	-	++	~	+	+	0	+	+	~	-	~	-
Infrastructure	~	~	~	-	+	~	+	+	0	++	+	+	-	0	~
Delivery	~	~	~	-	++	~	+	++	0	++	+	++	-	0	~
Environment	0	+	+	+	-	+	0	+	0	0	-	+	+	0	+
1. Minimise air, noise and light pollution to improve wellbeing 2. Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change 3. Protect and enhance the area's biodiversity and geodiversity assets, and expand the provision of green infrastructure 4. Promote efficient use of land, whilst respecting the variety of landscape types in the area 5. Ensure that everyone has good quality housing of the right size and tenure to meet their needs 6. Maintain and improve the quality of life of residents 7. To reduce deprivation 8. To promote access to health facilities and promote healthy lifestyles 9. To reduce crime and the fear of crime								10. To promote access to education and skills training and support increased educational attainment. 11. Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres 12. Reduce the need to travel and promote the use of sustainable transport modes 13. Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment. 14. Minimise waste generation, promote recycling and avoid sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land. 15. Maintain and enhance water quality and ensure the most efficient use of water.							

Economy: To support and promote the growth of an enterprising, creative, broad based economy with high productivity and a skilled workforce.

4.6.4. The proposed objective has a positive effect in terms of housing, deprivation and economic development. In order to maximise positive effects it will be important to ensure that economic growth is promoted so that there is a good relationship between jobs and homes, ensuring that there are good links between areas of deprivation and areas promoted for economic growth and where it will help maintain and enhance existing town centres. Key conflicts result from the potential of new development to have a negative impact on issues such as air, noise and light pollution, reducing carbon emissions, protecting biodiversity, respecting landscape or heritage assets, loss of high quality agricultural land and impact on the water environment. Where potential

negative effects are identified these can be mitigated through measures such as ensuring that there are good sustainable transport links between areas of economic growth and homes, and ensuring that sites promoted in the local plan for economic growth have the least impact on biodiversity, the water environment, landscape or heritage assets, or that effective mitigation plans are put in place.

Communities: To grow vibrant, healthy communities giving people a high quality of life in well-designed developments and good access to jobs, services and facilities.

4.6.5. It is not considered that this proposed objective would have any significant potential negative effects in relation to any of the draft SA objectives. In order to maximise the benefits of this objective it will be important to plan for a distribution of residential and economic development that meets needs and is best placed to ensure residents are well provided for in terms of services and facilities. It is also important that the distribution of development supports existing services and facilities and which more generally seeks to address key principles of good design ensuring that new development functions well, establishes a strong sense of place, responds to local character and history, creates safe and accessible environments and is visually attractive.

Homes: To enable delivery of high quality homes of the right size, mix and tenure to meet people's needs throughout their lives.

4.6.6. The effects of this proposed objective are closely related to those identified for the economy objective, including positive effects in relation to the SA objectives on housing and reducing deprivation. These positive effects could be maximised by ensuring that viable sites are allocated which are able to meet any affordable housing obligation and by ensuring that development is designed to take account of crime and safety issues. As with the economic objective key conflicts result from the potential of new development to have a negative impact on issues such as air, noise and light pollution, reducing carbon emissions, protecting biodiversity, respecting landscape or heritage assets, loss of high quality agricultural land and impact on the water environment. Again, these effects can be mitigated through measures such as: ensuring development has a good relationship to services and facilities; if new services can be provided as part of new development ensuring that existing residents are also well placed to benefit from them; ensuring that sites allocated for development have the least impact on biodiversity, landscape or heritage assets; or that effective mitigation plans are put in place. It will also be important to ensure the appropriate infrastructure can be delivered to maintain the supply/demand balance for water.

Infrastructure: To promote the timely delivery of infrastructure to support existing communities and growth; and to improve connectivity to allow access to economic and social opportunities.

4.6.7. This proposed objective has a positive effect in terms of SA objectives that cover issues such as housing, quality of life, deprivation and economic development, transport and water. These positive effects can be maximised by planning for transport and communications infrastructure in a manner which

best supports planned housing development and economic growth and creates links to areas of deprivation. Where potential negative effects, or a negative component of mixed effects, are identified these relate to: the possibility that new infrastructure may have a physical impact on landscape or heritage assets; or where it is not planned to minimise impacts on air, noise or light pollution and CO2 emissions; or where opportunities for sustainable transport choices such as walking or cycling, which support healthy lifestyles, are not addressed. These negative effects can be minimised by making the best use of existing infrastructure, ensuring that where new infrastructure is planned it minimises its physical impact on landscape and townscapes and where it maximises opportunities to support and promote sustainable modes of transport.

Delivery: To promote the delivery of housing, jobs and infrastructure supported by intervention mechanisms where the market is unable to deliver.

4.6.8. The effects of this proposed objective are closely related to those identified for the economy, homes and infrastructure objectives, having positive effects in terms of SA objectives that cover issues such as housing, quality of life, deprivation and economic development and transport. These positive effects can be maximised by ensuring that allocations are shown to be viable and supported by a clear infrastructure delivery plan and that local plan policies are consistent with external interventions to support delivery. As is the case for the infrastructure objective, where potential negative effects, or a negative component of mixed effects, are identified these relate to: the possibility that the delivery of new infrastructure may have a physical impact on landscape or heritage assets; or where it is not planned to minimise impacts on air, noise or light pollution and CO2 emissions; or where opportunities for sustainable transport choices such as walking or cycling, which support healthy lifestyles, are not addressed. These negative effects can be minimised by making the best use of existing infrastructure, ensuring that where new infrastructure is planned it minimises its physical impact on landscape and townscapes and where it maximises opportunities to support and promoted sustainable modes of transport.

Environment: To protect and enhance the built and natural environment, make best use of natural resources, minimise contributors and adapt to climate change.

4.6.9. It is considered that this objective has a generally positive impact in relation to the SA objectives. These positive effects can be maximised through measures such as providing appropriate policy protection for the historic environment, key landscapes, natural resources and areas of habitat or conservation important. Also, planning for new development in a manner which avoids significant impact on these features wherever possible will be important. There are potential negative effects identified in terms of the SA objectives which seek to ensure housing needs are met and that economic development is promoted. These effects primarily relate to the possibility that housing and economic development needs may not always be met in a manner which has no impact on the objective. In order to minimise these effects it will be important to ensure that a proportionate approach is taken to the protection of assets relative to their importance, that the potential for mitigation is explored as early

as possible and that effective measures are put in place on development sites. Possible negative effect could also result if development were distributed in a manner which is inconsistent with minimising contributors to climate change, in particular with regards to the impact of travel. To minimise such impact it will be important that the plan exploits opportunities for the use of sustainable transport as far as is practicable.

5. Methodology for Identifying Reasonable Alternatives and Evaluating Significant Effects

- 5.1. Identifying and evaluating Reasonable Alternatives is an essential part of the plan making and sustainability appraisal process from both a practical and legal compliance point of view.
- 5.2. In legal compliance terms, Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004 requires the environmental report to identify, describe and evaluate the likely significant effects on the environment of implementing the plan and reasonable alternatives taking into account the objectives and geographical scope of the plan.
- 5.3. From a practical point of view, a robust approach to identifying, evaluating and selecting alternatives will ensure, as far as practicable, that the preferred approach included in the final version of the plan is justifiable and deliverable.
- 5.4. The geographical scope of the GNLP is the combined local planning authority areas of Broadland, Norwich and South Norfolk. For the purposes of defining reasonable alternatives, the objectives that have been taken into account are the “working draft” GNLP Objectives considered by the GNLP board on 17 January 2017 and evaluated against the SA objectives in Section 4.6 of this document.

How was the assessment undertaken?

- 5.5. The GNLP Options for Growth consultation document sets out a range of strategy and policy alternatives. In accordance with Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004, the Interim Sustainability Appraisal of the GNLP includes an outline of the reasons for selecting the alternatives dealt with.
- 5.6. At this stage, for an alternative to have been considered “reasonable” it must be deemed to assist in the achievement of, and be otherwise compatible with the “working draft” GNLP Objectives. In addition, for an alternative to be “reasonable” there must also be a reasonable expectation that it can be delivered, and it must be consistent with National Planning Policy (to ensure that the plan can be found sound).
- 5.7. Due to the range of policy alternatives under consideration at this stage, assessing the GNLP as a whole is not practical at this stage. Consequently the SA first considers the alternatives identified for each section of the GNLP consultation document; and then evaluates the “significant effects” of the alternative on the baseline / likely future baseline.
- 5.8. The assessment protocol set out at appendix A. The protocol explains the rationale behind the scoring of significant effects within this interim sustainability appraisal and can be used to interpret the assessment findings. The key to the scoring system is shown below:

Key:	
Likely strong positive effect	++
Likely positive effect	+
Neutral/no effect	0
Mixed effects	~
Likely adverse effect	-
Likely strong adverse effect	--
Uncertain effect	?

6. Assumptions and Limitations

- 6.1. Whilst all reasonable steps are taken to evaluate significant effects accurately, predicting such effects is intrinsically difficult due to the broad nature of many of the alternatives under consideration, particularly in regards to alternatives considering distribution, and uncertainties about the likely future baseline in regards to the scale and distribution of further development in the “no plan” alternative.
- 6.2. Therefore a degree of caution has been taken in identifying significant effects. Key assumptions and limitation in the assessment are set out below.
- 6.3. In some instances it has not been possible to conclude whether there will be a significant effect on the baseline or that there could be differing effects on the baseline between alternative policy approaches. However, it may still be possible to differentiate between alternatives in relative terms. Where this occurs, it is set out explanatory text to the assessment.
- 6.4. The key assumptions and limitations are as follows:
 - Due to the range of alternatives currently under consideration, and therefore possible permutations for the final plan, it is not reasonably practical to undertake an overall assessment of the impact of the Plan at this stage. This assessment will be undertaken for the purposes of the Sustainability Appraisal that accompanies the pre-submission publication version of the GNLP.
 - National Planning Policy and Guidance will continue to impose a presumption in favour of sustainable development. This will include an ongoing emphasis on boosting significantly the supply of housing and significantly increasing the likelihood of windfall housing planning permissions being granted on departure applications in the absence of a 5 year housing land supply.
 - The likely evolution of the baseline assumes that without the implementation of the GNLP some level of development will still occur. Such development would be unplanned and reactive to landowner/developer actions. There can be no certainty about the quantum and distribution of unplanned development, save that new development poorly-related to existing settlements are unlikely to be acceptable. This is therefore a key limitation of the assessment. The same issue broadly applies to windfall housing, where distribution is uncertain. It is assumed that in terms of quantity that windfall will continue to come forward at rates consistent with historic delivery (over the past 5-10 years).
 - Housing delivery is dependent on many factors. It is likely that above a certain level the release of land for development would not increase housing delivery due to wider economic factors of the housing market. Nonetheless, within the limits of this assessment it is assumed that a higher release of land for housing would result in high delivery rates and overall build out levels. It is also generally assumed that higher development levels will lead to greater impacts on matters such as air quality and emissions on the basis that more development will mean more trips generated.

- Until actual sites are identified, there are limits to the extent to which the impacts of development can be accurately assessed. It is generally assumed that a proportionate approach will be taken to matters such as the protection of historic, ecological, mineral or landscape assets, relative to their importance.
- It is assumed that that large scale sites are more able to contribute to services and infrastructure but are also more likely to suffer from increased lead-in timescales. Smaller sites are assumed to be have a shorter lead-in timescale. A wide dispersal and mixture of development sites is assumed to provide more choice and competition in the housing market, which has benefit in terms of housing delivery.
- It is assumed that suitable sites can be found to deliver the different distribution of growth alternatives; and that these sites can be accommodated within existing infrastructure, or that additional infrastructure could be provided.
- It is assumed that where development is located closer to higher concentrations of services and facilities, such as the larger villages, towns and Norwich, there will be greater opportunities to access these services by sustainable transport modes and thought active travel, and that residents will take up these opportunities. It is also assumed that the further away a development site is from a sensitive biodiversity site the less likely the recreational impact on that site will be from new residents.
- It is assumed that larger sites (of several hundred dwellings) are less likely to be able to provide higher proportions of affordable housing, due to the increase cost of providing infrastructure.
- It is assumed that too much allocated land could undermine growth by reducing certainty for developers and increasing the risk of investment in supporting infrastructure needed to bring sites forward.
- Strategic transport improvements not directly related to growth included within the plan will be identified and promoted by Norfolk County Council as Highway Authority through the Local Transport Plan (LTP) and/or Norwich Area Transport Strategy (NATS). It will be for the SA/SEA that accompanies the LTP/NATS to assess the significant impact of these proposals.
- Integrating new development with existing communities and interspersing affordable and other types of housing within new housing allocations will support community integration and contributing to the quality of life of residents being maintained/improved.

7. Greater Norwich Local Plan: Options for Growth – The Strategy

7.1. GNLP Strategy: Jobs Targets – Outline of the Reasons for Selecting the Alternatives

7.1.1. Identifying a jobs target for the GNLP provides clarity that will help to ensure that the economic and related policies of the plan are justifiable and effective. It will provide a measurable indicator that can be used to monitor the implementation of the plan.

7.1.2. The East of England Forecasting Model (EEFM) provides a credible forecast of jobs growth between 2015 and 2036 of 27,400. The remainder of the JCS planned growth plus the EEFM would represent a baseline, “forecast”, jobs growth scenario. **A reasonable alternatives would be for the GNLP jobs target to delivery forecast jobs between 2015 and 2036 only.**

7.1.3. The Greater Norwich Authorities have also committed to a City Deal with Government. The City Deal, amongst other things, establishes an additional aspiration target of 13,000 additional jobs across Greater Norwich. Taking into account the EEFM the Central Norwich Strategic Housing Market Assessment (SHMA) calculates that planning for baseline (EEFM) growth plus City Deals growth would equate to 45,390 jobs between 2015 and 2036. The Employment, Town Centres and Retail Study (2017) recommends an “enhanced” jobs target of 44,000 between 2014 and 2036. Taking both sources of evidence into account the enhanced jobs growth target of 45,000 2015-2036 would be a reasonable mid-point. **A reasonable alternative would be for the GNLP jobs target to delivery forecast jobs growth plus additional growth between 2015 and 2036.**

7.1.4. Setting a jobs target below the EEFM forecast is not a reasonable alternative as it would result in policies that may artificial constraint the economic potential of the area, and is thus inconsistent with the Economic objective of the plan:

“To support and promote the growth of an enterprising, creative, broad based economy with high productivity and a skilled workforce”.

7.2. GNLP Strategy: Jobs – Evaluating Significant Effects

Reasonable Alternatives															
JT1: GNLP jobs target to be equal forecast jobs growth, plus aspirational growth between 2015 and 2036.															
JT2: GNLP jobs target to be equal forecast jobs growth between 2015 and 2036.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
JT1	-	-	0	-	0	0	++	0	0	0	++	0	0	0	0
JT2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

7.2.1. Alternative JT2 proposes a jobs target equivalent to the EEFM forecast. This is effectively evolution of the baseline, and therefore would have a neutral

effect on all SA objectives. Alternative JT1 proposes planning for a significant number of additional jobs above the forecast. Although the distribution of these additional jobs would heavily influence the sustainability outcome, it can be assumed that such a difference in the jobs target would likely have a significant negative impact on environmental objectives SA1 and SA2 as carbon emissions, air and light pollution would likely increase with more employment sites. SA4 would also be negatively impacted since more greenfield land would inevitably be needed. Conversely, planning for a significant number of additional jobs would help to achieve SA7 as the availability of jobs should reduce deprivation, and SA11, encouraging economic development over a range of sectors.

7.3. GNLP Strategy: Homes – Outline of the Reasons for Selecting the Alternatives

GNLP Housing Requirement

- 7.3.1. The Housing Requirement is a critical element of any plan making process: it is the housing target, for which allocations of land will need to be made and against which housing land supply will be measured. Increasing the housing requirement would not only result in a potentially increased impact from planned development but would also increase the likelihood of a five year land supply deficit. A land supply deficit could result in the ad-hoc release of land for housing, with difficult to predict effects on the baseline.
- 7.3.2. The draft objectives of the GNLP seek to deliver the high quality homes that are needed within Greater Norwich, supporting healthy and vibrant communities and economic growth.
- 7.3.3. In order to establish Housing Requirement policy alternatives it is necessary to consider: the evidence of the Objectively Assessed Need (OAN) for housing; whether the GNLP Housing Requirement should be equal to, greater or less than the OAN; the scale of the Delivery Buffer; and, the impact of predicted future windfall housing.

Objectively Assessed Need for Housing (OAN)

- 7.3.4. Evidence on the OAN for Greater Norwich is contained in the Central Norfolk Strategic Housing Market Assessment (SHMA), July 2017. The SHMA identifies that the OAN for Greater Norwich is 39,486 homes between 2015 and 2036 (1,880 per annum).
- 7.3.5. On 14th September 2017 Government published a consultation on its standard methodology for calculating housing need. This methodology identifies that the OAN for Greater Norwich is 38,988 homes between 2017 and 2036 (2,052 per annum).
- 7.3.6. Whilst the approach adopted by government could change following its consultation on the standard methodology, it is their clear intention that the standard methodology should be used to identify the OAN in future local plans. Therefore, the only reasonable alternative would be to use the figure derived from the draft methodology as the OAN for the purpose of the GNLP.

Should the Housing Requirement be Equal to OAN?

- 7.3.7. A housing requirement that equals OAN would ensure that the plan meets the forecast housing need in Greater Norwich. Therefore **a reasonable alternative would be for the Housing Requirement to equal the OAN.**

Should the Housing Requirement be lower than OAN?

- 7.3.8. The GNLP is at a relatively early stage. Nonetheless, there has already been early engagement with key stakeholders, including as part of the SA scoping and production of the draft Norfolk Strategic Framework (NSF). To date, no overriding constraints, that would indicate that the full OAN could not be met, have been identified.

- 7.3.9. Therefore, there is no justification for considering an alternative Housing Requirement lower than the OAN. Such an alternative would also be contrary to the draft GNLP objective on housing and the national policy to significantly increase the supply of housing.

Should the Housing Requirement be higher than OAN?

- 7.3.10. The NSF also considers whether authorities can meet their own identified housing needs. Whilst the NSF is still in draft form, there is no current indication that neighbouring districts cannot meet their housing need. Consequently there is no justification for considering an alternative Housing Requirement that is higher than OAN in this regard.

- 7.3.11. However, the Greater Norwich City Deal seeks to deliver enhanced, “aspirational” jobs growth (as set out in paragraph 7.1.3) on top of forecast jobs growth to 2036. The Central Norfolk SHMA considered the number of homes necessary to support “aspirational” City Deal’s jobs growth. A simple rebase of the SHMA assessment to 2017 suggests that approximately 40,700 homes would be needed to support forecast (baseline) plus City Deals jobs growth.

- 7.3.12. Supporting the delivery of the city deal would be consistent with the Economic and Housing objectives of the GNLP. Therefore, **a reasonable alternative would be to increase the GNLP Housing Requirement to 40,700, which would include the housing response needed to support the City Deal.**

Housing Delivery Buffer

- 7.3.13. Paragraph 4 of the NPPF states that:

“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change ...”

- 7.3.14. For the purposes of policies that allocate land for housing the most straightforward way to meet this obligation is to identify more land than is required to meet the housing requirement: a housing delivery buffer.

- 7.3.15. There is no clear guidance as to how large a delivery buffer should be. It is however, reasonable to expect that in areas that have historically under delivered against their housing requirement, such as Greater Norwich, that the buffer would be larger than in areas that have met their targets.

- 7.3.16. Each Local Planning Authority in Greater Norwich incorporates some form of delivery buffer. Whilst the scale of this buffer varied, taking into account

windfall, the buffer general approached or exceeded 20% of the Housing Requirement. Consequently, incorporating **a delivery buffer of at least 20%, (taking into account windfall) is a reasonable alternative**. Given local delivery issues, **a significantly higher delivery buffer than 20% (taking into account windfall) is also a reasonable alternative**. This approach would further minimise risks of under-delivery, and ensure that the plan more effectively plans for the aspirations of the Greater Norwich City Deal.

- 7.3.17. Because it would create a plan that it very inflexible, and could well struggle to deliver its housing requirement, it is not considered reasonable for the GNLP to include a housing delivery buffer that is significantly lower than 20% (taking into account windfall).

Windfall Housing

- 7.3.18. Windfall is housing which comes forward as an application on a site which has not been identified in a local plan. Windfall has occurred throughout the history of forward plan making. The sources of supply for windfall housing are expected to continue throughout the period of the GNLP.

- 7.3.19. A straightforward extrapolation of the windfall rates forecast in the Greater Norwich five year housing land supply statement would indicate that windfall housing could provide up-to 5,600 homes over the plan period.

- 7.3.20. Whilst, further research and fact-finding is needed to confirm the extent sources of windfall housing can be relied upon over the period to 2036, **a reasonable alternative would be for Windfall Housing to form part of a delivery buffer of at least 20%**. This approach would effectively reduce the scale of housing allocations that is needed. It would also be **a reasonable alternative not to use Windfall as part of a delivery buffer of at least 20%**. In this scenario positive land allocations would be made to ensure a 20% delivery buffer, any Windfall Housing that is delivered would be on top of the 20% delivery buffer; in practical terms this is the same as incorporating a delivery buffer that is significantly higher than 20%.

Conclusions

- 7.3.21. The reasonable alternatives identified above are not mutually exclusive. When the various factors are considered in combination it leads to four overarching reasonable alternatives in terms of amount of housing that is planned for⁵:

1. **GNLP Housing Requirement is equal to OAN. Delivery Buffer is Approx. 20%. Forecast Windfall Housing does not form part of the Delivery Buffer.**
2. **GNLP Housing Requirement is equal to OAN. Delivery Buffer is Approx. 20%. Forecast Windfall Housing forms part of the 20% Delivery Buffer.**

⁵ For the purposes of this assessment it is assumed that there would be an additional allocation of land for housing equivalent to 10% of the Housing Requirement under alternatives 2 and 4. Windfall housing would then ensure that the delivery buffer is at least 20% of the Housing Requirement.

3. **GNLP Housing Requirement is Equal to OAN plus Housing Response to City Deal. Delivery Buffer is Approx. 20%. Forecast Windfall Housing does not form part of the Delivery Buffer.**
4. **GNLP Housing Requirement is Equal to OAN plus net Housing Response to City Deal. Delivery Buffer is Approx. 20% OAN. Forecast Windfall Housing forms part of the 20% Delivery Buffer.**

7.4. GNLP Strategy: Homes – Evaluating Significant Effects

Reasonable Alternative															
<ol style="list-style-type: none"> 1. GNLP Housing Requirement is equal to OAN. Delivery Buffer is Approx. 20%. Forecast Windfall Housing does not form part of the Delivery Buffer. 2. GNLP Housing Requirement is equal to OAN. Delivery Buffer is Approx. 20%. Forecast Windfall Housing forms part of the 20% Delivery Buffer. 3. GNLP Housing Requirement is Equal to OAN plus Housing Response to City Deal. Delivery Buffer is Approx. 20%. Forecast Windfall Housing does not form part of the Delivery Buffer. 4. GNLP Housing Requirement is Equal to OAN plus net Housing Response to City Deal. Delivery Buffer is Approx. 20% OAN. Forecast Windfall Housing forms part of the 20% Delivery Buffer. 															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
1	-	-	-	-	++	0	0	0	0	0	++	0	-	0	0
2	-	-	-	-	+	0	0	0	0	0	+	0	-	0	0
3	--	--	--	--	++	0	0	0	0	0	++	0	--	0	0
4	-	-	-	-	++	0	0	0	0	0	++	0	-	0	0
<ol style="list-style-type: none"> 16. Minimise air, noise and light pollution to improve wellbeing 17. Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change 18. Protect and enhance the area's biodiversity and geodiversity assets, and expand the provision of green infrastructure 19. Promote efficient use of land, whilst respecting the variety of landscape types in the area 20. Ensure that everyone has good quality housing of the right size and tenure to meet their needs 21. Maintain and improve the quality of life of residents 22. To reduce deprivation 23. To promote access to health facilities and promote healthy lifestyles 24. To reduce crime and the fear of crime 								<ol style="list-style-type: none"> 25. To promote access to education and skills training and support increased educational attainment. 26. Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres 27. Reduce the need to travel and promote the use of sustainable transport modes 28. Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment. 29. Minimise waste generation, promote recycling and avoid sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land. 30. Maintain and enhance water quality and ensure the most efficient use of water. 							

SA Objective	Discussion of significant effects, and relative merits of alternatives.
<p>SA1: Minimise air, noise and light pollution to improve wellbeing.</p>	<p>All housing development, unless “car free”, will inevitably generate additional car trips locally as new residents move into the area. Therefore, because all of the Core Housing Alternatives would result in the allocation of further land for housing development, all alternatives would give rise to increased air and noise pollution, disruption to amenity and potential secondary health impacts locally. Similarly, more housing is likely to result in more light pollution. Consequentially, all alternatives are predicted to have a significant negative impact on the baseline.</p> <p>The identified impacts are directly related to the scale of development. In this regard alternative 2 would release the least land for development followed by alternative 4 then alternative 1. Alternative 3 would release the most land. A straightforward reading of the alternatives would therefore indicate that alternative 2 is likely to have the least impact and alternative 3 would have the greatest impact. Whilst alternatives 1 would release more land for development than alternative 4, alternative 4 would carry a greatest risk of further land releases on 5 year land supply grounds. Thus in relative terms the impact of alternative 4 and alternative 1 are considered to be similar.</p> <p>It is possible, maybe even likely, that, above a certain level, increasing the scale of land allocated for housing would have no impact on actual housing delivery i.e. availability of land would no longer be a constraint to development and the ability of the market to deliver would be the sole determinant of housing completions. It is uncertain whether any of these alternatives would have this impact however.</p>
<p>SA2: Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.</p>	<p>The principal concern in relation to climate change mitigation will be the degree to which new development supports efforts to reduce car dependency and bring about modal shift to less polluting forms of transport, walking and cycling. Other considerations will relate to the extent to which development would support low carbon energy generation or buildings that are energy efficient.</p> <p>In terms of adaptation, key issues will include flood risk concerns and green infrastructure.</p> <p>Again the relative scale of the alternatives would indicate that alternative 3 would release the most land and have the greatest impact. Alternatives 1 and 4 would be broadly similar in terms of impact. Alternative 2 is likely to have the least impact, as it would release the least land for development. However, all alternatives are predicted to have a significant negative impact on the baseline.</p>
<p>SA3: Protect and enhance the area's biodiversity and geodiversity assets, and expand the provision of green infrastructure.</p>	<p>It is reasonable to assume that growth on the scale proposed within all of the alternatives would lead to direct effects on land that has some biodiversity importance, or land that contributes to the functioning of wider “ecological networks”. There may also be some indirect effects associated within</p>

	<p>growth, such as recreational impact on ecologically important sites. Consequently it is considered that all alternatives are likely to result in a significant negative impact on the baseline.</p> <p>On the basis of the above, it is also arguably the case that higher scales of development are likely to lead to greater impact than lower scales of growth. Consequently, alternative 2 is likely to have the least impact, as it would release the least land for development. Alternative 3 would release the most land and have the greatest impact. Alternatives 1 and 4 would be broadly similar in terms of their impact in land release terms and therefore it is not possible to meaningfully differentiate between them.</p>
SA4: Promote efficient use of land, whilst respecting the variety of landscape types in the area	<p>The vast majority of the additional growth that will be planned for within the GNL P is likely to be on edge of settlement greenfield land that currently contributes to landscape character of different types, in particular the setting of settlements. It is therefore suggested that all alternatives result in a significant negative impact on the baseline.</p> <p>Again the relative scale of the alternatives would indicate that alternative 2 is likely to have the least impact, as it would release the least land for development. Alternative 3 would release the most land and have the greatest impact. Alternatives 1 and 4 would be broadly similar in terms of land release.</p>
SA5: Ensure that everyone has good quality housing of the right size and tenure to meet their needs	<p>In theory all of the alternatives would be capable of providing the housing needed, including the provision of the necessary affordable housing. Therefore all alternatives are considered to result in a significant positive impact on the baseline.</p> <p>A straight forward assessment might conclude that the alternative which plans for the most housing would perform best in relative terms, as it would provide the most housing. However, given that alternatives 1, 3 and 4 all positively plan for a potential level of development that is in excess of 20% above the OAN, each alternative is clearly capable of meeting needs. Whilst alternative 2 also plans for a level of growth that is 20% above OAN, a substantial proportion of this (in excess of 50% of the buffer) would be in the form of windfall housing. Current windfall projections are based on past trends and whilst legitimate over the short term they are less certain over the longer term. Therefore, alternative 2 is considered to offer less certainty of delivery than the other alternatives. It is subsequently considered to perform worse in relative terms.</p>
SA6: Maintain and improve the quality of life of residents	<p>It is considered likely that all alternatives would result in development in locations that are currently of high amenity value, or environmental quality. It is likely also that it would be possible to create high quality developments within these areas.</p> <p>Important to consider also is the impact on the "quality of life of residents" as perceived by existing residents. Many people may well feel that new development will have a detrimental</p>

	<p>impact on their quality of life. Others could, of course, see that development will bring with it some benefit.</p> <p>On the basis of the above, it is concluded that the alternatives on Core Housing Matters will have no significant effect on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA7: To reduce deprivation	<p>Development may stimulate or support regeneration of deprived areas. The provision of affordable housing will also help to address deprivation to some degree. In theory, more affordable housing could be delivered from options which provide more housing overall. More overall housing growth could, in theory, also support enhanced jobs growth.</p> <p>However, whilst the alternatives would all provide for affordable housing, it is the distribution and form of development that would dictate the extent to which development would stimulate or support regeneration. Consequentially it is considered that the alternatives would have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA8: To promote access to health facilities and promote healthy lifestyles	<p>If well planned, development can contribute to, or create, mixed and inclusive communities that are supported by a range of services and facilities, including green infrastructure.</p> <p>The impact of development on these matters is however related to distribution and choice of site rather than pure housing numbers. Therefore, it is considered that the alternatives would have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA9: To reduce crime and the fear of crime	<p>If well planned, development can contribute to, or create, mixed and inclusive communities that are designed taking into account guidance such as "safer by design".</p> <p>The impact of development on these matters is however not directly related to decisions about the scale of housing allocation. Therefore, it is considered that the alternatives would have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA10: To promote access to education and skills training and support increased educational attainment.	<p>It is assumed that housing will be distributed so as to make effective use of existing school capacity, or be located in areas where additional capacity can be made available. There is no evidence that there are any fundamental constraints to education provision that are directly related to decisions about the scale of housing allocation.</p> <p>As such, it is considered that the alternatives would have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>

<p>SA11: Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres</p>	<p>All of the alternatives plan for a sufficient number of homes to accommodate the workers needed to realise the East of England Forecasting Models projections for jobs growth across Greater Norwich, and the additional homes needed to support the Greater Norwich City Deal. It is also notable that the New Anglia Strategic Economic Plan (2014) estimated that each new home built is equivalent to £36, 700 more (in GVA) to the economy.</p> <p>Therefore all alternatives are considered to result in a significant positive impact on the baseline.</p> <p>Alternatives 3 and 4 proactively plan for all of the additional homes needed to support the City Deal and include at least a 20% buffer above this number of homes. This means that they are best placed to ensure there are sufficient homes to support City Deals jobs growth. However, alternative 1 also provides more than 20% above the number of homes needed to support the City Deal. Alternative 2 provides a fraction less than 20%.</p> <p>Therefore, in relative terms alternative 2 is considered to perform less well than the other alternatives in regards to this objective, but the difference is very slight.</p>
<p>SA12: Reduce the need to travel and promote the use of sustainable transport modes</p>	<p>In the context of housing growth, reducing the need to travel and promoting the use of sustainable modes of transport are matters that are expected to be principally aligned to the strategy for the distribution of housing. Additional development may generate/justify investment that would result in improved public transport services and sustainable transport infrastructure which would provide wider sustainable transport benefits. Conversely, widely dispersed growth could foster car dependency.</p> <p>Therefore, it is not possible to conclude that the alternatives would have a significant impact on the baseline.</p> <p>However, alternatives 3 and 4 would result in a GNLP housing requirement that is notably above OAN, and linked to the realisation of City Deal aspirational jobs growth. If such aspirational jobs growth does not occur then there will be insufficient demand for the planned housing. In this scenario it is likely that housing delivery would fall behind the requirement, with the distinct possibility of a lack of five year housing land supply. This may lead to additional, unplanned sites being released for development that may not be as well related to sustainable transport as planned sites. Therefore there is an increased risk that alternatives 3 and 4 would result in development that is more poorly served by sustainable transport.</p>
<p>SA13: Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.</p>	<p>The vast majority of the additional growth that will be planned for within the GNLP will be on greenfield land. It is likely that some of this would have an impact on the historic environment, heritage assets or cultural heritage. It is therefore suggested that all alternatives result in a significant negative impact on the baseline.</p>

	<p>Alternatives that release more land therefore carry an increased risk that within this land there are sites that would impact on heritage assets. However, the precise impact of the growth in terms of the historic environment will depend upon the allocations made. Therefore it is not possible to differentiate between the alternatives in this regard.</p>
<p>SA14: Minimise waste generation, promote recycling and avoid sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land.</p>	<p>The vast majority of the additional growth that will be planned for within the GNLP will be on greenfield land. However, the impact of the growth in terms of this objective is expected to relate to the location of the allocations made. Therefore, it is not possible to conclude that the alternatives would have a significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
<p>SA15: Maintain and enhance water quality and ensure the most efficient use of water.</p>	<p>The supply and disposal of water, and related water quality matters, are key issues for the GNLP. The vast majority of the housing development that needs to be planned for is contained within existing planning permissions and allocations. There is good evidence to suggest that these developments can be delivered without any significant impact on water quality.</p> <p>Further growth will place an additional burden on water supply and disposal infrastructure. Early engagement with AWS, EA and NE have not identified any fundamental water quality constraint to further development. However, detailed evidence on this issue is not currently available therefore it is not possible to conclude that the alternatives would have a significant impact on the baseline.</p> <p>A straight forward analysis might however suggest that allocation alternatives that release less land for housing would be less likely to be impactful than those that release more land for housing.</p> <p>Particularly in terms of waste water disposal and its impact on water quality, distribution of housing further away from Norwich is likely to be significant, as foul water will be disposed of through local treatment works which have their own particular issues in terms of their volumetric capacity and required treatment standards.</p>

Summary of Significant Effects

- 7.4.1. Alternatives 3 and 4 would establish a Plan Requirement that is notably above OAN, and one that is only likely to be deliverable if the significant increase in jobs, as envisaged by the aspirational City Deal actually occurs. This would create a situation where the authorities are more likely to suffer from a housing land supply deficit. This could result in further development in less sustainable locations and would create uncertainties in relation to objective 12, as well as increasing the impact on the baseline under objectives 1 and 3. There is therefore good reason to consider that these alternatives should not be preferred.
- 7.4.2. Alternatives 1 and 2 avoid the situation set out above by making the Plan Requirement equivalent to OAN, and thus relating any calculation of housing land supply to the standard methodology. There are therefore good reasons to prefer alternatives 1 and 2.
- 7.4.3. Alternative 2 performs better in terms of air quality and climate change related to emissions, however it would also include a significantly lower delivery buffer, which is heavily reliant on assumed windfall housing projections being delivered. Given the delivery challenges experienced locally this presents a notably increased risk to housing delivery and thus has more uncertainties in terms of meeting housing needs in accordance with Objective 5. Alternative 2 also would provide for slightly less than a 20% buffer to the delivery of the housing required to meet City Deals jobs growth. This could restrict the economic growth potential of the area, and thus would perform relatively worse in terms of contributing toward Objective 11, although given that the buffer to city deals related jobs growth is only fractionally under 20% this impact is slight. Alternative 1 includes a high delivery buffer, giving more certainty of delivery (better in terms of providing the homes needed in accordance with Objective 5). It would also provide more than a 20% buffer to the delivery of the homes needed to support the City Deal.
- 7.4.4. Given the increased potential impact of alternative 1 in terms of air quality, climate change emissions and other objectives directly affected by the scale of growth, compared to its very slight benefits in terms of objective 11 (related to jobs and the economy), it is considered that there are good reasons to prefer alternative 2.

7.5. GNLP Strategy: Infrastructure

- 7.5.1. Housing and jobs growth needs to be supported by the appropriate infrastructure. The growth identified, and planned for, in the JCS, which will also form a substantial part of the housing requirement of this plan, is dependent on the completion of the NDR and improvements at Thickthorn (the A11/A47 junction). Work is progressing on both these schemes, the NDR to be completed by early 2018 and Thickthorn improvements planned to start in 2020.
- 7.5.2. The GNLP will look forward beyond the JCS to 2036. No further strategic improvements to support the overall scale of growth have been identified. The infrastructure requirements will vary depending on the distribution of growth. As appropriate, the Sustainability Appraisal that supports the pre-submission version of the GNLP will consider infrastructure that is needed to support planned growth.

GNLP Strategy: How Should Greater Norwich Grow? – Outline of the Reasons for Selecting the (Distribution of Development) Alternatives

7.5.3. In order to determine the most appropriate distribution of additional housing a series of conceptual alternatives have been defined. These alternatives consider options for heavy concentration of development in and around Norwich and the Built-up Fringe through to wide ranging dispersal across Greater Norwich, along with other discrete alternatives that lie in between.

7.5.4. The alternatives derived are based on a number of technical decisions and assumptions, which are outlined below:

Housing Allocation Requirements

7.5.5. The Housing Allocation Requirement identified in the Distributional Alternatives is based on the following assumptions: the GNLP Housing Requirement will be equal to OAN; the Housing Delivery Buffer will equal at least 20% of OAN (taking account of Windfall). These assumptions have been used as they are consistent with the best performing Housing Requirement alternatives as explained in section 7.4.

7.5.6. The Housing Allocation Requirement underpinning the distributional alternatives also assume that all outstanding housing commitments (planning permission and local plan allocations) will be delivered by 2036. The housing commitment comprises sites with planning permission or land allocated for housing in the current local plan. As such, there is a high degree of confidence that these sites remain developable within the GNLP Plan Period (2017-2036). If evidence emerges indicating that these commitments are not deliverable in the plan period then a corresponding increase in land allocations may be needed.

7.5.7. The Housing Allocation Requirement and how this relates to the assumed GNLP Housing Requirement is set out in the table below:

Housing numbers for the Greater Norwich Local Plan (GNLP)			
	Source	Overall number	Per annum
A	GNLP Housing Requirement 2017-2036	38,988	2,052
B	Total Housing to meet Housing Requirement plus City Deal 2017-2036	40,700	2,142
To be delivered by the following supply:			
C	Housing commitments @ 01/04/2017	35,665	
D	Proposed new allocations	7,200	
E	Windfall housing 2017 to 2036	Up to 5,600	
F	GNLP Housing provision	48,465	
The GNLP housing provision (including Windfall) is 9,477 above the GNLP Housing Requirement. The total delivery buffer is therefore <u>24%</u>.			

Approach to Defining Distributional Alternatives

7.5.8. The approach to defining distributional alternatives was based on the following staged approach:

1. **Maximise delivery on previously developed land within Norwich and the built up areas of the fringe parishes**
2. **Maintain and enhance the vitality of Main Towns and Villages by ensuring an appropriate baseline level of growth**
3. **Identify alternative distributions for any remaining growth to Fringe Locations, Main Towns, Key Service Centres and Other Villages.**

7.5.9. The justification and rationale behind this staged approach is set out below.

Previously Developed Land within Norwich and the built up areas of the fringe parishes

7.5.10. To ensure the efficient use of land, it is critical that the best possible use is made of previously developed land within Norwich and the urban fringe. Sites within Norwich and the Urban Fringe, in addition to being previously developed, will also typically benefit from the best access to services, facilities, public transport (and other sustainable forms of transport) and employment opportunities.

7.5.11. Currently it is estimated that additional capacity on previously developed land equates to 1,500 additional homes in Norwich, with a further 200 in the Broadland part of the Urban Fringe. Whilst these sites appear deliverable/developable, it is considered **unreasonable** not to include these sites within the baseline for the distributional alternatives. Discounting deliverable/developable previously developed sites in Norwich and the Urban Fringe would not ensure an efficient use of land, would increase the loss of natural resources (in the form of land) and would result in the need to identify additional, less sustainable, sites elsewhere.

Maintaining and enhancing the vitality of Main Towns and Villages

7.5.12. As well as making the most efficient use of land, it is also critical that the vitality of Main Towns and Villages is maintained and enhanced. In practical terms this means planning for new development in settlements where there is an appropriate range of services and facilities to support a degree of sustainable development.

7.5.13. In addition, planning for additional development within Main Towns and Villages will support the delivery of the housing needed within the area by ensuring that there is diversity, choice and competition in the market for land. This is particularly relevant given that existing housing commitments are substantially focused in large or strategic sites on the edge of, or near to Norwich and the Urban Fringe.

7.5.14. The scale of growth that is considered to be an appropriate baseline to maintain and enhance the vitality of Main Towns, Key Service Centres and Service and Other Villages is set out below:

- Main Towns and Key Service Centres (1,000 homes)
- Service Villages or Village Clusters (1,000 homes)
- Other villages or Village Clusters (200 homes)

7.5.15. It is considered that not providing for an appropriate scale of development in Main Towns, Key Service Centres and Service and Other Villages would be **unreasonable**. This is because doing so would fail to provide small-scale housing growth to meet local needs, including for affordable housing, support local services and facilities and make the fullest possible use of infrastructure capacity, in this case primarily primary school capacity, contrary to the communities objective.

Additional Allocations needed in Alternative Strategies

7.5.16. Taking account of the assumed baseline growth on PDL and in Main Towns, Key Service Centres, Service Villages and Other Villages or Village Clusters, the Alternative Strategies need to accommodate an additional 3,300 new homes. The housing yield from the various baseline sources is set out in the table below:

New Allocation Requirements for Alternative Strategies		
	Source	New Housing Allocations
A	GNLP Proposed New Allocation 2015-2036	7,200
To be delivered by:		
B	Baseline Growth on Previously Developed Land In Norwich and Built Up Areas of Fringe Parishes	1,700
C	Baseline Growth in Main Towns and Key Service Centre	1,000
D	Baseline Growth in Service Villages or Village Clusters	1,000
E	Baseline Growth in Other Villages or Village Clusters	200
F	Baseline Sub-Total	3,900
Residual Allocations to be identified in Alternative Strategies:		
G	Additional Allocations needed in Alternative Strategies	3,300

The Distributional Alternatives

7.5.17. Six Alternative Strategies have been defined. These deliver the additional 3,300 homes needed on top of the baseline 3,900 homes in different ways. This alternatives are:

- **Urban Concentration**
- **Transport Corridors**
- **Cambridge – Norwich Tech Corridor**
- **Dispersal**

- **Dispersal Plus New Settlement**
- **Dispersal plus Urban Growth**

7.5.18. These approaches either concentrate the additional allocations: as close to Norwich as possible; along the main transport corridors; along the Cambridge-Norwich Tech Corridor; in a widely dispersed number of locations; in a dispersed number of locations supported by a new village; or, in a hybrid approach of dispersal and urban growth.

7.5.19. Whilst the actual allocation numbers within each approach could vary to some degree, such variation is not considered to constitute a fundamentally different conceptual alternative. Therefore these Alternatives are considered to cover the full range of potential conceptual approaches to distributing additional development across Greater Norwich. Further information on the Alternatives is included as Appendix B.

7.6. GNLP Strategy: How Should Greater Norwich Grow? – Evaluating Significant Effects

Reasonable Alternatives															
1) Urban Concentration (close to Norwich)								4) Dispersal							
2) Transport Corridors								5) Dispersal Plus New Settlement							
3) Cambridge – Norwich Tech Corridor								6) Dispersal and Urban Growth							
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
1	-	+	-	-	+	0	+	0	0	0	++	++	-	0	0
2	-	+	-	-	+	0	+	0	0	0	++	++	-	0	0
3	-	+	-	-	+	0	+	0	0	0	++	++	-	0	0
4	--	0	--	-	++	0	+	0	0	0	+	--	-	0	0
5	--	0	--	-	++	0	+	0	0	0	+	--	-	0	0
6	--	0	--	-	++	0	+	0	0	0	+	+	-	0	0
1. Minimise air, noise and light pollution to improve wellbeing 2. Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change 3. Protect and enhance the area's biodiversity and geodiversity assets, and expand the provision of green infrastructure 4. Promote efficient use of land, whilst respecting the variety of landscape types in the area 5. Ensure that everyone has good quality housing of the right size and tenure to meet their needs 6. Maintain and improve the quality of life of residents 7. To reduce deprivation 8. To promote access to health facilities and promote healthy lifestyles 9. To reduce crime and the fear of crime								10. To promote access to education and skills training and support increased educational attainment. 11. Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres 12. Reduce the need to travel and promote the use of sustainable transport modes 13. Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment. 14. Minimise waste generation, promote recycling and avoid sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land. 15. Maintain and enhance water quality and ensure the most efficient use of water.							

SA Objective	Discussion of significant effects, and relative merits of alternatives.
<p>SA1: Minimise air, noise and light pollution to improve wellbeing.</p>	<p>All housing development, unless “car free”, will inevitably generate additional trips locally as new residents move into the area. The city centre is the area most affected by air pollution. By its nature, the city centre is likely to attract a significant number of trips from new growth irrespective of its location, although there will be some mitigating impact to the effect where growth is located in the larger main towns that have a greater range of services and facilities, such as Diss, or where growth is well served by sustainable transport links to Norwich. The key to mitigation in Norwich is likely to revolve around minimising further polluting trips.</p> <p>An additional consideration would be the extent to which particular distributions would contribute towards locations that are already affected by, or at risk of being affected by issues of air, noise or light pollution.</p> <p>Because all alternatives would result in the allocation of further land for housing development, all alternatives would give rise to increased air and noise pollution, disruption to amenity and potential secondary health impacts locally. Similarly, levels of light pollution are likely to be affected. Consequentially, all alternatives are predicted to have a significant negative impact on the baseline.</p> <p>In relative terms, alternative 1 is likely to be best placed to minimise the need to travel as development under this alternative would have the best relationship to services, facilities and employment opportunities and would be best placed to utilise public transport and other sustainable modes of travel. Alternatives 4 and 5 are likely to result in the least preferential relationship to the focus of jobs, facilities, services and sustainable transport options near to Norwich. The remaining alternatives are likely to lie somewhere in between alternative 1 and alternatives 4&5. It is difficult to distinguish between 2 & 3, as both focus significant growth near to jobs, facilities, services and sustainable transport opportunities, albeit less so than alternative 1. Alternative 6 lies between alternatives 2 & 3 and 4 & 5 as they have a high proportion of development focused in unspecified service and other villages, and thus would be likely to have a high proportion of housing that is less well related to sustainable transport options or likely to affect the dark skies of areas such as the Broads.</p>
<p>SA2: Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.</p>	<p>A principal concern in relation to climate change mitigation will be the degree to which new development supports efforts to reduce car dependency and brings about modal shift to less polluting forms of transport, walking and cycling.</p> <p>Taking into account the assumption that the “no plan” scenario would likely be one where a substantially amount of additional homes would still be built, but in an ad-hoc fashion where local sustainability considerations were taken into account, but outside of a coherent plan for growth that could form the basis of investment decisions around sustainable transport, it is considered that alternatives 1, 2 and 3 would result in a significant positive impact on the baseline and other alternatives would likely have no significant impact on the baseline.</p>

	<p>Within this context, alternative 1 is likely to perform best, followed by alternatives 2&3, then by alternative 6, with alternatives 4&5 likely performing worst for the reasons set out in regards to objective SA1.</p> <p>Other considerations will relate to the extent to which development would support low carbon energy generation, or buildings that are energy efficient. The 2009 Greater Norwich JCS Sustainable Energy Study identified that development at a scale of roughly 500 units (and at a density of 50 units per hectare) is necessary to support CHP. It is notable however that only one scheme of more than 500 units in Greater Norwich, Beeston Park, actually proposes to incorporate any form of district scale decentralised, low carbon energy generation. This scheme is yet to be implemented. Therefore, whilst larger schemes may have theoretical potential to support such interventions, practical experience suggested that their actual implementation may be limited. Thus no distinction is drawn between alternatives that are more likely to result in larger allocation sites.</p> <p>In terms of adaptation, key issues will include flood risk concerns and green infrastructure. It can reasonably be expected that under all alternatives flood risk concerns would be effectively considered during site selection and that any green infrastructure strategy could be amended to effectively mitigate and serve the impact/needs of new development.</p>
<p>SA3: Protect and enhance the area's biodiversity and geodiversity assets, and expand the provision of green infrastructure.</p>	<p>It is reasonable to assume that growth on the scale proposed within all of the alternatives would lead to direct effects on land that has some biodiversity importance, or land that contributes to the functioning of wider "ecological networks". Consequently it is considered that all alternatives are likely to result in a significant negative impact on the baseline.</p> <p>Potential impacts on European sites include:</p> <ul style="list-style-type: none"> Increased urbanisation of the countryside leading to fly tipping, littering or predation by domestic animals; Increased ground water abstraction, leading to detrimental impacts on biodiversity through: <ul style="list-style-type: none"> changing the balance of freshwater to saline water in coastal wetlands; depleting river flows and increasing potential for saline water incursion; depleting river flows with the effect of reducing dilution of pollutants and nutrients; reduced ground water inputs/irrigation of fens Chemical release or STW failure resulting in pollution from waste water discharges; Increased emissions from vehicular traffic; Disturbance and trampling from people and especially dog walkers where nutrient enrichment from dog excrement is also an issue; <p>Mitigations for such impacts could include:</p> <ul style="list-style-type: none"> Minimising vehicular access to designated sites. Ensuring a suitable off-set of new development from designated sites Providing alternative recreational opportunities

	<ul style="list-style-type: none"> Providing for the relocation of parking, signage, wardens or other management interventions at designated sites <p>It should be noted that key uncertainties remain in regards to water resource impact, and consequently it is not possible at the current time to identify particular mitigations for potential impacts.</p> <p>It is possible in very crude terms to identify those locations which are closest to the greatest number of designated sites; these are typically to the north, north east and east of Norwich. However, it would not be justifiable to simply avoid these areas; it is entirely possible that a certain scale of development could occur within these areas and that it would have no impact, or fully mitigatable impact on designated sites. Therefore, it is not possible at the moment to differentiate between the alternatives in relation to this objective. This is, however, an issue that will need to be addressed in due course through the GNLP production process.</p>
SA4: Promote efficient use of land, whilst respecting the variety of landscape types in the area	<p>The vast majority of the additional growth that will be planned for within the GNLP will be on greenfield land that currently contributes to landscape character of different types. It is therefore suggested that all alternatives result in a significant negative impact on the baseline.</p> <p>The precise impact of the growth in terms of the efficient use of land or on particular landscape sensitivities will depend upon the allocations made. Therefore it is not currently possible to differentiate between the alternatives in this regard.</p>
SA5: Ensure that everyone has good quality housing of the right size and tenure to meet their needs	<p>In theory all of the alternatives would be capable of providing the housing needed, including the provision of the necessary affordable housing. Therefore all alternatives are considered to result in a significant positive impact on the baseline.</p> <p>A key issue, however, is whether a particular distribution provides greater certainty of delivery than another. In this regard consideration needs to be given to two factors in particular: does a particular distribution increase diversity, choice and competition in the market for land; and, what is the likelihood of a particular alternative resulting in further large scale development sites, which are more likely to suffer from increased lead-in timescales and a greater risk of delivery complications.</p> <p>The greatest concentrations of current growth commitments are the north east sector (which has by far the greatest level of current commitment at approx. 13,000 homes), the north sector in Hellesdon, the west sector, south west sector, Wymondham, Long Stratton and Poringland/Framingham Earl.</p> <p>Alternatives 4 and 5 would result in the widest dispersal of housing allocations, and thus arguably result in the greatest amount of choice and competition. Alternatives 2, 3 and 6 provide broadly comparable levels of dispersal, albeit that alternative 6 provides for notably more development in service and other villages.</p> <p>Alternative 1 would largely build on existing locations that are experiencing significant growth, and thus likely provides the least diversity.</p> <p>Whilst a large allocation number within a particular location might be delivered through a number of smaller sites, for the purposes of this assessment it is assumed that those alternatives that</p>

	<p>include a higher number of large scale allocations (defined as 1,000 or more homes in a location and including new settlements) would also carry the greatest risk of incorporating large allocations that would suffer from potentially long lead-in times and increased delivery risks. In this context alternative 1 is likely to include the greatest number of large allocations with 2. Alternatives 2 and 3 are likely to be reliant on 1 or 2 large allocations. Alternatives 5 and 6 have only likely to be reliant on 1 large allocation. Alternative 4 is not likely to be reliant on any large allocations.</p> <p>Therefore alternative 4 can be assumed to have the least risk of delay through large scale allocation, followed by alternatives 5 and 6.</p> <p>On the basis of a combination of the above factors it is considered that alternative 4 performs best in relation to this objective, followed by alternatives 5 and 6, then 2 and 3. Alternative 1 is considered to perform worst, while still having a positive impact on this objective.</p>
SA6: Maintain and improve the quality of life of residents	<p>It is considered likely that all alternatives would result in development in locations that are currently of high amenity value, or environmental quality. It is likely also that it would be possible to create high quality developments within these areas.</p> <p>Important to consider also is the impact on the "quality of life of residents" as perceived by existing residents. Many people may well feel that new development will have a detrimental impact on their quality of life. Others could, of course, see that development will bring with it some benefit.</p> <p>On the basis of the above, it is concluded that the alternatives will have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA7: To reduce deprivation	<p>Development may stimulate or support regeneration of deprived areas. The provision of affordable housing will also help to address deprivation to some degree.</p> <p>All of the alternatives would provide for affordable housing to meet identified needs. Each alternative is also based on the assumption that there will be 1,500 homes in Norwich, some of which will stimulate regeneration of deprived areas e.g. Anglia Square. Consequentially it is considered that all alternatives would have a significant positive impact on the baseline. Locations outside the built-up area of Norwich are relatively undeprived. Therefore, it is not possible to differentiate between the alternatives in relation to this objective based on the distribution of development outside Norwich.</p> <p>It should be noted that in certain instances development schemes have not, or are now not expected to be able to viably deliver the JCS affordable housing requirements. This issue disproportionately affects larger sites with more significant infrastructure cost associated. Therefore, distributions that have a greater chance of more large allocations may also carry a greater risk of lower affordable housing provision. At this stage, when sites are unknown, it is not possible to conclude on this issue.</p>

<p>SA8: To promote access to health facilities and promote healthy lifestyles</p>	<p>Under all alternatives community services, and facilities (including health services) can reasonably be expected to be in close proximity to the larger scale developments, and relatively easily accessible from the main towns and key service centres. More dispersed, small scale development carries a greater risk of a poor relationship to community services, and facilities (including health services).</p> <p>Larger scale development in particular would also support the provision of new open space. Smaller scale development would make a proportionate contribution to new open space, but in all probability would be, to some extent, reliant of other pre-existing open space, including access to the countryside.</p> <p>Whilst there remains uncertainty about the location and scale of allocations in villages it is not possible to conclude that there will be a significant impact on the baseline resulting from any of the identified alternatives. This conclusion has been reached in the knowledge that the situation under the “no plan” scenario would likely be one where the additional homes required would come forward in an ad-hoc fashion where local sustainability considerations were taken into account, but outside of a coherent plan for growth that could form the basis of investment decisions for a range of service providers.</p> <p>However, it is true to say that health facilities in Greater Norwich are focused in Norwich and the built-up fringe parishes, the main towns and the key service centres. Therefore alternatives that focus growth within these locations are likely to perform better in terms of access to health facilities.</p> <p>Promoting health and wellbeing means encouraging active healthy lifestyles and social interaction. This will include: promoting active travel i.e. walking and cycling; ensuring access to high quality open spaces, green infrastructure and opportunities for play, sport and recreation, avoiding potential pollution or other environmental hazards; and, creating spaces and places to meet.</p> <p>Supporting active travel will be easier to achieve where development is well related to a range of services, facilities, employment opportunities and sustainable transport options. Such areas are typically in or near Norwich and the built-up fringe, the main Towns and the key service centres.</p> <p>In a similar vein, encouraging social interaction will be easier where there are existing community facilities and activities e.g. primary school, parish/town hall, recreation grounds, and active community groups. Again such facilities are typically located in or near Norwich and the built-up fringe, the main towns and the key service centres.</p> <p>The availability of high quality open spaces and green infrastructure is considered to be more variable between different types of location, not least because access to the countryside will be a key element of such considerations and many rural villages would benefit from good access to such via public footpaths.</p> <p>Overall, it is considered that alternative 1 would result in the best relationship to health facilities, and have the greatest potential to encourage active lifestyles, primarily as a result of the proximity of development to services, facilities and employment opportunities,</p>
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	that can be accessed by foot or by bicycle. Next would be alternatives 2 and 3, then 6 with 4 and 5 likely to have the least beneficial relationship in terms of encouraging active lifestyles.
SA9: To reduce crime and the fear of crime	<p>If well planned, development can contribute to, or create, mixed and inclusive communities that are designed taking into account guidance such as “safer by design”.</p> <p>This impact of development on these matters is not directly related to decisions about the distribution of housing however. Therefore, it is considered that the alternatives would have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA10: To promote access to education and skills training and support increased educational attainment.	<p>Key issues in relation to this objective are access to primary, secondary, post 16 and higher educational opportunities. Detailed discussions with the local education authority are ongoing, but have not yet drawn clear conclusions. Therefore, at the time of writing it is not possible to conclude that any alternatives would have a significant impact on the baseline.</p> <p>Notwithstanding the above, an explanation of key issues and potential constraints, and their relationship to the objectives is set out below.</p> <p>Whilst there may be individual capacity issues that would need to be addressed, growth within the city, adjacent to the built-up fringe parishes, in the main towns and key service centres would be well related to primary schools. Baseline growth identified for service and other villages is predicated on access to a primary school.</p> <p>Higher levels of growth in the service and other village category (or within village clusters) does carry a greater risk of higher levels of allocations in villages without a primary school, but with access to one, and also in villages without easy access to primary education.</p> <p>There are understood to be constraints at secondary education level, these comprise:</p> <ul style="list-style-type: none"> • No further capacity to expand Wymondham High School (although growth in this area may be able to be served by Wymondham College or Hethersett High School. • Limited capacity at Hellesdon High School with limited, if any, scope for expansion (although there is capacity at Taverham which could serve growth in the wider north west) • Existing high school capacity in north east Norwich will not be sufficient for planned growth, and therefore a new secondary school is planned but is yet to be delivered • Ormiston Victory Academy, serving the western sector, has limited capacity or potential to expand • Framingham Earl may have limited capacity to expand <p>Consequently alternatives that place significant growth near to these schools could result in a sub-optimal relationship between secondary education and growth.</p> <p>Higher education opportunities are largely focused in Norwich, although East Coast college, in Great Yarmouth, also offers post 18 education. Very crudely, locations closest to Norwich would have the best relationship to such opportunities, although main towns,</p>

	<p>which typically have bus services to Norwich and locations such as Diss, Lingwood and Reedham which have main or branch line rail services to Norwich would also have a good relationship to such facilities.</p> <p>Alternative 1 would put additional pressure on identified secondary education constraints in the north east, north/north west and west; alternative 2 on the north east and Wymondham. Alternative 3 would put additional pressure on the west, south west and Wymondham. The impact of alternatives 4, 5 and 6 is more difficult to predict, as significant growth is provided for within unspecified service and other villages, which could include those which feed into constrained schools. Alternatives 4 and 5 also have a greater risk of significant allocations in villages with a sub-optimal relationship to education opportunities, while alternative 6 would place additional pressure on the north east, west and south west as well as unspecified villages.</p>
<p>SA11: Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres</p>	<p>In theory all of the alternatives would plan for a sufficient number of homes to accommodate the workers needed to realise the East of England Forecasting Models projections for jobs growth across Greater Norwich, and also the additional homes needed to support the Greater Norwich City Deal.</p> <p>Therefore all alternatives are considered to result in a significant positive impact on the baseline.</p> <p>The fewer accessible employment opportunities in an area, the less they will improve employment opportunities for residents. In this regard, all of the strategically important employment areas in Greater Norwich are located close to Norwich. Alternatives 1, 2 and 3 are those that focus most development within areas close to Norwich and therefore are likely to result in the best relationship between jobs and homes in locational terms. This is followed by alternative 6, then 4 and 5 which increase the amount of development in Service and Other Villages, and thus (at least in part) further away from strategic employment areas.</p> <p>It should also be recognised that alternative 3 has been specifically derived to support the economic growth plans for the Cambridge – Norwich Technology Corridor. This has further potential benefits, in that it would result in a housing distribution that would support a specific economic growth initiative.</p> <p>Each of the alternatives contains a baseline level of growth within the Main Towns and Key Service Centres that will help to maintain their retail centres. However, alternatives 4, 5 and 6 proportionately provide for more growth in these locations. Therefore, whilst evidence on this point is limited, it is arguably the case that these alternatives would increase the potential local spending power to support local convenience and comparison retail.</p> <p>Overall, however, it is considered that the higher quality relationship of housing to employment offered by alternatives 1, 2 and 3 is better related to the intentions of the objective than alternatives 4, 5 and 6.</p>
<p>SA12: Reduce the need to travel and promote the use of sustainable transport modes</p>	<p>The extent to which any alternative will reduce car dependency and bringing about modal shift to sustainable forms of transport will</p>

	<p>depend upon the relationship of new growth to services, facilities, employment opportunities and sustainable transport options.</p> <p>Within this context, alternatives 1, 2 and 3 are likely to perform best as they focus the most growth near to the highest number of services, facilities and employment opportunities; in locations where sustainable transport alternatives are already available/practical; and where there is planned investment to improve sustainable transport infrastructure. Alternative 6 is also likely to perform well against this objective, on the same basis as alternative 1, but the wider dispersal to Main Towns, Key Service Centres, Service and Other Villages will diminish its sustainable transport potential to some extent. In this context these alternatives are considered to have a significant positive impact on the baseline.</p> <p>Alternatives 4&5 are likely to perform worst as they disperse significant amounts of development to locations which are less well served by sustainable transport and less well related to services, facilities and employment opportunities on this basis these alternatives are likely to have a significant negative impact on the baseline.</p>
<p>SA13: Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.</p>	<p>The vast majority of the additional growth that will be planned for within the GNLP will be on greenfield land. It is likely that some of this would have an impact on the historic environment, heritage assets or cultural heritage. It is therefore suggested that all alternatives result in a significant negative impact on the baseline.</p> <p>The precise impact of the growth in terms of the historic environment will depend upon the allocations made. Therefore it is not possible to differentiate between the alternatives in this regard at this point.</p>
<p>SA14: Minimise waste generation, promote recycling and avoid sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land.</p>	<p>The vast majority of the additional growth that will be planned for within the GNLP will be on greenfield land. Potential mineral resources, particularly sands and gravels, are wide spread across the Greater Norwich Area. Therefore it is likely that significant elements of all alternatives will need to consider the potential for such resources to be viably extracted. This is an important site-based consideration but not one on which a judgement can currently be made.</p> <p>There are areas of grade I & II agricultural land across Greater Norwich, with almost the whole area being within the broad grade III category. However the vast bulk of Grade I & II land is found along the A47 corridor between Gt & Lt Plumstead/Blofield and Acle. There are also notable, but less extensive areas around Barnham Broom and Kimberley.</p> <p>Given that exact sites are not yet known it is not possible to conclude that any alternatives would have a significant impact on the baseline. Nor would it be justifiable to differentiate between alternatives in regards this objective. However, there is an assumption in alternative 2 that there would be no growth above the baseline along the A47 east corridor. If this proves not to be the case, at a very crude level it stands to reason that alternatives that increase growth along the A47 east corridor would be more likely to impact upon the best and most versatile agricultural land i.e. alternative 2.</p>

<p>SA 15: Maintain and enhance water quality and ensure the most efficient use of water.</p>	<p>The supply and disposal of water, and related water quality matters, are key issues for the GNLP. The vast majority of the housing development that needs to be planned for is contained within existing planning permissions and allocations. There is good evidence to suggest that these developments can be delivered without any significant impact on water quality.</p> <p>Further growth will place an additional burden on water supply and disposal infrastructure. Early engagement with AWS, EA and NE has not identified any fundamental water quality constraint to further development.</p> <p>In regards to waste water disposal, and its impact on water quality, the distribution of housing is a significant consideration, as foul water will be disposed of through local treatment works which have their own particular issues in terms of their volumetric capacity and required treatment standards.</p> <p>There are known to be waste water constraints at Long Stratton, but none of the alternatives identify further growth in this location. There may also be constraints at Aylsham and Acle. However, most alternatives include only limited growth in these locations, in part because of potential infrastructure constraints, and in doing so minimise potential impacts.</p> <p>However, detailed evidence on this issue is not currently available therefore it is not possible to conclude that the alternatives would have a significant impact on the baseline. Nor can a differentiation be made in terms of the impact of the alternatives at this time.</p>
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Summary of Significant Effects

- 7.6.1. Options 1, 2 and 3 may be harder to deliver. This is because they focus growth in locations that have already seen significant growth, have significant outstanding commitment and have experienced delivery issues over the JCS period. Alternatives 4 and 5 provide for a much wider dispersal of development, and in doing so increase diversity, choice and competition in the market for land, which should be beneficial for delivery. If so, then alternatives 4 and 5 would perform better than alternatives 1, 2 and 3 for delivery. Option 6 lays somewhere in between.
- 7.6.2. However, Options 1, 2 and 3 perform better than alternatives 4 and 5 in relation to objectives that seek to improve air quality, reduce the impact of traffic, address climate change issues, increase active travel and support economic development. This a result of the better geographical relationship of development under these options to services, facilities, employment opportunities and sustainable transport options. Again Option 6 sits somewhere in between.
- 7.6.3. On the basis of the above, in sustainability terms the choice between alternatives, at this stage of the assessment process, appears finely balanced, with no alternative clearly better than another in SA terms.

7.7. GNLP Strategy: Green Belt – Outline of the Reasons for Selecting the Alternatives

7.7.1. Green Belt serves five purposes: checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns merging; assisting in safeguarding the countryside; preserving the setting and special character of historic towns; and assisting urban regeneration. All of these purposes could be of relevance to Greater Norwich, however new Green Belts should only be established in exceptional circumstances, with the particular exceptional circumstances tests set out in the National Planning Policy Framework.

7.7.2. There are three conceptual green belt alternatives:

1. A wide Green Belt surrounding Norwich and extending beyond the first ring of villages/towns;
2. A narrow Green Belt surrounding Norwich and extending to, but not beyond the first ring or villages; and,
3. A series of Green Belt “wedges” based around landscape protection zones for the Southern Bypass, NDR, River Valleys and undeveloped approaches to Norwich and certain Strategic Gaps between settlements such as Wymondham and Hethersett.

7.7.3. For all alternatives it was considered that:

- there was no convincing justification that normal planning policies would be inadequate in terms of the five purposes of the Green Belt as they relate to Greater Norwich;
 - and, that there were no major changes in circumstances that made the adoption of a Green Belt necessary.
- also,
- that alternatives 1&2 would have long term detrimental impacts for sustainable development.

7.7.4. Consequently, **none of the identified Green Belt alternatives were considered to be reasonable** in the context of National Planning Policy Framework requirements and have not been evaluated further within the Interim SA.

7.8. GNLP Strategy: Norwich City Centre – Outline of the Reasons for Selecting the Alternatives

- 7.8.1. A strategic City Centre policy that covers areas such as retail, leisure and commercial development is necessary in order to fulfil the Economic and Communities objectives of the plan. A policy would do this by supporting and promoting the growth of an enterprising, creative, broad based economy with high productivity and a skilled workforce with good access to jobs, services and facilities. Therefore it would be unreasonable to exclude a City Centre policy from the GNLP.
- 7.8.2. Whilst there are a number of emerging options raised in the GNLP Option for Growth Consultation few are sufficiently distinct that they comprise fundamental alternatives, rather they are different approaches to implementing the alternative approach described above.
- 7.8.3. The only distinct alternatives identified relates to the geographical definition of the City Centre for planning purposes. **The retention of the current city centre boundaries is considered to be a reasonable alternative** as it would encourage intensification of city centre uses reinforcing the city as a compact, vital and vibrant centre well served by public transport and other sustainable transport links.
- 7.8.4. The need to increase city centre functions may, however, not be achievable through intensification alone, without undue impact on its historic character. Therefore, **enlarging the city centre boundary is also considered to be a reasonable alternative**. An enlarged city centre boundary may include areas: east of Norwich City Football Ground; along Thorpe Road; and, west along Dereham Road.
- 7.8.5. Reducing the boundaries of the city centre for planning purposes would not enable an increased city centre function. It would thus be inconsistent with the economic and community objectives of the GNLP and is therefore an unreasonable alternative.

7.9. GNLP Strategy: Norwich City Centre – Evaluating Significant Effects

Reasonable Alternatives															
CC1: Retain the current city centre boundaries.															
CC2: Enlarging the city centre boundary															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
CC1	-	+	0	0	0	0	0	0	0	0	+	+	0	0	0
CC2	?	?	0	-	-	0	0	0	0	0	+	?	0	0	0

Summary of Evaluation

- 7.9.1. Alternative CC1 proposes to retain the city centre boundary as currently defined for planning purposes. Effectively, this intensifies the role of the city centre and is therefore likely to reduce the number of trips (SA2 and SA12), but may have a detrimental impact on the AQMA in Norwich city centre (SA1). Both alternatives aim to support business and enhance the city centre, supporting SA11. The proposal to extend the defined city centre in

alternative CC2 raises a potential dichotomy. It is possible that expanding the functional city centre area would prevent more out of town retail development, which would subsequently prevent an increase in potential car journeys. However, expanding the city centre area could also encourage less intensive, car-based development which would be more difficult to serve effectively by public transport. Therefore, the impact on SA1 (minimise air, noise, light pollution), SA2 (reduce carbon emissions) and SA12 (reduce the need to travel) is uncertain. It is possible that expansion of the functional city centre would result in the loss of sites which could be suitable for housing, with a subsequent negative impact on SA5 and an indirect negative impact on SA4 due to the loss of greenfield land as housing or other uses are displaced from the expanded centre.

7.10. GNLP Strategy: Norwich Urban Area and Fringe Parishes – Outline of the Reasons for Selecting the Alternatives

7.10.1. The Norwich Urban Area and Fringe Parishes are home to a significant number of people, business and environmental assets. The area also plays an important role in providing links between the City Centre and its hinterland.

7.10.2. In order to fulfil the plan's economic, community, environment and transport objectives it is critical that a policy is included in the GNLP that identifies/supports:

- regeneration priorities;
- location specific design considerations;
- Green Infrastructure priorities;
- Economic priorities;
- Education priorities;
- Protection and Enhancement of Local Services; and,
- Transport Improvements

7.10.3. Therefore, **the only reasonable alternative is to include a policy for the Norwich Urban Area and Fringe Parishes as set out above.** Within these parameters there are not considered to be any options that sufficiently distinct that they comprise fundamental alternatives, rather they are different approaches to implementing the same alternative approach.

7.11. GNLP Strategy: Norwich Urban Area and Fringe Parishes – Evaluating Significant Effects

Reasonable Alternative(s)															
Include a policy that: regeneration priorities; location specific design considerations; Green Infrastructure priorities; Economic priorities; Education priorities; Protection and Enhancement of Local Services; and, Transport Improvements															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
UA1	0	0	+	+	+	+	++	0	0	?	+	++	0	0	0

Summary of Evaluation

7.11.1. The proposal to continue to support suburbs and the Norwich fringe parishes is a broad policy approach, with far-reaching aims, some of which are neutral in their impact or lack the detail to enable assessment. The policy does specify suburban regeneration and aims to enhance the vitality of the wider Norwich built up area, and therefore the policy is likely to have a strong positive impact on SA7 (regeneration) and SA12 (reducing the need to travel and promoting sustainable transport modes). The policy proposes further development of green infrastructure, so there is also likely to be a positive impact on SA3. Increasing densities of the various land uses in fringe parishes would theoretically support SA4 (efficient use of land) and SA5 (housing) while integrating new and existing communities, which would support achievement of SA6. SA objective 11 (economic development) is also addressed within the policy, as is SA10 (education) although the

promotion of Norwich as a 'learning city' may not increase access to education or skills training or support increased educational attainment.

7.12. GNLP Strategy: Settlement Hierarchy – Outline of the Reasons for Selecting the Alternatives

- 7.12.1. A settlement hierarchy groups places together according to the availability of services and facilities, access to employment and opportunities for sustainable and active travel. The hierarchy helps to ensure that growth is distributed according to the range of supporting services and infrastructure that are available in a particular location. For this reason it is considered unreasonable not to include a form of settlement hierarchy within the GNLP.
- 7.12.2. Current JCS policy establishes the following tiers of the Hierarchy:
1. Norwich Urban Area, including the built-up parts of the urban fringe parishes
 2. Main Towns
 3. Key Service Centres
 4. Service Villages
 5. Other Villages
 6. Smaller Rural Communities and the Countryside
- 7.12.3. The structure of the hierarchy established by the JCS remains reasonable. In regards to the top three tiers of the hierarchy **there are not considered to be any alternatives in terms of the levels of the hierarchy or qualifying criteria for them**: tightening the criteria would likely create an artificial distinction between broadly similar settlements, loosening the criteria would make very different settlements equivalent to one another. Whilst minor tweaks to the criteria could be considered these are not deemed sufficiently distinct that they comprise fundamentally different alternatives.
- 7.12.4. **The current JCS approach to the bottom three tiers of the hierarchy is also considered reasonable** as it also effectively groups together individual settlements with similar characteristics. Adopting this approach would retain the current six tiered hierarchy. It is however possible that the distinction between the bottom three tiers of the hierarchy masks the fact that neighbouring villages can share services, and where this occurs the actual availability of nearby services to a village may be greater than if the village is considered in isolation. For this reason **it is also considered to be reasonable to group the bottom three tiers of the hierarchy together as a single Village Cluster tier**. Adopting this approach would create a four tiered hierarchy, with village clusters being the bottom and final tier.
- 7.12.5. The potential for different scales of growth at different levels of the hierarchy is considered within the Growth Alternatives and, in regards to the approach to windfall, within the Housing Policy Alternatives.

7.13. GNLP Strategy: Settlement Hierarchy – – Evaluating Significant Effects

Reasonable Alternative(s)															
SH1: Have a six tiered hierarchy															
SH2: Have a four tiered hierarchy, including “Village Clusters” as tier 4.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
SH1	+	+	0	0	+	+	+	+	0	?	0	+	0	0	0
SH2	?	?	0	0	+	?	?	?	0	?	0	?	0	0	0

Summary of Significant Effects

7.13.1. Maintaining the current hierarchy would be an effective mechanism to ensure development is well related to an appropriate range of services and facilities, thereby reducing the number and length of vehicle trips and increasing opportunities for people to make trips by walking or cycling. This results in a significant positive effect in terms of SA1, SA2, SA6, SA7, SA8, and SA12. The impact of SH2 is uncertain; if villages are clustered in such a way that higher growth is only allocated where the levels of accessibility to services is good then the impact of this approach could also be positive in respect of SA1, SA2, SA6, SA7, SA8, and SA12. If however it results in higher growth being allocated to villages where easy access to services by sustainable mean in different villages does not readily exist then the effect of the policy would be negative against those same criteria, and in this scenario would clearly perform worse than SH1 in sustainability terms.

7.13.2. Both alternatives are considered to have a positive impact in terms of SA5 as they will support the identification of allocations in a range of settlements and in doing so provide for diversity, choice and completion in the housing market. Whilst currently uncertain, it is possible that SH2 would create more diversity, choice and competition if it results in a wider range of allocations in expanded range of settlements.

7.14. GNLP Strategy: Influence of the Norwich Urban Area & Distribution of Growth – Outline of the Reasons for Selecting the Alternatives

7.14.1. The concentration of jobs, services, facilities and travel options available in the Norwich urban area and its hinterland will continue to exert an influence on its surrounding area. In recognition of this influence, there has long been a policy approach called the Norwich Policy Area (NPA) which focusses development primarily in and around the urban area. The NPA also plays a role in promoting the economic strength of Norwich and its hinterland, demonstrating the collective importance of the area and showing the scale of housing and jobs growth with a Norwich focus. It is also the same geography as the NATS area, which is used for transport planning. **Continuing with the Norwich centred policy for some policy purposes related to the above function is a reasonable alternative.**

7.14.2. However, as the GNLP is intended to be a comprehensive local plan, encompassing both strategic planning policies and site allocations, an overarching policy directing the location of growth for lower tier documents is not required. Consequently **dispensing with the NPA is also a reasonable alternative.**

7.14.3. As the housing market area covers all of the three districts covered by the GNLP **retaining the NPA for the purposes of calculating 5 year housing land supply not considered a reasonable alternative.**

7.14.4. **Calculating housing land supply on an individual district basis is considered to be an unreasonable alternative** taking account the intended purpose of the GNLP as it would run contrary to the general principles and implicit objective of a joint plan, and emerging national planning policy. There is no evidence that suggests any other geographies for calculating housing land supply would be justifiable.

7.14.5. If a Norwich centred policy were to be retained there would also be potential alternatives for its geography. The exact options in this regard are currently unclear: whilst any revised boundary would be unlikely to be significant smaller than its current definition, the expansion of any boundary would be linked, to some extent, to the distributional strategy that is pursued. Therefore, at this stage there are no tangible alternatives to compare in regards to the potential extent of an NPA boundary.

7.15. GNLP Strategy: Influence of the Norwich Urban Area & Distribution of Growth – Evaluating Significant Effects

Reasonable Alternative(s)															
NCPA1: Do not have a Norwich centred policy area.															
NCPA2: Retain a Norwich centred area for some policy purpose, including recognition of the concentration of growth, to provide information to support promotion for economic purposes and to attract inward investment.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
NCPA1	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0
NCPA2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

- 7.15.1. The majority of the most sustainable locations (judged against all three limbs of sustainability) within Greater Norwich lie adjacent or near to Norwich and the built-up parts of the fringe parishes. This is because this is where the majority of jobs, educational opportunities, services and facilities are focused. Focusing development in the most sustainable locations has clear benefits in terms of reducing the need to travel and minimizing impacts on air quality and carbon emissions from transport.
- 7.15.2. However, as the plan will contain site allocations, the absence of a Norwich centred policy will not, of itself, necessarily result in a wider dispersal of development to less well connected locations than might otherwise be the case. Moreover, the vast majority of current housing commitments, which will deliver the vast bulk of the GNLP's housing requirements, are already located close to Norwich. Therefore, within the confines of this plan, NCPA2 is unlikely to result in a significantly different distribution when compared to the no-plan alternatives.
- 7.15.3. As a consequence of the above, the impact of both alternatives on the baseline is predominantly neutral other than in regard to SA11 for NCPA1.
- 7.15.4. In regards to SA11, it is possible that retaining a Norwich centred policy for some policy purposes could have benefits in term of promotion of Greater Norwich as a location for inward investment, and support policy integration across sectors, tiers of government and geographical areas e.g. by ensuring that there is commonality between the GNLP and the NATS strategy. There is however no tangible evidence that a Norwich centred policy would necessarily result in a significant positive impact on the baseline in this regard. It is also plausible that similar benefits could be derived by ensuring other strategic and thematic policies address relevant issues in this regard. The potential benefit of NCPA1 is therefore identified as an uncertainty.

7.16. Identifying Development Sites

- 7.16.1. As distributional alternatives remain at a relatively early stage of production no shortlisting of sites has yet been undertaken for the GNLP. Moreover, comparing every potential permutation of site selection in this report for each alternative distribution would create so many alternatives that it would not be practically achievable, or particularly meaningful.
- 7.16.2. Notwithstanding the above, future iterations of the Sustainability Appraisal will evaluate site selection alternatives in order to inform the plan.

8. Greater Norwich Local Plan: Topic Policies

8.1. The thematic policies of the GNLP cover a number of broad policy areas. Each of these policy areas has a number of alternatives relating to specific elements of the policy. These alternatives are explained in the section below.

8.2. Economy

8.2.1. The economic policy considers alternatives in regards to the overarching policy approach to the economy, the supply of employment land, the approach to windfall development and the retail hierarchy and focus of new comparison good retail floorspace.

Overarching Economic Policy – Outline of the Reason for Selecting the Alternatives Dealt with

8.2.2. There is significant potential for economic growth in Greater Norwich. The City Deal has been signed with Government to promote accelerated growth, the LEP's economic strategy identifies Greater Norwich as the region's main engine of growth and the Norwich Cambridge Tech Corridor initiative promotes further growth of high tech industries which are growing in significance nationally and internationally.

8.2.3. The plan's draft vision promotes a strong economy for Greater Norwich. The economy objective is to support and promote the growth of an enterprising, creative, broad based economy with high productivity and a skilled workforce. Therefore the GNLP will need to continue to provide a wide ranging approach to supporting economic development and growth. This is the only reasonable alternative, as not including such a policy would not meet the objectives of the plan.

Overarching Economic Policy – Evaluation of Alternatives

Reasonable Alternative															
EC0: Continue with a wide ranging policy approach to promoting the economy.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
EC0	-	?	0	0	0	0	+	0	0	0	++	0	0	0	0

Summary of Significant Effects

8.2.4. Supporting economic development will inevitably increase light, noise and air pollution levels (SA1) although the extent to which this occurs would depend on the type of development, which cannot be predicted at this stage. The type of business will also dictate the impact on carbon emissions, so the impact on SA2 cannot be judged at this stage.

Supply of Employment Land – Outline of the Reason for Selecting the Alternatives Dealt with

- 8.2.5. The area currently has around 340 hectares (ha) of undeveloped employment land that is allocated or permitted. The Employment, Town Centres and Retail study concludes that, even to support an enhanced level of employment growth, the overall need for land is significantly less at 114ha.
- 8.2.6. There is no evidence to justify increasing the overall supply of employment land. Further increasing supply for which there is no demand increases uncertainty, risking investment to bring sites forward. It also increases the risk of encouraging uses that will be damaging to the city and town centres.
- 8.2.7. Retaining currently allocated employment land would be consistent with the objective of the plan, as it would provide completion and choice in the market for employment land consistent with the objective to support and promote the growth of an enterprising, creative, broad based economy. It would also be reasonable to significantly reduce the amount of employment land identified, given the significant oversupply.
- 8.2.8. It is also reasonable to consider whether an employment windfall policy should be included to provide a flexible means to respond to particular economic demands. This is also consistent with the objectives of the plan. In the absence of a windfall policy, departure planning applications could still lawfully be granted where material consideration indicate that they should be. Therefore it is not considered absolutely necessary to include a windfall policy.

Supply of Employment Land – Evaluation of Alternatives

Reasonable Alternative															
EC1: Broadly maintain the current supply of employment land															
EC2: Significantly reduce the overall level of supply while still maintaining choice and flexibility															
EC3: Develop a criteria-based policy allowing windfall development.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
EC1	0	0	0	-	0	0	0	0	0	0	+	0	0	0	0
EC2	0	0	0	+	+	0	0	0	0	0	++	0	0	0	0
EC3	0	0	0	+	0	0	0	0	0	0	++	0	0	0	0

Summary of Significant Effects

- 8.2.9. Alternatives EC1 and EC2 are mutually exclusive; both are designed to support businesses and encourage economic development so that more jobs are created, so there would be a positive impact on SA7 (addressing deprivation) and SA11 (economic development and town centres) with either approach. There is however a concern that the significant oversupply of employment

land resulting from EC1 risks undermining investor confidence which may hinder economic growth.

- 8.2.10. Alternative EC3 proposes a criteria-based policy. As a demand-responsive approach, this alternative would make efficient use of land (SA4) as it would release land only in justified areas and could support businesses in general but also changing needs of key employment sectors identified by the LEP (SA11).

Retail and Town Centre Policy – Outline of the Reason for Selecting the Alternatives Dealt with

- 8.2.11. A hierarchy of “town” centres helps ensure development of new retailing, services, offices and other town centre uses at a scale that is appropriate to their location. The current approach to the retail hierarchy ensures consistency between the scale of development and function of the location and continuing with this approach is therefore considered reasonable.

- 8.2.12. Evidence does suggest, however, that there will be a significant growth in retail expenditure on comparison goods. Absorption of increased spending within the current hierarchy is a reasonable alternative as average turnover across Norwich city centre is lower than comparable centres (such as Cambridge) and the quality of the offer in the city centre also lags behind Cambridge.

- 8.2.13. There could be some scope for out of centre development in sustainable locations, particularly if further investigation finds that there is limited physical scope within the city centre and market towns to accommodate further comparison goods expenditure.

Retail and Town Centre Policy – Evaluation of Significant Effects

Reasonable Alternative															
EC4: Maintain the current retail and town centre hierarchy															
EC5: Increased comparison goods expenditure primarily within existing town centres, perhaps some out of centre allocations															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
EC4	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0
EC5	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0

Summary of Significant Effects

- 8.2.14. Alternatives EC4 and EC5 are again mutually exclusive. Both would make a positive impact on SA11 because they would support existing town centre uses, albeit that EC4 could constrain growth potential if there was insufficient scope for expansion in the city. Adopting option EC5 would likely result in additional trips in the medium to longer term. In the short term growth would continue to be

focused in existing comparison retail outlets with a minimal effect on the baseline. Conversely EC4 would focus growth in compact city centre, supporting sustainable and active transport. Overall the difference between the alternatives is limited. If continuing to focus comparison growth in the city does not inhibit overall growth this would appear to be the most appropriate alternative in SA terms.

8.3. Access and Transportation

8.3.1. The access and transport policy considers alternatives in regards to Strategic Transport Issues, the development and implementation of Transport Improvements and promotion of sustainable transport / broadband access.

Strategic Transport Issues – Outline of the Reason for Selecting the Alternatives Dealt with

8.3.2. Access and transport is fundamental in day to day life. A well-functioning transport system and access to jobs, services and information is vital to the economy of the area and the well-being and quality of life for residents. Therefore it is essential that the plan includes an overarching policy that supports and promotes strategic transport improvements.

8.3.3. It is however important to recognize that, whilst the GNLP may support strategic transport improvements, it is for the responsible bodies such as Highways England, Network Rail and Norfolk County council as local Highways Authority to develop, promote and determine which strategic transport improvements, other than those directly related to a particular growth strategy, are necessary.

Overarching Transport Policy – Evaluating Significant Effects

Reasonable Alternative															
TR0: A policy broadly supporting and promoting strategic transport improvements															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
TR0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

8.3.4. The proposal at TR0 is simply to support strategic transport improvements which are, or will be, identified by the responsible Authority. The GNLP will not be proposing the transport improvements, such transport improvements will be promoted by the appropriate body and subject to separate SEA/SA as appropriate through a separate process. Whilst there would be benefits to ensuring a close relationship between the GNLP and transport infrastructure, in particular in regards to SA11, the impact of this policy is not considered to constitute a significant positive impact on the baseline when considered against the “no plan” scenario. This conclusion has been reached as it can reasonably be expected that any strategic transport scheme that is agreed as part of the policies and investment programmes of the delivery bodies would likely go ahead irrespective of a broad supportive policy in the GNLP. Consequently the impact of this policy has been assessed as neutral.

Transport Interventions – Outline of the Reason for Selecting the Alternatives Dealt with

8.3.5. The GNLP will need to identify any transport improvements that are necessary to support growth in the plan. Strategic transport improvements that are not directly related to a Growth Alternative, or a particular development site, and smaller-scale area-wide transport improvements that manage the impact of growth and address existing traffic issues will be dealt

with by the Highway Authority (Norfolk County Council) as part of its transport strategy.

- 8.3.6.** No overarching transport improvements that are a direct result of growth within the plan have currently been identified. Furthermore, in advance of the identification of Reasonable Alternative development sites no site specific transport improvements, or alternative can currently be identified. Therefore, at this stage there are no transport alternatives to consider in this regard.

Healthy Lifestyles, Sustainable Transport and Broadband – Outline of the Reason for Selecting the Alternatives Dealt with

- 8.3.7. Reducing reliance on the private car and promoting more sustainable and healthy travel choices are important aspects of achieving the communities and environmental objectives of the GNLP. Therefore, the only reasonable alternative is to include a policy that addresses these issues within the plan.

Healthy Lifestyles, Sustainable Transport and Broadband – Evaluating Significant Effects

Reasonable Alternative															
TR1: Continue current approach re public transport, walking & cycling improvements & better broadband															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
TR1	+	+	0	0	0	0	0	+	0	0	+	++	0	0	0

Summary of Significant Effects

- 8.3.8. TR1 aims to encourage improvements to public transport, walking and cycling and a better broadband network. This alternative is ultimately likely to reduce the number of car journeys and increase walking, cycling and public transport use, supporting the achievement of SA1, SA2, SA8 and SA12. Better broadband would help the economy, supporting the achievement of SA11.

8.4. Design

Outline of the Reason for Selecting the Alternatives Dealt with

- 8.4.1. Good design is indivisible from good planning. Not having a design and density policy in the GNLP, simply relying on existing development management policies, is **unreasonable** as the NPPF clearly requires a specific policy approach to be taken in new local plans. It would also risk a policy vacuum in some areas currently covered by JCS policies 1 and 2.
- 8.4.2. Two reasonable alternatives have been identified for the design policy. These would comprise continuing with the current approach (as set out in the JCS) or creating a stronger policy approach to design and density. The former would address, albeit in a fairly basic manner, national policy requirements, but may not enable full recognition of emerging national policy changes, with an increased focus on high-quality design and density. The latter would allow greater specificity of design requirements. It could also allow identification of areas suitable for higher-density development, and perhaps specify minimum densities. It could consider the question of residential space standards, design quality and wheelchair accessibility too.

Evaluating Significant Effects

Reasonable Alternative															
DE1: Broadly continue with the existing design and density policy approaches, with some relatively minor changes and updating, covering general high-quality design, recognizing local character, encouraging walking and cycling etc.															
DE2: Create a stronger policy approach to design and density, including giving a clear policy approach to high-density development in appropriate locations or scenarios.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
DE1	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
DE2	0	0	0	+	++	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

- 8.4.3. Alternatives DE2 has more scope to improve the efficiency of land use (SA4) than DE1. While both would enable the delivery of the objectively assessed need for homes (SA5), DE2 would also provide for diversity if it applied accessibility standards and a range of density requirements. Otherwise, the two alternatives would have a largely neutral impact on the SA objectives.

8.5. Housing

8.5.1. The GNLP Housing Policy will cover a number of different elements of housing including affordable housing provision, exception sites, housing mix, older peoples and care accommodation and provision for Gypsies and Travellers.

Affordable Housing Provision Threshold – Outline of the Reason for Selecting the Alternatives Dealt with

8.5.2. Historically, smaller sites have tended to be an important source of affordable housing, particularly in more rural areas. Having too high a threshold for affordable housing could deliver less affordable housing, and therefore risk failing to meet the housing objective of the GNLP.

8.5.3. An affordable housing threshold of 5 or more, or 11 or more dwelling are both reasonable alternatives as they would both likely enable the delivery of the needed affordable housing: maintain the supply from smaller sites; minimising the need to make large allocations in smaller villages to secure affordable housing; and, maintain the likely viability of sites.

8.5.4. Requiring affordable housing on sites of fewer than 5 dwellings is inconsistent with Government policy and could threaten viability at that scale. Requiring affordable housing only on sites of 15/20 or more would diminish the delivery of affordable housing, particularly from smaller windfall sites. Therefore both of these are considered to be unreasonable alternatives.

Affordable Housing Provision Threshold – Evaluating Alternatives

Reasonable Alternative															
AH1 - A proportion of affordable housing would be sought on all sites of 5 or more dwellings (as per current JCS Policy 4)															
AH2 - A proportion of affordable housing would be sought on all sites of 11 or more dwellings (or 0.5 hectares or more).															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
AH1	0	0	0	0	++	+	++	0	0	0	0	?	0	0	0
AH2	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0

Summary of Significant Effects

8.5.5. A lower threshold for affordable housing is likely to result in more affordable housing, although this outcome is by no means certain as the viability of small sites can be more critical when smaller developers may have more limited funding available. Either alternative would likely provide affordable housing in a variety of locations and sizes, and would make a positive impact in terms of objectives 5 and 7. However, on balance it is considered that alternative AH1 would be likely to maximise the delivery of affordable housing over the course of the plan period.

8.5.6. The provision of affordable housing could improve quality of life by providing homes for current or future residents who are unable to meet their housing needs through the market, this would be expected to have benefits

in terms of promoting integration. Both alternatives therefore are considered to have a significant positive effect on the baseline in regards to Objective 6. AH1 is, however, more likely to result in affordable housing being available in a wider range of villages, including smaller villages that would be unlikely to see a development of 10 or more dwellings, thus contributing to creating mixed and balanced communities and maintaining local connections. Thus whilst both alternatives are considered to have the same impact on the baseline, alternative AH1 is considered to perform better in relative terms than AH2.

- 8.5.7. A lower threshold may result in more small sites (less than 10) being allocated, including in smaller settlements which may not be appropriate for or have land available for sites of 10 or more dwellings, in order to maximise the benefits of affordable rural housing. This may result in a greater dispersal of new housing, including in locations which do not benefit from public transport and have few services. If this were to occur then it could increase the need to travel, with a resultant negative impact in regards to Objective 12. The approach to housing distribution is however the subject of a separate policy. It does not therefore automatically follow that a lower threshold would result in more dispersed patterns of housing. This potential effect is identified as an uncertainty at this stage.

Affordable Housing Percentage Requirement – Outline of the Reason for Selecting the Alternatives Dealt with

- 8.5.8. The 2017 SHMA conclusion is that a total of 11,030 affordable houses need to be provided over the period 2015-2036. Taking into account affordable housing completions, this is 27% of the OAN for Greater Norwich derived from the recently published Standard Methodology. However, experience dictates that it is likely that not all sites will be able to deliver a policy-compliant level of affordable housing. Flexibility over affordable housing to ensure viability would need to be a feature of any affordable housing policy.
- 8.5.9. The following alternatives are reasonable on the basis that they would meet the housing objective of the GNLP: Requiring all qualifying sites to provide 27%, on the assumption that the GNLP incorporates a reasonable amount of housing over-provision e.g. a delivery buffer; subject to a demonstration of viability, requiring more than 27% affordable housing on qualifying sites; and, specify the affordable housing amount and, perhaps, phasing, on larger sites on a bespoke basis (taking into account the particular circumstances of that site), with a more general policy for smaller sites
- 8.5.10. Seeking less than 27% or requiring differing affordable housing percentages in Broadland, Norwich and South Norfolk would be unreasonable as both risk failing to meet the housing need in the area, which is inconsistent with the Housing Objective of the GNLP.

Affordable Housing Percentage Requirement – Evaluating Alternatives

Reasonable Alternative															
AH3 - Seek 27% affordable housing on all sites above the qualifying threshold															
AH4 – Seek more than 27% affordable housing on all sites above the qualifying threshold															
AH5 – Specify the affordable housing amount and, perhaps, phasing, on larger sites (perhaps 100+) on a bespoke basis, with a more general policy for smaller sites															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
AH3	0	0	0	0	+	0	+	0	0	0	0	0	0	0	0
AH4	0	0	0	0	++	0	++	0	0	0	0	0	0	0	0
AH5	0	0	0	0	?	0	?	0	0	0	0	0	0	0	0

Summary of Significant Effects

8.5.11. Requiring a blanket level of affordable housing as in A10 would clearly contribute to meeting the needs for affordable housing. Experience suggests that some sites will provide less than the requirement. Therefore setting the requirement at the OAN minimum may risk under-delivery of affordable housing needs overall. This effect could be mitigated by ensuring an adequate delivery buffer, which includes affordable and market housing, could be brought forwards if the market is sufficiently strong. Requiring a higher level of affordable housing as in AH4 would help to maximise affordable housing delivery on development sites, whilst mitigating against potential under-delivery on sites where viability would reduce the amount of affordable housing provided. Viability evidence produced in support of the GNLP suggests that most types of site would be viable at 33% affordable housing (which is the current JCS requirement). On balance it is considered that both AH3 and AH4 would have a positive effect on the baseline, with AH4 being particularly significant in terms of Objective 5 and 7.

8.5.12. Alternative AH5 seeks to create a clearer link between affordable housing contributions and viability at the plan level. Theoretically this has the potential to maximise the delivery of affordable housing where viability permits. It is however assumed to be much more likely that this will be realised as a reduced requirement on more challenging sites. The overall effect of this alternative is difficult to assess ahead of site allocations alternatives, and is thus currently uncertain.

Affordable Housing Tenure – Outline of the Reason for Selecting the Alternatives Dealt with

8.5.13. The evidence of the 2017 Central Norfolk SHMA evidence is that the split between affordable/social rented dwellings and low-cost home ownership (LCHO) should be 79:21 (which would be sensibly rounded to 80:20).

8.5.14. Subject to flexibility to ensure viability, the only reasonable alternative is to seek this tenure split on development sites as it is the only method to ensure that housing needs are met in accordance

with the housing objective of the GNLP. Requiring a different tenure split or not requiring a tenure split at all would not ensure that housing needs are effectively met and thus would be contrary to the housing objective of the GNLP.

Affordable Housing Tenure – Evaluating Alternatives

Reasonable Alternatives															
AH6: Require all qualifying sites to provide the SHMA-evidenced ratio of rented and low-cost home ownership housing on all sites															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
AH6	0	0	0	0	++	0	++	0	0	0	0	0	0	0	0

Summary of Significant Effects

8.5.15. Requiring the tenure split which addresses the need identified in the SHMA will ensure that affordable housing needs are best met. Therefore alternative AH6 is considered to have a significant positive effect on the baseline in regards to Objectives 5 and 7.

Exception Site Housing – Outline of the Reason for Selecting the Alternatives Dealt with

8.5.16. Enabling affordable exception sites outside development boundaries will help to support the delivery of affordable housing to meet local needs in a flexible way. If market housing exception are also enabled then this approach would help to boost the supply of windfall housing, increasing choice and competition in the market. Both alternatives are considered reasonable as they are consistent with the Housing Objective.

Exception Site Housing – Evaluating Alternatives

Exception Site Housing															
AH7: Allow “small sites windfalls” to be permitted adjacent to development boundaries (i.e. sites of 10 or fewer), subject to them meeting certain criteria in all settlements with a development boundary.															
AH8: Don't allow any small-scale windfall sites for market housing adjacent to development boundaries, only for genuine “exception” sites (including an element of cross-subsidy, if necessary).															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
AH7	-	-	0	-	~	0	?	?	0	?	--	--	0	0	0
AH8	0	0	0	0	+	0	++	0	0	0	0	0	0	0	0

Summary of Evaluation

8.5.17. As alternative AH8 limits exception sites to affordable housing, where there is identified local need, the number of sites/homes expected to come forward under this option is limited. Therefore the impact of this alternative on Objectives 1, 2 and 12 is neutral. Conversely, AH7 would allow small developments of market housing to also qualify as exception sites. This has the potential to significantly increase development in small and more rural settlements with few services. Therefore, alternative AH7 is likely to increase

the number and length of car journeys, result in development that is poorly related to employment opportunities and which could increase light pollution in rural areas leading to a negative impact on the baseline in regards to objective 1, 2 and a significant negative impact in regards to objective 11 and 12.

8.5.18. As alternative AH8 is expected to release limited "exception" land for development its effect on the baseline in regards to Objective 4 is considered to be neutral. As AH7 would be expected to result in a significant amount of otherwise undeveloped greenfield land it is considered to have a significant negative effect on the baseline in regards to Objective 4.

8.5.19. The number of sites/homes likely to come forward under Alternative AH8 is expected to be limited, but would nonetheless meaningfully contribute to the provision of affordable housing where a local need is identified. This is considered to result in a positive effect on the baseline. While AH7 would arguably contribute to choice and competition in the market for land, this is likely to be at the expense of affordable housing exception sites, which would achieve lower land values, with a consequential impact on the potential for local affordable housing needs to be met. Therefore, alternative AH7 is considered to have mixed effects.

8.5.20. Reasonable alternative AH8 would help to maximise the delivery of affordable housing. Therefore, AH8 has a significant positive effect in terms of objective 7. AH7 may result in a proliferation of small sites on the edge of small settlements, not within walking distance of services such as GP, dentist or pharmacy, and likely to result in more car trips. There is also no guarantee that such sites would provide affordable housing. If the above effects were to occur in combination AH7 would be expected to have a significant negative effect on the baseline. These consequences are however uncertain and AH7 has been evaluated as such in regards to Objective 7 and 8.

8.5.21. Both alternatives could help to support primary schools in smaller settlements. AH8 would however only result in additional affordable housing for local needs. This scale of development in itself is unlikely to have a significant effect on the baseline. Alternative AH7 could well result in significantly more small sites on the edge of small settlements. Most settlements with a settlement boundary would be expected to contain a primary school, which could well be within walking distance. Therefore, alternative AH7 has the potential to have a significant positive effect on the baseline, however as the exact effect is difficult to predict this has been identified as an uncertainty at this point.

House Size Mix – Outline of the Reason for Selecting the Alternatives Dealt with

8.5.22. The evidence from the 2017 Central Norfolk SHMA sets out the mix of dwelling sizes required to meeting housing need and demand. It would be reasonable to require new development to provide the housing mix specified in the SHMA as it will ensure that the Housing Objective of the GNLP is met. It would also be reasonable to require the market to determine a mix, although this would assume that over time the housing market would effectively respond to the need and demand for different housing sizes.

8.5.23. It would be unreasonable to require differing house size mix across Greater Norwich, because it would restrict smaller dwellings in fringe locations most likely to contribute to meeting housing need arising in Norwich.

House Size Mix – Evaluating Alternatives

Reasonable Alternatives															
AH9: Require a specific housing mix on all sites above a defined threshold															
AH10: Do not require the identified housing mix need to be explicitly required on all sites individually															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
AH9	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
AH10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

8.5.24. AH9 directly addresses Objective 5, specifying that development should provide for the size of homes that are required to meet housing need on qualifying sites. This would consequently have a significant positive effect on the baseline in terms of Objective 5. It should be recognized however that the most appropriate mix to provide for the needs of the area may not be fully consistent with the mix that would maximize the return for a housebuilder. AH9 may therefore have some impact on viability, and maximizing the delivery of affordable homes. AH10 would allow the market to determine the most appropriate mix for each site, this is consistent with the likely evolution of the baseline without the implementation of the GNLP.

Older Peoples and Care Accommodation– Outline of the Reason for Selecting the Alternatives Dealt with

8.5.25. There is a rapidly-ageing population in Norfolk. There is also increasing demand for specialist retirement-type accommodation. Given these pressures, it would not be reasonable to have no policy response in the GNLP as this would fail to meet the Housing Objective.

8.5.26. Four reasonable policy responses have been identified that would help meet the housing objective. These need not necessarily work independently of one another. These alternatives are: Identifying residential care accommodate as suitable on any allocated housing site; making specific allocations; setting out a criteria based policy to enable retirement/care housing; and, requiring residential care uses to be accommodated on certain residential allocations.

Older Peoples and Care Accommodation – Evaluating Alternatives

Reasonable Alternatives:

AH11: Enable residential care accommodation (use class C2) uses to be appropriate on any allocated housing sites, subject to a criteria-based policy

AH12: Make specific allocations for residential care (C2) and retirement care (use class C3) uses

AH13: Criteria-based policy enabling retirement/ care accommodation outside settlement boundaries and/or on other types of land within settlement boundaries

AH14: Require an amount of C2 residential care and/or C3 extra-care or retirement uses to be accommodated on “qualifying” housing allocations.

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
AH11	0	0	0	0	+	+	0	+	0	0	0	+	0	0	0
AH12	0	0	0	0	++	+	0	+	0	0	0	+	0	0	0
AH13	0	0	0	-	++	0	0	-	0	0	0	0	0	0	0
AH14	0	0	0	0	++	+	0	+	0	0	0	+	0	0	0

Summary of Evaluation

8.5.27. Alternative AH13 would allow retirement or care accommodation outside settlement boundaries according to criteria/need. The number of sites likely to come forward under this option is limited, but the impact on Objective 4 is nonetheless negative, since more greenfield land would likely be lost. The other alternatives would incorporate retirement/care accommodation within settlement boundaries or on allocations, this could support an efficient use of land. The impact of these alternatives on Objective 4 is thus neutral.

8.5.28. Residential care accommodation would have to compete with the potentially higher land values available from market housing in alternative AH11. Although the proposed policy aims to increase the provision of this specialist area, it could result in a smaller increase than the other alternatives. All alternatives are considered to have a significant positive impact in relation to Objective 5, but AH12, AH13 and AH14 are considered to be most beneficial.

8.5.29. Incorporating older person and care accommodation would lead to more mixed communities that would encourage integration and contribute to the quality of life of residents. The impact of alternatives AH11 and AH14 on Objective 6 is therefore positive. AH12 would take a bespoke approach to allocation of residential care, in which consideration of integration could be taken into account. Alternative AH13 is more likely to result in retirement/care accommodation in locations on the fringes of settlement. Although alternative AH13 need not operate in isolation of the other alternatives, this approach could lead to less well integrated older persons and care accommodation. The effect in this regard while notable is not considered to be significantly detrimental however. AH13 is thus considered to be neutral in regards to objective 6

8.5.30. Reasonable alternative AH13 would likely result in more development on the fringes of settlements, these locations are typically less well-related to GPs, pharmacies or dentists. The impact of this alternative on Objective 8 is therefore negative. AH11 may result in limited provision of retirement/care accommodation, due to higher competing land values from residential, but the approach does aim to ensure this use is possible in sustainable locations and is not necessarily mutually exclusive of other alternatives. AH12 and AH14 make specific provision for older persons and care accommodation where access to health facilities can be taken into account. Consequently, AH11, AH12 and AH14 are considered to have a positive impact on this objective.

8.5.31. Most alternatives would focus development in sustainable locations, but AH13 allows some scope for land which is in less accessible locations to be developed. Depending on the criteria, there is potential for some schemes to come forward on more isolated sites which require car travel. However, the number of these is likely to be limited. Therefore AH13 is considered to have a neutral impact on this objective. Other alternatives are likely to have a positive impact as they would result in older persons and care homes on sites likely to be well related to services and facilities.

Houseboats – Outline of the Reason for Selecting the Alternatives Dealt with

8.5.32. Making specific allocations of land for permanent and/or temporary houseboat moorings is considered to be an **unreasonable alternative** as there is no evidence of need in Greater Norwich, and no potential sites have been put forward through the Call for Sites.

8.5.33. There are however two reasonable alternatives that would address the situation of an, as yet unidentified, need arising after the adoption of the plan. These are two set out a criteria based policy or to rely on national policies and general development management policies.

Houseboats – Evaluating Alternatives

Reasonable Alternative															
HB1: Develop a criteria-based policy to allow for moorings of houseboats, subject to evidence of need															
HB2: Continue current approach relying on NPPF and DM policies															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
HB1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
HB2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

8.5.34. Alternatives HB1 and HB2 are mutually exclusive, considering whether or not the GNLP should have a criteria-based policy to allow for mooring of houseboats, subject to evidence of need. Either alternative would have an entirely neutral effect on the SA objectives, since there is no need identified in Greater Norwich for houseboat moorings. Therefore, even SA5 (ensuring everyone has good quality housing of the right type) is unaffected.

Gypsies and Travellers – Outline of the Reason for Selecting the Alternatives Dealt with

- 8.5.35. On the basis of current evidence, relying solely on a criteria-based policy is not considered a reasonable alternative. It would reduce the level of certainty that the level of identified need would be provided, given the practical difficulties that there can sometimes be in finding acceptable sites for new Gypsy and Traveller pitches to be located on. This would therefore be contrary to the housing objective of the plan.
- 8.5.36. Therefore a two approaches to identifying allocation sites for Gypsies and Travellers: Specific Allocation for pitches can be made or larger housing allocations can be required to include a specific number of G7T pitches.

Gypsies and Travellers – Evaluating Alternatives

Reasonable Alternative															
GT1: Allocate land to deliver the quantified need for new G&T pitches, and criteria-based policy															
GT2: Require larger housing allocations to include a specific number of G&T pitches															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
GT1	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0
GT2	0	0	0	?	~	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

- 8.5.37. GT2 would require large housing allocations to include some G&T pitches, which could impact on the efficiency of land. Private G&T sites are sometimes significantly less dense than a comparable residential plot, while public G&T sites can be more dense, but broadly comparable to some affordable housing. Including pitches within a housing site could result in a lower density overall on that site. However, there would be a subsequent 'saving' of land at an alternative location. The impact of GT2 on land efficiency (SA4) is therefore uncertain. GT2 may however support integration between new and existing communities by minimizing physical segregation, this is not however considered to be a significant effect for the purposes of SA.
- 8.5.38. Both alternatives aim to address the full objectively assessed need for a diversity of housing, and therefore both could be seen to have strong positive impacts in relation to SA5. As housebuilders are unlikely to be set up to deliver G&T pitches, linking a development to the delivery of such pitches could result in delays to delivery. Therefore mixed effects are identified for SA5 in regards to GT2.

Travelling Showpeople - Outline of the Reason for Selecting the Alternatives Dealt with

- 8.5.39. Evidence from the Caravans and Houseboats ANA shows that the current site at Mousehold is over-crowded and that about an additional 46 plots are needed in Greater Norwich or North Norfolk, over half of which (25) are required from 2016-2021. They generally need to be well-located in relation to the major road network due to the regular use of HGV vehicles.

Such plots also need to be fairly large, to allow the storage of both touring caravans and fairground equipment.

- 8.5.40. Given the practical difficulties that there can be in finding appropriate sites for new Travelling Showpeople plots to be located on (no new sites have been provided since the JCS has been adopted, despite an identified need), it is necessary to allocate sites. This is the only identified reasonable alternative.

Travelling Showpeople – Evaluation of Significant Effects

Reasonable Alternative															
TS1: Allocate land to deliver some or all of the quantified need for new TS plots															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
TS1	0	0	0	0	++	?	0	0	0	0	+	0	0	0	0

Summary of Significant Effects

- 8.5.41. TS1 directly addresses the full objectively assessed need for a diversity of housing, and therefore has a strong positive impact on the baseline in regards to SA5. TS1 also supports SA11, since Travelling Showpeople yards are important bases for these businesses. There may be benefits in regards to SA6, as if an allocation site were close to an existing or planned residential area this could support integration of new and existing communities. Since the allocation sites have not yet been identified any benefit in this regard is considered uncertain, and may not be significant at the strategic level.

Residential Caravans and Park Homes- Outline of the Reason for Selecting the Alternatives Dealt with

- 8.5.42. There is a need/demand for about 106 dwellings in Greater Norwich to 2036, most of which is in the period 2017-2022. Some existing caravan parks could perhaps be expanded, but realistically new sites will need to be allocated to meet the identified need. Having only a criteria-based policy would not be a reasonable approach to take, as it would not demonstrate that the identified need/demand for this type of accommodation is being met contrary to the housing objective of the plan.

Residential Caravans and Park Homes– Evaluation of Significant Effects

Reasonable Alternative															
RC1: Allocate land to deliver some of the need/demand for residential caravans															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
RC1	0	0	0	0	++	?	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

- 8.5.43. RC1 directly addresses the full objectively assessed need for a diversity of housing, and therefore has a strongly positive impact on the baseline in respect of SA5. There may be benefits in regards to SA6, as if an allocation site were close to an existing or planned residential area this could support

integration of new and existing communities. Since the allocation sites have not yet been identified any benefit in this regard is considered uncertain, and may not be significant at the strategic level.

8.6. Climate Change

Outline of the Reasons for Selecting the Alternatives Dealt with

8.6.1. The 2004 Planning and Compulsory Purchase Act imposes a legal duty to include "Policies designed to secure that the development and use of land in the local planning authority area contribute to mitigation of, and adaption to, climate change". The GNLP's draft environment objective is: *To protect and enhance the built and natural environment, make best use of natural resources, mitigate against and adapt to climate change.*

8.6.2. As a consequence of the above there are not considered to be any other reasonable alternatives other than to include a specific policy that continues with the current JCS policy approach on climate change.

Evaluation of Alternatives

Reasonable Alternative															
CC1 – Continue with current policy approach															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
CC1	+	++	+	0	0	0	0	0	0	0	0	++	0	0	+

Summary of Significant Effects

8.6.3. Policy CC1 can reasonably be expected to directly address climate change mitigation in regards to carbon emissions, particularly from traffic by promoting sustainable modes of transport modes. It would also be expected to address climate change mitigation through measures such as green infrastructure and increased water efficiency. Policy CC1 would also indirectly address air pollution, by supporting reduced carbon emissions from traffic. All of these would result in significant positive effects on the baseline. It should be noted that other policies of the GNLP will directly impact on these issues also e.g. the transport policy and also that other influences, such as the local transport plan, could have a greater impact on these issues than the policies of the GNLP.

8.7. Air Quality

Outline of the Reasons for Selecting the Alternatives Dealt with

- 8.7.1. Air quality is recognised as an important issue for Greater Norwich. The Norwich Area Transport Strategy will play the most important role in tackling air quality issues across Norwich and its immediate hinterland, specifically through implementation of NATS measures such as prioritising sustainable transport on some roads. There is also a specific Action Plan that relates to the Air Quality Management Area (AQMA) in central Norwich.
- 8.7.2. Air quality implications relating to individual sites will be considered through the ongoing site assessment process. The inclusion of an overarching policy requiring air pollution impact assessments on appropriate development is also reasonable and is consistent with communities objective: *To grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities*; and, The overall vision to: *To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment*.
- 8.7.3. Given that air quality issues will primarily, and most effectively, be dealt with through NATS and specific area action plans it is also reasonable to continue without a specific air quality policy in the GNLP.

Evaluation of Alternatives

Reasonable Alternative															
AQ1 – Require planning applications which may have potential to impact on air quality and/or are located in an area of poor air quality to be accompanied by air pollution impact assessments.															
AQ2 – Do not have a specific policy in the GNLP on air quality.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
AQ1	++	++	0	0	0	0	0	+	0	0	0	+	0	0	0
AQ2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

- 8.7.4. AQ1 is likely to have a strong positive impact on air quality where it is poor, as developers would be required to explicitly state how they plan to reduce the impact of poor air quality and of the proposed development on air quality. If alternative AQ2 was chosen, relying on the NPPF and existing DM policies would be effectively evolution of the baseline without a plan. Alternative AQ1 would require developers to consider how they might mitigate the impact of their development on air quality. The indirect impact of this is that developers are likely to maximise their contributions to sustainable transport modes, which would result in more active travel in some form. Thus, AQ1 is likely to indirectly promote healthy lifestyles.

8.8. The Environment

8.8.1. The environment policy of the GNLP covers flooding, mitigating effects on internationally designated wildlife sites and green infrastructure. The identified reasonable alternatives for each of these sub-areas is set out below.

Flooding – Outline of the Reasons for Selecting the Alternatives Dealt with

8.8.2. It is important that the GNLP steers new development away from flood risk area as far as possible and ensures that it mitigates against, and if necessary is adapted to, flood risk.

8.8.3. Requiring new development to follow the NPPF requirements only in regards to flooding has been considered. However, as this approach would not meet the clear recommendations of the SFRA, in particular dealing with surface water flooding risks, and would risk a lack of co-ordination between sites and a lack of clarity about the long-term maintenance regime for SuDS infrastructure, this is considered to be an unreasonable alternative.

8.8.4. Therefore it is necessary to include a policy that specifically meets the recommendations of the SFRA guidance. This is the only reasonable alternative.

Flooding – Evaluation of Alternatives

Reasonable Alternative															
FR1 – Include a Specific Flooding Policy in the GNLP requiring all relevant applications to undertake site-specific Flood Risk Assessments and to provide a Surface Water Drainage Strategy showing how any SuDS infrastructure will be maintained in perpetuity.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
FR1	0	?	?	0	0	0	0	0	0	0	0	0	?	0	?

Summary of Significant Effects

8.8.5. Alternative FR1 has the potential to have a significant positive impact on the baseline in respect of climate change mitigation (SA2), biodiversity (SA3), protection of the historic environment (SA13) and water quality (SA15). It is however difficult to predict with any accuracy the impact of this policy in advance of the precise policy wording being developed. Therefore at this stage these impacts are identified as uncertainties.

Nature Conservation – Outline of the Reasons for Selecting the Alternatives Dealt with

8.8.6. There are potentially “cumulative” recreational impacts on SAC/SPA and Ramsar sites resulting from the scale of growth needed within Greater Norwich. It is necessary to address these impacts. The absence of a policy that addresses recreational impact on SAC/SPA sites would be unreasonable and would fail to meet legislative requirements and the environmental objective of the plan.

8.8.7. There are considered to be two principle forms of mitigation: the provision of suitable alternative natural green space, to direct additional

recreational trips away from sensitive sites, or direct mitigation for SACs/SPAs and Ramsar in the form of a management and monitoring strategy to increase the resilience of sites from recreational impacts. These are the alternatives that have been considered. No other alternatives have been identified.

Mitigation of Recreational Impact on SAC/SPA and Ramsar Sites – Evaluation of Alternatives

Reasonable Alternative																
NC1 – Require housing developments to provide additional green space on-site (or through off-site contributions) to address the impact of housing growth on designated nature conservation sites.																
NC2 – Require housing developers to make payments so that impacts on the designated nature conservation site are addressed.																
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	
NC1	0	++	++	+	0	0	0	+	0	0	0	+	0	0	0	
NC2	0	0	++	+	0	0	0	0	0	0	0	0	0	0	0	

Summary of Significant Effects

8.8.8. NC1 would ensure development contributes towards green infrastructure, which would in some cases provide routes for walking and cycling supporting healthier lifestyles and mitigate of the effects of climate change. There may also be indirect significant benefits in terms of promoting walking and cycling as modes of sustainable transport as walking and cycling infrastructure could also enhance access to employment and education or services and facilities. NC1 and NC2 would both protect or enhance nationally and internationally designated sites. NC1 and NC2 would provide for additional green infrastructure and the enhancement of existing designated sites which could maintain or enhance landscape character.

Green Infrastructure – Outline of the Reasons for Selecting the Alternatives Dealt with

8.8.9. Green infrastructure (GI) is defined in the NPPF Glossary as “a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”.

8.8.10. Defining, protecting and enhancing a Green Infrastructure network will be a key part of meeting the overall vision for the plan as well as the environmental and community objectives. Therefore the only reasonable alternative is to include a green infrastructure policy in the plan.

Green Infrastructure – Evaluation of Significant Effects

Reasonable Alternative																
NC3 – Broadly reproduce the current JCS Policy 1 elements as they relate to green infrastructure, updating the baseline information (such as the GI Map), with each allocated site setting out the details of any specific mitigation measures/improvements within its allocation policy																

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
NC3	0	++	++	++	0	0	0	+	0	0	0	+	0	0	0

Summary of Significant Effects

8.8.11. NC3 would ensure development contributes towards green infrastructure, which would in some cases provide routes for walking and cycling, supporting healthier lifestyles. It would also contribute to the protection and enhancement of biodiversity, help to mitigate against the effects of climate change and maintain or enhance landscape character. There may also be indirect significant benefits in terms of promoting walking and cycling as modes of sustainable transport as walking and cycling infrastructure could also enhance access to employment and education or services and facilities.

8.9. Landscape

Landscape – Outline of the Reasons for Selecting the Alternatives Dealt with

- 8.9.1. There are no nationally-designated landscape areas (Areas of Outstanding Natural Beauty) in Greater Norwich, although the Broads Authority area has status equivalent to a National Park, and there is thus a statutory duty to “conserve and enhance the natural beauty, wildlife and cultural heritage of the area”. Nonetheless it is important that valued landscapes are protected and enhanced.
- 8.9.2. Particular valued landscapes in Greater Norwich include the Strategic Gaps, A47 landscape protection zone, River Valleys, undeveloped approaches and gateways in South Norfolk.
- 8.9.3. It is reasonable to consider whether the policies that seek to preserve and enhance these valued landscape areas should be rolled forward into the plan, and also whether these principles should be applied across Greater Norwich as a whole, which would mean identifying further landscape areas potentially related to the NDR and strategic gaps between particular settlements.

Landscape – Evaluation of Significant Effects

Reasonable Alternative															
LA1 – Retain the general current approach in the South Norfolk and extend these principles to those parts of Broadland closest to Norwich															
LA2 – Retain the general current approach to landscape protection and as outlined in the current three separate Local Plans, rolling these forward to the GNLP															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
LA1	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0
LA2	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

- 8.9.4. Both LA1 and LA2 would protect valued landscape and maintain the identity of separate settlements, therefore having a strong positive impact on the baseline in regards to SA4. There may also be benefits in terms of quality of life (SA6) and conserving the historic environment (SA13). Extending the greater protections, as would result from LA1 would offer the most benefits in terms of these positive impacts, as they would provide the greatest level of protection for valued areas of landscape.

8.10. Energy

Outline of the Reason for Selecting the Alternatives Dealt with

- 8.10.1. National policy requires LPAs to demonstrate a positive strategy to promote the delivery of renewable and low carbon energy. The environmental objective of the GNLP also seeks to minimise the contributors to climate change.
- 8.10.2. Not having a policy at all would be **unreasonable** as it would not conform to the NPPF⁶ or the environment objective of the GNLP. A second **unreasonable** approach would be to require a higher minima of Decentralised and Renewable Low Carbon Energy sources than the current JCS: There is no current evidence that would demonstrate that this is achievable.
- 8.10.3. It is however considered reasonable to develop a policy similar to the current JCS policy, but remove policy content relating to wind energy or sustainable construction to avoid conflict with recent Government policy changes. It would also introduce an energy generation element of the policy which identifies suitable areas for renewable energy generation for wind and/or solar power. This option would be a positive step towards helping to meet carbon reduction targets and would meet the requirements of the NPPF and is consistent with the environmental objective of the plan.

Evaluation of Alternatives

Reasonable Alternative															
EN1: Keep a "Merton" policy approach, but remove sustainable construction content to avoid conflict with recent Government policy changes. Also identify suitable locations for wind and/or solar power.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
EN1	0	++	0	0	0	0	0	0	0	0	++	0	0	0	0

Summary of Significant Effects

- 8.10.4. The principle aim of policy EN1 is to fulfil the obligation for a positive strategy to promote energy from renewable and low carbon sources and to maximise renewable and low carbon energy development, which would strongly support objective SA2, which aims to reduce carbon emissions. The policy would also support employment in the energy industry, which is one of the LEP's key sectors, thus helping to achieve SA11. The impact of EN1 on other SA objectives is considered to be neutral.

⁶ Paragraph 97

8.11. Water

Outline of the Reason for Selecting the Alternatives Dealt with

- 8.11.1. Greater Norwich, like many parts of the south and east of England, experiences low levels of rainfall and is defined by Environment Agency as an area of water stress. At the same time it has and neighbours internationally important water based environmentally protected sites. In addition, the Water Resources Management Plan 2014 emphasises the need for new development to be water efficient throughout the Anglian Water area, promoting water efficiency, enhanced metering and additional leakage control in this area and the Inspectors at the JCS firmly supported such a policy approach.
- 8.11.2. National planning policy requires that "Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of water supply and demand considerations".
- 8.11.3. It is therefore essential that growth in Greater Norwich addresses water efficiency and quality issues. The JCS approach of requiring sufficient infrastructure to meet the needs of additional growth, whilst at the same time promoting water efficiency, protection of water quality and protection of areas of environmental importance covers all of the key issues in relation to water and thus its continuation is considered to be the only reasonable alternative.

Evaluation of Alternatives

Reasonable Alternative															
W1: Retain current approach requiring sufficient water infrastructure for growth, promoting water efficiency, protecting water quality and areas of environmental importance															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
W1	0	0	++	0	0	0	0	0	0	0	0	0	0	0	++

Summary of Evaluation

- 8.11.4. WA1 represents a continuation of current policy, and is therefore known to be generally viable and implementable. The impact on most SA objectives is therefore considered to be neutral. The exception to this is that the approach directly aims to protect areas of environmental importance, supporting the achievement of both SA3 (protection of biodiversity assets) and SA15 (maintain and enhance water quality and ensure the most efficient use of water).

8.12. Communities

8.12.1. In order to meet the communities objective, the plan must provide the policy background to enable new communities to grow which have a range of services, good access, and enable people to lead active and healthy lifestyles.

Integration of Affordable Housing – Outline of the Reason for Selecting the Alternatives Dealt with

8.12.2. Affordable housing on a mixed should be “tenure-blind”. “Pepper-potting” of affordable houses is the generally preferred approach (i.e. mixing affordable houses with market houses), but it is recognised that for Registered Providers (companies managing affordable houses), there can sometimes be economies of scale in the locating small clusters of affordable houses together. An outcome to avoid is for all the affordable housing in a development to be located in one part of the site together (perhaps separated from market housing by landscaping, trees or a significant road), which might give the impression of “affordable” and “market” parts of the site.

8.12.3. Not setting policy for the distribution of affordable housing across and within housing sites would be an unreasonable alternative. This is because it would run a significant risk of “affordable only” sections of development sites being created, with affordable houses (particularly social/affordable rented) concentrated together, separately from market sections, reducing the perception that the development could be considered as a coherent whole. It is therefore proposed that a policy seeking to achieve the integration of affordable housing is the only reasonable alternative.

Location of Affordable Housing within Sites – Evaluation of Alternatives

Reasonable Alternative															
COM1: Affordable housing should be spread evenly across and within housing sites and be of tenure-blind appearance															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
COM1	0	0	0	0	++	+	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

8.12.4. COM3 promotes an even distribution of affordable housing within a residential scheme. This approach would provide an appropriate mix of housing tenure (SA5) and have a positive impact on social integration (SA6). This could also have some benefits in addressing the fear of crime (SA9), although this is not considered to be a significant impact. Other SA objectives would not be impacted by this proposal.

Health Impact Assessments – Outline of the Reason for Selecting the Alternatives Dealt with

8.12.5. Health Impact Assessments (HIAs) assess the potential effects of a scheme on active lifestyles and the health of a population and identify the health care facilities required to support the development. This helps inform the design and layout to best allow for walking, cycling, open space and

recreation and mitigate the impacts of vehicular traffic, especially in relation to air quality and noise.

- 8.12.6. Whilst these considerations are those that can more generally be taken into account in the determination of a planning application, requiring a systematic process of assessment can increase the certainty over which such issues will be effectively addressed. Therefore a policy requiring HIAs on qualifying development is considered to be a reasonable alternative consistent with the communities objectives of the plan.

Health Impact Assessments – Evaluation of Significant Effects

Reasonable Alternative															
COM2: Require developers to submit a health impact assessment for large sites															
COM3: Do not require developers to submit a health impact assessment for any scale of development															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
COM2	+	+	0	0	0	0	+	++	0	0	0	+	0	0	0
COM3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

- 8.12.7. COM2 would require developers to demonstrate how their scheme affords residents the best opportunities to live healthy and active lifestyles and to identify the health care facilities required to support development. This should increase the access to health facilities (SA7 and SA8). By providing opportunities to live healthy, active lifestyles, there should be a reduction in car journeys (SA1 and SA12) and a subsequent reduction in carbon emissions (SA2). Conversely, COM3 is the absence of a positive policy, which is effectively evolution of the baseline and would have a neutral impact on all SA objectives.

Neighbourhood Planning – Outline of the Reason for Selecting the Alternatives Dealt with

8.12.8. Neighbourhood Plans were introduced by the Localism Act 2011. They provide local communities with the power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They give local communities the ability to choose where they want new development to take place, to say what new buildings should look like and what infrastructure should be provided.

8.12.9. An important part of the assessment of the “Basic Conditions” tests of a Neighbourhood Plan is that the policies of the Neighbourhood Plan are in “general conformity” with the strategic policies contained in the development plan for the area (i.e. the various local plan documents).

8.12.10. It is therefore important that the plan clearly establishes what are its “strategic policies” in order to effectively support the development of neighbourhood plans.

Neighbourhood Planning – Evaluation of Significant Effects

Reasonable Alternative															
NP1: Identify which GNLP policies will be classed as ‘strategic’ for purpose of neighbourhood planning															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
NP1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

8.12.11. No neighbourhood planning policies are identified in the draft GNLP, but there is an option to identify which policies would be considered as strategic, and to which neighbourhood plans must therefore be in conformity. This alternative would have neutral impact on all SA objectives.

8.13. Culture

Outline of the Reason for Selecting the Alternatives Dealt with

8.13.1. Cultural assets performs an important function in terms of quality of life and building and maintaining community identity. Cultural assets which enhance the local economy include museums, galleries, theatres, sports venues and festivals; specific events and venues mentioned include Norwich City Football Club and the Royal Norfolk Show. The scope of any cultural policy should also be set within the wider context of the history, architecture and landscape of the Greater Norwich, recognising the multitude of historic buildings, many iconic in their status, such as Norwich Cathedral, Norwich Castle, Blickling Hall and Wymondham Abbey, and the distinctive landscapes of the area. Culture is therefore an important attribute of the area that needs to be addressed in the GNLP if it is to achieve its vision and its objectives, in particular the community objective.

8.13.2. A key question in developing reasonable alternatives for a Culture policy is the extent to which it needs to be set out as a standalone policy within the GNLP, rather than being an integral element of other policies. Because all of the GNLP policies are currently in their formative stages, the extent to which the elements related to culture will be covered remains uncertain.

8.13.3. At this stage of the process three alternatives have been identified: retaining the current JCS approach; developing a simplified policy focusing on protecting, enhancing and providing new facilities; or, having no specific policy but integrating important cultural policy elements into other parts of the plan.

Culture – Evaluation of Alternatives

Reasonable Alternative																
CUL1: Broadly retain the current approach: includes elements of design, leisure and green infrastructure																
CUL2: Develop a simplified culture policy to protect/ enhance/provide facilities																
CUL3: Do not have a specific policy on culture																
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	
CUL1	0	0	+	+	0	++	0	0	0	0	+	0	+	0	0	
CUL2	0	0	+	+	0	++	0	0	0	0	+	0	+	0	0	
CUL3	0	0	?	?	0	?	0	0	0	0	?	0	?	0	0	

Summary of Significant Effects

8.13.4. CUL1, CUL2 and CUL3 are mutually exclusive, offering various options to include (or not) a stand-alone policy on culture in the GNLP. Both CUL1 and CUL2 would directly address the topic, with CUL2 stripping out some elements of the previous policy which are covered by other policies. Therefore, both alternatives are considered to perform equally, with the strongest positive impact being on SA6 (quality of life). Other positive impacts would be achieved, assuming all the content of the current JCS policy 8

were addressed somewhere, against SA3 (green infrastructure) SA4 (landscape) SA11 (economy and town centres) and SA13 (cultural heritage). The impact on other SA objectives is considered to be neutral.

- 8.13.5. CUL3 could incorporate all elements of the other alternatives within other policies. Therefore, in principle, it could share the same positive impact on the baseline. At this time, in the absence of clarity about where and how elements would be incorporated into other policies, these impacts are identified as uncertain. The decision whether to integrate or separate a culture policy or elements of it would not affect the result of the policy content.

8.14. The Broads

Outline of the Reason for Selecting the Alternatives Dealt with

8.14.1. The Broads, which has status equivalent to a National Park, borders various parts of Greater Norwich, mostly along the main rivers of the Bure, Yare and Waveney. The Broads Authority has its own local plan and is the planning authority for most planning applications within its area. Nonetheless, given the particularly important status of the Broads a reasonable alternative would be for the plan to incorporate a policy requiring the special characteristics of the area to be taken into account in the determination of planning applications.

8.14.2. It is important to note that any applications for areas outside the Broads, but which could potentially affect the Broads, would need to take into account the special character of the Broads, relevant Broads Local Plan policies and national policies and legislation, irrespective of whether there is a local plan policy covering this matter.

The Broads – Evaluation of Alternatives

Reasonable Alternative															
BR1: Have a specific policy covering development proposals close to Broads, requiring the special characteristics and nature of Broads area to be taken into account.															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
BR1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Summary of Significant Effects

8.14.3. BR1 aims to highlight the national importance of the Broads, the executive area of which extends into the area covered by the three Greater Norwich authorities. Development within the Broads area is within the remit of the Broads Authority and outside the scope of the GNLP, but the special landscape and ecological characteristics of the Broads may be affected by development proposals close to this sensitive area, and this is addressed by proposed policy BR1. In SA terms, however, as the Broads are protected by national policy and legislation, the impact of BR1 on all SA objectives is considered to be neutral.

8.15. Monitoring

Outline of the Reason for Selecting the Alternatives Dealt with

- 8.15.1. Given that the GNLP will be allocating individual sites, rather than simply setting out strategic development locations as the JCS did, it will be important to ensure that a detailed monitoring framework is in place to record progress on the implementation and delivery of the plan allocations, as well as the strategic area wide policies. Specific proposals for monitoring as set out in section 7 of the interim SA.
- 8.15.2. One particularly important area in relation to monitoring, that also has a policy response implication is five year housing land supply. The policy implication is the approach that would be taken to help address a shortfall in the five-year supply of deliverable housing land.
- 8.15.3. There are considered to be to reasonable alternative policy approaches to an inadequate housing land supply. Firstly that the Greater Norwich authorities to turn to the annually-updated Housing and Economic Land Availability Assessment (HELAA). There are likely to be (unallocated) sites in the HELAA list which could potentially come forward for development. These would have the advantage over completely new sites in that they have already undergone a level of assessment, and so there could be a higher level of certainty of their delivery compared to windfall developments, which are inherently somewhat unpredictable. The other alternative would be a review of the plan, whilst this could more comprehensively consider issues it would also be a much longer process.
- 8.15.4. Not having a specific policy is considered to be unreasonable as it would not be consistent with national policy, and would also conflict with the overall vision and housing objective of the plan.

Housing Land Supply – Evaluation of Alternatives

Reasonable Alternative															
HLS1: Allow the most appropriate HELAA sites to come forward if there were no 5-year housing land supply															
HLS2: Do a review of the GNLP to allocate more deliverable sites if there were no 5-year housing land supply															
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
HLS1	?	?	?	?	++	?	?	?	?	?	?	?	?	?	0
HLS2	~	~	?	~	++	~	~	~	~	~	~	~	~	~	0

Summary of Significant Effects

- 8.15.5. Both alternatives HLS1 and HLS2 aim to deliver the homes needed within the area and therefore have a significant positive impact on Objective SA5: that everyone has good quality housing of the right size and tenure to meet their needs. A key difference is that HLS1 could be implemented more quickly, and therefore has benefits in the short term, as well as over the longer term. The positive impact of HLS2 would likely to be seen in the medium and long term.

8.15.6. HLS2 would be implemented through a Local Plan and there would likely be positive impacts on all SA objectives over the longer term compared to the 'no policy' alternative. It is estimated that HLS2 would however take up to 5 years to implement, leaving a period in the short term under which planning authorities would have to respond to applications from developers and landowners, with potential negative impacts over this period. Therefore it has distinctly mixed effects. HLS1 would likely have a beneficial impact on the baseline against a number of SA objectives, as the HELAA process would identify the most suitable sites for development, which are likely to perform best against SA objectives. The actual impact will however relate to the sites that are available, as these are unknown the impact is identified as uncertain. Even with the implementation of HLS1 it is likely that a local plan review process would go ahead, therefore the positive impacts of HLS2 over the longer term are also likely to be realised through the implementation of HLS1.

9. Mitigation of Adverse Effects and Maximising Beneficial Effects

GNLP Strategy – Jobs

- 9.1. The negative impact of seeking a higher jobs target in terms of air pollution, carbon emissions and loss of greenfield land of seeking a higher jobs target in accordance with Alternative JT1, could be mitigated by seeking to focus jobs growth in a limited number of employment sites that were well connected to public transport, walking and cycling routes. The benefits of these policies could be maximized if the location of new jobs was linked to existing areas of deprivation (either by geographical proximity or through consideration of public transport links) and by encouraging or supporting employment in the key sectors identified by the LEP.

GNLP Strategy - Homes

- 9.2. Adverse effects related to new homes growth can be mitigated by ensuring that new housing allocations are well related to services and facilities and that the total number of homes planned for (housing requirement and buffer including windfall) are proportionate. Benefits can be maximized by ensuring that allocated sites create diversity, completion and choice in the market for housing land and are well related to key employment locations.

GNLP Strategy: How Should Greater Norwich Grow?

- 9.3. Adverse impacts in regards air pollution and increasing the need to travel can be minimized by ensuring that the best possible relationship between new homes and services and facilities is achieved within any distributional alternative. This action would also maximize any benefits in terms of reducing carbon emissions and reducing the need to travel and promoting the use of sustainable transport.
- 9.4. Impacts on biodiversity and geodiversity assets and the historic environment can be minimized by varying the scale of allocation at certain tiers of the hierarchy, and selecting development site that have the least impact in regards to these concerns. A key principle of the distribution alternatives is to maximize the use of brownfield land, the residential impact in terms of the loss of greenfield land needed to deliver the scale of growth required is permanent and irreversible.
- 9.5. Benefits in terms of providing good quality housing that meets everyone's needs can be maximised by ensuring that allocated sites are viable, can provided an appropriate amount of affordable housing and have an appropriate mix of types, tenures and sizes. Benefits in terms of economic development can be maximized by ensuring that the best relationship between homes and places of employment is achieved within any distributional alternative.

GNLP Strategy: Norwich Urban Area and Fringe Parishes

- 9.6. Benefits in terms of addressing deprivation and protecting/enhancing GI could be maximized by specifically identifying the areas to target for regeneration/GI protection/enhancement. Benefits in term of promoting sustainable transport can be achieved by ensuring that the policy effectively links to plans for sustainable transport improvements, including those within plans other than the GNLP. Benefits in terms of addressing deprivation can

be maximized by ensuring, as far as practicable, they are well linked to services, facilities, employment and public transport opportunities.

GNLP Strategy – Settlement Hierarchy

- 9.7. The benefits of a Settlement Hierarchy policy can be maximised by ensuring that development is distributed so as to ensure that there is a good relationship between homes, jobs and services, including by means of sustainable and active travel, whilst maintaining a sufficient spread of development to provide diversity, choice and completion in the market for housing land.

GNLP Strategy – Influence of the Norwich Urban Area & Distribution of Growth

- 9.8. The benefits of any Norwich centred policy can be maximised by ensuring that it provides a cross-cutting and integrated policy framework with other economic development, promotional, inward investment, transport or other relevant strategies to support delivery. Any adverse effects of dispensing with a Norwich centred policy can be minimised by ensuring that a cross-cutting and integrated policy framework supporting the areas explained above is incorporated within other strategic and topic policies.

GNLP Topic Policy - Economy

- 9.9. Negative impacts of the overarching economic growth in terms of air pollution, carbon emissions could be mitigated by supporting focus jobs growth in locations well connected to public transport, walking and cycling routes. The benefits of the policy could be maximized employment was promoted in locations well linked to areas of deprivation (either by geographical proximity or through consideration of public transport links) and by encouraging or supporting employment in the key sectors identified by the LEP.
- 9.10. In regards the supply of employment land, negative impacts can be mitigated by ensuring that, as far as is possible within any alternative, the amount of land made available is as closely related to that needed. This will included including an appropriate justification requirement for additional land releases for windfall employment uses. Benefits can be maximized by ensuring that the policies around allocated sites are drafted in a manner that supports growth in key sectors and by ensuring that site allocation policies are consistent with external economic plans and promotional activities.
- 9.11. In regards retail and town centre policies, benefits can be maximized, and negative impacts minimized if any additional out of centre allocation for comparison goods space is located in areas that are as well related to centres of population and opportunities for sustainable and active travel.

GNLP Topic Policy - Transport

- 9.12. Continuing to support strategic transport initiatives promoted and justified through Local Transport Plan is an important mechanism to ensure benefits are maximized, as it helps to ensure the different an integrated and coherent approach to development planning. This can be further maximized if the policies supporting healthy lifestyles, sustainable transport and broadband are consistent with external transport plans and initiatives and related promotional activities.

GNLP Topic Policy - Design

- 9.13. The benefits of any design policy could be maximized if the policy were clear about areas of particular sensitivity in terms of design quality, this will ensure that particular consideration is given to design in those areas which are most sensitive, e.g. historically or prominent locations, in a manner proportionate to their status.

GNLP Topic Policy - Housing

- 9.14. In terms of the provision of affordable housing, benefits can be maximized by ensuring that allocated sites are viable and able to meet affordable housing requirements and that housing is designed to be well integrated into new developments.
- 9.15. Negative impacts of windfall exception housing could be minimized, and benefits maximized by only allowing exception site windfall in locations that are well related to services and facilities and by including a limit to the total (non-affordable) edge of settlement windfall sites that would be acceptable within a specific period e.g. plan period or 5 year period.
- 9.16. The benefits of a housing mix policy would be maximized by ensuring that it continues to be based on an up-to-date assessment of need throughout the plan period. This will require an updating of baseline evidence.
- 9.17. Negative impacts of a windfall policy for older peoples and care accommodation could be minimized by only allowing exception site windfall in locations that are well related to services and facilities, in particular health care facilities.

GNLP Topic Policy - Climate Change

- 9.18. The benefits of any climate change policy could be maximized by ensuring that climate change considerations run through all of the strategic and topic based policies of the plan. This will ensure consistency and that key considerations will not be set aside in the planning balance.

GNLP Topic Policy – Air Quality

- 9.19. The benefits of an air quality policy could be maximized if the potential air quality impact of new development were considered at the allocation stage as well as the application stage. Also, by ensuring consistency between the GNLP transport policies and external policies, strategies and promotional activities e.g. Local Transport Plan, Norwich City Centre Air Quality Action Plan.

GNLP Topic Policy – The Environment

- 9.20. The benefits of any flooding policy will be maximized by ensuring that catchment wide considerations are properly taken into account both through the allocation of land and by site specific flood risk assessments.
- 9.21. The benefits of a policy to mitigate recreational impact on SAC/SPA and Ramsar sites would be maximised by ensuring that development is distributed and allocations made so as to minimise any impacts. If a SANGs approach is adopted then its benefits could be maximised by specifying the characteristics that any SANG should include so as to be valid mitigation. The

policy should be consistent with external policies and investment strategies e.g. the emerging Norfolk Infrastructure Delivery Plan.

- 9.22. Overall benefits to the environment could be maximized through an overarching policy setting out the context of key environmental considerations and policy requirements e.g. minimizing impact of new development on sensitive environmental sites in a manner proportionate to their status.

GNLP Topic Policy - Landscape

- 9.23. The benefits of the GNLP Landscape policy could be maximized if there is integration between areas of protection and enhancement identified, the overarching GI strategy and the planned mitigation for mitigate recreational impact on SAC/SPA and Ramsar sites.

GNLP Topic Policy - Energy

- 9.24. The benefits of this policy could be maximized by ensuring, as far as practicable, consistency between the policy and external policies, strategies and promotional activities related to wind and solar energy, and the intentions of renewable energy providers.

GNLP Topic Policy Water

- 9.25. The benefits of this policy could be maximized by ensuring the development is distributed, as far as is practicable within any chosen distribution, so as to minimise impact on the water environment. Benefits could also be derived by ensuring that policy requirements related to SUDs include measure that would support aquifer recharge.

GNLP Topic Policy - Communities

- 9.26. The benefits of the communities policies could be maximized by ensuring the development is distributed, as far as is practicable within any chosen distribution, so as to create the best relationship between new development and opportunities to live healthy lifestyles. The benefits of this policy could be maximized by ensuring, as far as practicable, consistency between the policy and external policies, strategies and promotional activities related e.g. the emerging Local Cycling and Walking Investment Plan.

GNLP Topic Policy - Culture

- 9.27. The benefits of a culture policy can be maximized policy by ensuring that key cultural facilities are identified including key land use and strategic policy considerations that relate to them. Culture considerations should also run through all appropriate strategic and topic based policies of the plan to maximize benefits.

GNLP Topic Policy – The Broads

- 9.28. The benefits of this policy could be maximized by ensuring, as far as practicable, consistency between the policy and external policies, strategies and promotional activities – in particular the Broads Plan, Local Plan and Tourism Strategy.

GNLP Topic Policy – Monitoring

- 9.29. The benefits of the proposed approach to monitoring, in terms of housing land supply, can be maximized by ensuring that the HELAA is periodically updated. This will ensure that additional sites can be brought forwards if necessary or ensure a key piece of evidence underpinning any revised local plan is up-to-date.

10. Monitoring

10.1. Monitoring allows the actual significant effects of implementing a plan or programme to be tested against those predicted. This interim sustainability appraisal has highlighted a number of potential positive and negative significant effects related to the identified plan alternatives.

10.2. It should be noted that the significant effects related to all of the plan alternatives identified at this draft stage will not necessarily be the same as those of the plan. This is because the plan will comprise only a selected set of alternatives, with the other reasonable alternatives for policies being set aside. Thus any significant effects that relate solely to the alternatives set aside will not be relevant to the final version of the plan.

10.3. Notwithstanding the above, the indicators below have been identified as a way to monitor the likely significant effects. These indicators are the same as those identified in the final version of the SA scoping consultation.

Objective	Indicator(s) identified in SA Scoping	Gaps in coverage and suggested indicators
SA1 Minimise air, noise and light pollution to improve wellbeing.	Indicator Concentration of selected air pollutants: a) NO ₂ b) PM ₁₀ (particulate matter) Target Decrease	
SA2 Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.	Indicator CO ₂ emissions per capita Target Reduction in emissions Indicator Sustainable and renewable energy capacity permitted by type Target Year on year permitted capacity increase Indicator Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence or water quality grounds Target Zero	
SA3 Protect and enhance the area's biodiversity and geodiversity assets, and	Indicator Net change in Local Sites in "Positive Conservation Management" Target Year on year Improvements	

Objective	Indicator(s) identified in SA Scoping	Gaps in coverage and suggested indicators
expand the provision of green infrastructure.	<p>Indicator Percentage of SSSIs in: a) favourable condition b) unfavourable recovering c) unfavourable no change d) unfavourable declining e) destroyed/ part destroyed</p> <p>Target 95% of SSSIs in 'favourable' or 'unfavourable recovering' condition</p> <p>Indicator Number of Planning Approvals granted contrary to the advice of Natural England or Norfolk Wildlife Trust (on behalf of the County Wildlife Partnership) or the Broads Authority on the basis of adverse impact on site of acknowledged biodiversity importance.</p> <p>Target None</p> <p>Indicator Percentage of allocated residential development sites, or sites permitted for development of 10 or more homes, that have access to a semi-natural green space of at least 2ha within 400m.</p> <p>Target Minimise</p> <p>Indicator Length of new greenway (defined as a shared use, car-free off road route for a range of users and journey purposes) provided as a consequence of a planning condition, S106 obligation or CIL investment.</p> <p>Target Increase</p>	

Objective	Indicator(s) identified in SA Scoping	Gaps in coverage and suggested indicators
	<p>Indicator Total hectares of accessible public open space (cumulative) provided as a consequence of a planning condition, S106 obligation or CIL investment within the plan period</p> <p>Target Equal to or above current local plan requirements.</p>	
SA4 Promote efficient use of land, while respecting the variety of landscape types in the area.	<p>Indicator Percentage of new and converted dwellings on Previously Developed Land</p> <p>Target 18% to 2026 (based on JCS housing allocations, update in line with GNLP)</p> <p>Indicator Number of Planning Approvals granted contrary to the advice of the Broads Authority on the basis of adverse impact on the Broads Landscape</p> <p>Target Zero</p>	
SA5 Ensure that everyone has good quality housing of the right size and tenure to meet their needs.	<p>Indicator Net housing completions</p> <p>Target Meet or exceed annual trajectory requirements</p> <p>Indicator Affordable housing completions</p> <p>Target Meet or exceed annual trajectory requirements</p> <p>Indicator House completions by bedroom number, based on the proportions set out in the most recent Sub-regional Housing Market Assessment</p> <p>Target Figures within 10%</p>	

Objective	Indicator(s) identified in SA Scoping	Gaps in coverage and suggested indicators
	tolerance of the Housing Market Assessment Requirements Indicator Starter Homes completions Target 20% of homes delivered are starter homes	
SA6 Maintain and improve the quality of life of residents	No indicators for provision of community facilities have been identified	
SA7 To reduce deprivation	Indicator and targets from IMD to be identified	Indicator Overall Index of Multiple Deprivation Target Increase the number of LSOAs In the least deprived 50% on the IMD
SA8 To promote access to health facilities and promote healthy lifestyles	Indicator Percentage of physically active adults Target Increase percentage annually or achieve percentage above England average Indicator and target for access to health facilities to be identified	Indicator IMD Access to services and housing Target Increase the number of LSOAs In the least deprived 50% on the IMD for access to housing and services
SA9 To reduce crime and the fear of crime	Indicator and target for crime reduction to be identified	Indicator IMD Crime Target Increase the number of LSOAs In the least deprived 50% on the IMD for Crime
SA10 To promote access to education and skills training and support increased educational attainment.	Indicator and target for access to education facilities to be identified	Indicator IMD Education, Skills and Training Target Increase the number of LSOAs In the least deprived 50% on the IMD for Education, Skills and Training
SA11 Encourage economic development covering a range of sectors and skill levels to	Indicator Amount of land developed for employment by type Target 118ha B1 & 111ha B2 /	

Objective	Indicator(s) identified in SA Scoping	Gaps in coverage and suggested indicators
improve employment opportunities for residents, and maintain and enhance town centres.	<p>B8 2007 to 2026 (split into five year tranches, based on JCS targets - update in line with GNLP targets)</p> <p>Indicator Annual count of jobs by BRES across the Plan area</p> <p>Target Measure against GNLP annualised jobs targets (2,222 p.a in JCS.)</p> <p>Indicator Employment rate of economically active population</p> <p>Target Increase</p> <p>Indicator Percentage of workforce employed in higher occupations</p> <p>Target Annual increase of 1%</p>	
SA12 Reduce the need to travel and promote the use of sustainable transport modes.	<p>Indicator Percentage of residents who travel to work:</p> <ul style="list-style-type: none"> a) By private motor vehicle b) By public transport c) By foot or cycle d) Work at, or mainly at, home <p>Target Decrease in a), increase in b), c) and d)</p> <p>Indicator IMD Access to services and housing</p> <p>Target Increase the number of LSOAs in the least deprived 50% on the IMD for access to housing and services</p>	
SA13 Conserve and enhance the historic	Indicator	

Objective	Indicator(s) identified in SA Scoping	Gaps in coverage and suggested indicators
<p>environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.</p>	<p>Percentage of Conservation Areas with appraisals Target Year on year increase</p> <p>Indicator Heritage at risk – number and percentage of a) Listed buildings; and b) Scheduled Ancient Monuments on Buildings at Risk register Target Year on year reduction</p>	
<p>SA14 Minimise waste generation, promote recycling and avoid the sterilisation of mineral resources.</p> <p>Remediate contaminated land and minimise the use of the best and most versatile agricultural land.</p>	<p>Minerals and waste indicators and targets tbc</p> <p>Indicator Number of planning permissions granted on non-allocated sites on class 1, 2 or 3a agricultural land Target Zero</p> <p>Indicator Percentage of land allocated for development, or subject to an extant planning permission of 5 or more dwellings that is identified as Grade I or II agricultural land value. Target Minimise</p> <p>No indicators for contaminated land have been identified</p>	<p>Indicator Number of planning permissions granted contrary to the advice of the Minerals and Waste Planning Authority on the basis of waste generation, recycling or protection of mineral resources. Target Zero</p>
<p>SA15 Maintain and enhance water quality and ensure the most efficient use of water</p>	<p>Indicator Water efficiency in new homes Target All new housing schemes to achieve water efficiency standard of 110 litres/person/day (lpd) No indicators for water infrastructure have been identified.</p>	

Objective	Indicator(s) identified in SA Scoping	Gaps in coverage and suggested indicators
	See also flood section (Number of planning permissions contrary to the advice of the Environment Agency on either flood defence or water quality grounds)	

11. Next Steps

- 11.1. Following consultation on the Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the GNDP will, taking into account the representations made, identify the preferred policy alternatives that will be selected to form part of the Greater Norwich Local Plan that is proposed to be submitted to the Secretary of State for Independent Examination.
- 11.2. This document, referred to as the “pre-submission” draft of the plan will be published prior to its submission to the Secretary of State and the public and other stakeholders will have a further chance to make representations in relation to the “soundness” of the plan.
- 11.3. The pre-submission draft of the plan will be accompanied by a further Sustainability Appraisal which will evaluate the significant effects of the Plan in its entirety. Further representations on this version of the Sustainability Appraisal can be made when it is published.

Appendix A: Assessment Protocol

SA Objectives with assessment protocol criteria	
1. Minimise air, noise and light pollution to improve wellbeing	
++	<p>The policy or site proposal addresses multiple existing air, noise or light pollution issues (e.g. AQMA in Norwich or air quality in Hoveton, noise around Norwich International Airport or main roads, or light pollution in urbanised areas) OR</p> <p>The policy or site proposal maintains current air, noise or light quality where it is already good, and protects this level of quality for the future (e.g. dark skies adjacent to the Broads Authority executive area)</p>
+	<p>The policy or site proposal addresses an existing air, noise or light pollution issue (e.g. AQMA in Norwich or air quality in Hoveton, noise around Norwich International Airport or main roads, or light pollution in urbanised areas) OR</p> <p>The policy or site is likely to reduce the number and length of car journeys</p>
-	<p>The policy or site has potential to create or exacerbate air, noise or light pollution (e.g. AQMA in Norwich or air quality in Hoveton, noise around Norwich International Airport or main roads, or light pollution in urbanised areas or adjacent to the Broads Authority executive area) OR</p> <p>The policy or site is likely to increase the number and length of car journeys</p>
--	<p>The policy or site will create or exacerbate multiple air, noise or light pollution issues (e.g. AQMA in Norwich, air quality Hoveton or elsewhere, noise around Norwich International Airport, main roads or elsewhere, or light pollution in urbanised areas, adjacent to the Broads Authority executive area or elsewhere) OR</p> <p>The policy or site will have a negative impact on sensitive environmental sites</p>
2. Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change	

++	<p>The policy or site will reduce the number and length of car journeys by improved linkages to a cycle network, or an existing or planned BRT route, OR</p> <p>The policy or site makes primary schools, GPs, food shops and employment accessible on foot or cycle OR</p> <p>There is a demonstrable link between the policy or site and renewable energy provision AND</p> <p>The site is in Flood Zone 1 with no risk of surface water flooding OR</p> <p>The policy or site provides green infrastructure</p>
+	<p>The policy or site will reduce the number and length of car journeys by improved linkages to an existing bus route OR</p> <p>The policy or site makes either primary schools, GPs, food shops or employment accessible on foot or cycle OR</p> <p>The policy or site has potential for renewable energy provision AND</p> <p>The site is in Flood Zone 1 with less than 10% of its area at risk of surface water flooding</p>
-	<p>The policy or site is likely to increase the number or length of car journeys but is well related to either primary schools, GPs, food shops or employment OR</p> <p>The policy or site has poor potential for renewable energy provision OR</p> <p>The site has up to 30% of its area in Flood Zones 2 or 3 or at risk of surface water flooding</p>
--	<p>The policy or site is likely to significantly increase the number and length of car journeys and is poorly related to services and sustainable forms of transport OR</p> <p>The policy or site hinders the potential for renewable energy provision OR</p> <p>The site has more than 30% of its area in Flood Zones 2 or 3 or at risk of surface water flooding</p>

3. Protect and enhance the area's biodiversity and geodiversity assets, and expand the provision of green infrastructure

++	<p>The policy or site increases the size, number or quality of:</p> <ul style="list-style-type: none"> • UK BAP priority species or habitats • European protected species • Natura 2k sites
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	<ul style="list-style-type: none"> • SSSIs • Regionally Important Geological Sites <p>OR</p> <p>The policy or site provides over 2ha semi-natural green space or over 1km of new greenway (car-free off-road route) OR</p> <p>The policy or site would result in housing within 400m of 2ha or more of semi-natural green space</p>
+	<p>The policy or site will increase the size, number or quality of:</p> <ul style="list-style-type: none"> • Local Nature Reserves • County Wildlife Sites • County Geodiversity Sites <p>OR</p> <p>The policy or site provides up to 2ha of accessible public open space or up to 1km length of linear green infrastructure (ponds, hedges, tree belts, road crossings) OR</p> <p>The policy or site would result in housing within 800m of up to 2ha of accessible public open space</p>
-	<p>The policy or site fragments, reduces or degrades:</p> <ul style="list-style-type: none"> • Local Nature Reserves • County Wildlife Sites • County Geodiversity Sites
--	<p>The policy or site fragments, reduces or degrades:</p> <ul style="list-style-type: none"> • UK BAP priority species or habitats • European protected species • Natura 2k sites • SSSIs • Regionally Important Geological Sites <p>OR</p> <p>The policy or site involves the significant loss of existing green infrastructure (open space, woods, ponds, hedges, tree belts, road crossings)</p>
4. Promote efficient use of land, whilst respecting the variety of landscape types in the area	
++	<p>The policy or proposal involves the redevelopment of previously developed land which is vacant, derelict or unused OR</p> <p>The policy or proposal is an environmental or landscape enhancement project or addresses the efficient use of land</p>

+	The policy or proposal involves previously developed land that is not derelict
-	The policy or site results in the loss of greenfield land (of a less valuable grade than grades 1 or 2 agricultural land)
--	<p>The policy or proposal results in the loss of greenfield land classed as agricultural grades 1 or 2 OR</p> <p>The policy or proposal would result in the loss or degradation of a valued landscape: historic parks and gardens, ancient woodlands, river valleys, identified remnants of historic woodland and heathland including Mousehold Heath, strategic gaps, key views, gateways and undeveloped approaches to Norwich, and the distinctive landscape of The Broads.</p>
5. Ensure that everyone has good quality housing of the right size and tenure to meet their needs	
++	<p>The policy enables delivery of the objectively assessed need for homes AND</p> <p>The policy provides for: diversity, choice and competition in the housing market; and maximises the delivery of affordable housing OR</p> <p>The site is viable, provides the full level of affordable housing and provides an appropriate mix of type and tenure</p>
+	<p>The policy enables delivery of the objectively assessed need for homes OR</p> <p>The policy provides for: diversity, choice and competition in the housing market; and provides for the delivery of affordable housing</p>
-	<p>The policy or site risks delivery OR</p> <p>The policy or site does not provide the full level of affordable housing OR</p> <p>The policy or site would result in the loss of a site that is suitable for housing</p>
--	<p>The policy or site would result in a net loss of housing OR</p> <p>The policy risks delivery of the objectively assessed need for homes OR</p> <p>The site is unviable, or does not provide any affordable housing or an appropriate mix of type and tenure</p>
6. Maintain and improve the quality of life of residents	

++	<p>The policy or site will increase the range or access to community halls and other cultural facilities AND</p> <p>The policy or site promotes integration between new and existing communities</p>
+	<p>The policy or site maintains the existing access to community halls and other cultural facilities AND</p> <p>The policy or site promotes social integration or integration between new and existing communities</p>
-	<p>The policy or site would diminish the availability or access to community halls and other cultural facilities OR</p> <p>The policy or site would result in separation between new and existing communities</p>
--	<p>The policy or site involves the loss of community halls or other cultural facilities</p>
7. To reduce deprivation	
++	<p>The policy or site provides accessible facilities in a deprived area OR</p> <p>The policy or site promotes regeneration in a deprived area OR</p> <p>The policy or site maximises affordable housing and will improve access to three or more of the following: employment, post office, primary school, high school, food shop, GP surgery</p>
+	<p>The policy or site improves the accessibility of facilities from a deprived area OR</p> <p>The policy or site provides some affordable housing and will improve access to one or two of the following: employment, post office, primary school, high school, food shop, GP surgery</p>
-	<p>The policy or site provides no affordable housing OR</p> <p>Housing development is not within the national mean average distance⁷ of any of the following: employment; post office 1.16km; primary school 0.89km; food shop 0.75km; or GP surgery 1.59km</p>
--	<p>The policy or site results in loss of accessible facilities OR</p> <p>The policy or site provides no affordable housing AND</p>

⁷ Derived from the mean average distance from existing dwellings to services published in the 'underlying indicators' table for 2015 Index of Multiple Deprivation <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015>

	Housing development is not within the national mean average distance of any of the following: employment; post office 1.16km; primary school 0.89km; food shop 0.75km; or GP surgery 1.59km
8. To promote access to health facilities and promote healthy lifestyles	
++	<p>The policy or site will increase the range or access to GP, dentist or pharmacy OR</p> <p>The policy or site will increase the range or access to sport and recreation facilities AND</p> <p>The policy or site provides opportunities for active lifestyles by enabling walking along footpaths, cycling on an identified cycle route or journey on public transport to education or employment</p>
+	<p>Housing development will be within walking distance of a GP, dentist or pharmacy OR</p> <p>The policy or site provides opportunities for active lifestyles by enabling walking along footpaths, cycling on an identified cycle route or journey on public transport to education or employment</p>
-	<p>Housing development is not within walking distance of a GP, dentist or pharmacy OR</p> <p>The policy or site is likely to result in more journeys by car</p>
--	<p>The policy or site results in the loss of GP, dentist or pharmacy OR</p> <p>The policy or site results in the loss of a sports facility</p>
9. To reduce crime and the fear of crime	
++	The policy or site is expected to reduce crime or the fear of crime
+	The policy or site contributes to mixed, inclusive communities
-	The policy or site would result in segregation of communities
--	The policy or site may increase crime or the fear of crime
10. To promote access to education and skills training and support increased educational attainment.	
++	<p>The policy or site will increase the range or access to education or training facilities OR</p> <p>The policy or site results in housing within 2 miles of a primary school along a safe walking route and within 3 miles of a secondary school along a safe walking/cycling route</p>

+	results in housing within 2 miles of primary school along a safe walkable route, and within 3 miles of a secondary school
-	Housing development will not be within 2 miles of a primary school along a safe walking route OR Housing development would place further burden on school capacity where it is known to be under pressure
--	Housing development will not be within 2 miles of a primary school along a safe walking route and will not be within 3 miles of a secondary school OR The policy or site will result in the loss of an education or training facility
11. Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres	
++	The policy or site will encourage or support employment in the key sectors identified by the LEP (advanced manufacturing & engineering; energy; agri-tech; ICT/digital creative; life sciences) or encourage new business start-ups OR The proposal on the site will result in a distance of less than 2km between housing and employment opportunities
+	The policy or site will support existing businesses, town centres or the rural economy OR The proposal is for an employment site and there is a bus stop within 400m
-	The policy or site may hinder the vitality or operation of existing businesses, town centres or the rural economy OR The site would be suitable for employment uses but this is not proposed
--	The policy or site results in a loss of existing employment OR The proposal on the site has a poor level of accessibility to employment that would require car journeys
12. Reduce the need to travel and promote the use of sustainable transport modes	
++	The policy or site promotes mixed use and delivers pedestrian, cycle and bus or rail enhancements, improving access to a range of facilities OR

	The policy or site supports an existing or planned BRT route or public transport routes to strategic employment areas such as Norwich airport, Broadland Business Park or Norwich Research Park/UEA/N&N cluster.
+	The policy or site promotes mixed use and offers pedestrian, cycle, bus or rail access to employment, education facilities or a food shop OR Housing development is within 400m of a journey-to-work bus or rail service and has access to a footpath or cycleway connecting it to a Service Village or above in the settlement hierarchy
-	Housing development is more than 400m from a bus or rail service or the local bus or rail service does not serve an employment use OR Housing development does not have access to a footpath or cycleway connecting it to a Service Village or above in the settlement hierarchy
--	The proposal on the site has no (or limited) public transport, walking or cycling access to employment, education facilities or food shop
13. Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.	
++	The policy or site enhances a heritage asset or its setting including listed buildings, scheduled monuments, conservation areas, significant archaeological sites and buildings on the 'at risk' register OR The policy or site protects or restores Grade I or II* listed buildings or a building on the 'at risk' register
+	The policy or site protects or maintains a heritage asset or its setting including scheduled monuments and archaeological sites OR The policy or site protects or restores a Grade II listed building
-	The policy or site results in negative impact on the setting of a heritage asset
--	The policy or site results in loss of or damage to a heritage asset including listed buildings, scheduled monuments, conservation areas, significant archaeological sites and buildings on the 'at risk' register
14. Minimise waste generation, promote recycling and avoid sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land.	

++	<p>The policy or site encourages waste minimisation and recycling or facilitates new or expanded waste facilities OR</p> <p>The policy or site ensures mineral deposits are protected for future use OR</p> <p>The policy or site addresses remediation of contaminated land OR</p> <p>The policy or site protects agricultural grade 1 or 2 land</p>
+	<p>Local waste management facilities have capacity AND</p> <p>The policy or site could allow extraction of underlying minerals prior to development AND</p> <p>There is no contaminated land within or adjacent to the site</p>
-	<p>Local waste management facilities do not have capacity OR</p> <p>Development is adjacent to a site of potential contamination with no remediation measures proposed</p>
--	<p>The policy or site would lead to an increase in waste production per capita or a loss of waste management facilities OR</p> <p>Development will sterilise a mineral resource OR</p> <p>The site contains potential contamination with no investigation or remediation measures proposed OR</p> <p>The policy or site would result in the loss of Grade 1 or 2 agricultural land</p>
15. Maintain and enhance water quality and ensure the most efficient use of water.	
++	<p>The policy or site has demonstrable potential to enhance water issues affecting Natura 200 sites</p>
+	<p>The policy or site will enhance water quality or the efficient use of water</p>
-	<p>The policy or site is likely to diminish water quality or the efficient use of water</p>
--	<p>The policy or site would result exceed the capacity of water infrastructure, significantly undermine the efficient use of water OR</p> <p>The policy or site will result in water abstraction or disposal which is likely to have a detrimental effect on Natura 2000 sites</p>

Appendix B: Distribution Alternatives

Option 1 Concentration close to Norwich

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 1 would concentrate all the 3,300 additional dwellings close to Norwich as urban extensions or in some of the closest villages.

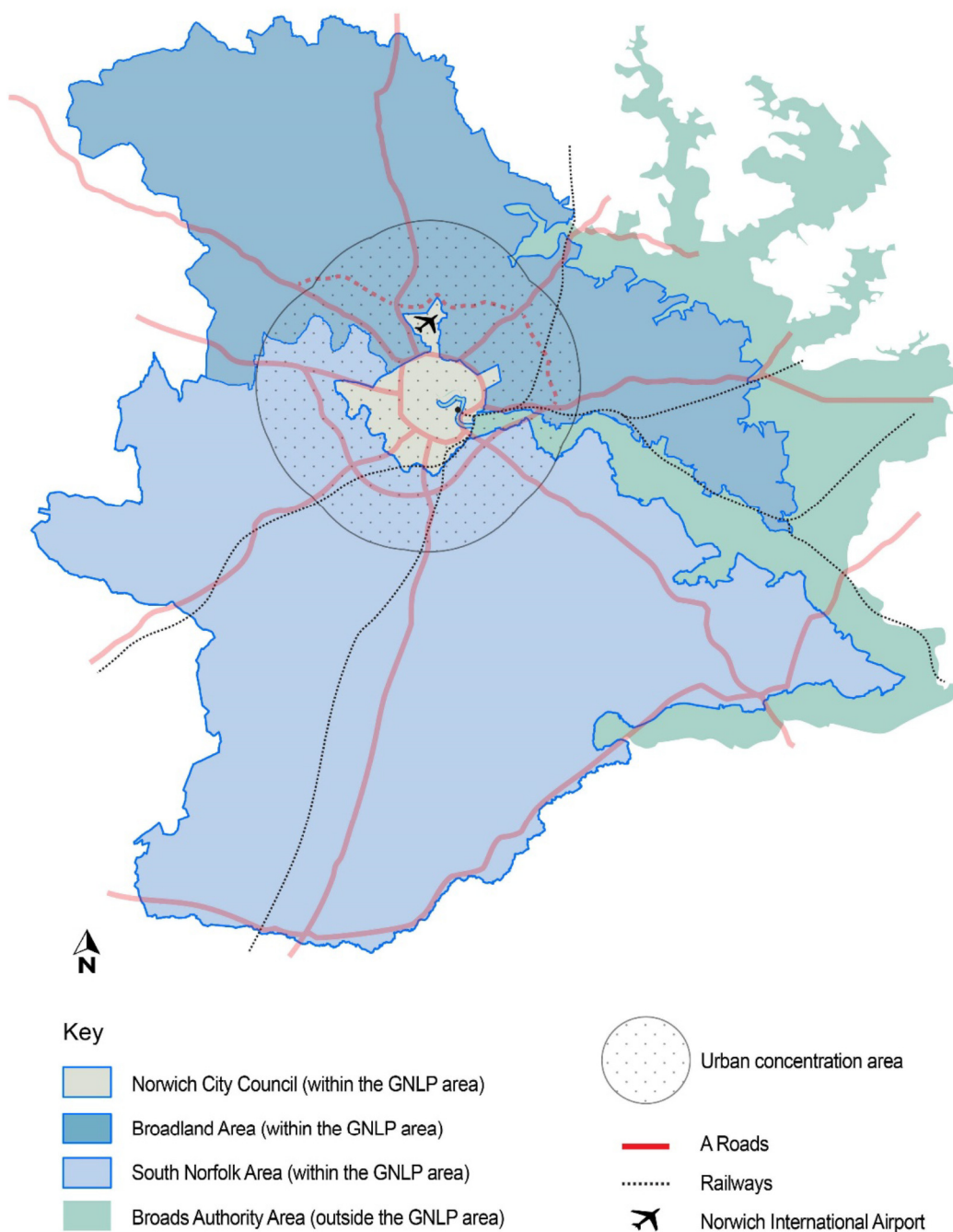
	Commitment ⁸	Baseline	Option 1	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200 ⁹	3,300	24,881	58	Around: 1,000 homes in the north east; 600 in the north and north west; 500 in the west; 1,200 in the south west.
Main Towns ¹⁰	5,468	550		6,018	14	There would be no additional homes beyond the baseline in Main Towns, KSCs or Service and Other Villages under this option.
KSCs	674	450		1,124	3	
Service and Other Villages or Village Clusters	1,143	1,200		2,343	5	
Totals	35,665	3,900	3,300	42,865		
		7,200				

⁸ As of April 2017, Service and Other Villages commitment also includes Countryside figures (applies to all options)

⁹ Brownfield sites in Broadland urban fringe (applies to all options)

¹⁰ Includes Long Stratton which will become a Main Town once anticipated growth is delivered (applies to all options)

Urban Concentration (close to Norwich)

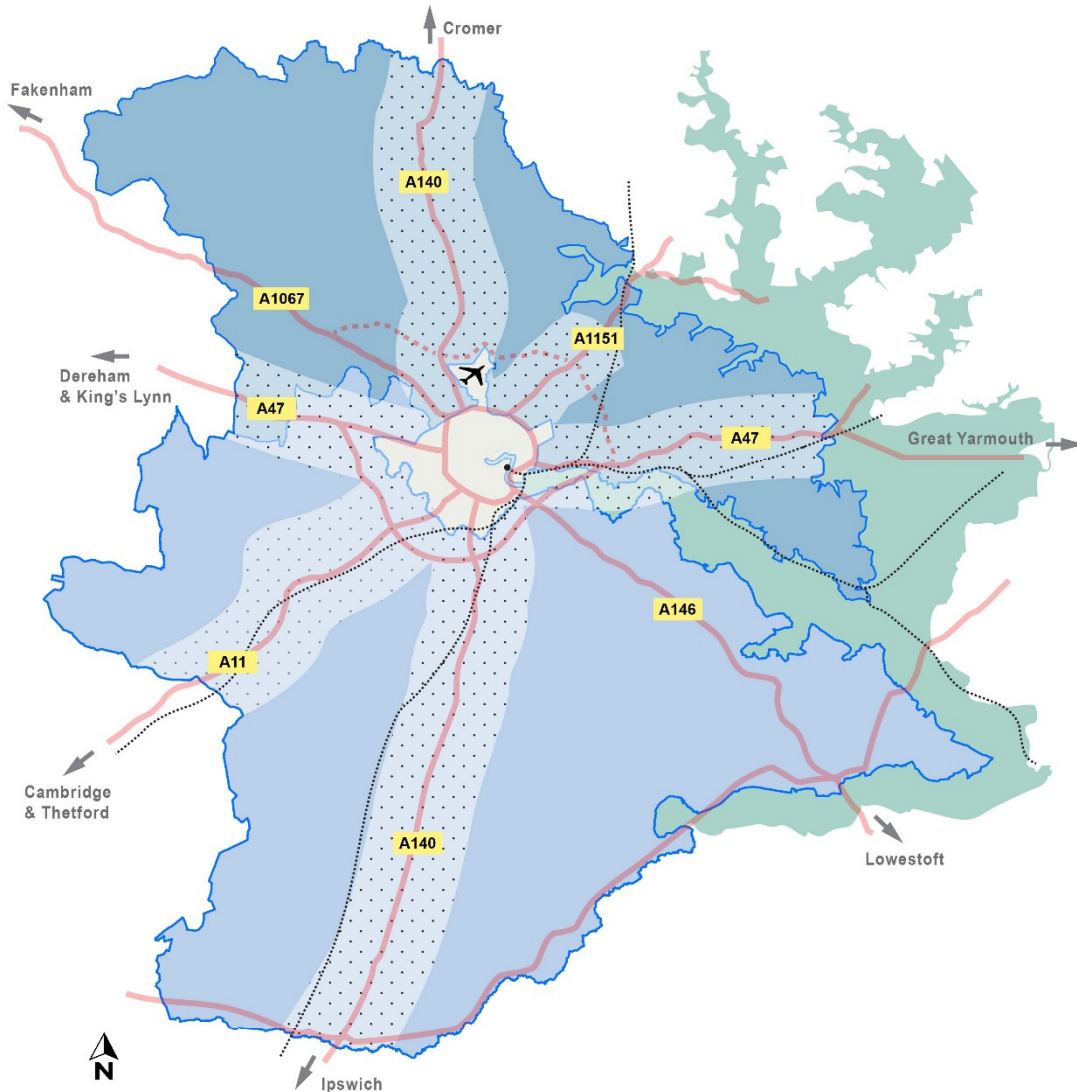


Option 2 Transport Corridors

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 2 would concentrate all of the additional 3,300 dwellings in the main transport corridors. There is a degree of overlap with Option 1 as urban fringe locations tend to be well served by transport corridors.

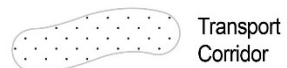
	Commitment	Baseline	Option 2	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200	2,200	23,781	55	Around: 1,000 homes in the north east; 200 in the north and north west; 500 in the west; 500 in the south west. Due to existing commitment and environmental constraints associated with the Broads, there would be no growth in this option above the baseline in the A47 (E) corridor.
Main Towns	5,468	550	1,100	7,118	17	The remaining 1,100 homes would be predominantly allocated to Wymondham in the A11 Corridor and to Diss, possibly including villages on the A140 (S) (other than Long Stratton where there are significant constraints to growth beyond current commitments).
KSCs	674	450		1,124	3	Other than possibly in villages on the A140 (S) near Diss, there would be no additional homes in KSCs or Service and Other Villages beyond the baseline under this option.
Service and Other Villages or Village Clusters	1,143	1,200		2,343	5	
Totals	35,665	3,900	3,300	42,865		
		7,200				

Transport Corridors



Key

- Norwich City Council (within the GNLP area)
- Broadland Area (within the GNLP area)
- South Norfolk Area (within the GNLP area)
- Broads Authority Area (outside the GNLP area)



Transport Corridor

A Roads

Railways

Norwich International Airport



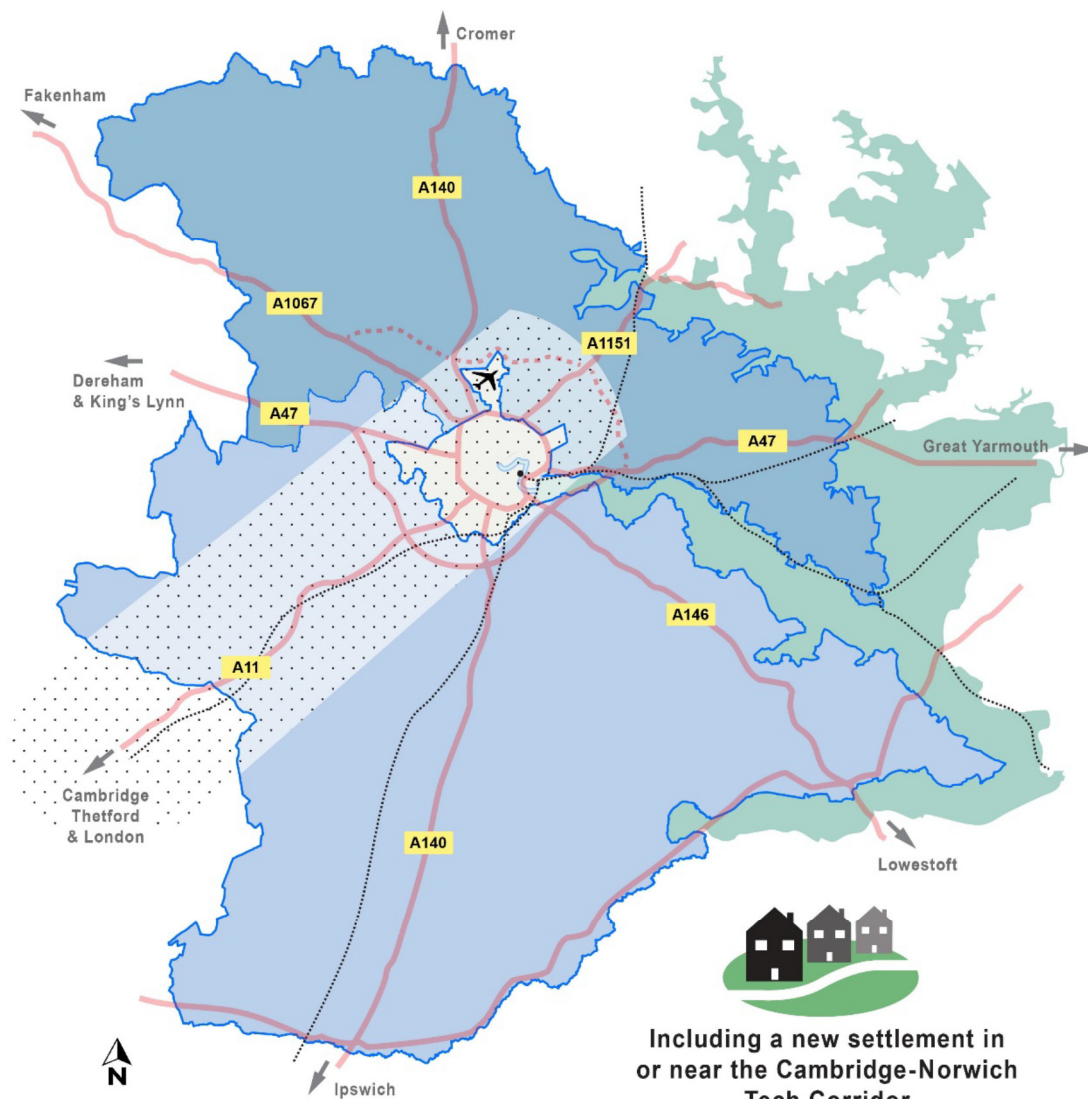
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 Norwich City Council - 100019747
 South Norfolk District Council - 100019483

Option 3 Supporting the Cambridge Norwich Tech Corridor

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 3 would concentrate the great majority of the additional 3,300 dwellings in the A11 corridor, with significant growth in the south west fringe, Wymondham and a new settlement in or near the corridor.

	Commitment	Baseline	Option 3	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200	2,000	23,581	55	Around: 500 dwellings in the west (which lies between the NRP and the Food Enterprise Zone, close to the A11 corridor); 1,500 in the south west on the A11 corridor.
Main Towns	5,468	550	700	6,718	16	The additional 700 homes would be predominantly allocated to Wymondham in the A11 Corridor rather than the other Main towns.
KSCs	674	450	100	1,224	3	The 100 additional homes in KSCs beyond the baseline would most likely be allocated to Hingham, which already has high tech businesses and is close to the A11 corridor.
Service and Other Villages or Village Clusters	1,143	1,200		2,343	5	There would be no additional homes in Service and Other villages beyond the baseline under this option.
New Settlement			500	500	1	There would be a new settlement in or near the A11 corridor under this option.
Totals	35,665	3,900	3,300	42,865		
		7,200				

Supporting the Cambridge-Norwich Tech Corridor



Including a new settlement in or near the Cambridge-Norwich Tech Corridor



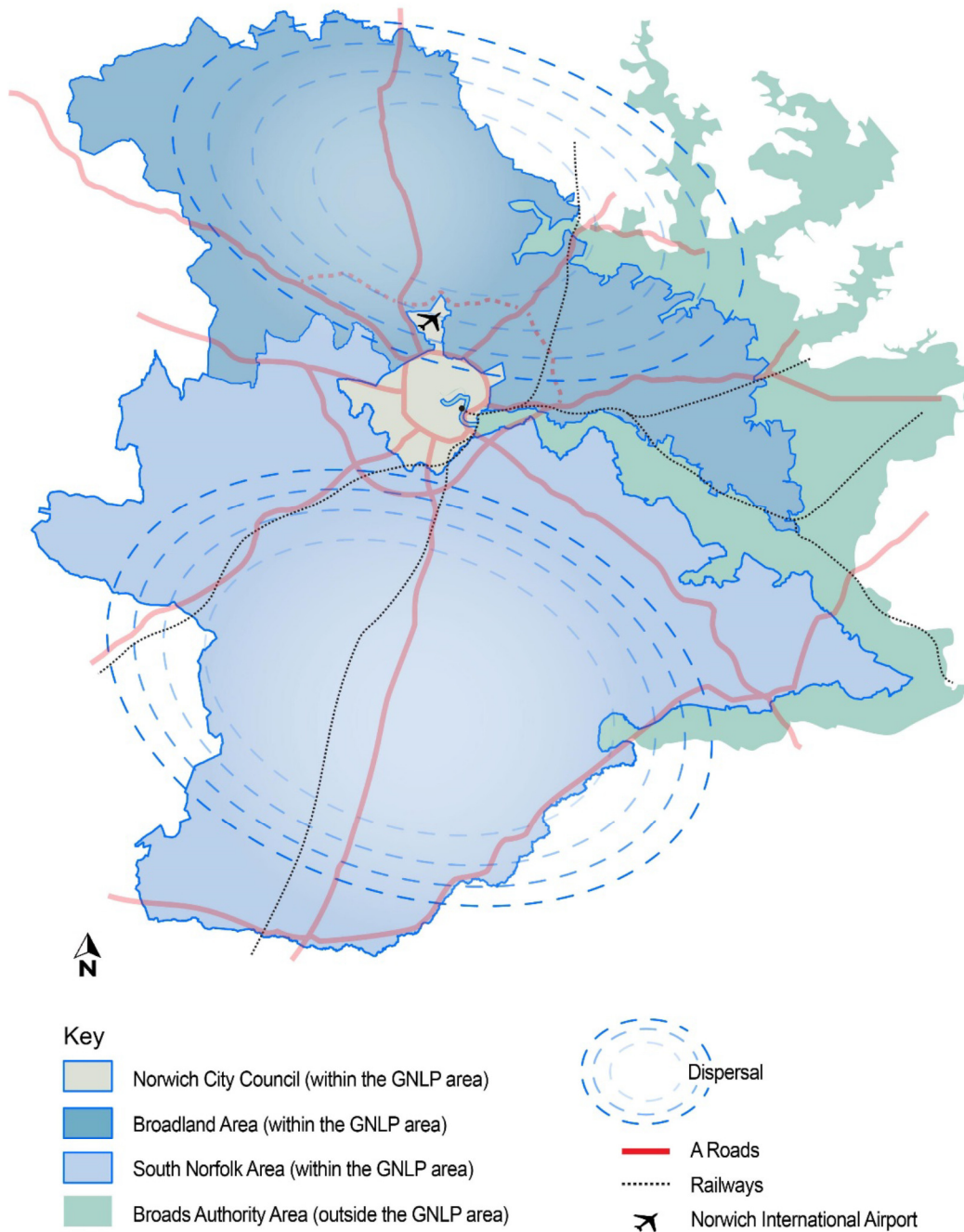
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Option 4 Dispersal

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 4 provides high levels of dispersal to villages while also putting a limited amount of growth in the Norwich fringe parishes and the A11 corridor.

	Commitment	Baseline	Option 4	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe sectors	21,381	200	350	21,931	51	Around: 100 homes in the north and north west; 100 in the west; 150 in the south west.
Main Towns	5,468	550	650	6,668	16	The large majority of the option's 650 homes would be distributed to Wymondham, Diss and possibly to Harleston.
KSCs	674	450	400	1,524	4	The large majority of the option's 400 homes would be likely to be distributed to the KSCs in South Norfolk (Loddon, Hingham and Poringland).
Service and Other Villages or Village Clusters	1,143	1,200	1,900	4,243	10	The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services and deliverability.
Totals	35,665	3,900	3,300	42,865		
		7,200				

Dispersal



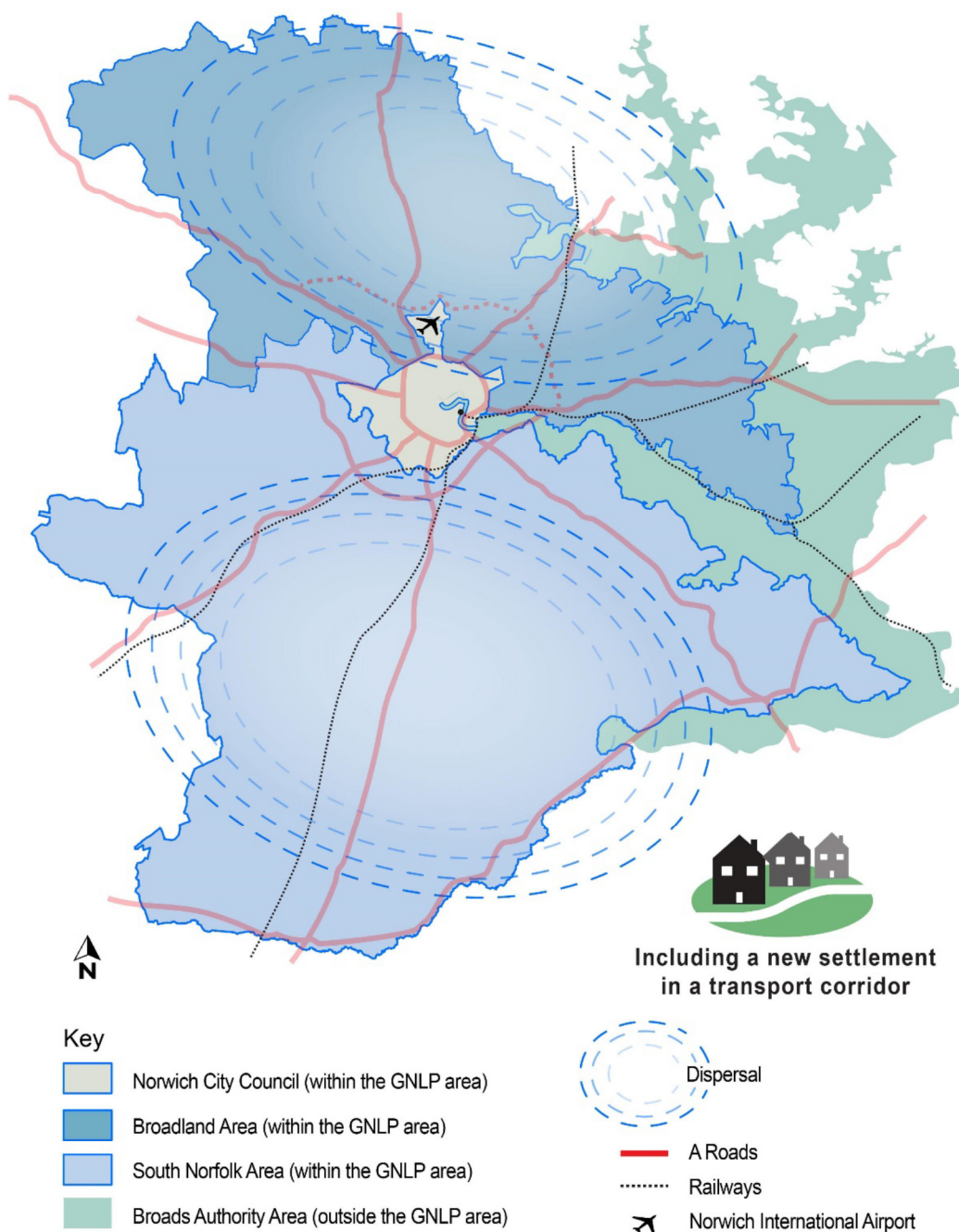
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Option 5 Dispersal plus New Settlement

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 5 is similar to Option 4 in that it provides high levels of dispersal to villages while also putting a limited amount of growth in the Norwich fringe parishes and the A11 corridor. It differs to Option 4 in that it diverts some of the village growth to a new settlement.

	Commitment	Baseline	Option 5	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200	350	21,931	51	Around: 100 homes in the north and north west; 100 in the west; 150 in the south west.
Main Towns	5,468	550	650	6,668	16	The large majority of the option's 650 homes would be likely to be distributed to Wymondham, Diss and possibly Harleston.
KSCs	674	450	400	1,524	4	The large majority of the option's 400 homes would be likely to be distributed to the KSCs in South Norfolk (Loddon, Hingham and Poringland).
Service and Other Villages or Village Clusters	1,143	1,200	1,400	3,743	9	The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services and deliverability.
New Settlement			500	500	1	A new settlement in a transport corridor
Totals	35,665	3,900	3,300	42,865		
		7,200				

Dispersal plus new Settlement



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Option 6 Dispersal plus Urban Growth

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 6 provides higher levels of dispersal to villages while putting significant growth in the Norwich fringe parishes, particularly in the north east and the west fringe.

	Commitment	Baseline	Option 6	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites in the urban area whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200	1,900	23,481	55	Around: 1,000 homes in the north east; 200 in the north and north west; 500 in the west; 200 in the south west.
Main Towns	5,468	550	150	6,168	14	The option's 150 homes would be likely to be distributed to Wymondham, Diss and possibly Harleston.
KSCs	674	450	150	1,274	3	The large majority of the option's 400 homes would be likely to be distributed to the KSCs in South Norfolk (Loddon, Hingham and Poringland).
Service and Other Villages or Village Clusters	1,143	1,200	1,100	3,443	8	The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services and deliverability.
Totals	35,665	3,900	3,300	42,865		
		7,200				

Dispersal plus Urban Growth

