

### **Sustainable development panel**

**Date: Wednesday, 25 January 2017**

**Time: 09:30**

**Venue: Westwick room, City Hall, St Peters Street, Norwich, NR2 1NH**

#### **Committee members:\***

##### **Councillors:**

Bremner (chair)  
Herries (vice chair)  
Brociek-Coulton  
Grahame  
Jackson  
Lubbock  
Maguire  
Thomas (Va)

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## Agenda

### Page nos

1     **Apologies**

To receive apologies for absence

2     **Declarations of interest**

(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)

3     **Minutes**

5 - 8

To approve the accuracy of the minutes of the meeting held on 30 November 2016.

4     **Joint Core Strategy Annual Monitoring Report 2015-16**

9 - 22

**Purpose** - To present the 2015-16 Joint Core Strategy Annual Monitoring Report for Broadland, Norwich and South Norfolk.

5     **Greater Norwich Local Plan - Sustainability Appraisal Scoping Report**

23 - 56

**Purpose** - To finalise the Greater Norwich Local Plan Sustainability Appraisal Scoping Report.

6     **One Planet Norwich - Refashion update**

57 - 58

**Purpose** - This report informs members of the outcome of the One Planet Norwich Refashion event.

Date of publication: **Tuesday, 17 January 2017**





**Sustainable development panel**

**09:30 to 11:30**

**30 November 2016**

Present: Councillors Bremner (chair), Herries (vice chair), Brociek-Coulton, Davis (substitute for Councillor Maguire), Grahame, Jackson, and Thomas (Va)

Apologies Councillors Lubbock and Maguire

**1. Declarations of interest**

There were no declarations of interest.

**2. Minutes**

**RESOLVED** to agree the accuracy of the minutes of the meetings held on 19 October 2016 and 7 November 2016.

**3. Greater Norwich Local Plan Update**

The head of planning services presented the report and together with the Greater Norwich Local Plan (GNLP) manager, answered members' questions. The purpose of the report was to note progress on the Greater Norwich Local Plan and to comment as appropriate for consideration by the council's Greater Norwich Development Partnership (GNDP) representatives, Councillors Bremner, Waters and Stonard. Councillor Grahame had attended and observed the GNDP meeting on 14 November 2016. Members noted that following the city council's request, members of the public could ask questions at the GNDP meetings.

During discussion members commented that they would find it useful if the papers included a glossary of terms and acronyms. Members also asked if a timeline for the delivery of the plan could be included in the papers. The panel noted that a copy of the programme for the delivery of the GNLP had been presented at its September meeting.

The head of planning services explained the status of the western link road to the Northern Distributor Road (NDR) and said that it was a separate process to the GNLP. He pointed out that neither process should prejudice the outcome of the other.

The panel then considered the objectives for the GNLP noting that the emerging plan would replace the Joint Core Strategy (JCS). The GNDP had not agreed the objectives at its meeting on 14 November 2016 and there would be further discussion at the next meeting. The panel confirmed that it agreed with the order of

the objectives and discussed the detailed wording of the objectives. Members noted that there had been a question at council (29 November 2016) about the first objective “To minimise the contributors to climate change and address its impact” and the Leader’s response. In reply to a member’s comment it was suggested that safeguarding air and water quality was intrinsic to this objective but sat within the proposed GNLP objective 8 and the text could be included there. Members also discussed GNLP objective 4 and suggested that the text be amended by deleting the second reference to “growth” and inserting “work”.

The panel then considered site allocation and the practicalities of engagement with landowners. Members were keen to ensure that brownfield sites were developed before greenfield sites and noted that the community infrastructure levy (CIL) would be used to provide infrastructure to assist development where appropriate. The Housing White Paper 2016 was expected to set out the government’s approach to The Community Land Trust. It was noted that the Norwich Area Strategic Housing Market Assessment (SHMA) would need to be updated. The call for sites was for all uses including sustainable energy.

The head of planning services explained that the GNDP would be revisiting the site hierarchy once it had reviewed the objectives, and together with the project officer, explained the scoring of settlements to meet the needs of the urban area and with access to Norwich.

Members confirmed their support for Norwich to remain within the Norwich Policy Area. There would be a report to the GNDP in January on this.

The project officer advised members that a report on the sustainable appraisal would be reported to the next meeting of the panel. The appraisal was not adopted but formed an important part of the evidence for the plan and was required by law.

**RESOLVED** to note:

- (1) the report;
- (2) that members of the panel:
  - (a) support the order of the GNLP objectives, and suggest the following:
    - (i) that “safeguarding air and water quality” is included in the wording for GNLP Objective 8;
    - (ii) that GNLP Objective 4 is amended to read as follows:

“To promote economic growth and diversity, provide a wide range of jobs to support sustainable patterns of work and promote a higher value economy.”
- (3) that the panel supports the definition of the Norwich Policy Area, which includes the city council area, and parts of Broadland District Council and South Norfolk Council.

#### **4. Community Engagement Norwich Pumpkin Rescue**

The environment strategy manager and the environmental communications co-ordinator gave a presentation on the One Planet Norwich - Pumpkin Rescue event held on 31 October and recycling points from 2 to 9 November 2016, and reported the outcomes and benefits of the scheme.

During discussion members praised the officers for the organisation of the event and its outcomes. The panel considered that the event was important to the wider community as it encouraged the use of recycling and composting. Members suggested that they could contribute to the publicising of events by using social media (Twitter and Facebook) to forward information to residents and schools.

Members suggested that there should be pumpkin recycling centres on allotment sites. The panel commented on potential sponsorship of the event. Members praised the quality of the soups available outside The Forum and suggested that this event could be run in conjunction with cookery sessions in community centres facilitated by the county council's Joy of Food initiative.

The environmental strategy manager said that the Pumpkin festival had cost around £500 and reached around 20,000 people with 1,500 either participating in the event or recycling pumpkins.

**RESOLVED** to note the information set out in the presentation.

CHAIR





**Report to** Sustainable development panel

**Item**

25 January 2017

**Report of** Head of planning services

**4**

**Subject** Joint Core Strategy Annual Monitoring Report 2015-16

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### **Purpose**

To present the 2015-16 Joint Core Strategy Annual Monitoring Report for Broadland, Norwich and South Norfolk.

### **Recommendation**

To note the publication and content of the 2015-16 Joint Core Strategy Annual Monitoring Report.

### **Corporate and service priorities**

The report helps to meet the corporate priority to provide a prosperous and vibrant city and the service priority to implement the local plan for the city.

### **Financial implications**

None directly.

**Ward/s:** All Wards

**Cabinet member:** Councillor Bremner – Environment and sustainable development

### **Contact officers**

Jonathan Bunting, planner (policy) 01603 212162

Mike Burrell, Greater Norwich local plan team manager 01603 222761

### **Background documents**

None

## Report

1. The purpose of this report is to inform members of the publication of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk Annual Monitoring Report 2015-16 (the JCS AMR).
2. In the interests of efficiency, the full JCS AMR, which is a large document, is available on the website [here](https://www.norwich.gov.uk/downloads/file/3678/amr_2015-16) ([https://www.norwich.gov.uk/downloads/file/3678/amr\\_2015-16](https://www.norwich.gov.uk/downloads/file/3678/amr_2015-16)) and is not appended to this report. Key summaries from the JCS AMR of direct relevance to Norwich are appended to this report (see below).
3. The JCS AMR records progress on the implementation of the JCS which provides the overall spatial planning strategy across the whole of the Greater Norwich area to 2026 and sets the context for the more detailed policies included in local plans for the individual districts. Progress is monitored since the base date of the JCS, which is 1 April 2008.
4. The Executive Summary on page 2 of the full JCS AMR document summarises its key findings. It is appendix 1 to this report.
5. Separate monitoring reports for the various district-wide local plans prepared by the constituent authorities are incorporated into the JCS AMR as appendices E (Broadland), F (Norwich, pages 130 to 209 of the full JCS AMR) and G (South Norfolk).
6. The main conclusions from appendix F for Norwich are in appendix 2 of this report. These relate to the Norwich-specific policies in the Development Management Policies Local Plan (the DM policies plan) adopted in December 2014. A monitoring framework<sup>1</sup> forming part of the plan sets out a number of detailed indicators against which its 33 individual policies are being monitored and the success of those policies gauged. This report is the first full year of monitoring of the DM policies plan.
7. This year a number of monitoring indicators for the JCS AMR have been reviewed and updated, both to simplify and streamline the process of monitoring the JCS in the light of reduced local authority resources and to remove any indicators that rely on data from third parties that is no longer collected or published.
8. Appendix A (pages 37-62 of the full JCS AMR) provides information on the current housing land supply position in the Greater Norwich area, assessed against the Government's requirement for local planning authorities to maintain at least a five year supply of specific deliverable housing sites, as set out in the National Planning Policy Framework and supporting planning practice guidance<sup>2</sup>. It includes tables showing housing completions in Norwich and its adjoining districts on a site by site basis in the last year and projections for future housebuilding on individual sites. The delivery estimates are informed by the most recent evidence on delivery expectations provided by housebuilders and landowners during 2016.
9. In relation to the **five year land supply**, the JCS AMR shows that housebuilding activity is increasing both in Norwich and in the Norwich Policy Area (NPA), which is

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<sup>1</sup> See [https://www.norwich.gov.uk/info/20221/development\\_management\\_policies\\_plan](https://www.norwich.gov.uk/info/20221/development_management_policies_plan) Appendix 9.

<sup>2</sup> National Planning Policy Framework, Department for Communities and Local Government 2012: section 6 *Delivering a wide choice of high quality homes*. See <http://planningguidance.communities.gov.uk/>

the relevant area for calculating Norwich's housing land supply. Whilst the number of deliverable sites and dwellings has grown in comparison to last year, the NPA remains short of a five year supply when assessed against JCS targets. Based on the most recent available estimates, the land supply in the NPA as at April 2016 was **93.9%** of the required figure, or **4.70** years' worth of sites.

10. So long as a five year supply cannot be demonstrated in the NPA, Norwich City Council will need to take a view on how to address the requirements of the NPPF when considering planning applications.
11. Appendix B (pages 63 to 75 of the full JCS AMR) contains details of Community Infrastructure Levy (CIL) receipts across the three councils. CIL regulations require this report to include details of CIL receipts received over the monitoring period. Norwich City Council's report is on page 69. Details of expenditure from the Greater Norwich Infrastructure Investment Fund is also recorded.
12. Appendix C (pages 76 to 80 of the full JCS AMR) provides information in relation to the statutory Duty to Cooperate and how the Greater Norwich authorities are complying with the duty to plan collaboratively across boundaries. This includes discussion of progress on the Norfolk Strategic Framework which will set the general parameters to inform future local plans across Norfolk.
13. Appendix D (pages 81 to 86 of the full JCS AMR) updates the sustainability appraisal baseline information covering the Greater Norwich area. This will inform the approach to the sustainability appraisal of the emerging Greater Norwich Local Plan (GNLP) which will eventually replace the Joint Core Strategy, and of any other subsequent local plans which are dependent on the GNLP.

## Joint Core Strategy for Broadland, Norwich and South Norfolk Annual Monitoring Report 2015-16

### Executive Summary

- 1.1 This Annual Monitoring Report (AMR) provides a useful indication of how the Greater Norwich area is performing against the objectives set out in the Joint Core Strategy.
- 1.2 There are many indicators that are currently being met or where clear improvements have been made:
- The number of new employee jobs have increased this year;
  - The number of Lower Super Output areas among the most deprived 20% nationally has shown a relative reduction since 2009/10;
  - Net housing completions have increased from last year and are at the highest level since 2009/10;
  - The proportion of new and converted dwellings developed on Previously Developed Land has met target across the Greater Norwich area as a whole;
  - No planning permissions have been granted contrary to the advice of the Environment Agency on either flood defence or water quality grounds;
  - The rate of new business registrations has increased;
  - Norwich has maintained its position in the national retail ranking;
  - No listed buildings have been lost or demolished;
  - The unemployment rate of the population aged 16-64 has decreased;
  - Life expectancy has increased;
  - The proportion of people claiming Employment Support Allowance/ Incapacity Benefit has remained stable over time;
  - CO2 emissions per capita have decreased; and
  - The proportion of household waste that is recycled and composted has increased from the last monitoring year.
- 1.3 There are a number of indicators where targets are not currently being met, some of which have been adversely affected by the global economic downturn. There are however a number of indicators which are perhaps less influenced by external factors and these are the areas where the overall focus of action should be placed:
- Although housing delivery has improved in recent years, the number of completions remain well below target;
  - Affordable housing completions are below target in both percentage and absolute terms;
  - Most economic indicators are not on target – in particular the overall number of jobs, office floorspace, and city centre retail floorspace are not growing as envisaged;
  - The continued loss of office space in Norwich City, and the growth of office space in Broadland and South Norfolk is noteworthy, continuing previous years' trends;

- The percentage of the work force employed in higher level occupation has decreased;
  - The total crime level has increased this year, including the number of people who were killed or seriously injured on roads in the Greater Norwich Area;
- 1.4 Even though a 5 year land supply cannot be demonstrated, throughout the monitoring period there has been a significant stock of unimplemented planning permissions for housing. The consistent under delivery of dwellings across the period reflects tough market conditions and housing industry business models that seek to maintain margins rather than necessarily increase supply. The low levels of affordable housing delivery is partly due to developers being able to demonstrate that planning obligation requirements challenge viability.
- 1.5 Similarly, the underperforming economic indicators reflect wider economic conditions. However, there is a strong argument that the ambitious JCS targets for office and retail development reflect older business models and less efficient use of space.
- 1.6 Crime rates and road accidents are among several “contextual” indicators in the AMR. The JCS has, a limited impact on these indicators.

### **Conclusion and next steps**

- 1.7 A range of activities are underway that will have a positive impact on stimulating growth and help deliver against targets over the coming years.
- 1.8 A number of local plan site allocation documents were progressed during the monitoring year in Broadland and South Norfolk and these have since been adopted. These will provide more certainty to developers and investors.
- 1.9 The local planning authorities, working with the County Council and the LEP through the Greater Norwich Growth Board, progressed implementation of the Greater Norwich City Deal agreed with Government in 2013. Working together, the partners support the private sector to deliver in a number of ways, including: making a Local Infrastructure Fund available to developers to unlock site constraints; direct investment in infrastructure such as the NDR and other transport measures; and engagement in skills initiatives to improve the match between labour supply and demand.
- 1.10 The authorities are working with colleagues across Norfolk and Suffolk to negotiate a devolution deal with Government that includes a number of options to stimulate growth, covering areas including housebuilding, economic growth, infrastructure and skills. The LPAs have recently begun to review and roll forward the JCS to produce the Greater Norwich Local Plan (GNLP), scheduled to be adopted in 2020. The AMR will inform and be informed by this process.



## Appendix 2 Norwich City Council Report against policies in the adopted Norwich development management policies local plan

### Summary of Main Findings

The AMR's main findings are set out in the following table:

Issue	Findings
Housing	<ul style="list-style-type: none"> <li>• <b>365</b> dwellings were <b>built</b> at sites including Geoffrey Watling Way (adjoining the Football Club, completing that development), Brazen Gate/Southwell Road, the former Lakenham Sports Club, Carshalton Road, Blackfriars Street and Edward Street in the Northern City Centre, Starling Road and Three Score, Bowthorpe (supported care housing for the elderly). There was a wide range of development on smaller sites.</li> <li>• <b>4181</b> homes have planning permission in Norwich as at April 2016 (largely similar to the figure a year ago);</li> <li>• Of these <b>1018</b> dwellings were granted <b>planning permission in 2015/16</b> although a significant proportion of these were approval of details, resubmitted or amended schemes on sites where the principle of development has already been agreed.</li> <li>• Of these, 440 homes were <b>office conversions granted prior approval as permitted development</b> which do not have to provide affordable housing and are not subject to the policies of the plan which would otherwise apply, including those in relation to space standards, amenity and outlook, parking and servicing. Monitoring shows that although some of these schemes are being implemented, others have proved to be of marginal viability and are either not being progressed or have stalled before completion;</li> <li>• Work commenced on the long delayed <b>St Anne's Wharf</b> development at King Street, which will provide a total of 437 homes on a key regeneration site.</li> <li>• Minimum internal <b>space standards</b> on permitted housing schemes (superseded during the 2015-16 monitoring period by a national minimum technical standard) have generally encouraged well designed schemes;</li> <li>• New <b>student</b> accommodation was completed at the bus station site, with discussions continuing on a further scheme by the same provider at the former Mecca Bingo site at All Saints Green. A 915-bed student accommodation development at the university was approved in May 2015 (the first phase of which was completed in September 2016);</li> <li>• Due to an increase in the proportion of development in suburban areas, average <b>densities</b> have fallen in recent years in comparison with the early years of the plan period when significant numbers of city centre flats were built.</li> </ul>

Heritage	<ul style="list-style-type: none"> <li>• No <b>listed buildings</b> were lost during the 2015-16 monitoring period;</li> <li>• The number of buildings on the <b>Buildings at risk register</b> (28 Listed Buildings and one Scheduled Ancient Monument) has reduced from the situation last year when there were 30 listed buildings and two SAMs.</li> </ul>
Environment	<ul style="list-style-type: none"> <li>• A range of <b>green design</b> and wildlife friendly features were negotiated in schemes across the city, including green roofs and bat and bird boxes in smaller schemes and wider green infrastructure initiatives in larger developments. A standard planning condition is now attached to planning permissions to ensure access routes for small mammals are available (via gaps in fences, etc.).</li> <li>• Three applications raised Environment Agency concerns in relation to <b>flood risk</b>: two were approved after negotiation to address these concerns, one application was withdrawn before determination. No applications raised <b>water quality</b> concerns or were refused on those these grounds;</li> <li>• 94.5% of Norwich's <b>County Wildlife Sites</b> are in positive conservation management (an increase over 2014/15) and there were no losses of nature conservation sites to development;</li> <li>• CIL funding has been used for further <b>natural environmental improvements</b> at Danby Wood, Marston Marshes and Earlham Millennium Green in the Yare valley and the Oasis site at Fishergate in the city centre. These sites also benefited from CIL funded spending in 2014/15;</li> <li>• Based on latest published figures (2014/15), <b>air quality monitoring</b> shows that levels of nitrogen dioxide and airborne particulates are largely unchanged from previously reported levels. Average levels across the city centre Air Quality Management Area remain well below the recommended maximum of 40 µg/m<sup>3</sup>, however, there are areas of hotspots such as Castle Meadow and St Stephens.</li> </ul>
Trees and Landscape	<ul style="list-style-type: none"> <li>• A very small amount of land in the <b>Yare Valley Character Area</b> (YVCA) was lost to development at Mansfield Lane as a result of a residential extension. As a result of new proposals for public car parking to serve the Sainsbury Centre at the UEA, land in the YVCA to the south of the building approved for temporary use as a car park will be reinstated.</li> <li>• 92 applications were approved for works to TPO trees, 19 of which involved felling. There was however <b>no net loss of trees</b> or hedgerows as a result of development. Financial contributions were committed or received from developers to provide 8 new street trees on sites at Earlham Hall and Starling Road together with a commitment to fund a number of street trees to be agreed</li> </ul>



	in association with development at 161 Oak Street.
Open Space	<ul style="list-style-type: none"> <li>• <b>No</b> designated <b>open space</b> was <b>lost</b> in Norwich to development;</li> <li>• New areas of public open space were brought into use at Brazen Gate/Southwell Road and the Bowthorpe Care Village at Three Score, as well as small “Pocket parks” in the city centre at All Saints Green and Mountergate. Delivery of significant new open space is anticipated in association with the ongoing development at St Anne’s Wharf.</li> </ul>
Employment	<ul style="list-style-type: none"> <li>• There has been a further recorded loss of <b>employment floorspace on industrial estates</b> largely as a result of one major scheme at Anson Way on the Airport Industrial estate – this involved the conversion of a former hangar previously used by Anglian Windows to an aviation academy: a use accepted in this location as supportive of economic development at the Airport;</li> <li>• Further potential losses of <b>office space</b> in the city centre to housing (amounting to 8881 sq.m) were agreed under the prior approval process introduced following the relaxation of planning rules in 2013, which has since been made permanent. Since 2008, the overall reduction of office stock is just over 29000 sq.m or 8%. This means the JCS target of achieving major office floorspace by 2026 (aiming in particular to increase city centre floorspace by 1000,000 sq.m or about a third) is not on track to be achieved. The number of office to residential schemes coming forward may have peaked, however. Three such schemes were commenced in the 2015-16 monitoring period, two since finished, but one (Bethel Street) was abandoned prior to completion. As previously, the office space involved has mainly been poorer quality stock dating from the 1960s and 70s. Although the best quality office buildings are likely to remain attractive to commercial office tenants, there remains considerable pressure to renegotiate schemes already approved with a significant office element to either reduce or remove the office floorspace entirely in favour of housing. The JCS target thus remains particularly challenging: on the one hand, limited market demand and lack of viability often does not justify developing new offices even if they have planning permission; on the other there are now few planning controls available to prevent the loss of existing office space.</li> </ul>
Retailing	<ul style="list-style-type: none"> <li>• Retail vacancies in the <b>city centre</b> have increased slightly since 2015, but remain relatively low in comparison with national averages and have been inflated by the effect of premises being vacated in advance of refurbishment schemes, most notably at Castle Mall (reported in the city council’s separate retail monitoring report). The subsequent closure of three large</li> </ul>

	<p>retail units: Castle Mall Post Office, Claes Olsson at Chapelfield and BhS occurred too late to be included in these figures and will impact further on the overall vacancy level in the primary shopping area.</p> <ul style="list-style-type: none"> <li>• The <b>hospitality sector</b> in the city centre appears to still be expanding, albeit at a slower rate than last year. The Back of the Inns area and the eastern part of the Lanes both showed increases in the proportion of cafes and restaurants compared to shops and new premises at Timberhill were occupied as a café/bakery. In St Benedict's there was a small increase in the proportion of shops and there are signs of an increase in footfall and retail representation in Westlegate following its permanent pedestrianisation, the effects of which should become more apparent next year.</li> <li>• Changes in government policy continue to affect the ability of local planning policies to directly influence the balance of uses in shopping areas;</li> <li>• Despite a marked increase in vacancy rates in <b>district and local centres</b>, the proportion of non-retail uses in those centres remains almost unchanged from last year. Overall the suburban centres continue to be relatively robust and to offer an appropriate range of local services and facilities, with small food stores being most important to their success;</li> <li>• The majority of permissions granted for main town centre uses were in the city centre and defined centres. 2075 sq.m of floorspace was approved in out of centre locations, the majority of which was accounted for by DIY retail floorspace for Wickes at Hellesdon Hall Road. In accordance with policy this is restricted to the sale of bulky goods only so will not compete directly with the city centre;</li> <li>• 2015-16 saw work completed on the <b>Hall Road District centre</b>. The development, anchored by an ASDA foodstore, also includes smaller shops, leisure and community facilities and business units and has significantly improved the range of convenience shopping to serve day to day and wider needs in the south of the city. It implements a longstanding proposal for district centre development included in both the current and previous local plans.</li> </ul>
Community Facilities	<ul style="list-style-type: none"> <li>• 12 new permissions for community facilities were granted in the 2015-16 monitoring period. These covered a wide variety of uses from healthcare uses and children's nurseries to two major indoor trampolining centres (one in the city centre, one in a former retail warehouse in an industrial estate location) and the Oak Circus Centre in the former St Michael at Coslany Church at Oak Street.</li> <li>• Nine proposals involving new education and training facilities were approved, most of them minor extensions and classroom development for established schools, but</li> </ul>

	<p>including business training centres at the Earlham Hall Enterprise Centre and the new Aviation Academy at the Airport.</p> <ul style="list-style-type: none"> <li>• Community facilities lost to approved development in the 2015-16 monitoring period included a dental surgery, a church (the former Silver Road Baptist Chapel approved for conversion to housing) and a bowling alley at Plumstead Road, demolished for housing development. An application for the residential conversion of another former church building – St Peters Park Lane Methodist Church and Church Hall – was submitted;</li> <li>• One community pub identified for protection under local plan policy - The Provision Stores, Dereham Road - was permanently lost to office use, with another subject to approved proposals for conversion to housing. Three other pubs subject to the protection policy have closed;</li> <li>• In April 2015 the government introduced a change in national planning rules withdrawing permitted development rights for the change of use of local pubs which are registered as Assets of Community Value. 19 Norwich pubs have been registered with ACV status since then, 13 of them in the 2015-16 monitoring period. One application for ACV status for a local pub was unsuccessful.</li> </ul>
Leisure, catering, Evening and Late Night Economy	<ul style="list-style-type: none"> <li>• As noted above there was some further growth in <b>catering and hospitality</b> uses in the city centre albeit that this has not been as marked as in previous years;</li> <li>• Only one new <b>hot food takeaway</b> was approved, this being to authorise a pre-existing takeaway use on Aylsham Road. No new takeaways were approved in the city centre;</li> <li>• One significant new <b>leisure use</b> was approved in the city centre leisure area, this being the Gravity Trampoline Park at Riverside, replacing a nightclub. (This is one of two similar facilities approved in the city, the other being “High Altitude” at Whiffler Road).</li> <li>• No new <b>late night uses</b> were approved. August 2015 saw changes to the city council’s licensing policy with the introduction of a Special Cumulative Impact Policy (CIP) applying to a sector of the city centre centred on the Late Night Activity Zone. It seeks to restrict the proliferation of such uses where they are likely to contribute to increased crime and disorder.</li> </ul>
University of East Anglia (UEA)	<ul style="list-style-type: none"> <li>• Phase 1 of the Enterprise Centre adjoining Earlham Hall was completed in July 2015;</li> <li>• The first phase of a 915-bed student accommodation development at the former Blackdale School site commenced during the 2015-16 monitoring period and completed in September 2016.</li> <li>• The UEA have announced plans for a 20% increase in student numbers to 18,000 by 2030 with substantial new</li> </ul>

	investment in the campus. The implications of this programme will need to be assessed and new policy approaches developed and agreed through the emerging Greater Norwich Local Plan.
Transport	<ul style="list-style-type: none"> <li>• Development at Hall Road (the new Harford Place district centre) delivered significantly enhanced cycling and pedestrian facilities off-site through a planning obligation. The ongoing Lakenham Sports and Leisure Centre development by Hopkins Homes includes improved pedestrian and cycle links and funding for an extended controlled parking zone (CPZ);</li> <li>• Monitoring showed that cycling levels increased overall in Norwich between 2014 and 2015, continuing a trend evident in previous year, with the proportion of adult residents cycling more than 3 days a week for utility purposes having almost doubled. The number of people passing automatic counter sites increased by 5%. Measurements at the inner and outer ring roads on one day in each year showed a 35% increase in the number of cyclists crossing the inner ring road and a 21% increase crossing the outer ring road cordons.</li> <li>• The £5.7 million pink pedalways project from the Norwich Research Park to Heartsease was largely completed in the 2015-16 monitoring period and formally launched in summer 2016. It included works in the city centre (Magdalen Street/Cowgate contraflow and Tombland/Palace Street junction redesign) and outside the centre at the Avenues, Park Lane/Vauxhall Street/Bethel Street (incorporating a new crossing at Chapelfield Road); Heathgate, Mousehold, Heartsease and Bowthorpe Three Score;</li> <li>• Work commenced on the major programme to enhance the yellow (Airport-Lakenham) and blue (Sprowston-Wymondham) pedalways, involving more than 40 individual projects with £8.4m of government funding as well as specific project funding committed from the Community Infrastructure Levy (CIL). Projects were completed on St George's Street, Pointers Field, Taylors Lane and Opie Street. A new toucan crossing was installed on Newmarket Road in Eaton;</li> <li>• The new Rose Lane multi storey car park at Mountergate commenced during the 2015-16 monitoring period and opened in May 2016. The number of public off street parking spaces in the city centre has increased by 833 spaces since May 2014 but remains below the 10,000 space limit imposed by the local plan;</li> <li>• 20mph speed limits have been extended to cover virtually the whole of the city centre and Heartsease as part of a major package of sustainable transport improvements benefiting from government funding. This will be further extended in 2016/17. Work is continuing to implement the extensive programme of city centre traffic management,</li> </ul>

	<p>cycle and bus priority measures, pedestrianisation and public realm enhancements under this initiative.</p> <ul style="list-style-type: none"> <li>• In 2017 further improvements to capacity on the A1074 Dereham Road and A11 Newmarket Road bus rapid transit (BRT) routes are expected to be delivered, with design and feasibility work being taken forward for the A140 BRT corridor.</li> <li>• Four car free and five low car housing schemes were approved during the 2015-16 monitoring period with a further two low car housing schemes agreed in principle.</li> </ul>
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**Report to** Sustainable development panel

**Item**

25 January 2017

**Report of** Head of planning services

**Subject** Greater Norwich Local Plan - Sustainability Appraisal  
Scoping Report

**5**

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### **Purpose**

To finalise the Greater Norwich Local Plan Sustainability Appraisal Scoping Report.

### **Recommendation**

To recommend that cabinet agrees the proposed amendments to the Greater Norwich Local Plan Sustainability Appraisal Scoping Report and its subsequent use as the basis for appraising policy options and choices in the Greater Norwich Local Plan.

### **Corporate and service priorities**

The report helps to meet the corporate priority to provide a prosperous and vibrant city and the service priority to implement the local plan for the city.

### **Financial implications**

None directly.

**Ward/s:** All Wards

**Cabinet member:** Councillor Bremner – Environment and sustainable development

### **Contact officers**

Mike Burrell, Greater Norwich local plan team manager      01603 222761

### **Background documents**

None

# Report

## Introduction

1. The purpose of this report is to inform members of the draft responses to the consultation representations, and relevant adjustments to the Sustainability Appraisal (SA) Scoping Report, which have been prepared by Greater Norwich Local Plan officers assisted by a specialist SA consultancy.
2. It is recommended that sustainable development panel should advise cabinet to agree the proposed changes to the draft SA Scoping Report, the finalised version of which will subsequently be used to assist plan making.
3. Similar reports are being considered by members at South Norfolk and Broadland as the agreement of each of the Greater Norwich authorities is required to finalise the SA Scoping Report.

## SA stages

4. The three Greater Norwich councils (South Norfolk, Broadland and Norwich, working with Norfolk County Council) agreed in late 2015/early 2016 to jointly prepare a Greater Norwich Local Plan (GNLP), as a successor document to the Joint Core Strategy and the various other local plan documents allocating sites.
5. One of the earliest pieces of work for any local plan is to prepare a Sustainability Appraisal Scoping Report, which summarises the social, economic and environmental “baseline” of the area, identifies the most significant sustainability issues, and develops a framework of sustainability appraisal (SA) objectives.
6. The key stages of preparing local plans and their relationship to the Sustainability Appraisal are described in the Planning Practice Guidance (<http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>). These are:
  - (a) Setting the context and objectives, establishing the baseline and deciding on the scope;
  - (b) Developing and refining alternatives and assessing effects;
  - (c) Preparing the Sustainability Appraisal Report when the Local Plan is published;
  - (d) Seeking representation on the Sustainability Appraisal Report from consultation bodies and the public; and
  - (e) Post adoption reporting and monitoring.
7. The SA Scoping Report covers the first of the stages above.



## Consultation

8. GNLP officers, assisted by a specialist SA consultancy, prepared the SA Scoping Report which can be viewed at <http://www.greaternorwichgrowth.org.uk/planning/greater-norwich-local-plan/sustainability-appraisal-scoping-report/>
9. Consultation on the draft SA Scoping Report ran from 20 June to 15 August 2016.
10. Representations were received from a total of 11 different organisations or individuals. Typically each respondent made a number of separate comments on different elements of the Scoping Report, and only some of the more significant representations made are highlighted below: a copy of the full representations made is available at [https://www.norwich.gov.uk/downloads/file/3679/sustainability\\_appraisal\\_scoping\\_report\\_representations](https://www.norwich.gov.uk/downloads/file/3679/sustainability_appraisal_scoping_report_representations).
11. Natural England, the Environment Agency and Historic England are statutory consultees for SA Scoping Reports.
12. Natural England is generally content with the document, but makes a number of detailed recommendations on amendments to some SA objectives, for example in relation to green infrastructure and biodiversity.
13. The Environment Agency is also “broadly satisfied”, but suggests, amongst other points, a small number of changes to better reflect the most recent required allowances for climate change in relation to flood risk (i.e. increased rainfall and river flows) and recognise the ecological importance of key watercourses.
14. Historic England has highlighted a number of additional plans and programmes that it says should be referenced. It is concerned that there is no reference to non-designated heritage assets and unidentified heritage assets, and would also like to see opportunities for improvements to development that the historic environment can bring being identified.
15. Other groups and individuals also commented on the SA Scoping Report.
16. The Campaign to Protect Rural England (CPRE) Norfolk responses raise a number of concerns, including: the need for better consideration of flood risk and water supply issues; inadequate account of water-dependent wildlife sites; the impact of visitor pressure on sensitive environmental sites; and that higher priority should be afforded to public transport measures and maintaining public footpaths.
17. A member of the Wensum Valley Alliance (WVA) makes similar points on public transport and footpaths, but feels particularly strongly that the housing figures in the Central Norfolk Strategic Housing Market Assessment should be re-appraised “radically”, with a view to being reduced. The WVA member also states that allocations of new employment land should be minimised, with a criteria-based policy being used instead.
18. The main matter of concern raised by Hempnall Parish Council is the “elevated housing targets”, and the “severe environmental consequences” that would, it asserts, occur in delivering such housing.

19. A small number of minor comments on infrastructure delivery, archaeology and minerals and waste were made by Norfolk County Council.
20. Separate detailed representations were lodged by three different local members of the Green Party as well as an official representation from the Norfolk Green Party. Although all different in precise details, some common themes are raised. The representations contend that the Scoping Report is flawed and inadequate on a number of matters, particularly:
- air quality in Norwich (reference is made to the recent Government defeats in the Courts on the matter of the National Air Quality Plans, and (it is asserted) inadequate measures taken in recent years to deal with the existing Air Quality Management Area (AQMA) in Norwich, and air pollution more generally);
  - the need for the GNLP to play its full part in contributing to carbon dioxide reductions required by the country as a signatory to the international Paris Agreement, through a quantitative assessment of CO<sub>2</sub> emissions and greater energy efficiency measures;
  - the need for public transport improvements and a “modal shift” away from car travel; and
  - that a stronger focus on promoting healthy communities is needed.

### **Proposed changes**

21. Officers have assessed and responded to the representations made (see Appendix 1). A number of adjustments are recommended to be made to the SA Scoping Report in response to representations made, with a track-changes version of the SA Scoping Report available here ([https://www.norwich.gov.uk/downloads/file/3681/draft\\_sustainability\\_appraisal\\_scoping\\_report\\_with\\_track\\_changes](https://www.norwich.gov.uk/downloads/file/3681/draft_sustainability_appraisal_scoping_report_with_track_changes)).
22. In almost all cases, the amendments seek to address the matter raised. However, it is important to note that some of the matters raised are not thought appropriate to make changes to, in most cases because a particular approach sought relates more to policy options; this is not a matter within the remit of the SA Scoping Report, but for the GNLP itself to assess (although clearly reasonable alternative policies will need to be considered and evaluated through the SA).
23. Another key issue will be clarifying where certain matters will be more appropriately addressed as part of a review of the Local Transport Plan and/or Transport for Norwich rather than as part of the GNLP.
24. A number of appropriate amendments are proposed to be made to some of the SA objectives and proposed monitoring indicators to reflect representations made by Natural England, the Environment Agency, Historic England and Norfolk County Council.
25. Some changes and clarifications will be made to reflect some points made by CPRE Norfolk, but much of their representation relates more to policy options and a critique of the level of need for housing, neither of which are directly within the scope of the SA Scoping Report to consider. The CPRE’s concern that the allocation of sites will only being subject to superficial environmental considerations is not accepted.

26. No changes are proposed in response to the WVA member's comments, as few of the points relate specifically to matters within the remit of the SA Scoping Report. Many of the assertions made (on the level of housing need, for example) will be more appropriately considered during the consideration of options in the GNLP itself.
27. The representations raised by the various members of the Green Party have been given careful consideration. In relation to air quality, a number of changes are proposed to better reflect the current situation with regards to the latest legal situation (such as the implications of the Government's Supreme Court defeat) and the latest information in relation to the Norwich AQMA. Consideration of some matters – such as tougher targets for nitrogen oxide (NO<sub>x</sub>) and fine particulates (PM10s and PM2.5s) – are not matters for the SA Scoping Report to consider, although they will need to be considered through the Norfolk Local Transport Plan, Transport for Norwich and the City of Norwich Air Quality Management Plan. Amendments are also proposed in relation to climate change, following the Green Party members' request for fuller information on the implications of the Climate Change Act 2008. However, GNLP officers remain unconvinced that it is a reasonable requirement of the SA process to undertake a full carbon audit of GNLP alternatives.
28. It is important to note that the baseline and consideration of other issues will need to be ongoing throughout the preparation of the GNLP, so any significant changes (in Government policy, for example) would need to be reflected in the ongoing process of SA, and so the SA baseline will need to be updated regularly prior to submission of the GNLP for independent examination in 2019.
29. Sustainability appraisal is a legal requirement when preparing any Local Plan document. Having taken advice from SA consultancy Lepus on the contents of representations made to the SA Scoping consultation (and made some appropriate modifications), officers are satisfied that the finalised SA Scoping Report is an improvement and addresses all the key elements required.



**Sustainability Appraisal Scoping Report: Officer  
Responses to Representations**

**December 2016**

The following table sets out the officer responses to representations submitted in response to consultation on the Greater Norwich Local Plan Sustainability Appraisal Scoping Report.

<b>Reference</b>	GNLP_SA_01
<b>Respondent</b>	Natural England
<b>Officer Response</b>	
<p>The 'Legislative Requirements' section will be amended to refer to the Birds Directive 2009/147/EC.</p> <p>The Sustainability Appraisal (SA) Scoping Report for the Greater Norwich Local Plan takes into account all relevant plans and programmes identified. Where relevant new plans and programmes emerge during the production of the SA these will be taken into account as appropriate.</p> <p>Figure 82 reflects the issues identified at the end of each thematic section. The summary of issues, and consequently table 82, will be amended broadly as recommended by Natural England. The SA intends to identify the significant effects resulting from cross-cutting issues as a result of the plan as part of its evaluation of its emerging policies. A new paragraph after 3.3.6 will be added to clarify the multi-functional benefits of a Green Infrastructure Network.</p> <p><b>SA Objectives</b></p> <p>Natural England's broad support for the over-arching objective is noted. Whilst it is recognised that for some objectives a number of issues have been identified it is not considered necessary to further sub-divide these objectives.</p> <p>The decision making criteria for: Air Quality; Health; Biodiversity; Geodiversity and Green Infrastructure; and, Landscape will be amended broadly in line with Natural England's proposed changes, although it considered that in some instances the suggestions are repetitive e.g. the proposed issues suggested for Biodiversity and Housing. For the sake of brevity this issues is proposed to be identified only once as an amendment to the issues under Biodiversity, Geodiversity and Green Infrastructure.</p> <p>An amendment to Transport and Access to Services will be included, however, it should be noted that the GNLP does not represent the Transport Strategy for Greater Norwich, which remains separate and within the legal competence of Norfolk County Council as Highway Authority not the Greater Norwich districts. Thus the key issue issue for the GNLP SA will relate to transport infrastructure which is a direct consequence of development promoted within the plan and transport issues related to the scale and distribution of development not wider transport policy or issues, which likely falls outside the scope of this plan.</p> <p>The comments provide in relation to Water efficiency appear to be more directed to policy development rather than evaluating the effects of the GNLP or monitoring the Sustainability Baseline and will be considered in this context.</p>	

## Monitoring Indicators

### Biodiversity

It is accepted that the current indicators for biodiversity are not directly related to the likely impacts of the plan. However, they are useful information giving an overview of the state of important sites and are thus considered to remain appropriate as part of the monitoring framework.

The suggested indicator relating to adverse impact on sites of acknowledged biodiversity importance is not considered appropriate as currently written because it will be a development not be an application that will have an impact on biodiversity nor does it seem useful to measure effects which might be minor and fully mitigated. In the spirit of the proposed modification it is suggested that a better worded indicator would be *“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”*.

There are significant concerns with the other two proposed indicators for Biodiversity. This is on the basis of the inherent complications with the proposed approach and resultant potential to give a false perception of success or failure. Issues that are likely to arise from the advocated approach are how to compare biodiversity enhancements for abundant species such as blackbirds, which may see a net benefit as a result of garden land and recreational open space through new development, against the loss of habitat for less abundant species, such as sky larks as a result of the loss of agricultural land. Similar issues arise in terms of measuring hectares of biodiversity habitat. Consequently it is not considered appropriate to add this indicators to the SA report at this stage, although if a solution to these issues can be found then the indicators could be introduced at a later stage.

### Landscape

The indicator “percentage of new and converted dwellings on Previously Developed Land” for monitoring landscape impact was proposed on the basis that the effective use of previously developed land, which is mainly to be found in built up areas, is likely to be effective in terms of minimising impacts on landscape sensitivities. It is considered to remain appropriate to monitor landscape impact, in part, by using this indicator.

Natural England’s alternative indicator of “new development within the setting or on the boundary of the Broads with commentary on likely impact” is considered somewhat unwieldy, with the potential for quite long commentaries on how the extent of landscape impact was evaluated. The indicator is also somewhat imprecise it does not define what would be considered to be “within the setting” of the Broads. Consequently it is suggested this issue is addressed by the following indicator, which is considered to retain the spirit of Natural England’s intention:

“Number of Planning Approvals granted contrary to the advice of the Broads Authority on the basis of adverse impact on the Broads landscape”.

### Green Infrastructure

Natural England’s propose monitoring the “number of planning approvals that generated loss of existing strategic Green Infrastructure”. There are however concerns that this will be impractical as a measure due to both difficulty of establishing a reliable baseline and effectively defining what could be termed “strategic green infrastructure”. Consequently it is not considered that it would be appropriate to incorporate this indicator at this stage. Notwithstanding the above, if a solution to these issues can be found then the indicators could be introduced at a later stage.

The proposed indicator “percentage of the population living within 400 metres of a natural green space” is considered to have some merit. As currently drafted however it is not well related to the effect of the plan and it is imprecise in terms of what would be considered to be a natural green space. Therefore it is proposed that the following indicator be used which addresses some of these concerns but retains the spirit of the new indicator: “Percentage of allocated residential developments sites, or sites permitted for residential development of 10 or more homes, that have access to a semi-natural green space of at least 2ha within 400m”.

There are also concerns with the proposed indicator monitoring the “length of new greenways constructed or protected”. This is again because it is to some degree imprecise as it does not necessarily directly relate to the plan, the overall state of any greenway network and could give a false impression i.e. Xkm of greenway “protected” but against no pressure for its loss. Therefore it is proposed that the following indicator be used which addresses some of these concerns but retains the spirit of the new 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”.

The final suggested indicator “hectares of accessible open space per 1,000 population” would have benefit in terms of the overall state of the sustainability baseline, but as currently written could make it difficult to ascertain the relative success of the plan e.g. quantitative losses or gains as a result of new development would be masked as a result of being averaged across the whole population. Therefore it is proposed that a better indicator for the plan in the spirit of what is proposed would be “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”.

### Soils

The proposed monitoring indicator for soils appears generally appropriate although data is generally available on the occurrence of Grade 3a agricultural land. Consequently it is suggested that, unless a reliable source of information on the abundance of Grade 3a can be found, that it is not included in the monitoring



target. It is also likely to be more user friendly to relate the indicator to allocation or “Percentage of land allocated for development or subject to an extant planning permission for 5 or more dwellings that is of identified as Grade I or II agricultural land value”

### **Habitat Regulations Assessment**

As per Natural England’s expectations, a separate Habitats Regulations Assessment (HRA) is being undertaken for the Greater Norwich Local Plan, and the recommendation of this assessment will be used to inform the Sustainability Appraisal.

<b>Reference</b>	GNLP_SA_02
<b>Respondent</b>	Environment Agency
<b>Officer Response</b>	
<p>As recently agreed with the Environment Agency, there will be a level 1 SFRA for the whole of Norfolk. This will address fluvial and surface water flood risk issues taking account of climate change. A level 2 SFRA will be undertaken if development is proposed in areas where there is a requirement for the exceptions test to be undertaken.</p> <p>Policy alternatives for climate change mitigation and adaptation will be developed as part of the plan making process and considered within the SA report. The potential for an increase in frequency and intensity of extreme weather events is identified as a climate change issue in section 2.5.</p> <p>In accordance with the request of the EA further emphasis will be added to Section 5 of the SA report to specifically address the Anglia River Basin Management Plan, and its 2015 update. Specifically, paragraphs 5.2.7 and 5.2.9 will include an explanation of the role of the Anglian River Basin Management Plan (RBMP), the role of the Broadland catchment partnership and the need to consider impact on an area wider than the GNLP covers. A paragraph will be added to the baseline to summarise the issues in the Broadland rivers catchment, and an issue will be added to consider the measures of the RBMP and the issues in the Broadland Rivers Catchment Plan. See actions.</p> <p>Whilst the overarching objective for SA16 is considered to remain appropriate, dealing with both water quality and the efficient use of water, to address the issue raised by the EA a new bullet point will be added to the decision making criteria asking the question “will it contribute to achieving the River Basin Management Plan actions and objectives”.</p> <p>To address issues raised by EA in regards to recognising the importance of other water courses alongside the Wensum, paragraph 5.3.15 will be broadened as recommended.</p>	

<b>Reference</b>	GNLP_SA_03
<b>Respondent</b>	Campaign to Protect Rural England (CPRE) (Norfolk)
<b>Officer Response</b>	
<b>Covering email</b>	
<p>National Planning Practice Guidance clearly states that “<i>Plan makers should not apply constraints to the overall assessment of need</i>” (for housing). This includes things such as environmental constraints”. This does not mean that environmental constraints are not an essential consideration in plan making, nor that where there are very significant detrimental impacts, or insurmountable local constraints, that the overall need must always be met. It does, however, mean that the starting point for any local plan making process should be to evaluate whether the overall need for development, as established through relevant fact finding and research studies, can reasonably be met.</p> <p>It is not within the remit of the SA scoping report to consider the Greater Norwich Local Plan (GNLP) policy alternatives, including how it proposes to deal with the need for development, the retention of the NPA/RPA, the settlement hierarchy or a potential green belt. Policy alternatives will be developed as part of the plan making process and considered appropriately in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. For the purposes of transparency it should be noted that, to date, whilst a number of issues exist, no constraints have been identified which are considered to indicate that Greater Norwich will not be able to accommodate its need for development.</p> <p>The Strategic Housing Market Assessment (SHMA), which identified the need for housing, was produced in accordance with accepted practice. The robustness of the assessment will be tested through an independent examination and stakeholders will have the opportunity to comment on the robustness of the housing figures during the production of the GNLP.</p> <p>Independent Inspectors have obligated South Norfolk and Broadland to review their current local plans by 2020 and 2021 respectively. For the reasons set out above, these local plans must consider if and how the objectively assessed need for development can be met. Therefore the Council’s consider it untenable to adopt an approach where they refuse to plan for growth until existing commitments are developed. In reality, should the Councils refuse to plan for identified development needs new development would still come forwards as planning applications. In the absence of a coherent strategy the Councils’ would be less able to effectively manage this development in a manner which best aligns with the availability of infrastructure and services.</p>	
<b>Section 2: Climate Change (and Flood Risk)</b>	
<p>CPRE’s statement that there is no issues list at the end of section 2 is incorrect. The issues relating to section 2 are set out in paragraph 2.5 of the scoping report.</p>	

Bullet point of 2.2.2 is considered to be an accurate reflection of the core policy set out in paragraph 100 of the NPPF. The procedures for avoiding flood risk both within the JCS, and in general across the planning function of the Greater Norwich Authorities is considered effective. The CPRE offer no evidence of their assertion to the contrary. It should be noted that there will be an update to the Strategic Flood Risk Assessment (SFRA) for Greater Norwich will be prepared during the production of the GNLP: there will be a level 1 SFRA for the whole of Norfolk. This will address fluvial and surface water flood risk issues taking account of climate change. A level 2 SFRA will be undertaken if development is proposed in areas where there is a requirement for the exceptions test to be undertaken. Notwithstanding the above, it is not within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and the CPRE will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

There is no justification provided that would support the CPRE's opinion that incorporating site allocation into a local plan would risk only a superficial attention to environmental considerations, such as flood risk and water supply". Sites will be allocated following an evaluation which will consider all relevant matters. The reasoned justification for the selection of site allocations and reasonable alternatives, including support site evaluations will be set out at future points of the plan making process and the CPRE will have an opportunity to make representations should they consider this to be flawed.

### **Section 3: Biodiversity, Geodiversity, and Green Infrastructure**

The importance of water quality in terms of biodiversity is set out in 3.3.1 and 5.3.15. The requirements of the WFD is specifically identified in paragraph 5.2.2. The issues relating to recreational pressure is set out in paragraph 3.2.19. Issues relating to water abstraction to serve new development, whilst protecting environmental interests, specifically the River Wensum SAC is set out in paragraph 5.3.7. Therefore the broad range of the interrelated issues between biodiversity, water and housing are considered to be covered by the SA scoping report. The matters identified in paragraph 3.5 are considered to accurately reflect the key biodiversity issues for the plan whilst reflecting the hierarchy of international, national and locally designated sites ensuring that protection is commensurate with their status and gives appropriate weight to their importance.

Notwithstanding the above the reference in 5.3.15 will be broadened to regards to recognising the importance of other water courses alongside the Wensum

### **Section; 5 Water**

The SA scoping is considered to effectively set out the key range of issues in regards to water. Notwithstanding the above, the first bullet under paragraph 5.5 will be broadened to more explicitly reference the range of factors set out by the CPRE.

The relocation of the Costessey abstraction point was determined to be an effective solution to the issues confronted within the area. This solution was

establish through Anglian Water's Water Resource Management Plan (WRMP), which was developed in discussion with statutory regulators and subject to all necessary environmental assessments. The GNLP SA Scoping recognises this reality.

In regards to water efficiency policies, it is not within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and the CPRE will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

Whilst CPRE suggest Long Stratton is one "of many" cases where the capacity of waste water treatment works will constraint planned growth, no other examples are actually cited. All of the allocations made in accordance with the requirement of the JCS, including the Local Stratton area action plan were subject to Independent Examination and found to be an appropriate basis on which to plan for the area. Considerations at the examination included deliverability.

## **Section 12: Transport and Access to Services**

The local context section accurately describes the transport plan, its objectives and the key issues for Greater Norwich. Major road schemes do form part of this strategy and these are listed in the first three bullet points under 12.2.10. Norfolk County Council, as Highway Authority, are investigating the potential for a "western link" between the A1067 and A47, however this does not form part of the adopted local transport plan, or Norwich Area Transport Strategy. Consequently it is not reflected in the Local context section.

Whilst road scheme are a key part of the transport plan, it is not true to say that they are its sole focus. For example, 12.2.11 identifies that "promoting active and healthier travel options for short journeys to schools, services and places of employment" is also a specified transport plan priority. Paragraphs 12.3.13 to 12.3.18 details actions undertaken or underway to improve cycling facilities, public transport services and the city centre.

The importance of connections to the countryside for health and wellbeing is accepted. To this end a further issue will be added to Health section of the SA at paragraph 9.5: **"it will be important to maintain and enhance links to the countryside and semi-natural open spaces to encourage physical activity and mental well-being"**.

CPREs comments in regards to the desirability/need for the western link are noted. The Highway Authority will continue to consider options for a western link as part of the evolution/revision of their transport plan. The GNLP will react as appropriate to the Western Link if and when further progress is made. It is not within the remit of the SA scoping to consider how the GNLP will react to the Western Link. Policy alternatives will be considered in later iterations of the SA and the CPRE will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

## **Section 14 Employment and the Economy**

The general approach to assessing the need for development is addressed in the response to CPREs covering email. For the sake of brevity this discussion is not repeated here. The jobs ambitions of the LEP economic plan and Greater Norwich City Deal are relevant to the development of the GNLP, and are appropriately taken into account in the SMHA. It is not within the remit of the SA scoping to consider the GNLP policy response to these matters. Policy alternatives will be considered in later iterations of the SA and the CPRE will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

<b>Reference</b>	GNLP_SA_04
<b>Respondent</b>	Cllr A Boswell (Green Party Norfolk County Council)
<b>Officer Response</b>	
<p>The purpose of the SA Scoping is not to address the decision making processes as they relate to the production of the GNLP. However, for the sake of clarity, it should be noted that the SA Scoping Report was considered by Broadland District Council's Place Shaping Committee, Norwich City Council's Sustainable Development Panel and South Norfolk Council's Cabinet prior to its publication. All of these meetings were held in public. The revised scoping report, amended as appropriate taking account of representations will also be reported to the appropriate committee of each of the councils.</p> <p>The concerns raised about the scoping report exaggerating, or misrepresenting the Councils achievements in relation to the success of the environmental policy are noted. Every effort is made to ensure information provided is reliable. Where concerns have been raised with a specific statement then these will be addressed in this response.</p> <p>It is agreed that the SA should appraise and document the significant effect of the Greater Norwich Local Plan in an honest way and every effort will be made to do so. To this end an expert consultant, LEPUS, has been appointed to advise on the production of the SA including reviewing alternatives, verifying appraisals and ultimately preparing the final SA report to accompany submission of the final plan for independent examination.</p>	
<b>Energy</b>	
<p>Whilst it is accepted that energy is an important issue it is not considered that it is necessary to identifying energy as a separate section, as issues can be appropriately identified within the climate change chapter.</p>	
<b>Air Quality and Noise</b>	
<p>The heading to the Air Quality and Noise section will be amended to read <b>"International and National"</b> as suggested.</p> <p>The national context section will be amended to identify the implications of the 2015 Supreme Court and 2016 High Court judgements related to Air Quality as set out in the proposed actions below.</p> <p>Issues relating to the impact of (poor) air quality on human health will be added to Section 9 Health as set out in the proposed actions below.</p> <p>As suggested, regard will be given to the Mayor of London's Clean Air Action Plan in developing the policies of the GNLP. It is not, however, within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are</p>	



evaluated in the SA report. It should be noted that it will be more appropriate to address certain matters relating to Air Quality during a review of the Transport Plan or Norwich Area Transport Strategy.

Paragraph 1.3.1 of the SA report does acknowledge that road infrastructure changes along with longer term measures such as travel planning (emphasis added) are necessary to address the air quality issues. Notwithstanding the above paragraph 1.3.1 will be amended as set out in the actions section to reflect concerns raised.

The further measures, that in the respondent's view, may reap rapid enhancements and sustained improvements to air quality, are not those which can be addressed through a Local Plan e.g. greater priority for bus emission standards in awarding contracts for bus services.

It is noted that the respondent wishes to see more stringent targets be put in place in regards to NO<sub>2</sub> levels and Particulates (PMs). At the scoping stage it is considered inappropriate to set out targets, as this is a matter that would be more appropriate to address through a review of the Transport Plan, Norwich Area Transport Strategy and/or City of Norwich Air Quality Action Plan. These are the plans which cover the largest range of issues that will affect the Norwich AQMA. Notwithstanding the above, Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP, whether they consider there are any omissions from policy and how they are evaluated in the SA report.

The first bullet point under 1.4 will be amended to remove the generalised reference to air quality across the Greater Norwich area as set out in the actions section below.

## **Climate Change**

The heading to the Climate Change section will be amended to read "International and National" as suggested.

It is unclear what is meant by making use of the UK Climate Change Act CCA in a "creative way". It is the intention of the SA scoping report to establish the relevant legislative and policy context in which the GNLP is being produced in so far as it relates to the assessment of significant effects of the plan on Social, Environmental and Economic factors.

The respondents concern about referring to the 2020 target as "interim" it noted. It should be noted that it is also referred to as an interim target in DECCs Annual Statement of Emissions for 2014, published in March 2016. Also this statement refers to the reduction required by 2020 (relative to 1990 levels) being 34% rather than the 35% reduction stated on the Committee on Climate Change website. The Planning Policy Guidance also refers to 34%. Notwithstanding this there is no objection to removing the interim reference and also providing further specificity in terms of the carbon budget for the periods 2018-2022 and 2023-2027. As such the current baseline section will be amended as set out in the actions. It should further



be noted that the reference to the reduction required by 2020 (relative to 1990 levels) being 34% is taken directly from the governments Planning Policy Guidance, which is of course different to the 35% reduction stated on the Committee on Climate Change website.

The request for the GNLP to enshrine the highest aspirations possible in terms of the local contribution to the CCA is noted. It is not, however, appropriate for the SA scoping to seek to establish the objectives, or policy ambitions of the GNLP. Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

It is recognised that some of the documents and strategies listed in the local context section are either dated, or have passed the stated lifespan. Nonetheless they remain document that have been produced and adopted by a relevant body in the recent past. Consequently it is considered to remain appropriate to reference these documents in the sections which sets out the local context.

The concern of the respondent in relation to Norwich City's support for the NDR is noted. This does not, however, indicated that, as part of the local context, Norwich City Council's Carbon reduction target should not be referenced as a relevant plan or programme for the purposes of the SA scoping report.

The concern that support for the NDR may have undermined local improvement to transport emissions is also noted. It is also true to say that the Examining Authorities Report acknowledged that the scheme would lead to an immediate and on-going increase in carbon emissions as compared with the 'Do-Minimum' scenario. However, the Examining Authority also noted that these increases may be mitigated in future by efficiency improvements promoted in future carbon budget rounds and that the evidence does not show that the impact of the scheme will, in isolation, affect the ability of the Government to meet its carbon reduction targets, nor the fulfilment of the overarching national carbon reduction strategy.

Taking the above points into account paragraph 2.39 will be amended to more fully explain the findings of the Examining Authorities in terms of the NDR, its effect on emissions and the relationship to the national carbon reduction strategy.

The reference to other transport scheme, which the respondent considers to be high carbon (A47 and Western Link), are noted. As evidence emerges in relation to the impact of these schemes then this can be related in future iterations of the SA scoping report.

As acknowledged in this proposed new text at 2.2.6 government is currently working on its emissions reduction strategy. This will set out how the UK intends to decarbonise, including in regards to transport, over the 2020s to meet its carbon budgets. In recognition of this emerging strategy a new issue is identified under 2.5.

## **Energy**

It is noted that the respondent considers that current policy JCS3 should be formed into a scoping criteria, that policy should set a higher target and that there should be active promotion of certain technologies. It is considered to be inappropriate for the SA scoping report to use a current policy, that is under review, as a scoping criteria. As previously identified Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. It should be noted that it will be more appropriate to address certain matters relating to Air Quality during a review of the Transport Plan or Norwich Area Transport Strategy.

## **Baseline**

It is noted that the respondent considers that there should be numerically creditable carbon footprinting, carbon accounting and carbon appraisal underpinning policy development. In support of this position the respondent refers to statements made by Inspector David Vickery during the examination of the resubmitted JCS.

Whilst it is true to say that additional work was required to show the likely relative performance of reasonable alternative distributions in terms of vehicle (road transport) emissions, this did not take the form of the numerical assessment suggested. Indeed within the document referred to by the respondent the Inspector acknowledges that the inappropriate use of numeric models could give rise to fictitious precision. This is within the part of the quote from the document omitted by the respondent in his representation.

Such work as may reasonably be required will be include in the SA report, and it is likely that this would include the type of analysis provided in the SA Report Addendum, September 2015, which was provided to meet the expectations of Inspector Vickery. However, it is not currently considered that a full numerical carbon assessment, as promoted by the respondent, is reasonably required as part of the Sustainability Appraisal of the GNLP.

The respondent's further comments in terms of the judicial review of the JCS as originally adopted are acknowledged. In particular the concern that alternatives were based on a singular model for transport. It is of course the case the relationship of the JCS to the proposed Norwich Northern Distributor Road was considered by Mr Justice Ousely as part of the judicial review. In particular Mr Justice Ousely concluded that it was for the highway authority to plan and promote the NDR through its plans and that as such there were no reasonable alternatives for the District Councils to consider, since transport was not within their statutory competence<sup>1</sup>.

Moreover, Mr Justice Ousely suggests that It would be unwise, if not impossible, to create a coherent strategy for any plan if the proposals for major infrastructure were ignored<sup>1</sup>.

<sup>1</sup> Approved Judgement, Heard V Broadland District Council, South Norfolk District Council, Norwich City Council, paragraphs 76, 79 and 78

The respondent asks how the potential for increased renewables will be realised and his concerns about biomass. As has been previously stated It is not considered to be within the remit of the SA scoping report to consider policy alternatives. Policy alternatives will be considered in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. This will include policies related to renewable energy.

Finally, the concern that the importance of Climate Change is not properly reflected in the SA report is noted. Elsewhere in this response the proposed changes to the section on climate change has been sign posted, which have taken into account representations submitted. This includes an amendment to 2.2.2 quoting from the HM Government response to the Committee on Climate Change's progress report which acknowledges climate change "as one of the most serious risks we face.

<b>Reference</b>	GNLP_SA_05
<b>Respondent</b>	Cllr D Carlo (Green Party Norwich City Council)
<b>Officer Response</b>	
<b>Air Quality</b>	
<p>The reference in paragraph 1.3.8 that air quality is likely to remain a major issue is not intended to suggest that air quality will continue to exceed nitrogen dioxide limits throughout the plan period but rather that, as a focus of travel movements, it is likely that continued monitoring and interventions will need to be made to ensure that there is no regression from the impact of planned actions.</p> <p>The Council's note the comments in regards to the health impacts of particulate matter and a further paragraph will be added to the baseline in the Health section of the report to reflect this issue. See actions.</p> <p>Whilst it is accepted that the impact of the GNLP in regards to air quality is an important consideration, the primary mechanisms through which issues of air quality addressed with be the Local Transport Plan and any related strategy of the Highway Authority, and through the measures identified within Air Quality Action Plans.</p>	
<b>Climate Change</b>	
<p>The climate change section will be revised taking into account this and other comments. See actions.</p> <p>The comments made in terms of the current JCS objectives, and proposed replacement objectives in the GNLP are noted. It is not within the remit of the SA scoping to consider the GNLP objectives. Plan objectives will be considered evaluated against the SA framework in to help maximise benefits and minimise detrimental effects. Stakeholders will have the opportunity to both comment on the draft Objectives of the GNLP and how they are evaluated in the SA report.</p> <p>The SA report includes a map of flood risk zones 2 and 3, which take account the effects of climate change and forms the current baseline for the plan. A stage 1 Strategic Flood Risk Assessment will be updated as part of the production of the GNLP and the implications of this update will be taken into account as part of plan production.</p> <p>To give carbon emission greater prominence, paragraphs 2.3.8 and 2.3.9 and figures 12 and 13 will be moved to the beginning of the Baseline section to be renumbered 2.3.1 and 2.3.2.</p> <p>Cllr Carlo's view that a plan is <u>required</u> to drastically reduce emissions in line with the legally binding Climate Change Act target of at least 80% on 1990 levels by 2050 (emphasis added) is noted. Whilst the CCA is clearly a relevant plan and programme it is not considered that the GNLP could reasonably be required under the Act to deliver a reduction commensurate with the CCA carbon budgets, which</p>	

are understood to be only binding at the national level. Indeed, given the defined scope of a Local Plan it would be unreasonable to expect it to achieve a target which relates to the full range of government policy.

The additional issues identified are noted. The second bullet under 2.5 is considered to sufficiently address issues related to coastal flooding.

It is considered that the proposed issue “The creation of infrastructure for facilitating the transition to zero carbon transport” could be more appropriately expressed if defined in relation to the forthcoming emissions reduction plan. Therefore an additional issue will be added along these lines.

The issue identified in relation to brownfield sites is considered better located within the natural resources, waste and contamination section. Therefore an addition is proposed to 13.5

### **Transport and Access to Services**

The Highway Agency will be consulting on potential improvements to the A47 in the near future. This is a result of the recognition of issues that need to be addressed and the SA Scoping reports reference is considered to be appropriate in this context.

The reference to completion of the NDR means that as described in the Development Consent Order. For the avoidance of doubt there will be an amendment to the issues under 12.5. See actions.

The first three additional issues proposed are considered to be covered by the first issue under 12.5.

The third bullet point will be amended to reference local rail services.

The fourth bullet point addressed rural transport issues appropriately.

The final propose issue is not considered to be justified. It is not a foregone conclusion that economic development will be linked to the need to build additional roads. However, in certain circumstances it may be that this is the appropriate response and to address this as an issue would be presumptive. Notwithstanding it will be for the Highway Authority or Agency to promote major road schemes as part of their transport strategy.

<b>Reference</b>	GNLP_SA_06
<b>Respondent</b>	Norwich Green Party
<b>Officer Response</b>	
<p>The comments in regards to air quality and climate change are noted. As a result of representations on the plan, amendments have been made to a number of sections including air quality and climate change section.</p>	
<b>Air Quality</b>	
<p>Paragraph 1.3.1 identifies the air quality management area within Norwich. It is recognised that the national context section does not refer to the 2015 supreme court judgement or the 2016 high court judgement or their implications. Therefore The national context section will be amended to identify the implications of the 2015 Supreme Court and 2016 High Court judgements related to Air Quality as set out in the actions section.</p>	
<p>The Council's note the comments in regards to the health impacts of particulate matter and a further paragraph will be added to the baseline in the Health section of the report to reflect this issue. See actions.</p>	
<p>Whilst it is accepted that the impact of the GNLP in regards to air quality is an important consideration, the primary mechanisms through which issues of air quality addressed with be the Local Transport Plan and any related strategy of the Highway Authority, and through the measures identified within Air Quality Action Plans.</p>	
<p>Paragraph 1.3.1 of the SA report does acknowledge that road infrastructure changes <u>along with longer term measures such as travel planning</u> (emphasis added) are necessary to address the air quality issues. Notwithstanding the above paragraph 1.3.1 will be amended as set out in the actions section to reflect concerns raised.</p>	
<b>Climate Change</b>	
<p>At 2.3.8 and 2.3.9 the report defers to DECC and ONS and ONS statistics on per capita emissions. Those statistics are considered reliable and, as stated in the report, show that there have been reductions in per capita CO2 emissions at all geographic levels.</p>	
<p>Notwithstanding the above a series of amendments are proposed to the climate change section to take account of these and other comments. See actions. These amendments provide greater specificity about the carbon budget requirements, the Committee on Climate Changes 2016 progress report and governments response</p>	

to it and the findings of the NDR DCO examination in regards to emissions and the relationship of the scheme to carbon budget requirements.

The SA report includes a map of flood risk zones 2 and 3, which take account the effects of climate change and forms the current baseline for the plan. A stage 1 Strategic Flood Risk Assessment will be updated as part of the production of the GNLP and the implications of this update will be taken into account as part of plan production.

## **Housing**

The Council's note the Green Party's desire to see all new building meet higher building standards. In the additional commentary provided in regards to climate change the Government's position in regards to the need to continue improving building standards is reflected. It should however be noted that the Deregulation Act 2015 (s43) amended the Planning and Energy Act 2008 so that local plan energy efficiency standards for housing will not be able to exceed building regulations. This is a further demonstration that it is not the Government's intention that the challenge set by the Climate Change Act will be met across a range of policy stands, not just planning.

Notwithstanding the above, it is not within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and the Green Party will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

The issue identified in relation to minimising the release of greenfield sites is addressed by an additional issue set out under 13.5 the natural resources, waste and contamination section.

## **Transport**

The objections in regard to the statements in relation to the NDR are noted but are considered to be an accurate reflection of the Transport Plan and Norwich Area Transport Strategy's position and intent. Therefore it is not considered that any change is necessary.

The reference to completion of the NDR means that as described in the Development Consent Order. For the avoidance of doubt there will be an amendment to the issues under 12.5. See actions.

The third bullet point under 12.5 is considered to sufficiently cover the necessary reference to walking, cycling and public transport.

## **People and Communities**

The Green Parties comments in terms of community-led initiatives is noted. They are, however, felt to be more directly related to the form and remit of policies within the plan. Indeed, the concern raised in the response refers to an opportunity being missed to write important issues into planning policy. It is not within the remit of the SA scoping report to consider the GNLP policy alternatives. Policy alternatives will be considered in later iterations of the SA and the Green Party will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report.

## **Health**

It is accepted that, alongside access to health care services, strong communities, well-designed places and access to green spaces are important to health and wellbeing. Indeed the Sustainability Framework objective under SA8 specifically focuses on healthy lifestyles.

In particular, the importance of connections to the countryside and open spaces for health and wellbeing and that new development should contribute to active and healthy lifestyles is accepted. To this end two further issues will be added to Health section of the SA at paragraph 9.5, see actions.



<b>Reference</b>	GNLP_SA_07
<b>Respondent</b>	Cllr S Jackson (Green Party Norwich City Council)
<b>Officer Response</b>	
<p>It is agreed that town planning has a significant impact on the opportunities afforded to people. The sustainability appraisal would however be better described as a document which seeks to set a framework that enables the systematic appraisal of the significant environmental, social and economic effects of a plan (in order to help maximise benefits and minimise negative effects), rather than one that talks about the “tactics” of trying to achieve sustainability.</p> <p>The draft SA Framework, with modifications as a result of consultation, is considered to be suitable for this purpose.</p> <p>The issues section has been amended to provide more detail around air quality, see actions. In addition the Sustainability Appraisal Framework, under SA1, will require local plan policies to be assessed as to their significant effects in relation to the objective to “minimise air, noise and light pollution to improve well-being.</p> <p>The issues section has been amended to provide more detail around climate change, see actions. Under SA2 policies will be assessed as to their significant effects in relation to the objective to “Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change”. Specific decision making criteria include whether a policy would support decentralised and renewable energy generation. It should however be noted that the Deregulation Act 2015 (s43) amended the Planning and Energy Act 2008 so that local plan energy efficiency standards for housing will not be able to exceed building regulations.</p> <p>Under SA12 policies will be assessed as to their significant effects in relation to the objective to “Reduce the need to travel and promote the use of sustainable transport modes”.</p> <p>Under SA8 policies will be assessed as to their significant effects in relation to the objective “To promote access to health facilities and promote healthy lifestyles”.</p> <p>Under SA9 policies will be assessed as to their significant effects in relation to the objective “To reduce crime and the fear of crime”, with a specific decision making criteria being “Will it help design out crime from new development?”</p> <p>In doing so the evaluation of the significant effect of policies against the SA Framework will address exactly the issues raised in the representation.</p> <p>The objection to the NDR as part of a sustainable transport strategy is noted. It is however considered to be an accurate reflection of the Transport Plan and Norwich Area Transport Strategy’s position and intent. Therefore the situation is deemed to have been appropriately reflected in the SA Scoping Report.</p>	

<b>Reference</b>	GNLP_SA_08
<b>Respondent</b>	Hempnall Parish Council
<b>Officer Response</b>	
<p>National Planning Practice Guidance clearly states that “<i>Plan makers should not apply constraints to the overall assessment of need</i>” (for housing). This includes things such as environmental constraints”. This does not mean that environmental constraints are not an essential consideration in plan making, nor that, where there are very significant detrimental impacts, or insurmountable local constraints, that the overall need must always be met. It does, however, mean that the starting point for any local plan making process should be to evaluate whether the overall need for development, as established through relevant fact finding and research studies, can reasonably be met.</p> <p>It is not within the remit of the SA scoping report to consider the Greater Norwich Local Plan (GNLP) policy alternatives, including how it proposes to deal with the need for development or the retention of the NPA/RPA or the settlement hierarchy. Policy alternatives will be developed as part of the plan making process and considered appropriately in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. For the purposes of transparency it should be noted that, to date, whilst a number of issues exist, no constraint has been identified which are considered to indicate that Greater Norwich will not be able to accommodate its need for development.</p> <p>The Strategic Housing Market Assessment (SHMA), which identified the need for housing, was produced in accordance with accepted practice. The robustness of the assessment will be tested through an independent examination and stakeholders will have the opportunity to comment on the robustness of the housing figures during the production of the GNLP.</p> <p>Landscape impacts will be one of a number of key considerations. Section 4 of the SA Scoping Report deals specifically with landscape issues, and the Sustainability Appraisal Framework contains a specific objective relating to Landscape. Policies of the emerging local plan will be assessed against the SA Framework to establish any significant effect and to help maximise benefits and minimise negative effects. One of the specific decision making criteria under the landscape objective is to minimise impact on landscape character.</p>	

<b>Reference</b>	GNLP_SA_09
<b>Respondent</b>	Historic England
<b>Officer Response</b>	
<p>Regard will continue to be had to published guidance on the Sustainability Appraisal (SA) during its production, this will include the guidance published by Historic England.</p>	
<b>Built Heritage</b>	
<p>The heading of section 6 will be changed to Historic Environment</p>	
<b>Key Plans and Programmes</b>	
<p>Relevant 'Plans and Programmes' will continue to be reviewed during the production of the SA, including those listed by Historic England, and taken into account a future iterations to be published at the same time as the issues and options consultation on the Greater Norwich Local Plan (GNLP) and the final report to be published alongside the submission of the GNLP for Independent Examination.</p>	
<b>Baseline Information</b>	
<p>Both statutory Historic Parks and Gardens and Locally Designated Historic Parks and Gardens are identified and mapped in Section 4: Landscape. See paragraph 4.3.7 and figures 29-32.</p>	
<p>Section identifies mapped information on locally designated heritage assets as a key data limitation. This continues to be the case. Area which may have the potential for historic or archaeological interest which are currently unidentified is another, nut currently unacknowledged, data limitation. As part of the production of the SA for the GNLP work will towards addressing current data limitations in future iterations of the SA. The data limitation section will be amended reflect unidentified heritage assets.</p>	
<p>Conservation Area Appraisal and Management Plans, Local Lists and Historic Characterisation Assessment, where available, will be taken into account as appropriate when policies are evaluated against the SA Framework.</p>	
<b>Key Sustainability Issues</b>	
<p>The issues identified will be added under 6.4 where appropriate, see actions. It should be noted that landscape issues are considered in section 4 of the report not in section 6. Therefore issues relating to the historic landscape will be dealt with in that section.</p>	
<p>Figure 82 is a summary of all of the issues identified throughout the report. The SA Framework includes objectives on Cultural Heritage, this will be amended to refer</p>	

to the Historic Environment. The appraisal of policy alternative will consider the significant effects of the plan, both positive and negative, in relation to the SA objectives. This process will help benefits of the plan to be maximised and detrimental effects minimised. It is through this process that opportunities offered by the historic environment can be established and any benefits maximised.

### **The Sustainability Framework**

SA13 will be retitled Historic Environment

The overarching objective will be revised taking into account Historic England's comments

The word "designated" will be deleted from the first bullet point of the decision making criteria under SA13.

Relevant stakeholders will be engaged during the production of the Greater Norwich Local Plan, this engagement will include, as appropriate local conservation officers, archaeological officers and local heritage groups.

<b>Reference</b>	GNLP_SA_10
<b>Respondent</b>	Norfolk County Council
<b>Officer Response</b>	
<p>The Greater Norwich Local Plan will appropriately consider infrastructure issues, and these issues are covered in a proportionate manner within the SA scoping report. Specifically SA Objective 12 addresses transport issues. Green Infrastructure is already considered to be adequately addressed under objective SA3. An additional criteria will be added to SA14, see actions. The objectives and decision making criteria relations to SA5, SA6 and SA8 are considered to adequately address likely Adult Social Care requirements. SA10 directly deals with education.</p> <p>Section 4 will be retitled Historic Environment.</p>	

<b>Reference</b>	GNLP_SA_11
<b>Respondent</b>	A Member of Wensum Valley Alliance (WVA)
<b>Officer Response</b>	
<p>The consultation on the scope of the Sustainability Appraisal (SA) exceeded the legal obligation. The Councils are only obliged to consult with Natural England, the Environment Agency and Historic England on the scope of the SA. A full public consultation on the Greater Norwich Local Plan, accompanied by an interim sustainability appraisal, will be undertaken in due course and all stakeholders will have the opportunity to response to both the emerging policy alternatives and how they are being appraised through the SA at this point.</p> <p>National Planning Practice Guidance clearly states that “<i>Plan makers should not apply constraints to the overall assessment of need</i>” (for housing). This includes things such as environmental constraints”. This does not mean that environmental constraints are not an essential consideration in plan making, nor that, where there are very significant detrimental impacts, or insurmountable local constraints, that the overall need must always be met. It does, however, mean that the starting point for any local plan making process should be to evaluate whether the overall need for development, as established through relevant fact finding and research studies, can reasonably be met.</p> <p>The Strategic Housing Market Assessment (SHMA), which identified the need for housing, was produced in accordance with accepted practice. The robustness of the assessment will be tested through an independent examination and stakeholders will have the opportunity to comment on the robustness of the housing figures during the production of the GNLP. Further evidence is being development in respect to the land requirements for employment land.</p> <p>It is not within the remit of the SA scoping report to consider the Greater Norwich Local Plan (GNLP) policy alternatives, including how it proposes to deal with the need for development, transport (in so far as transport matters fall within the remit of the local plan). Policy alternatives will be developed as part of the plan making process and considered appropriately in later iterations of the SA and stakeholders will have the opportunity to both comment on the draft policies of the GNLP and how they are evaluated in the SA report. For the purposes of transparency it should be noted that, to date, whilst a number of issues exist, no constraint has been identified which are considered to indicate that Greater Norwich will not be able to accommodate its need for development.</p> <p>The reference to completion of the NDR means that as described in the Development Consent Order. For the avoidance of doubt there will be an amendment to the issues under 12.5. The Greater Norwich Local Plan will have regard as appropriate to the progress of current investigation into the Western Link during the production of the plan.</p> <p>Figure 19 shows SSSIs, Figure 20 shows CWS, as well as National Nature Reserves, Local Nature Reserves, Roadside Nature Reserves. Figure 30 shows</p>	

ancient woodlands. Whilst these are at a large scale they include all relevant designated sites.





**Report to** Sustainable development panel  
25 January 2016  
**Report of** Director regeneration and development  
**Subject** One Planet Norwich - Refashion update

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**Item**

**6**

**Purpose**

This report informs members of the outcomes of the One Planet Norwich Refashion event

**Recommendation**

To note the outcomes of the event

**Corporate and service priorities**

The report helps to meet the corporate priorities of as safe, clean and low carbon city

**Financial implications**

Within existing budgets.

**Ward/s:** All wards

**Cabinet member:** Councillor Bremner – Environment and sustainable development

**Contact officers**

Richard Willson, environmental strategy manager

01603 212312

**Background documents**

None

## Report

1. This is an update of the ReFashion Norwich event, created under the One Planet Norwich framework. One of the council's key corporate priorities is to 'make Norwich a safe, clean and low carbon city' and within that we have said we will 'reduce the amount of waste sent to landfill'. The event links in with these priorities, as well as Section 8 of the Environmental Strategy on how we will engage and communicate these messages to Norwich citizens.
2. It was the first council run event that aimed to highlight the problems associated with the fashion industry, including textile waste. In Norfolk approximately 8,500 tonnes of textiles that could have been reused or recycled are thrown away every year, and in a recent recycling audit Norwich City Council found that 74% of recycling bins in Norwich contained textiles. The event supported these figures by reinforcing the message of repairing, reusing and recycling textiles to avoid landfill.
3. The presentation is a summary of the event. ReFashion Norwich worked with 26 organisations and approximately 400 visitors attended. The event received great local publicity with features in the EDP, Evening News, Mustard TV and Future Radio. It also gained brilliant feedback from visitors with 100% of participants wanting to see more events similar to this in our city.
4. We welcome any recommendations for events going forward of this type in Norwich.

## Reference

Power point presentation