

Report to	Cabinet	Item
	15 March 2017	
Report of	Head of planning services	5
Subject	Greater Norwich Local Plan: Sustainability Appraisal Scoping Report	

Purpose

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

Recommendation

To agree 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

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Background documents

None

Report

Introduction

1. The purpose of this report is to update Cabinet on the responses to the consultation representations, and relevant adjustments to the Sustainability Appraisal (SA) Scoping Report, which it previously considered and approved for consultation at its meeting on 8 June 2016. The representations and changes have been considered by Greater Norwich Local Plan officers assisted by a specialist SA consultancy and were reported to Sustainable Development Panel on 25 January 2017.
2. It is recommended that Cabinet should note the proposed changes to the draft SA Scoping Report and agree that the finalised version should be used as the basis for appraising policy options and choices in the Greater Norwich Local Plan. The proposed final version of the SA Scoping report, including all the changes referred to in this report, is available here.:

https://www.norwich.gov.uk/downloads/file/3749/final_sustainability_appraisal_scoping_report_march_2017

3. Similar reports have been considered by members at South Norfolk and Broadland district councils as the agreement of each of the Greater Norwich authorities is required to finalise the SA Scoping Report. Both Broadland and South Norfolk have now agreed the proposed changes, including those resulting from the consideration of Sustainable Development Panel.

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:
 - i) Setting the context and objectives, establishing the baseline and deciding on the scope;
 - ii) Developing and refining alternatives and assessing effects;
 - iii) Preparing the Sustainability Appraisal Report when the Local Plan is published;
 - iv) Seeking representation on the Sustainability Appraisal Report from consultation bodies and the public; and
 - v) 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 draft SA Scoping Report which can be viewed at <http://www.greaternorwichgrowth.org.uk/dmsdocument/2166>.

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.

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 CO₂ 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 assessed and responded to the representations made including by recommending that a number of adjustments be made to the SA Scoping Report.
22. In almost all cases, the amendments sought to address the matter raised. However, it is important to note that some of the matters raised were 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 was clarifying where certain matters are 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 were proposed 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 were made to reflect some points made by CPRE Norfolk, but much of their representation related 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 were 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 were 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_x) 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 were 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. Details of the representations made and changes proposed were considered by Sustainable Development Panel at its meeting on 25 January 2017 papers for which are still available [CMIS > Meetings calendar](#)). This meeting resolved to suggest a number of further minor amendments to the SA Scoping Report. Most of these amendments proposed, related to electric and diesel vehicles, green infrastructure and typographical errors have now been incorporated into the final version of the SA Scoping Report. However, on further investigation some suggestions for changes for changes on the monitoring of carbon dioxide emissions and of community cohesiveness did not prove practicable to make. Details of changes made and reasons for not taking forward the other issues are set out in Appendix 1.
29. 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.
30. 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.

Integrated impact assessment



NORWICH
City Council

Report author to complete

Committee:	Cabinet
Committee date:	15 March 2017
Director / Head of service	Head of Planning Services
Report subject:	Greater Norwich Local Plan: Sustainability Appraisal Scoping Report
Date assessed:	6 th March 2017
Description:	<p>To agree 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</p> <p>It is a statutory requirement to produce a local plan and to produce a Sustainability Appraisal as part of the process of plan preparation to ensure that reasonable alternative options are properly appraised as part of plan preparation and this is done against an accurate and up to date baseline of information.</p> <p>Therefore there is little effective choice about whether to produce the scoping report or not. The choice revolves around how to respond to the comments made to its consultation to ensure that the baseline and the appraisal process is as robust as possible. Therefore all impacts have been assessed as neutral although it should be noted that the SA process will mean that a number of matters listed below are systematically considered and addressed in the plan making process..</p>

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial inclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
Equality and diversity (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Relations between groups (cohesion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Eliminating discrimination & harassment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advancing equality of opportunity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Environmental (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Natural and built environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Energy and climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(Please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Risk management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Recommendations from impact assessment
Positive
None
Negative
None
Neutral
All assessed as neutral for reasons outlined above
Issues
None identified. Recommendation effectively is for a stage in the plan making process to be completed following consultation and consideration of the responses made. As both the plan making process and the SA process are statutory requirements there is no effectively choice of this. IIA process is not designed to assess whether all of the matters listed above are adequately addressed in the SA scoping exercise.

Appendix 1

Sustainability Appraisal Scoping Report: Schedule of Additional Corrections and Changes Proposed by Norwich City Council's Sustainable Development Panel

The following schedule sets out the proposed minor amendments to the Greater Norwich Local Plan Sustainability Appraisal Scoping Report proposed by Norwich City Council's Sustainable Development Panel.

Reference	Page	Paragraph	Proposed Amendment
SDP1	20	1.3.9	... ultra low emission vehicles during the lifetime of the GNLP. <u>Norwich City Council has recently agreed a motion that policies over provision of electric car parking points when planning permission is granted should be updated where appropriate.</u> This may ...
SDP2		1.3.1	... Road traffic is the most significant source of NO2 and, more specifically, <u>diesel vehicles including many</u> buses and taxis ...
SDP3	22	2.2.4	...budgets. The first five budgets, leading to 2032, have not <u>now</u> been set in law. The ...
SDP4	28	2.3.3	<p>...transport. In regards to Ttransport, it is acknowledged that the Examining Authorities Report into the Northern Distributor Road (NDR) found that the scheme will “lead to an immediate and ongoing increase in carbon emissions as compared with the “Do-Minimum” scenario”. Although <u>However</u> it was also acknowledged that these may be “mitigated by efficiency improvements promoted in future carbon budget rounds and that evidence submitted to the examination did not show that, in isolation, the scheme would affect the ability of the Government to meet its carbon reduction targets, nor the fulfilment of the overarching national carbon reduction strategy”¹.</p> <p>¹ The Planning Inspectorate, The Norfolk County Council (Norwich Northern Distributor Road (A1067 to A47(T) Order, Examining Authorities Report of Findings and Conclusions and Recommendation to the Secretary of State for Transport, paragraph 4.283.</p>
SDP5	84	9.5	<p>Amend first bullet point:</p> <p>It will be important to maintain and enhance links, <u>including green infrastructure links</u>, to the countryside and semi-natural open spaces to encourage physical activity and mental well-being.</p>

Reference	Page	Paragraph	Proposed Amendment
SDP6	84	9.5	<i><u>It will be important to</u></i> ensuring new development is well related to green infrastructure

In addition to the amendments listed above the Sustainable Development Panel also requested that consideration was given to the following points where no change is proposed to the SA Scoping Report:

1. Investigate whether there could be an indicator identified for “cohesiveness of communities” under the People and Communities section.

There is no single measure of community cohesion. Whilst it may be technically possible to measure community cohesion it is a complex and involved process which requires the consideration of a range of measures including subjective matter such as resident surveys and objective administrative data such as ethnicity, faith, age, culture, educational attainment and unemployment. An initial investigation has not uncovered any existing monitoring that is undertaken to understand levels of community cohesion. Undertaking the investigation required to develop measures from first principles is currently considered to go beyond that reasonably required for the purposes of Sustainability Appraisal. Whilst further investigation will continue, it appears that an indicator(s) on community cohesion cannot be incorporated.

2. Considered whether future text could be added at 2.3.2. to make it more nuanced in terms of interpreting the data. Amend the related issue on page 36 if necessary.

Further investigation will be undertaken to establish the extent to which further, or more nuanced interpretation of the CO2 emissions data can appropriately and reliably be provided as part of the Sustainability Appraisal.

3. Consider adding the Issue “Facilitation of zero carbon transport” under 2.5 on page 36.

The first bullet point under 2.5 seeks consistency with the interventions proposed in the forthcoming emissions reductions plan. This sets an appropriate basis for consideration of matters relating to carbon emissions within the Sustainability Appraisal, and in a manner which will be consistent with the intention of Government. The forum to consider whether policy interventions intended to facilitate zero carbon transport are appropriate will be the GNLP plan making process and this issues is considered to be best addressed in this way.