NORWICH
City Council

Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report:

Affordable Housing Supplementary Planning Document

July 2025

1.0 Purpose of this Document

1.1 This purpose of this report is to determine if the Affordable Housing Supplementary Planning Document (SPD) requires Strategic Environmental Assessment (SEA) and/or a full Habitats Regulation Assessment (HRA) through a process known as SEA screening.

2.0 Background

2.1 Strategic Environmental Assessment (SEA) involves evaluation of the environmental impacts of a plan or programme. The SEA Directive sets out a legal assessment process that must be followed. Often within the planning context, the SEA requirements are met by incorporating it within a Sustainability Appraisal (SA), which is a requirement for Development Plan Documents. There is no legal requirement for Supplementary Planning Documents to be accompanied by Sustainability Appraisal.

2.2 However, “in exceptional circumstances” there may be a requirement for SPDs to undertake Strategic Environmental Assessment where it is felt they may have a likely significant effect on the environment that has not been assessed within the SEA/SA of the Local Plan. To assess whether a SEA is required the local planning authority must undertake a screening process based on a standard set of criteria, to establish whether the draft SPD is likely to have a significant environmental effect. This must be subject to consultation with the three consultation bodies: Historic England, the Environment Agency and Natural England.

2.3 The requirement to undertake Habitats Regulation Assessment (HRA) of plans and projects is set out in the Conservation of Habitats and Species Regulations (2017) (as amended). Regulation 105 of the Habitats Regulations requires consideration to be given to whether a plan will have an effect on protected habitats sites either alone, or in combination with other plans or projects. As per the Habitat regulations assessment guidance the process can have up to 3 stages: the first of which is screening to check if the proposal is likely to have a significant effect on the site’s conservation objectives. If no significant effect is identified there is no need to go through the subsequent stages of Appropriate Assessment or Derogation. The GNLP was subject to full Habitat Regulations Assessment. Where screening identified a likely significant effect, Appropriate Assessment was undertaken and the mitigation measures identified were incorporated within the plan, resulting in the conclusion that the GNLP would not lead to any adverse effects on habitat sites within the Greater Norwich area. Therefore, this document will screen the Draft Affordable Housing SPD to ensure that it will not lead to any adverse effects on protected Habitats sites not already identified and mitigated for by the wider GNLP HRA.

2.4 A screening process has been followed and forms the main content of this report.

3.0 Draft Affordable Housing SPD

3.1 The Affordable Housing SPD, once adopted, will supplement policy 5 of the Greater Norwich Local Plan (GNLP). It will assist developers, Registered Providers, the Local Planning Authority and Norwich City Council's development strategy team in implementing policy 5 of the GNLP.

3.2 Policy 5: Homes encourages the provision of a full range of type, tenure and cost of housing to meet the varied housing needs of our community. It also includes minimum space standards and requirements for adaptable homes to provide an improved quality of life and meet the needs of an ageing population. The policy is flexible in relation to affordable housing sizes, types and tenures to allow differing needs to be met in Broadland, Norwich and South Norfolk on a site-by-site basis based on the most up-to-date evidence on housing need to be used.

3.3 The policy sets a general requirement for on-site affordable housing provision of 33% on sites that show better viability based on local evidence, with a lower requirement for 28% in Norwich City Centre. The policy is clear that affordable housing should be provided on-site except where exceptional circumstances justify off-site provision.

3.4 The main purpose of this SPD is to provide guidance on how the off-site affordable housing contribution will be calculated where such provision has been justified. It is considered that the GNLP policy, the National Planning Policy Framework and Planning Practice Guidance provide sufficient detail to ensure the effective implementation of the rest of the policy on affordable housing. The SPD does however signpost readers to relevant policies and evidence in order to ensure that affordable housing is provided in accordance with policy requirements.

4.0 The Strategic Environmental Assessment Screening Process

4.1 The purpose of the screening opinion is to determine whether the SPD is likely to have significant environmental effects, using the criteria set out in Annex II of the SEA Directive. The Greater Norwich Local, to which this SPD supplements, has been subject to the preparation of a Sustainability Appraisal, incorporating SEA. Despite no longer requiring sustainability appraisal, SPDs may still require SEA. The ODPM practical guidance provides a checklist approach based on the SEA regulations to help determine whether SEA is required. This guide has been used as the basis on which to assess the need for SEA.

4.2 The three consultation bodies (Historic England, Environment Agency, and Natural England) will be consulted to determine whether they agree with the conclusion of this report, in determining whether the draft SPD has a "significant environmental effect" and therefore requires SEA. Should it be determined by the local authority and consultation bodies that SEA does need to be undertaken, the council will need to undertake the Scoping stage of SEA.

Table 1: Establishing the need for SEA

Assessment criteria	Assessment	Reason
1) Is the Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament of Government? (Article 2(a))	Yes	The SPD is to be prepared and adopted by the local authority Norwich City Council.
2) Is the SPD required by legislative, regulatory or administrative provisions? (Article 2(a))	Yes	Supplementary Planning Documents (SPDs) are optional; there is no legislative or regulatory requirement to prepare them. SPDs can be prepared and adopted by Local Planning Authorities provided the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 are met. This SPD has been produced to supplement the Greater Norwich Local Plan. .
3) Is the SPD prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article 3.2(a))	Yes	The SPD is for town and country planning purposes and sets a framework of guidance for the delivery of affordable housing.
4) Will the SPD, in view of its likely effect on sites, require an assessment for future development under	No	The policy that the SPD is supplementing has been subject to Habitats Regulations Assessment.

Article 6 or 7 of the Habitats Directive (Art. 3.2(b))		A HRA screening assessment has been carried out for the Affordable Housing SPD (see section 5)
5) Does the SPD determine the use of small areas at local level, OR is it a minor modification of a PP subject to Article 3.2? (Article 3.3)	No	Not applicable
6) Does the SPD set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art. 3.4)	Yes	The SPD provides further guidance to supplement GNLP policy 5 related to affordable housing. Whilst not allocating land, the SPDs provide a framework for the future provision of affordable housing.
7) Is the SPD's sole purpose to serve national defence or civil emergency, OR is a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7?	No	The SPD does not serve national defence or civil emergency, nor is it co-financed by structural funds or EAGGF programmes.
8) Is it likely to have a significant effect on the environment? (Art. 3.5)	No	The purpose of the SPD is to provide guidance to assist in the interpretation of policy 5 of the GNLP. The GNLP was subject to SEA (incorporated within the Sustainability Appraisal), and no significant effects were expected. Therefore, the SPD will not have any significant effects on the environment.

Table 2: Likely Significant Effects on the Environment

Criteria in Annex II of the SEA Directive	Assessment	Is there a Significant Environmental effect?
1) The characteristics of plans and programmes, having regard, in particular, to: The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,	While the SPD will include additional considerations, it does not determine the detail of the framework i.e., it does not establish policy.	No
The degree to which the plan or programme influences other plans and programmes including those in a hierarchy,	The Affordable Housing SPD supplements policy 5 of the GNLP rather than influencing the overall direction of the GNLP.	No
The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,	The SPD assists in the promotion of sustainable development together with other policies within the GNLP.	No
Environmental problems relevant to the plan or programme,	There are no environmental problems that are specific to this SPD.	No
The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	Not relevant to this SPD.	No
2) Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: The probability, duration, frequency and reversibility of the effects,	The SPD supplements policy 5 of the GNLP and therefore the overall impacts will be in accordance with the GNLP.	No
The cumulative nature of the effects,	The SPD will not lead to significant cumulative negative effects.	No

The transboundary nature of the effects,	The SPD is unlikely to have an impact on neighbouring authorities.	No
The risks to human health or the environment (e.g. due to accidents),	The SPD is unlikely to introduce significant risks to human health or the environment.	No
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),	The SPD supplements policy 5 of the GNLP and therefore the overall impacts will be in accordance with the GNLP.	No
The value and vulnerability of the area likely to be affected due to: - special natural characteristics or cultural heritage, - exceeded environmental quality standards or limit values, - intensive land-use, - the effects on areas or landscapes which have a recognised national, community or international protection status.	The SPD supplements policy 5 of the GNLP and along with other policies within the GNLP will ensure that there is no significant negative impact upon natural or heritage assets.	No

5.0 HRA Screening Assessment

5.1 To assess whether an Appropriate Assessment as a part of the HRA is required the local authority must undertake a screening process based on a standard set of criteria. This must be subject to consultation with Natural England. Table 3 considers each relevant section of the draft Affordable Housing SPD in relation to whether there is potential for a likely significant effect on protected Habitat sites. Consideration is given to the characteristics and location of the protected sites. The relevant sections are considered within the context of the GNLP policy 5 from which it supplements, and which has itself been subject to Habitats Regulations Assessment.

Table 3: HRA screening for likely significant effects

Section	Assessment of potential impact on Habitat sites	Habitat sites that could possibly be affected	Likely significant effect identified	AA needed?

1. Introduction and purpose of the SPD	This section outlines the key elements of GNLP policy 5 and the reasons why an SPD is being produced.	None	None	None
2. Policy Context	This section outlines the relevant national policies and guidance (NPPF and Planning Practice Guidance) and sets out the local planning policy context.	None	None	None
3. Delivering affordable housing	This chapter sets out key questions about affordable housing provision and signposts readers to the relevant policies, guidance and advice.	None	None	None
4. Off-site affordable housing via a commuted sum	This chapter sets out the level of payment that will be used in calculating a commuted sum for provision of off-site affordable housing.	None	None	None
5. Details of public consultation	This section provides details of the public consultation.	None	None	None

6.0 Conclusions and Statement of Reasons for Determination

6.1 On the basis of the screening process, it is the council's opinion that the impact of the Affordable Housing SPD, through responses to the SEA Directive Criteria, will not have significant environmental effects on Norwich that have not already been assessed as part of the Greater Norwich Local Plan (GNLP). This SPD is not setting a new policy; it supplements existing GNLP policy 5. Therefore, the council considers that an SEA will not be required for this SPD. However, it is necessary to consult with the three statutory environmental bodies over the SEA Screening Report for the Affordable Housing SPD.

6.2 Furthermore the overall conclusions of the HRA undertaken for the adopted GNLP (supported by the results of the screening undertaken for the Affordable Housing SPD) state that the plan is not likely to have adverse effects on the integrity of the European sites (Natura 2000 and Ramsar site(s), either alone or in-combination with other plans or projects. Therefore further Appropriate Assessment is not considered necessary or required for this SPD. This conclusion is subject to consultation with Natural England.