

Norwich Local Plan

Sustainability Appraisal of the Norwich Site allocations and site specific policies local plan:

Environmental Adoption Statement (December 2014)

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1. Purpose

1.1 Norwich City Council adopted the *Site allocations and site specific policies local plan* ('*Site allocations plan*') on 1st December 2014. In accordance with the requirements of Article 9 of the Strategic Environmental Assessment Directive (SEA) 2001 and the SEA Regulation 16 (3) and (4 a-f as summarised below) of the Environmental Assessment of Plans and Programmes Regulations, 2004, the purpose of this Environmental Adoption Statement is to set out:

- a) How environmental considerations have been integrated into the plan;
- b) How the environmental report (i.e. the June 2012 Sustainability Appraisal (SA) Main Report, and the June 2014 SA Report Addendum has been taken into account);
- c) How the results of public consultation on the plan and sustainability appraisal have been taken into account;
- d) How trans-boundary issues have been taken into account;
- e) The reasons for choosing the plan as adopted, in the light of other reasonable alternatives;
- f) Measures to be taken to monitor the significant environmental effects of implementation of the plan.

1.2 The purpose of the Sustainability Appraisal (SA/SEA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of plans. The SA also meets the legal requirement to undertake a Strategic Environmental Assessment (SEA), which covers only the environmental considerations relating to plan making. Whilst the European legal requirement in the SEA Directive is for this Environmental Adoption Statement to cover how environmental considerations have been covered in the Environmental Report (the SA), as the SEA process was incorporated into the SA process, this statement constitutes the SA/SEA Adoption Statement and focuses on all three areas. In fact, since issues determining decisions in plan making are often inter-related, this approach is necessary.

2. Background

- 2.1 Norwich City Council commenced preparation of the *Site allocations plan* in 2009. For most of its preparation period the plan was prepared in tandem with the *Development management policies plan*.
- 2.2 The plan making and sustainability appraisal (SA) process are iterative in nature and this report shows how the SA/SEA and public consultation has influenced the development of the plan. Please note that the 'SA/SEA report' is henceforth referred to as the 'SA report' in this environmental adoption statement.
- 2.3 The plans were submitted together to the Secretary of State in April 2013 and the public examination hearings took place consecutively in late February – early March 2014. The Inspector's report of the examination into both plans was received in October 2014. The council resolved to adopt both plans on 25 November, and this took effect on 1 December 2014.
- 2.4 This report sets out how the legal requirements set out in paragraph 1.1 have been addressed for the *Site allocations plan*. The report structure reflects the requirements of the SEA set out above, with the exception of (d) relating to transnational boundaries. There are no European trans-boundary issues associated with the plan so this issue is not covered further in this report.
- 2.5 Please note that the final SA report constitutes the June 2012 SA Report and the June 2014 SA Addendum. This approach was agreed with the Inspector during the public examination process and reflects the fact that the Regulation 19 *Site allocations plan* was taken by the Inspector as the starting point for the public examination process rather than the Regulation 22 *Site allocations ('Submission') plan*. The June 2014 SA Addendum complements the June 2012 SA report and should be read alongside it.

3. How environmental and sustainability considerations have been integrated into the local plan

- 3.1 This section of the report explains how environmental and sustainability issues have been integrated into the *Site allocations plan*.
- 3.2 The SA for the *Site allocations plan* was largely carried out by LUC who also prepared the SA for the *Development management policies plan*. The only part of the SA process not undertaken by LUC was the initial scoping phase which was carried out by Norwich City Council.
- 3.3 The purpose of the SA process was to inform the preparation of the *Site allocations plan* to ensure that it has as many positive effects on environmental and sustainability issues as possible, and to avoid or minimise negative impacts. As part of this the SA informed the content of the plan including site selection and the consideration of options (reasonable alternatives).
- 3.4 The initial phase of SA work, carried out by the City Council, set the context and objectives, established the baseline, and established the scope of the SA, identifying the sustainability issues facing the area.
- 3.5 The sustainability objectives set out below, covering environmental, social and economic issues, were derived from the sustainability issues. They provided the framework for the SA against which the plan's policies have been assessed. The objectives covered all of the environmental topics required by the SEA Regulations. The main SA objectives (as set out in Table 1 below) were underpinned by a series of sub-questions enabling the likely significant effects arising from the Plan to be more readily identified.
- 3.6 Sustainability appraisal was undertaken as an iterative process with reports produced at key stages of plan production, as summarised below:

- *Draft Site allocations DPD: SA scoping report*, November 2009, Norwich City Council;
- *Norwich Site Allocations DPD: Sustainability Appraisal Report and Appendices*, prepared for Norwich City Council by LUC, December 2010;
- *Norwich Site Allocations DPD: addendum to the Sustainability Appraisal Report*, prepared for Norwich City Council by LUC, July 2011
- *Sustainability Appraisal of the Norwich Site Allocations and Site Specific Policies DPD: Regulation 19 Pre-Submission version and Appendices*, prepared for Norwich City Council by LUC, June 2012;
- *Sustainability Appraisal of the Norwich Site Allocations and Site Specific Policies DPD: March 2013 Submission SA Main Report and appendices* , prepared for Norwich City Council by LUC, March 2013;
- *SA Addendum for the Norwich Site Allocations and Site Specific Policies Plan*, prepared for Norwich City Council by LUC, June 2014.

Table 1 – SA framework

SA objective
Environmental
ENV 1 – To reduce the effect of traffic on the environment
ENV 2 – To improve the quality of the water environment
ENV3 – To improve environmental amenity, including air quality
ENV4 – To maintain and enhance biodiversity and geodiversity
ENV5 – To maintain and enhance the quality of landscapes, townscapes and the historic environment
ENV6 – To adapt to and mitigate against the impacts of climate change
ENV7 – To avoid, reduce and manage flood risk
ENV8 – To provide for sustainable use and sources of water supply
ENV9 – To make the best use of resources, including land and energy and to minimise waste production
Social
SOC1 – To reduce poverty and social exclusion
SOC2 – To maintain and improve the health of the whole population and promote healthy lifestyles
SOC3 – To improve education and skills
SOC4 – To provide the opportunity to live in a decent, suitable and affordable home
SOC5 – To build community identity, improve social welfare and reduce crime and anti-social activities
SOC6 – To offer more opportunities for rewarding and satisfying employment for all
SOC7 – To improve the quality of where people live
SOC8 – To improve accessibility to essential services, facilities and jobs

Economy
EC1 – To encourage sustained economic growth
EC2 – To encourage and accommodate both indigenous and inward investment
EC3 – To encourage efficient patterns of movement in support of economic growth
EC4 – To improve social and environmental performance of the economy

4. How the environmental / SA report has been taken into account

- 4.1 The SA was undertaken iteratively alongside the plan preparation process. The SA fed into and informed plan making by assessing, at each stage in the plan process, the sustainability and environmental effects of the draft plan. SA reports prepared at key stages in the process described the approach taken, the potential effects identified, and put forward recommendations to avoid or minimise negative effects, or enhance positive effects. These recommendations were taken into account by Norwich City Council while making changes to the plan at key stages.
- 4.2 As part of this the SA informed the content of the plan including site selection and the consideration of options (reasonable alternatives). This is examined in more detail in section 6 of this report.
- 4.3 Table 2 below provides an overview of how the preparation of SA reports has corresponded with each stage of the preparation of the *Site allocations plan*, and how recommendations were taken into account. Further detail is provided in paragraphs 4.4 - 4.14.

Table 2: Stages of plan preparation and corresponding SA/SEA stages, showing how the SA report has been taken into account

Plan making stage	SA / SEA stage
<p>‘Call for sites’ Initial ‘call for sites’ (consultation February to April 2009) and evidence gathering</p>	<p>Drafting of SA scoping report (Norwich City Council, November 2009). This was the first stage of the SA process, which set the context and objectives, established the baseline, and decided the scope of the SA. It presented the outputs of the scoping phase of the SA and the proposed sustainability framework (a set of sustainability objectives and criteria) against which the <i>Site allocations plan</i> has been assessed.</p>
<p>First stage of public consultation on potential development sites: November 2009 to February 2010 (‘Regulation 25 (1) stage’)</p>	<p>The SA scoping report was consulted upon at the same time as the Regulation 25(1) plan (a long list of about 170 potential sites was considered). Comments received at this stage are set out in appendix 1 (and summarised in section 5) and have resulted in the amendment of SA objective ENV9 the inclusion of designated sites outside the city in the appraisal of all sites. Later in 2010, the SA Scoping Report was amended to reflect a revised GIS based SA methodology. Consultation on this revised methodology was undertaken in October 2010 with a number of key consultees.</p>
<p>Second stage of public consultation on preferred (or ‘shortlisted’) sites: January to March 2011 (‘Regulation 25 (2)’ stage).</p> <p>Following identification of additional sites and proposed amendments to others through this consultation, an additional round of consultation took place on specific sites from July to September 2011 (Regulation 25 (2a) stage).</p>	<p>A Sustainability appraisal report was produced by LUC in December 2010 to accompany the second round of consultation on the Regulation 25 (2) plan (January to March 2011). The SA assessed 124 shortlisted sites, using a Geographical Information Systems (GIS) based approach (the criteria suitable for analysis by GIS fell into two categories – those criteria that could represent constraints on development such as flood risk, proximity to designated nature conservation or cultural heritage sites and those criteria that could represent opportunities, for example potential sites allocated for a range of uses that are in close proximity to schools, bus stops or cycle routes). This enabled NCC officers to understand the likely sustainability implications of potentially allocating around 124 sites.</p> <p>A further SA report was produced by LUC in July 2011, to assess 12 new sites, 2 of which had not been previously considered and 10 sites which were revised since the previous consultation or which had been previously discounted and</p>

Plan making stage	SA / SEA stage
	<p>were now proposed for development on a different basis. This SA Addendum was consulted on at the same time as the additional stage of consultation.</p> <p>A number of comments were made to this stage of SA, as set out in appendix 1 (and summarised below in section 5).</p> <p>The SAs of the shortlisted sites fed into the next stage of plan making by informing the site selection process.</p>
<p>Pre-submission plan consultation: August to October 2012 ('Regulation 19' stage)¹. This report</p>	<p>LUC produced the SA report in June 2012 to reflect the content of the draft Pre-submission plan. This contained a set of recommendations, many of which were accepted by the council and incorporated into the final Pre-Submission plan prior to consultation (see paragraph 4.8 and appendix 2 for further detail). In addition, a number of changes were made to the Pre-submission plan in July 2012 to reflect changes to the status of sites (i.e. sites no longer available) and in response to feedback from elected members at a NCC Cabinet meeting on 11 July 2012. The SA/SEA was not updated at this stage to reflect any of these changes, but appraisal of all these changes is included in the SA Addendum (June 2014).</p>
<p>Submission to Secretary of State: April 2013 ('Regulation 22 stage')</p>	<p>An updated SA report was prepared in March 2013 to accompany the plan submitted under Regulation 22. This SA fully reflected the choice of sites in the Submission (Regulation 22) plan. This SA contained the same recommendations as for the June 2012 SA and acknowledged that most of these had already been addressed by the council.</p> <p>The Inspector subsequently decided to examine the Regulation 19 (Pre-submission) plan rather than the Submission plan. As described earlier, the Final SA Report now comprises both the Regulation 19 (June 2012 SA Report) as well as the SA Addendum produced in June 2014 and the two reports should be read in conjunction.</p>

¹ Under the 2012 planning regulations the pre-submission stage is now 'Regulation 19' (rather than 'Regulation 27' under the previous regulations).

Plan making stage	SA / SEA stage
<p>Examination stage: Proposed Main modifications June to August 2014</p>	<p>The June 2014 SA Addendum supplemented the June 2012 SA report and should be read alongside it. It appraises 4 sets of plan changes:</p> <ul style="list-style-type: none"> • Changes made prior to Regulation 19 consultation by members and in response to updates on the availability of sites; • Changes in response to SA recommendations from the Regulation 19 SA; • Proposed main modifications to the <i>Regulation 19 plan</i>; • Proposed minor (additional) modifications to the <i>Regulation 19 plan</i>. <p>This SA was consulted upon at the same time as the Main modifications consultation. There were no comments made regarding the SA of the modifications. (The representations received to the main modifications themselves are discussed in section 5.)</p> <p>The inspector's report² states that the SA for the <i>Site allocations plan</i> has been carried out appropriately and is adequate.</p>
<p>Adoption: December 2014, following receipt of the Inspector's report September 2014.</p>	<p>Production of this Environmental Adoption Statement (EAS) in accordance with the SEA Directive.</p>

4.4 As referred to in Table 2, the SA process has informed plan making. In the early stages of plan making ('Regulation 25' stage – now referred to as Regulation 18 stage under the 2012 planning regulations), the SA reports provided GIS based analysis of how the shortlisted sites performed against the sustainability objectives. This analysis was taken into account in the site selection process alongside other relevant information; see the *Background document for site selections*³ (January 2011) and *Further Site Assessment*⁴ (July 2011) which form part of the supporting documentation for the local plan examination.

² <http://www.norwich.gov.uk/Planning/Pages/DMAandSAPoliciesPlans.aspx>

³

<http://www.norwich.gov.uk/Planning/JointSAandDMLibrary/Background%20document%20for%20site%20selections.pdf>

⁴ <http://www.norwich.gov.uk/Planning/JointSAandDMLibrary/Further%20site%20assessment.pdf>

- 4.5 At the next stage in the plan making process, the choice of preferred site allocations in the *Regulation 19 Pre-Submission plan* (August 2012) was directly informed by SA. *The Justification for the selection of preferred sites*⁵ (June 2012) shows how the SA findings for individual sites were part of the evidence base feeding into the choice of preferred sites in the *Regulation 19 plan*.
- 4.6 Table 2 refers to the fact that changes were made to the Pre-Submission plan prior to it being finalised and consulted upon. Some of these changes were made in response to a series of recommendations set out in the June 2012 SA report.
- 4.7 The June 2012 SA report identified many positive sustainability effects for the proposed sites as well as some negative ones. Its recommendations included proposed changes to some site policies to mitigate the negative effects and to strengthen sustainability effects generally.
- 4.8 A table setting out these recommendations, and the council's responses to them, is attached at Appendix 1. Following the decision of cabinet on 11th July 2012, the council incorporated the many of the recommended changes (as shown in Appendix 1) into its final Pre-Submission plan by amending a number of site specific policies. The SA Addendum (June 2014) summarises and appraises these changes in chapter 5.
- 4.9 Cabinet on 11th July 2012 made other changes to the Pre-Submission plan prior to consultation. One site was removed from the plan as the landowner no longer wished it to be developed (R34: Land at Northumberland Street). The plan was also amended in respect of three sites, following the decision of members at cabinet on 11th July:
- Removal of site R6 (Former Lakenham Sports Centre) from the plan

⁵ <http://www.norwich.gov.uk/Planning/JointSAandDMLibrary/Justification%20for%20selection%20of%20preferred%20sites.pdf>

- Removal of site R45⁶ (Land west of Bluebell Road) from the plan
- Amendment to site CC9 (King Street Stores) to remove the Lincoln Ralphs sports hall and car park from the allocation.

4.10 The June 2012 Pre-Submission SA report was not updated to reflect any of the changes made to the Pre-Submission *Site allocations plan* prior to consultation. All these changes were subsequently appraised in the June 2014 SA Addendum (in chapters 4 and 5).

4.11 The Addendum also appraises the main modifications to the plan (chapter 6) which were consulted on between June and August 2014, and additional (minor) modifications which were publicised at the same. Following discussion of the merits of R45 (Land west of Bluebell Road) at the public examination hearings, the main modifications included the proposed allocation of site R45. The main modifications also included amendments to site R10⁷ (Deal Ground) with additional wording seeking to ensure that adjacent uses would not be prejudiced as a result of the proposed development.

4.12 The Inspector's report for the *Site allocations plan* was received in September 2014. It confirmed the vast majority of proposed main modifications including the allocation of R45 (Land west of Bluebell Road). However the proposed modification to R10 (Deal Ground) was not confirmed and the site policy remains as it appears in the Pre-Submission plan, with the addition of some minor modifications (both of which have been subject to SA). Consequently the sustainability effects predicted for this site remain as reported in the June 2012 SA Report.

4.13 As part of the public examination process, the Inspector specifically considered whether the SA for the *Site allocations plan* had been carried out appropriately, why the SA that accompanied the Pre-Submission plan included the appraisal of sites not included in the plan (referred to in

⁶ The site reference shown is from the Regulation 19 (Pre-Submission) plan. This site is now R42 in the final adoption plan.

⁷ Site reference R9 in the adoption plan.

paragraph 4.9), and whether any interests had been prejudiced by this approach. Evidence was provided at the public examination hearings as follows:

- Reference was made to Table 1.1 of the Regulation 19 SA report (June 2012) which sets out where the requirements of the SEA Directive have been met within the main SA report and /or in the accompanying appendices, which demonstrates that the SA/SEA was carried out appropriately;
- The evidence explained why the council chose not to update the June 2012 SA report prior to the Regulation 19 consultation. The intention was to update the SA following the consultation period to reflect the changes made to the plan prior to the publication of the *Regulation 19 plan* (set out at paragraph 4.9 above) and to take into account consultation responses on 'soundness'. This was considered an appropriate approach given the iterative nature of the plan and SA process. The SA was subsequently updated in March 2013 to fully reflect the Submission (Regulation 22) version of the plan. As stated above, following submission the inspector decided to base the public examination on the *Regulation 19 plan*. The June 2014 Addendum specifically assessed the changes made prior to the *Regulation 19 plan* to ensure that these were fully taken into account and consulted upon.
- The evidence states that the decision not to update the Regulation 19 SA Report prior to consultation in August to October 2012 did not disadvantage anyone who wished to comment on the inclusion or exclusion of particular sites. For example, sites such as R45 (Land west of Bluebell Road) and R5 (former Lakenham Sports and Social Club) attracted comments about their non-inclusion in the *Regulation 19 plan* through formal representation on that plan and through representations on the Regulation 19 SA Report. As the sites were appraised in the Regulation 19 SA Report it was clear what

the sustainability impacts of allocating them would be. Also the reduction in the site area of site CC9 (King Street Stores) in the *Regulation 19 plan*, did not materially change the sustainability appraisal of this sites between Regulation 19 SA and submission SA stages, and the decision of the council to reduce the site area was in the public domain.

4.14 This evidence was discussed in detail at the examination hearings. In his final report dated September 2014 the Inspector concludes that the SA has been carried out appropriately and is adequate.

5. How the comments of consultation bodies and the public have been taken into account

- 5.1 At the Scoping stage, comments were made by four organisations (the RSPB, English Heritage, Natural England, and the Greenhouse Trust). Most of the comments made by respondents were noted. However responses received from the RSPB and The Greenhouse Trust on the SA Framework were taken into account: designated sites outside the city boundary were included in the appraisal of all sites; and SA objective ENV9 has been amended to assess whether a site will minimise greenfield land / agricultural land, minimise energy consumption, and promote energy efficiency and use of renewable resources. In addition, several comments were made by respondents about a revised methodology, all of which were noted.
- 5.2 At draft plan stage (Regulation 25 and additional Regulation 25 stages of consultation), responses were received from organisations including the Environment Agency, English Heritage, Natural England, and Mr Trevor Lewis (a South Norfolk District Councillor). Most comments were noted however clarification was provided in relation to the issue of the width of buffer zone in sites adjacent to the river, in response to a comment from the Environment Agency.
- 5.3 A number of responses were received at Regulation 19 (Pre-Submission) stage including from Norfolk County Council, Norwich Green Group, the RSPB, Bidwells and Bartram Mowers. Clarification has provided in relation to many of these comments. In response to a comment by the RPSB, explicit reference has been made in the SA report to Appropriate Assessment. In relation to a response by Bartram Mowers (landowner of site R45: Land west of Bluebell Road) in relation to landscape impact, LUC recommended that an independent landscape assessment should be commissioned by Norwich City Council prior to the public examination. A landscape assessment was subsequently carried out and helped inform

the discussion about R45 (Land west of Bluebell Road) at the examination hearings.

- 5.4 The final stage of consultation on the *Site allocations plan* was the main modifications consultation following the public examination hearing, which took place between June and August 2014. No representations were received in relation to the sustainability appraisal for the plan.
- 5.5 A total of 34 representations were received to the main modifications themselves (available to view on the council's website: <http://www.norwich.gov.uk/Planning/PlanningPolicy/Documents/4MainModificationsResponseSummaryTables.pdf>).
- 5.6 The representations include several in respect of the Deal Ground policy (R10), The Paddocks, Holt Road (R32), and Land west of Bluebell Road, Bartram Mowers Limited (R45). Many representations are of support, and most of the remainder relate to specific aspects of the modified policies and text. The only representations which are specifically concerned with sustainability issues are some of those made in relation to R45: Land west of Bluebell Road. The issues raised include concerns about the potential landscape and traffic impacts of development, and comments stressing the potential for brownfield development offered by the site, the fact that it is well located in relation to services and facilities, and the fact that it would deliver housing for the elderly, for which there is a need.
- 5.7 The representations made to the main modifications were considered by the Inspector in this report. However he did not carry forward the main modification to policy R10 (the Deal Ground) on the basis that, given the site has planning permission for a mixed use development, it would be inequitable to modify the policy to require further work to be carried out with regard to noise, dust and odour pollution.

6. The reasons for choosing the plan as adopted, in the light of other reasonable alternatives

6.1 All the sites proposed in the *Site allocations plan* have gone through a selection process which has comprised a number of stages including several rounds of consultation, as set out in Table 2 and discussed in chapter 5 of this report. As part of this a large number of alternative sites for new housing, employment and mixed uses have been considered by the council.

Initial 'call for sites'

6.2 In 2009, developers, agents, community groups and the public were asked to suggest sites for development or change of use. The sites put forward, along with sites identified through the Local Plan and background studies were all included in the initial list of sites. This process identified approximately 170 sites.

Regulation 25 stage

6.3 The long list of 170 sites was subject to public consultation from November 2009 to February 2010 in the first stage of Regulation 25 consultation. Three of the sites were subsequently ruled out by the council as not being reasonable (one due to its location in neighbouring South Norfolk District and two were considered too small to allocate).

6.4 The initial Scoping Work undertaken at this time provided the Council with information on the environmental and socio-economic baseline to be considered when evaluating the potential to bring sites forward.

6.5 Following the first stage of Regulation 25 consultation and the consideration of consultation responses, the 'long list' of approximately 170 sites was reduced to 124 sites. The reduction in the number of sites reflected the consultation comments, sites which were merged, and removal of sites considered more appropriate for inclusion in designations in the Development Management Policies plan.

6.6 Through consideration of consultation responses, 12 additional sites were identified for potential inclusion in the plan – two of the sites had not previously been considered; some were included in the earlier Regulation 25 consultation but were now put forward with revised boundaries and/or changes to the proposed site use; others were previously discounted but were now put forward for development on a different basis. The 12 additional sites were also subject to SA.

Regulation 19 ('Pre-submission) stage

6.7 Following review of the Regulation 25 consultation responses, officer judgements and the outcome of the SA a total of 79 sites were included in the Regulation 19 Site Allocations Plan. The majority of these sites were for housing and mixed use developments with a small number allocated for employment and other uses.

6.8 The council's *Background document for site selections* (January 2011) and *Further site assessment* (July 2012) document explain the process for developing and refining the site options proposed in the *Regulation 19 plan*. Site selection was based on a consideration of suitability, sustainability and availability. The reasons for rejecting sites includes:

- Sites that have been granted planning permission and are now developed or sites that have changed ownership and are no longer available for development;
- Sites that are no longer available for development following consultation with the landowners;
- Sites more appropriate for inclusion in the *Development management policies local plan*;
- Sites integrated into a larger site;
- Sites assessed to be 'unsuitable' or 'less suitable for development, on the basis of suitability or sustainability; and
- Sites too small to allocate.

6.9 The SEA Directive requires consideration of 'reasonable alternatives' through the SA process, i.e. alternative sites which were considered during the preparation of the plan but not included. The early stages of SA, following the Scoping phase, focused on the appraisal of options and

assessment of sustainability effects. This was undertaken through a GIS based assessment of 'potential' sites in the December 2010 SA Report. When additional and amended sites were proposed following the second stage of Regulation 25 consultation (January to March 2011) these sites were subject to the same GIS based analysis in the July 2011 SA Addendum report. The report assessed the relative performance of sites against a number of criteria including sustainable access to jobs and services, proximity to environmental constraints, public transport accessibility, nature conservation interest, historic environment, and flood risk. As noted in Table 2, these assessments informed the next stage of plan making: the sustainability strengths and weaknesses of sites were taken into account by the council as part of the site selection process.

6.10 The public examination was based on the *Regulation 19 plan* which included 79 sites in total: 36 in the city centre and 43 in the remainder of the city. Appendix 1 of the plan identified 17 sites that were identified as 'reasonable alternatives', The June 2012 SA Report assessed both the preferred allocations and the reasonable alternatives.

6.11 The 2012 SA Report found there to be a wide range of positive and significant positive effects associated with many of the preferred sites. It also found that the preferred sites, on balance, tended to perform better than the reasonable alternatives, with the potential to result in more significant positive effects. There were, however, a number of potentially adverse and significant adverse effects also identified for the preferred sites, which would mainly impact on the following SA objectives:

- ENV5 (to maintain and enhance the quality of landscapes, townscapes and the historic environment);
- ENV7 (to avoid, reduce and manage flood risk)
- ENV9 (to make the best use of resources including land and energy, to minimise waste production); and
- SOC7 (to improve the quality of where people live).

6.12 A number of recommendations were proposed to reduce the likelihood and number of significant negative effects. As explained earlier in this EAS, many of these proposed changes were incorporated into the *Regulation 19 plan* prior to its publication in August 2012 (see Appendix 2).

6.13 As explained above, the SA Report did not fully reflect the choice of sites in the *Regulation 19 plan*: for example it assessed site R45: Bartram Mowers as a preferred allocation when by the time of publication of the *Regulation 19 plan* in August 2012 this site had been removed from the plan. However the June 2014 SA Addendum, by agreement with the Inspector, supplemented the earlier June 2012 SA Report, and, amongst other things, assessed the changes made by elected members and in response to updates on site availability to the *Regulation 19 plan* prior to its publication (in chapter 4 of the SA Addendum), and the changes made in response to SA recommendations (chapter 5).

Public examination stage

6.14 As stated earlier, the public examination was conducted on the basis of the *Regulation 19 Site allocations plan*. Following the end of the public examination hearings, the inspector proposed a set of main modifications which were consulted upon between June and August 2014, alongside the June 2014 SA Addendum. The council also proposed a set of additional (minor) modifications which were consulted upon at the same time. All the proposed modifications are available to view on the council's website⁸. In summary, these include deletion of 7 sites which are no longer available or are being developed, proposed amendments to Land at Garden Street (CC11 – new reference CC10) and The Paddocks Holt Road (CC32 - new reference CC30), and a proposed new allocation of the Bartram Mowers site (R45 – new reference R42) for housing for the elderly.

⁸ <http://www.norwich.gov.uk/YourCouncil/Consultations/Pages/NewLocalPlan.aspx>

6.15 The SA Addendum appraised all 73 sites proposed for inclusion in the Plan (the reduction in the number of sites reflects the fact that some sites were no longer available for development by this stage, or were already being developed) and 17 reasonable alternatives (all the alternative sites identified and appraised during the June 2012 SA were still considered to be reasonable with the exception of a single site which had been developed and the addition of a new reasonable alternative which represented a site removed from the Regulation 19 Plan following a Cabinet Meeting in July 2012). Consequently 17 reasonable alternative sites were tested), and no reasonable alternatives were identified in respect of the main modifications themselves.

6.16 The SA appraisal of all the allocated sites and their reasonable alternatives are set out in the June 2014 SA Addendum. Since publication of the Inspector's report and his confirmation of the allocation of the Bartram Mowers site R45 for housing for the elderly, site M009 (the original proposed allocation of a larger Bartram Mowers site for housing and community facilities) can no longer be considered a reasonable alternative, reducing the number of reasonable alternatives to 16. This is reflected in Table 3 which sets out the reasonable alternatives considered and the reasons why these were not taken forward into the main Plan (and is an updated version of Table 2.2 in the June 2014 SA Report):

Table 3: Reasonable Alternatives considered

Reasonable Alternative	Proposed Use	Included as an alternative in Regulation 19 Plan	Reason for Discounting as a Reasonable Alternative	Reason Site is not included in the Plan
H004: Land to rear of 180 Earlham Road, Norwich	Housing	Yes	N/A	Major issue with highway access and safety which is not likely to be overcome. Width of access via Earlham Road is not adequate. Ownership issue is not likely to be resolved.
H008: Land	Housing	Yes	N/A	Site located within industrial

Reasonable Alternative	Proposed Use	Included as an alternative in Regulation 19 Plan	Reason for Discounting as a Reasonable Alternative	Reason Site is not included in the Plan
at Northumberland Street				area which is protected for employment use. Loss of small business units is not favoured. Development is piecemeal and not compatible with surrounding employment use.
H011: Land at Eaton Golf Club (part)	Housing	Yes	N/A	No identified access. Loss of urban green space and habitats is not justified. Adjacent County Wildlife Trust site.
M052: Colegate Car Park	Housing	Yes	N/A	Listed buildings and archaeological constraints make this site less likely to be viable.
NOR0005: Former Eaton Rise Service Station, Ipswich Road	Housing	Yes	N/A	The site is too small to allocate for housing development due to ground conditions and topography constraints restricting the amount of developable land.
M001: Gooseberry Gardens and access there via existing allotments, Cathedral Precinct	Mixed Use	Yes	N/A	Development would adversely affect: the setting of the cathedral and views of it both from close proximity and from the wooded ridge and Mousehold Heath: the setting of listed buildings in the vicinity; and the character of the city centre conservation area due to traffic impacts. Other constraints include being within Flood Zone 3 and loss of urban green space.
M0002: Land between Hooks Walk & Ferry	Mixed Use	Yes	N/A	Development would adversely affect: views of the cathedral; the setting of this part of the city centre conservation area; and the setting of listed

Reasonable Alternative	Proposed Use	Included as an alternative in Regulation 19 Plan	Reason for Discounting as a Reasonable Alternative	Reason Site is not included in the Plan
Lane on west flank of Norwich School playing fields, Cathedral Precinct				buildings in the vicinity. Other constraints include the site being within Flood Zone 3 and with significant mature trees.
M0003: Brownes Meadow Car Park and land to the rear of 20-24 The Close	Mixed Use	Yes	N/A	Development would adversely affect: the character of this part of the city centre conservation area; the setting of listed buildings; and the area to the east of 21 Ferry Lane which is of value in terms of amenity, biodiversity and climate change adaptation. Mature trees onsite also pose a significant constraint.
M0004: Land to the rear of 9-14a The Close and car park west of Horsefair House	Mixed Use	Yes	N/A	Development would adversely affect the setting of many highly-graded listed buildings in the vicinity. The sub-division of historic plots and loss of historic walls is not justifiable. Access to the site presents significant constraints. Mature trees on site also pose a significant constraint.
M0005: 10 Barnard Road	Mixed Use	Yes	N/A	Site is located in primary industrial area and is not suitable for hotel development.
M0008: Norfolk Tower, Surrey Street	Mixed Use	Yes	N/A	Loss of city centre office floor space is not justified.
M048: 1-6b Craft Workshops, Bowthorpe	Mixed Use	Yes	N/A	Development will lead to loss of functional workshop units; In addition, buildings are locally listed which makes

Reasonable Alternative	Proposed Use	Included as an alternative in Regulation 19 Plan	Reason for Discounting as a Reasonable Alternative	Reason Site is not included in the Plan
				development less likely to be viable.
M056: 38 Surrey Street, Saints Court and Land to the North of Surrey Grove	Mixed Use	Yes	N/A	Land is not likely to be deliverable due to ownership issues. Loss of urban green space is not favoured.
E002: Victoria House, Queens Road, Norwich	Retail led Mixed Use	Yes	N/A	Mainly town centre uses will not be acceptable as the site is outside city centre primary retail area.
E002: Victoria House, Queens Road, Norwich	Employment led Mixed Use	Yes	N/A	Mainly town centre uses will not be acceptable as the site is outside city centre primary retail area.
Reasonable Alternatives added since Regulation 19 SA dated June 2012				
Reasonable Alternative	Proposed Use	Included as an alternative in Regulation 19 Plan	Reason for Discounting as a Reasonable Alternative	Reason Site is not included in the Plan
R6: Former Lakenham Sports Centre	Housing	No	N/A	Site was removed from the Regulation 19 Plan following a Cabinet meeting in July 2012, chiefly on grounds of loss of open space. Site now has planning permission for housing (unimplemented) and hence is included as a reasonable alternative in this SA Addendum

Reasonable Alternative	Proposed Use	Included as an alternative in Regulation 19 Plan	Reason for Discounting as a Reasonable Alternative	Reason Site is not included in the Plan
Reasonable Alternatives discounted since Regulation 19 SA dated June 2012				
Reasonable Alternative	Proposed Use	Included as an alternative in Regulation 19 Plan	Reason for Discounting as a Reasonable Alternative	Reason Site is not included in the Plan
NOR0128: RAF Officers Married Quarters, Dowding Road	Housing	Yes	Site has now been developed	Site has now been developed and hence this is no longer a reasonable alternative
M0009: Land West of Bluebell Road, Bartram Mowers	Mixed Use (mainly housing with community facilities)	Yes	N/A	This site is no longer considered a reasonable alternative now that site R45 (Bartram Mowers) has been confirmed as an allocation in the Inspector's report.

6.17 The Addendum finds that, for the most part, the main modifications have resulted in no or limited changes to the SA objective scores in the June 2012 SA or the proposed changes are not significant. The findings can be summarised as follows:

- Seven sites were removed from the plan following Regulation 19 stage (CC2, CC18, CC25, CC28, CC33, R14 and R46) which reduces the likelihood of a number of potential significant positive and negative effects as identified in the June 2012 *SA Report*,
- Although the SA scores for most sites have not changed significantly since the 2012 *SA Report*, the appraisal score for CC31 (St Stephen's Street) has changed as the policy now addresses viability considerations, which is reflected by building in

an element of uncertainty into the SA scores for objectives ENV5 and SOC8;

- Site R45 (Bartram Mowers) is included as a new allocation and appraised as such: no significant positive or negative effects are identified for this new allocation;
- The redefinition of Critical Drainage Catchments (CDCs – replacing Critical Drainage Areas) has resulted in additional sites falling within the wider catchment area, with potential for new development to contribute to flood risk. A minor adverse uncertain score has been identified in respect of these sites;
- A new significant positive uncertain score is predicted in relation to SA objective SOC6 for site R32 (The Paddocks, Holt Road). The main modification makes provision for general employment to come forward for this site, if supported by evidence;
- A new significant positive uncertain effect is identified for site CC11 (Garden Street) where the main modification makes temporary provision for a new primary school, subject to evidence, which should increase the supply of available school places.

6.18 In terms of cumulative effects, the key change is to SA objective ENV7 (to avoid, reduce and manage flood risk) through the replacement of Critical Drainage Areas by larger Critical Drainage Catchments (CDCs) where new development could potentially contribute to risk of flooding. This has increased the number of sites within the wider CDC. This risk should be mitigated by amendments to a number of site specific policies for sites within CDCs, requiring a flood risk / surface management assessment which should demonstrate that the site would not increase the vulnerability of the site or wider catchment to flooding. The report acknowledges that there is potential for cumulative significant adverse, uncertain effects on this SA objective.

6.19 There is however potential for cumulative significant positive effects to arise in respect of a number of the SA objectives (ENV1, ENV5, and

ENV6, as well as a number of the social objectives) as identified in the Regulation 19 SA Report.

6.20 In summary, all proposed sites and reasonable alternatives have been subject to SA in the Regulation 19 SA Report (2012) and the SA Addendum (2014) (both of which are considered to constitute the 'Final SA/SEA Report'), as required by the SEA Directive.

7. How the environmental and sustainability effects will be monitored.

- 7.1 The SEA Directive requires that “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*” (Regulation 17) and that the environmental report should provide information on a “*description of the measures envisaged concerning monitoring*” (Schedule 2). Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, which should help decision making.
- 7.2 The Government’s latest guidance⁹ on SA states that details of the proposals for monitoring the significant effects of implementing the adopted local plan should be included in the sustainability appraisal report, or the post-adoption statement (this document). It is not necessary to monitor everything. Instead monitoring should focus on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before damage is done), and significant effects where there is uncertainty and where monitoring would enable preventative or mitigation measures to be taken.
- 7.3 The June 2012 SA Report identified a number of SA objectives for which no significant effects were identified. The report recommends, in chapter 6, that monitoring of sustainability effects for the *Site allocations plan* is undertaken only for those objectives where significant or uncertain effects were identified. The SA objectives which are predicted to have significant sustainability effects (both positive and negative) are set out in table 4 below. These were identified in the Regulation 19 SA Report (June 2012). The SA Addendum (June 2014) concludes that, generally, the proposed modifications and other changes have resulted in no or limited changes to the scores predicted for the SA objectives, or the proposed changes are not significant.

⁹ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

- 7.4 Monitoring will be undertaken through Norwich City Council's *Annual monitoring report* so that it is integrated with monitoring the progress of the whole local plan. In addition to the framework set out in the *JCS*, the *Norwich local plan* has a monitoring framework (appendix 3 in the Site allocations plan) which sets out the SA objective being monitored for each local plan policy.
- 7.5 The monitoring framework commits Norwich City Council to seeking new evidence, implementing focussed changes to the plan or commencing work towards implementing a new plan if any issues with implementation of the policies become evident through monitoring within 2 years of adoption of this plan. This meets the requirements of the SEA Directive set out in paragraph 7.1 to undertake appropriate remedial action at an early stage if unforeseen adverse effects emerge.

Table 4: Monitoring Indicators for the Norwich Site Allocations DPD

SA objectives for which potential significant effects have been identified	Indicators
ENV1: To reduce the effects of traffic on the environment	<ul style="list-style-type: none"> • Proportion of journeys made by different modes (i.e. walking, cycling, public transport, car). • Increase/decrease in traffic volumes within Norwich. <p><i>Source: Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report, Greater Norwich Growth Board (JCS AMR)</i></p>
ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic environment	<ul style="list-style-type: none"> • Heritage at risk – Number of: <ol style="list-style-type: none"> a) listed buildings, and b) scheduled ancient monuments on the buildings at Risk Register. <p><i>Source: JCS AMR</i></p> <ul style="list-style-type: none"> • Number of listed buildings lost/demolished <p><i>Source: JCS AMR and Norwich local plan AMR.</i></p>
ENV6: To adapt to and mitigate against the impacts of climate change	<ul style="list-style-type: none"> • Total CO₂ emissions per capita • Decentralised and renewable or low carbon energy sources permitted in major development <p><i>Source: JCS AMR</i></p> <p>Note: Flood risk covered by ENV7.</p>
ENV7: To avoid, reduce and manage flood risk	<ul style="list-style-type: none"> • Development permissions granted contrary to Environment Agency advice on flood risk. • Number of dwellings permitted within the high risk flood areas (Environment Agency Flood Zones 2 and 3) <p><i>Source: JCS AMR</i></p>
ENV9: To make the best use of resources, including land and energy to minimise waste production	<ul style="list-style-type: none"> • Dwellings built on previously developed land or as conversions. <p><i>Source: JCS AMR</i></p>
SOC2: To maintain and improve the health of the whole population and promote healthy lifestyles	<ul style="list-style-type: none"> • Healthy life expectancy at age 65 of a) males and b) females. <p><i>Source: JCS AMR</i></p>
SOC3: To improve education and skills	<ul style="list-style-type: none"> • Workforce qualifications - % of working age population with

SA objectives for which potential significant effects have been identified	Indicators
	<p>qualifications at NVQ Level 4 or above.</p> <p><i>Source: JCS AMR</i></p> <ul style="list-style-type: none"> • School leaver qualifications - % of school leavers with 5 or more GCSEs at A*-C grades. <p><i>Source: Norwich Local plan: AMR</i></p>
<p>SOC4: To provide the opportunity to live in a decent, suitable and affordable home</p>	<ul style="list-style-type: none"> • Net housing completions. • Affordable housing completions. • New house completions by bedroom number, based on the proportions set out in the most recent Sub-regional Housing Market Assessment. <p><i>Source: JCS AMR</i></p>
<p>SOC5: To build community identity, improve social welfare and reduce crime and anti-social activities</p>	<ul style="list-style-type: none"> • Reduction in overall crime. <p><i>Source: JCS AMR</i></p>
<p>SOC7: To improve the quality of where people live</p>	<ul style="list-style-type: none"> • Unfit housing – % of homes from overall housing stock not meeting the ‘Decent Homes Standard’. • % of public housing stock built to the standard of the Code for Sustainable Homes (all affordable housing to achieve CfSH level 3). <p><i>Source: JCS AMR</i></p>
<p>SOC8: To improve accessibility to essential services, facilities and jobs</p>	<ul style="list-style-type: none"> • Accessibility of leisure and recreation facilities. <p><i>Source: JCS AMR</i></p> <ul style="list-style-type: none"> • Percentage of people claiming Job Seekers Allowance for a) >1 year; b) >2 years. <p><i>Source: JCS AMR</i></p>
<p>EC1: To encourage sustained economic growth</p>	<ul style="list-style-type: none"> • New business registration rate as a percentage of business stock. <p><i>Source: Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p> <ul style="list-style-type: none"> • Median earnings. <p><i>Source: Norwich Economic Barometer, Norwich City Council.</i></p>
<p>EC2: To encourage and accommodate both indigenous and</p>	<ul style="list-style-type: none"> • Amount of floorspace developed by employment type.

SA objectives for which potential significant effects have been identified	Indicators
inward investment	<ul style="list-style-type: none"> • Net change in retail floorspace in city centre. <p><i>Source: JCS AMR</i></p>
EC3: To encourage efficient patterns of movement in support of economic growth	<ul style="list-style-type: none"> • Proportion of travel to work journeys made by different modes (i.e. walking, cycling, public transport, car). <p><i>Source: Local Transport Plan monitoring; Census data and JCS AMR.</i></p>

Appendix 1

**Norwich City Council's responses to June 2012 SA Report
recommendations**

(endorsed by Sustainable Development Panel, 20 June 2012)

Sustainability objective	Recommendation	Proposed council response
ENV1, ENV3 and ENV 6	It is recommended that where sites are proposed to be car free, the intention to develop car free developments is stated specifically in the site policies. This would strengthen the likelihood of car free development occurring. It is recognised that Development Management Policy DM32 sets out criteria for residential development to be car free or acceptable as car free or low car housing which should help to ensure positive effects associated with car free or low car development occur.	Noted. No change is proposed in relation to this recommendation. This approach is consistent with policy DM32 in the Development Management Policies DPD which requires car free development in certain circumstances: where it is required this is set out in the site specific policy. However where car free housing is considered acceptable or desirable this is referred to in the explanatory text.
ENV4	In order to strengthen the likelihood of positive effects on biodiversity, we recommend that where intentions to maintain, protect or enhance biodiversity is stated in the supporting text to a site policy, the policy itself makes this explicit. In particular, it is recommended that site Policy CC1 is expanded to make reference to retaining and enhancing the wooded ridge which is located on part of the site and forms part of Richmond Hill. It is considered that all policies for development of sites on greenfield land should be amended to include measures to avoid, reduce or compensate for the loss of biodiversity.	Noted. Specific change to policy CC1 is accepted. All relevant site specific policies will be reviewed and amended to reflect recommendation where appropriate.
ENV5	A number of site specific recommendations have been made in relation to this objective, which would involve adding text to the policy as follows: CC12 – The need to respect the setting of neighbouring listed and locally listed buildings. CC5 –The need to respect the setting of on site listed buildings. CC24 –The need to respect the setting of nearby listed and locally listed buildings and the City Wall. CC34 - The need to respect the	All site specific recommendations for changes to policies are accepted. Please note however that no change is required for policy R13 as it already refers to the need to create a street frontage to Aylsham Road.

Sustainability objective	Recommendation	Proposed council response
	<p>setting of nearby locally listed buildings and the line of the City Wall.</p> <p>R3 - The need for the development not to be dominated by car parking.</p> <p>R13 – The need to create a street frontage to Aylsham Road.</p> <p>R24 –The need to create a street frontage to Aylsham Road.</p>	
ENV5	It is recommended that where sites are within close proximity to the Broads National Park relevant site policies or the supporting text to the policy should make reference to the need to protect the setting of the National Park.	This is covered by policy DM6 in the Development Management Policies DPD.
ENV7	It is recommended that a commitment to mitigate flood risk at sites located in a Critical Drainage Area is included as a requirement in the relevant site policies.	Accepted: all relevant site specific policies will be amended accordingly.
SOC7	It is considered that where noise has been identified as a potential issue, the requirement for a noise assessment and appropriate mitigation should be set out in the site policy.	Accepted: all relevant site specific policies will be reviewed and amended accordingly.
EC4	Site policy recommendations set out under SA Objective ENV3, ENV4, ENV5 and ENV7 will also apply to SA objective EC4 – To improve the social and environmental performance of the economy.	Noted: see responses set out above.

