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Sustainability Appraisal of the Norwich Development Management Policies DPD

Regulation 19 (Pre-submission) Version

Prepared by LUC
June 2012

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Client: Norwich City Council

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Non-technical summary

What is the purpose of Sustainability Appraisal?

1. When preparing the Development Management Policies Development Plan Document (DPD) (hereafter referred to as the "DM Policies DPD"), Norwich City Council is required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA). The government recommends that both SA and SEA are undertaken in one process to meet the legal requirements and this process is referred to as the "SA", with the overall aim of achieving sustainable development.
2. The purpose of the SA was to assist Norwich City Council in preparing the DM Policies DPD by identifying key sustainability issues facing the city, to predict what would be the likely effects of the DM Policies DPD on these issues and to put forward recommendations to improve it. The aim was to ensure that the proposed DM policies have as many positive effects as possible, and that any potential negative effects are avoided to protect the city from harmful developments.

What is in the DM Policies DPD?

3. To supplement the Joint Core Strategy (JCS) that covers Norwich along with Broadland and South Norfolk, Norwich City Council is continuing the approach of setting out local planning policies in two separate development plan documents:
 - The DM Policies DPD, which contains general policies to guide development, which apply across the whole city; and
 - The Site Allocations and Site Specific Policies DPD, which sets out site specific policies and proposals for sites where a change of use is anticipated.
4. The DM Policies DPD provides detailed planning policies to help deliver the JCS and to guide how the council responds to planning applications for new development in the city. The document includes 33 policies broadly based on the themes of the JCS. It also includes policies on locally specific issues that are not already covered in national policy or the JCS. Supplementary text is provided for each policy, giving further detail, explanation and clarification. To accompany the DM Policies DPD the council has produced a Policies Map showing various policies and where site allocations apply.

How was the Sustainability Appraisal carried out?

5. The SA of this version of the DM Policies DPD has been undertaken independently by consultants (LUC), with some input from Norwich City Council. Since 2010, LUC has provided advice to Norwich City Council during the preparation of the DM Policies DPD.
6. The SA has comprised five main phases of work:

SA Stage A: Deciding the scope of the SA

7. The first stage of the SA process, setting the context and objectives, establishing the baseline and deciding the scope was undertaken by Norwich City Council and presented in the 2010 DM Policies Development Plan Document SA Scoping Report. The Scoping Report was published for consultation from 19 April to 24 May 2010.
8. The Scoping Report presented the outputs of the scoping phase of the SA and development of the SA framework (a set of sustainability objectives and criteria) against which the various

components of the DM Policies DPD have since been appraised. Five consultation responses were received from Norfolk Landscape Archaeology, Norwich City Council (Environment, Transport and Development), English Heritage, Environment Agency and Natural England. The comments have been taken into account in this SA report, as detailed in **Table 3.2** of the main SA Report.

SA Stage B: Developing and refining options and assessing effects

9. Developing options for a plan is an iterative process, usually involving a number of consultations with key stakeholders and the public. The SA helps to identify where there may be other 'reasonable alternatives' to the (proposed) options being considered for a plan. 'Reasonable alternatives' is a term used in the SEA Directive and Regulations, and is therefore legally required to be considered when preparing a plan. The options for the DM Policies DPD have been developed and refined through a number of stages as described below.
 - 'Regulation 25' (now known as Regulation 18) consultation (January to March 2011)
 - Regulation 19 (Pre-submission) consultation (expected to take place for 12 weeks from early August 2012)
10. The December 2010 SA report was published at the Regulation 18 consultation. One consultation response was received from the Environment Agency in March 2011 which suggested that the SA contain an explanation on two matters relating to flood risk and Norwich City Council's application of national planning policy on flooding. This issue has been addressed in detail in the DM Policies DPD (e.g. supporting text to DM5) and main SA Report.

SA Stage C: Preparing the sustainability report

11. This SA Report, to accompany the Regulation 19 consultation on the DM Policies DPD, details the process undertaken to date in conducting the SA of the Norwich DM Policies DPD (Pre-Submission Version) as well as setting out the findings of the appraisal.

SA Stage D: Consultation on the DM Policies DPD (Pre-Submission Version) and this SA report

12. Norwich City Council is inviting representations on the DM Policies DPD (Pre-Submission Version) and this SA report in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

SA Stage E: Monitoring Implementation of the DPD

13. This SA report sets out the recommendations for monitoring the significant social, environmental and economic effects of implementing the DM Policies DPD. These monitoring proposals should be considered within the context of the broader monitoring framework for the Local Development Framework and the Norwich City Council Monitoring Report.

Character of the City of Norwich

14. Norwich is characterised largely by its historic townscape and its green setting with significant areas of trees and woodland, some of which form green links into the surrounding countryside. To the west of Norwich, there are extensive areas designated as county wildlife sites associated with the floodplains of the Rivers Wensum, Tud and Yare. Norwich has been able to meet many of its recent housing development needs by utilising brownfield or previously developed sites. The 'fringe' area around Norwich benefits from a number of schemes that seek to improve its habitats, landscapes and recreational attractions. Further development of this green infrastructure could play an important role in helping to avoid increased flood risk and harm to wildlife as a result of climate change. Important wildlife sites in the city consist mainly of marshland and meadows in the river valleys and wooded former chalk pits. Norwich's distinctive townscape contains conservation areas covering 17 per cent of the total area of the city, including virtually the whole of the city centre whilst important historic features include the medieval cathedral, castle, city walls, historic parks and archaeological sites.

15. East Anglia is recognised as one of the driest areas of the country, with pressure on water resource supplies being linked to low rainfall, widespread agricultural water use and new residential and employment growth. Whilst it is important that new development is water efficient Anglian Water Services and the Environment Agency have stated that there are sufficient water resources to meet the growth demands until 2031. Additional wastewater treatment capacity and strategic sewers will be needed in some areas to support new development and some freshwater wildlife sites suffer from poor water quality.
16. Studies show that significant areas of Norwich City are at risk from flooding and that regional housing targets cannot be met by only developing in low risk areas of the city.
17. Norwich has successfully reduced the amount of rubbish it sends to landfill sites in recent years and Norwich City uses fewer resources and produces fewer greenhouse gases per person than greater Norwich.
18. Greater Norwich has the theoretical potential to meet all of its current energy needs from renewable sources with local biomass and wind generation offering the lowest cost solutions.
19. The Norwich area provides the largest concentration of jobs in the eastern region and the economy of Norwich is characterised by a high proportion of jobs in large businesses and in professional positions. The financial sector is a particularly important employer in Norwich City, whilst public administration, education and health are the second largest sector. Employment growth should focus on its strengths in relation to an attractive environment and knowledge based industries.
20. Norwich's entertainment, leisure, retail and cultural offerings are also important to its economy as are its higher education facilities. Norwich city centre has a strong regional role and a relatively strong and attractive retail offer. There is a need to maintain this competitive position by continued investment in the retail centre, including the historic environment and tourist attractions of the centre.
21. Although public transport is generally available across the city, approximately half of its residents travel to work by private car with travel by foot or cycle also high. Approximately 72% of Norwich's working residents work in the local area and approximately 42% of its workforce lives locally. An increasing quality of bus provision and expansion of a park and ride service to the city centre have seen some success in reducing private car use. Future proposals exist for a new road to address orbital traffic congestion as well as public transport improvements. A number of areas of poor air quality exist within the city, mainly as a result of traffic pollution. Norwich International Airport, which carries over 400,000 passengers a year, lies in Norwich City and neighbouring Broadland district.
22. There were an estimated 144,000 people living in Norwich in 2010 with 72% of working age and 14% pensionable age. The black and ethnic minority proportion of Norwich's total population is only half that of the regional average. Despite being an urban area, Norwich contains significant number of groups of gypsies and travellers. Norwich ranks as significantly more deprived than neighbouring authority areas or the English average and has considerably lower educational attainment at GCSE level than the national average.
23. Norwich has extensive areas of terraced housing adjacent to the city centre, which, being older properties, comprise the largest proportion of homes that fail to meet the 'decent home' standards. There are higher-than-average numbers of 'vulnerable' residents in Norwich residing in non-decent homes. Norwich also contains higher proportions of households living in accommodation that is unsuitable for their needs. Norwich provides the most affordable homes in greater Norwich and contains the largest proportion in the East of England; some 36 per cent of the housing stock is social housing. Housing affordability is a problem, especially for first time buyers.

Review of other plans, policies and programmes

24. The DM Policies DPD is influenced by many other plan, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other

programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level.

25. As part of the SA, a review was undertaken of other relevant plans, policies and programmes to establish their objectives, and their implications for the DM Policies DPD and SA. The review is detailed in the main SA Report. The most significant development for the DM Policies DPD has been the recent publication of the new National Planning Policy Framework (NPPF) in March 2012, which replaced the existing suite of Planning Policy Statements (PPSs) and Planning Policy Guidance documents (PPGs). The NPPF is intended to streamline national planning policy, having reduced over a thousand pages of policy down to around 50 pages. Although most of the objectives within the NPPF are similar to those they replaced, there is now a strong 'presumption in favour of sustainable development'. In addition to the new NPPF, the Localism Act 2011 abolished the regional tier of the planning system such that the former Regional Assemblies and Regional Development Agencies no longer exist. However, until central Government has formally revoked the Regional Strategies they remain relevant when preparing local planning documents.

What are the main sustainability issues facing Norwich?

26. Reviewing the relevant plans, policies and programmes, and considering the baseline character of the area has highlighted a number of key sustainability issues facing Norwich, as set out in **Table 1** which also sets out how they are likely to change without the DM Policies DPD. These give an indication of the environmental, social and economic character of the city of Norwich and the areas most likely to be affected by the plan. Many of the issues identified are influenced by a wide range of factors, including those outside of the control of the planning system (e.g. the state of the wider economy), but in general they are likely to continue without the combined intervention of the JCS, the Site Allocations and Site Specific Policies DPD, and the DM Policies DPD, which is the subject of this SA report.

Table 1: Sustainability issues identified for Norwich

Key Sustainability Issues	Likely Evolution without the Plan
Natural and Built environment	
Pressure on the character/quality of the natural and built environments from widespread development	Likely to continue and may be exacerbated without a planned approach to development
Requirement for green spaces and green corridors in and improved walking and cycling networks	Less opportunity to adopt a co-ordinated approach to the development of green spaces/green networks and walking and cycling networks without the Plan.
Requirement to enhance the historic core of Norwich and other distinctive heritage features, by making them more able to withstand development pressures in the immediate future such as traffic growth	National policy should help to protect and enhance heritage assets but whether or not this will help specific sites is uncertain
Climate change	
Significant areas in the city are at risk of flooding, including previously developed areas	The areas at risk of flooding will increase with climate change
Flood risk in areas like the Broads can also be exacerbated by developments upstream causing a change to natural watercourses and the water cycle	Without the Plan it will be more difficult to manage the effects of developments on flood risk, although all developments would need to take account of National policy on flood risk
Adapting to the effects of climate change will need to include the ability to design developments that are water efficient and recycle water resources as Norfolk is one of the drier parts of the country	Without the Plan it will be more difficult to adopt a co-ordinated approach to adapting to climate change. Conversely, new development needs to meet higher water efficiency standards and water companies must plan to reduce leaks from the water supply network as well as improve water efficiency
New developments in all sectors, land uses and activities will need to minimise their carbon emissions. The growth in the popularity and use of Norwich Airport will also need to be addressed through carbon-saving elsewhere	Emissions from new development are likely to be progressively reduced due to initiatives such as the Code for Sustainable Homes. Growth in use of the airport and consequent need for airport expansion is likely to be outside the direct control of local planning policy
Natural Resources	
There is increasing pressure on the natural resources needed to facilitate new development, which will impact on water quality and supply, air quality, energy and minerals use	This pressure will continue in the absence of the Plan
There is a need to reduce the amount of waste sent to landfill sites, and find alternative	Management of waste will be co-ordinated and planned for separately

Key Sustainability Issues	Likely Evolution without the Plan
methods of disposal	
Transport	
Over-reliance on the car to access facilities and services	Likely to continue in line with national trends.
Access to jobs needs to be improved; this includes provision of jobs closer to centres of population	Access to jobs is likely to remain at odds with the key centres of population
Population, Access to Services and Community	
Requirement to meet the needs of an increasingly ageing population	Responding to the needs of an ageing population may be less co-ordinated in the absence of the Plan. However, all new housing developments would need to meet the requirements of Lifetime homes.
Need to create balanced and integrated communities	Creation of genuinely balanced and integrated communities may be more difficult to achieve in the absence of a Planned approach
Household sizes are becoming smaller as more people remain single for longer or become single, as a result require more homes to cater for this trend	Likely to continue in line with national trends
Deprivation	
Deprivation is highest in urban areas	Likely to continue without appropriate Policy response although this is recognised in the JCS
Health	
Promoting healthy lifestyles will be important	Consideration of healthy lifestyles (including responding to issues such as obesity) will occur at the National level. Local level initiatives e.g. public health strategies will seek to respond to Norwich-specific issues
Health infrastructure required to meet increasing overall population and increasingly ageing population	Trend likely to continue
Traffic-related emissions are having an effect on the population of Norwich's health and wellbeing	Trend likely to continue, although future designation of city centre-wide AQMA may prevent worsening of the issue
Need for permanent gypsy and traveller sites to improve access to key facilities such as healthcare and education	Likely to continue because of the difficulty of finding suitable sites
Crime	

Key Sustainability Issues	Likely Evolution without the Plan
Some higher crime levels exist in the urban areas, particularly the more deprived wards	Likely to continue, linked to employment opportunities, education and skill levels
Leisure, culture and recreation	
Need to provide access to a good range of cultural and leisure facilities, including improved access to local green spaces	Likely to continue. Delivery may be less co-ordinated in absence of the Plan.
Education, Skills and Employment	
The retention and attraction of young people through jobs provision and access to the housing market will be a key priority	Retention/attraction of young people to Norwich may continue to be difficult, linked to accessible employment and affordable housing
Employment businesses need support to diversify (large employers tend to be located in the city and small employers in neighbouring districts). This will be particularly important to strengthening the tourism industry, although promoting the tourism product of the area will need to be done in a sustainable way	Employment trends likely to continue
Housing	
Difficulties in accessing the housing market	Likely to continue
Requirement for housing of all types and tenures	Likely to continue, although recognised through JCS.
Existing housing stock is of poor quality	Likely to continue, although JCS is now in place and its emphasis on urban and suburban regeneration alongside specific initiatives for neighbourhood renewal will help to address this issue.

What are Norwich's sustainability objectives?

27. The review of other policies, plans and programmes and the identifications of sustainability issues during Stage A of the SA provided the basis for a set of sustainability objectives to be developed. The sustainability objectives have been the main tool at each stage of the SA for assessing the options for the DM Policies DPD, and comprised a number of environmental, social and economic objectives, and are shown below in **Table 2**.

Table 2: List of SA objectives

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, townscape 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 social activity
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

How did the Sustainability Appraisal influence what the DM Policies DPD says?

28. As set out above, development of the DM Policies DPD has been an iterative process. The SA has run alongside this process and the findings of the SA have been taken into account by Norwich City Council at each stage. **Appendix 5** of the main SA Report details the many recommendations made during earlier stages of the SA and how these have been taken into account by Norwich City Council when refining the DM Policies DPD. Further recommendations at this final stage of SA are summarised later in this Non-Technical Summary.

What are the sustainability effects of the DM Policies likely to be?

29. A summary of the sustainability effects identified through the appraisal is provided **Table 3**. The SA objectives are shown in the left-hand column. Predicted sustainability effects are highlighted under the relevant DM Policy theme using the symbols shown in the key below the table.

Table 3: Summary of SA scores

DM Policy theme / SA Objective	Environmental Design	Communications	Housing	Economy	Communities	University of East Anglia	Norwich Airport	Transport	Planning Obligations
ENV1	+	0	-	-	+/-	-	-?	+	+
ENV2	+	0	-	-	+	0	-?	0	+
ENV3	+	0	-	-	+	+/-	-/-?	+	+
ENV4	+	0	+	0	0	+/ -?	-?	0	+
ENV5	++	+	+	+	+	+	-?	+/-	+/-
ENV6	+	0	+/-	+/-	+/-	-	-	+	+
ENV7	-?/+?	0	-?/+?	-?/+?	0	0	0	0	0
ENV8	0	0	-	-	0	0	0	0	+/-
ENV9	+	0	+	0	+/-	-	--?	+	+/-
SOC1	+	0	+	0	+	+	0	0	+
SOC2	+	0	+	0	+	+	-?	+	+
SOC3	0	0	0	0	+	++	+	0	0
SOC4	+	0	++	0	0	+	0	0	++
SOC5	+	0	+	0	+	0	0	0	+/-
SOC6	0	0	0	++	+/-	+	+	0	+/-
SOC7	+	0	+	+	+	+	-	+	+
SOC8	+	+	+	++	+/-	+	+	++	+/?
EC1	+	+	0	++	+	+	+	+	+/-
EC2	+	+	0	++	+/-	+	+	+	+/-
EC3	+	+	0	++	+/-	+	-?	+	+/-
EC4	+	+	0	+	+	+	+/-	+	+/-

Key	
Score	Effects
++	Significant positive effect
+	Minor positive effect
0	Neutral or no effect
-	Minor negative effect
--	Significant negative effect
/	Mixed effects (e.g. -/+ minor negative effects and significant positive effects)
?	Uncertain effect

30. It is apparent that the sustainability effects of the DM Policies DPD are generally minor. This is to be expected since the DM policies represent the lowest tier in a hierarchy of planning policies, adding local detail to implement the broader principles of policies within the National Planning Policy Framework (NPPF) and JCS. The fact that the effect of the DM policies over and above the business as usual policy framework is generally positive is also to be expected since many of these policies are designed to avoid or mitigate some of the potential adverse effects of the development provided for in the JCS, by addressing local issues.
31. Looking across the DM policies DPD at the cumulative effect of all DM policies, the large number of minor positive effects combined with some significant positive effects and relatively few negative effects are judged to produce **significant positive effects** for the following SA objectives:
- ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic
 - 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
 - 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
 - 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 the social and environmental performance of the economy
32. Looking across the DM policies DPD at the cumulative effect of all DM policies, no significant negative cumulative effects were identified.
33. Relatively few policy themes attracted purely negative (as opposed to mixed) sustainability effects as a result of the mitigation provided by other policies and within the same policy. The potential negative environmental effects of many of the policies supporting housing and economic development, for instance, are mitigated by policies such as DM1 (Achieving and delivering

sustainable development), DM6 (Natural environmental assets) and DM9 (the historic environment and heritage assets).

34. In addition, the position of the DM Policies DPD at the bottom of a hierarchy of planning policies means that the incremental effect of implementing the DM policies is likely to be minor since reliance on the 'business as usual' (BAU) framework of other existing policies (for example those in the JCS and NPPF) would often produce a similar effect. For example, increased airport related development is likely to result in increased aircraft movements and significant associated greenhouse gas emissions. Although this effect will be difficult to mitigate, it is judged to be largely attributable to BAU policies, notably the Aviation White Paper 2003 and JCS Policy 6 (Access and transportation). The incremental effect of policy DM27 (Development at Norwich Airport) on ENV6 (To adapt to and mitigate against the impacts of climate change) due to increased airport operations was therefore judged to be limited to a minor negative one.
35. In light of the above, the only significant negative residual effect identified for an individual policy theme was the effect of DM27 on ENV9 (To make the best use of resources, including land and energy and to minimise waste production). This relates to the presence of greenfield land in Agricultural Land Classification (ALC) zones 1-3 within the airport boundary which could be lost to development. Uncertainty relates to the fact that the land may fall into ALC classification 3b which is not 'best and most versatile' rather than 3a which is 'best and most versatile' but data are unavailable to make this distinction.

What alternatives were considered during preparation of the DM Policies DPD?

36. A large number of alternative policies to assist in managing development have been considered by Norwich City Council during the preparation of the DM Policies DPD. The relative sustainability performance of the alternative policies is summarised below for each policy theme.

Environmental Design

37. Some of the reasonable alternatives considered would be likely to have more positive effects on certain SA objectives than the proposed policies. For example, an option for policy DM6 (Natural Environmental Assets) would prohibit any form of development within national, regional or local sites. This option would provide stronger protection for biodiversity and landscape but could also have negative effects on access to green infrastructure by preventing the development of informal outdoor recreation. Overall we conclude that none of the reasonable alternatives perform significantly better in sustainability terms than the corresponding policies proposed in the DM Policies DPD.

Communications

38. Two alternative policies were considered by Norwich City Council for the Communications Infrastructure policy (DM10). The first was relying on the 'business as usual' (BAU) framework of other existing policies. The second option considered was a more restrictive policy and it is likely this would not allow for the efficient development of the communications network to meet public and business needs. However, this likely reduction in communications infrastructure would reduce potential impacts on landscape and townscape. Overall we conclude that none of the reasonable alternatives perform significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD.

Housing

39. Although some of the alternative policies would result in more positive effects on certain SA objectives, this would be offset by more negative effects on other objectives compared to the proposed policies. For example, alternatives which place greater restriction on developments of houses in multiple occupation (HMOs), residential institutions or gypsy and traveller sites or on loss of existing housing would help secure the supply of general housing but would risk failing to meet the needs of specific housing groups and threaten the achievement of mixed and balanced communities. Overall we conclude that none of the reasonable alternatives considered for this

policy theme performs significantly better in sustainability terms than the corresponding policies proposed in the DM Policies DPD.

Economy

40. Similar to other policy themes, alternative policies would result in positive effects, but these would be offset by more negative effects compared to the proposed policies. For example, alternatives which would prioritise protection of prime employment sites whilst relaxing protection of others would have the advantage of giving businesses more flexibility to respond to market signals but would also risk losing employment provision and economic activity associated with non-prime sites. Overall we conclude that none of the reasonable alternatives considered for this policy theme performs significantly better in sustainability terms than the corresponding policies proposed in the DM Policies DPD.

Communities

41. Some of the alternatives would result in more positive effects on certain SA objectives, but this would be offset by more negative effects on other objectives. For example, an alternative for DM24 would extend the defined leisure and Late Night Activity Zone which could have more positive effects on the economy but could produce more adverse effects on the natural environment and the quality of life of neighbours. Overall we conclude that none of the reasonable alternative sites considered for this policy theme performs significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD.

University of East Anglia

42. Three alternative options were considered for this policy theme. One of the options was to expand the boundary to cover a larger area. Expanding the area was considered to have positive effects on the provision of education and the economy but negative effects on natural environment assets. Another option was to prevent further growth of the UEA but this would be directly contrary to the JCS, as a result this has not been assessed. Overall, we conclude that none of the reasonable alternatives performed significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD.

Norwich Airport

43. Options which constrain further growth of the airport (contrary to the JCS) could have potentially significant adverse effects on supporting the economy but would avoid the potential significant adverse effects on the environment. Conversely, options for expanding the airport boundary could have the opposite effect. Although the proposed policy attempts to strike a balance between these opposing effects and to be consistent with the JCS and Aviation White Paper, some significant adverse environmental effects are likely to result from the proposed policy in combination with JCS policy 6.

Transport

44. This theme had a number of reasonable alternative policies all of which had positive effects and negative effects. For example, one of the alternatives was to apply more or less restrictive car parking standards. Applying a more restrictive level of car parking would have positive effects on the environment, quality of life and the economy while applying a less restrictive level of car parking would have negative on the environment, quality of like and the economy. All but one of the alternatives were considered to not perform significantly better in sustainability terms than the preferred policies in the DM Policies DPD. The exception was the alternative policy which would reduce the number of overall spaces within the city centre which performed better against the environmental objectives but less well against the economic ones. However, this option is not considered a reasonable alternative as it would result in the DM Policies DPD not conforming to the JCS. This is because the Norwich Area Transportation Strategy (NATS), which is integral to transport policy in the JCS, stipulates parking provision should not be capped below 10,000. Similarly, the option would risk non-conformity with the NPPF which requires a level of parking provision that will support businesses and the vitality and viability of the city centre.

Planning Obligations

45. Two alternative policies were considered by Norwich City Council for this policy theme. The first one was reliance on the BAU framework of other existing policies. The second option considered was a more detailed policy, adding more content on specific matters covered by planning obligations. Although this policy could perform better in sustainability terms than the proposed policy in the DM Policies DPD, it was considered that this level of detail is inappropriate for a Local Plan policy. Instead, a recommendation has been made (below) that an Appendix is added to the DM Policies DPD detailing other types of infrastructure that could be secured through planning obligations.

What could be done to make the DM Policies DPD even better?

46. After taking into account existing mitigation, for example that provided by other policies within the DM Policies DPD and JCS, no significant negative effects were identified from the DM Policies DPD therefore no further mitigation has been recommended. The one exception to this is the significant negative but uncertain effect of DM27 Norwich Airport on ENV9 (To make the best use of resources, including land and energy and to minimise waste production). This relates to the presence of greenfield land in Agricultural Land Classification zones 1-3 within the airport boundary which could be lost to development. Uncertainty relates to the fact that the land may fall into Agricultural Land Classification classification 3b (which is not 'best and most versatile' land) rather than 3a (which is 'best and most versatile land') but data are unavailable to make this distinction. In order to mitigate this potential significant negative effect it is recommended that the potential agricultural value of greenfield land within the airport boundary and of site R32 in the Site Allocations and Site Specific Policies DPD are confirmed to inform a future airport Masterplan and to fully establish the potential effects of allocating site R32.
47. A number of other potential improvements to the DM Policies DPD were identified during the course of the SA. Recommendations made at earlier stages and Norwich City Council's responses to them are set out in **Appendix 5** of the main SA Report. Recommendations made during the SA of the Regulation 19 version of the DM Policies DPD are summarised below by policy theme:

Communities

48. Schools have the potential to significantly increase the number of private car journeys. Policy DM22 should explicitly state the need to keep private car travel as low as feasibly possible.

Norwich Airport

49. It is recommended that the Norwich Airport Masterplan, once complete, is subject to Sustainability Appraisal/Strategic Environmental Assessment.
50. It is recommended that safeguards to ensure that pollution from airport related development arising as a result of DM policy 27 will not have a significant effect on watercourses draining to the Broadland SAC, SPA and Ramsar site are confirmed with Natural England the Environment Agency.

Planning obligations

51. It is considered that although a more detailed policy DM33 is inappropriate for a Local Plan policy, the potential benefits of listing the types of the infrastructure that can be funded through planning obligations are significant. Therefore it is recommended that an Appendix is created for this policy that lists the following infrastructure: Transportation; Green infrastructure; Community infrastructure; Historic environment; Waste recycling; Renewable energy infrastructure; Flood prevention and drainage; Economic development infrastructure (and associated skills and training). This would help to ensure that funding for essential infrastructure is a material consideration of a proposed development.

How will the sustainability effects of the DM Policies DPD be monitored?

52. Monitoring of the DM Policies DPD will be focussed on:
- Significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends and corrective action before such damage is caused); and
 - Significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken; and
 - Significant effects where monitoring would help to ensure that positive outcomes are realised.
53. It will be conducted as part of an overall approach to monitoring the sustainability effects of the DM Policies DPD alongside the JCS and Site Allocations and Site Specific Policies DPD, and should be incorporated within other monitoring requirements (i.e. the Annual Monitoring Report).
54. A table is included within the full SA report, which summarises the significant effects to be monitored for Norwich's DM Policy DPD and the suggested indicators or datasets that may be able to provide an indications of the extent of those effects.

What are the next steps in preparation of the DM Policies DPD and its Sustainability Appraisal?

55. The SA report will be published for consultation alongside the Pre-Submission DM Policies DPD. Norwich City Council is inviting consultation responses (or 'representations') on the 'soundness' of the DPD and on this SA report. The DPD will then be revised to take into account the consultation responses and make it ready for Submission to the Secretary of State. Any significant changes to the DPD will need to be subject to SA, and if so, a revised SA Report (or addendum to this report) will be prepared. A public examination will then be held to decide if the DPD is 'sound'.

Where can I find out more about Sustainability Appraisal?

56. More information about SA can be found in the SA report which follows, and on the Planning Advisory Service website: www.pas.co.uk.

1 Introduction

- 1.1 In 2004, a revised system for preparing and delivering planning policy was introduced by the government, called the Local Development Framework (LDF). As part of developing the LDF, Norwich City Council has been preparing a folder of planning documents to provide the basis for determining planning applications and future development in the City. The LDF is composed of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The Councils of Broadland, Norwich and South Norfolk, supported by Norfolk County Council, worked together to prepare a single Joint Core Strategy (JCS) DPD adopted in 2011.
- 1.2 However, this system is again being reviewed by the present government and the LDF suite of documents concept is being phased out. Instead, Local Planning Authorities will be required to produce a "local plan" for their area (although the local plan in practice may consist of more than one published document). In addition to the JCS, Norwich City Council is setting out its own local planning policies in two separate DPDs just for Norwich City: the Development Management Policies DPD (DM Policies DPD), which sets out general policies to guide development across the whole city (and is the subject of this Sustainability Appraisal) and the Site Allocations and Site Specific Policies DPD, which contains detailed, site specific policies and proposals on sites where change is anticipated or proposed.
- 1.3 This report constitutes the Sustainability Appraisal (SA) Report for Norwich City Council's Pre-submission DM Policies DPD. The SA Report has been produced alongside the DPD, and both documents are being published for consultation at the same time in order to provide the public and statutory consultation bodies¹ with an opportunity to express their opinions on the SA Report and to enable them to use it as a reference point when commenting on the 'soundness' of the DM Policies DPD.

Purpose of the SA

- 1.4 All local plans are required to be subject to SA under the Planning and Compulsory Purchase Act 2004. The purpose of SA is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of plans. Local plans are also legally required to be subject to a Strategic Environmental Assessment (SEA) under the 2001 European Directive².
- 1.5 The objective of SEA, as defined in Article 1 of the SEA Directive, is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development'.
- 1.6 Due to their similar requirements, there are many parallels between the SA and SEA processes but also some differences. SA includes a wider range of considerations, as it includes social and economic impacts of plans, whereas SEA is more focussed on environmental impacts. The Government guidance³ on SA shows how it is possible to satisfy both requirements through a single appraisal process i.e. a joint SA/SEA (hereafter referred to as SA).
- 1.7 A key output of the SA process is a Sustainability Appraisal Report which describes what elements of the local plan have been appraised, the method of appraisal and the likely significant sustainability effects of plan implementation.
- 1.8 **Table 1.1** below signposts how the requirements of the SEA Directive have been met within this SA report.

¹ The statutory consultation bodies in England are the Environment Agency, Natural England and English Heritage.

² Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. European Parliament and Council of the European Union (2001).

³ SA guidance is part of the Plan Making Manual hosted on the Planning Advisory Service (PAS) website .

Table 1.1: Requirements of the SEA Directive and where these have been addressed in this SA Report (after Appendix 1, SA Guidance, ODPM, 2005)

SEA Directive Requirements	Where covered?
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Section 2, Section 4, Appendix 3
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 4, Section 5 appraisals of BAU, Appendix 2
c) The environmental characteristics of areas likely to be significantly affected	Section 4, Appendix 2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 4
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Section 4, Appendix 3
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Section 5, Section 6
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 5, Section 6
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 3, Appendix 4
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 6
j) a non-technical summary of the information provided under the above headings	A non-technical summary forms part of this SA report.

SEA Directive Requirements	Where covered?
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	Addressed throughout this SA report.
Consultation: <ul style="list-style-type: none"> authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4) 	Consultation on the SA Scoping Report was undertaken in April-May 2010.
<ul style="list-style-type: none"> authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2) 	Consultation is being undertaken in relation to this SA report alongside the Pre-submission Site Allocations and Site Specific Policies DPD – expected to commence August 2012.
<ul style="list-style-type: none"> other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	N/A
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	
Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed: <ul style="list-style-type: none"> the plan or programme as adopted a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures decided concerning monitoring (Art. 9) 	To be addressed at a later stage in the SA process.
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	Section 6
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	This table demonstrates where the requirements of the SEA Directive have been met.

Structure of the SA Report

- 1.9 This introductory section (**Section 1**) provides background information regarding the preparation of the DM Policies DPD and explains the requirement to undertake SA. The remainder of the main body of this report is structured as follows:

Section 2 – The DM Policies DPD summarises the content and structure of the DPD.

Section 3 – Sustainability Appraisal Methodology and Framework describes the methodology that has been used for the SA, lists the SA objectives that have been used to appraise the DM Policies DPD and describes any difficulties that have been encountered during the process.

Section 4 – Baseline Characterisation and Plan and Programme Review provides a description of the key environmental, social and economic characteristics of the City of Norwich, the key sustainability issues facing the City, and relevant national and local policy objectives that taken together provide context for the sustainability appraisal.

Section 5 – Appraisal of DM Policies and Reasonable Alternatives describes the findings of the appraisal of the DM Policies in the pre-submission DPD, as well as reasonable alternatives to those policies.

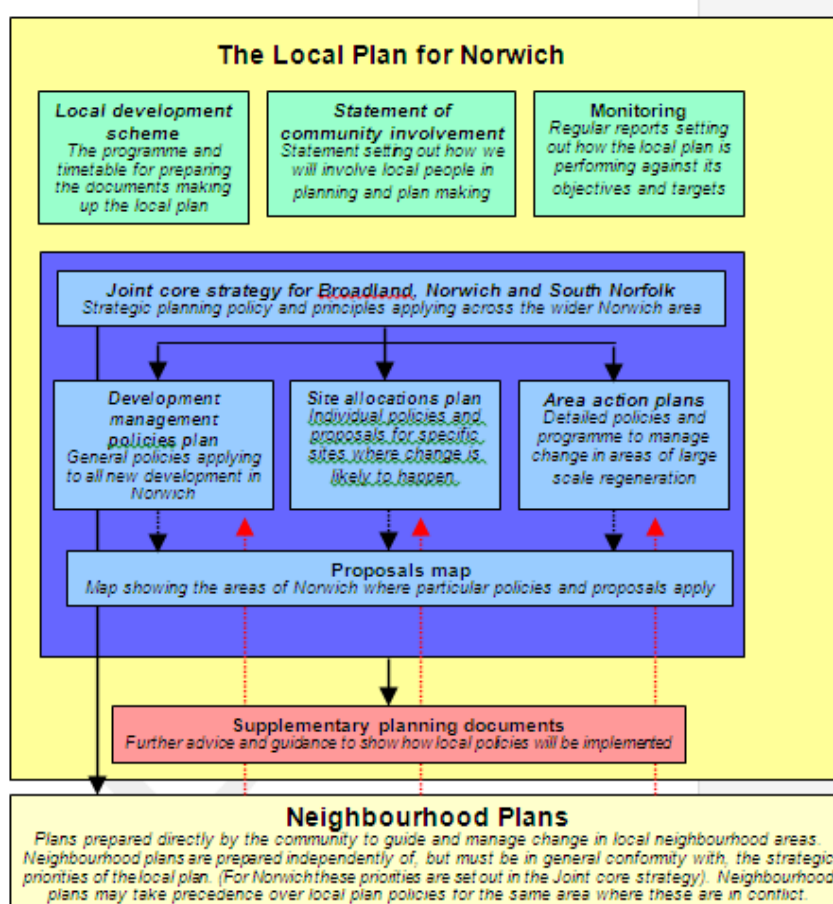
Section 6 – Conclusions summarises the main conclusions of the SA of the DM Policies DPD, and describes proposals for monitoring the potential sustainability effects of its implementation.

2 The DM Policies DPD

The local plan

- 2.1 As described in Section 1, many local planning authorities have opted to prepare a single plan under the new government requirements for local planning. In contrast, Norwich City Council is continuing the approach of setting out local planning policies in two separate DPDs that supplement its adopted JCS (which covers Broadland, Norwich City and South Norfolk Districts).
- The DM Policies DPD, which sets out general policies to guide development, which apply across the whole city; and
 - The Site Allocations and Site Specific Policies DPD, which contains detailed, site specific policies and proposals for sites where a change of use is proposed or expected.
- 2.2 Norwich City Council's DM Policies DPD has been prepared in accordance with the policies and proposals set out in the adopted JCS and the policies of City Council's draft Site Allocations DPD. The relationship and conformity of the DM Policies DPD to other documents within the Local Development Framework is set out in the Local Development Scheme⁴ (LDS) and reproduced in **Figure 2.1**.

Figure 2.1: Documents making up the new local planning framework for Norwich



⁴ Local Development Scheme for Norwich 2009 to 2012, Norwich City Council, March 2010.

- 2.3 The JCS, prepared by the Greater Norwich Development Partnership (GNDP) formed from constituent planning authorities in the greater Norwich area, was adopted by the three Councils in March 2011. The JCS sets out the council's vision, objectives and strategic policies on important issues such as housing, employment and shopping. The JCS sets out the long-term vision and objectives for the area, including strategic policies for steering and shaping development. It identifies broad locations for new housing and employment growth and changes to transport infrastructure and other supporting community facilities, as well as defining areas where development should be limited.
- 2.4 On 3 May 2011 Broadland, Norwich and South Norfolk Councils received a legal challenge to the adoption of the JCS. The final order of the High Court (issued on 24 April 2012 following a judgement in February) found that those parts of the JCS concerning the North East Growth Triangle (NEGT) in Broadland District should be remitted for further consideration and that a new Sustainability Appraisal be prepared for that part of Broadland falling within the Norwich Policy Area. Thus, with the exception of those parts of the document specific to the Norwich Policy Area part of Broadland (including housing targets for that area) the JCS remains adopted and part of the respective Development Plans for Broadland, Norwich city and South Norfolk districts. Planning determinations will still be made in accordance with the Development Plan unless material planning considerations indicate otherwise.
- 2.5 The JCS's spatial planning objectives are derived from the Sustainable community strategies for each of the three districts and in summary are:
- Objective 1: to minimise the contributors to climate change and address its impact.
 - Objective 2: to allocate enough land for housing, and affordable housing, in the most sustainable settlements.
 - Objective 3: to promote economic growth and diversity and provide a wide range of jobs.
 - Objective 4: to promote regeneration and reduce deprivation.
 - Objective 5: to allow people to develop to their full potential by providing educational facilities to support the needs of a growing population.
 - Objective 6: to make sure people have ready access to services.
 - Objective 7: to enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact.
 - Objective 8: to positively enhance the individual character and culture of the area.
 - Objective 9: to protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value.
 - Objective 10: to be a place where people feel safe in their communities.
 - Objective 11: to encourage the development of healthy and active lifestyles.
 - Objective 12: to involve as many people as possible in new planning policy.

The DM Policies DPD

- 2.6 The DM Policies DPD provides detailed planning policies to help deliver the JCS and to guide how the council responds to planning applications for new development in the city. The document also includes policies on locally specific issues not already covered by national policy or the JCS. To accompany the DPD the council has produced a Policies Map showing where various policies and site allocations apply. Further information on development of the DPD and consultation thereon is contained in Section 3.
- 2.7 The Development management policies plan contains 33 policies, broadly based on the themes of the JCS. Supplementary text is also provided for each policy, giving further detail, explanation and clarification. The DM Policies DPD includes the following sections:

- **Introduction:** outlines recent changes to the planning system, the local the plan preparation process being undertaken by Norwich City Council and its suite of local plan documents.
- **The role of neighbourhood plans:** invites proposals for community-led plans and states the requirement for conformity with the local plan.
- **What are development management policies?:** clarifies that the main purpose of policies in the DM Policies DPD is to set out local standards and criteria against which planning applications for the development and use of land and buildings will be assessed.
- **Preparing the plan - Where we are now:** sets out the plan preparation and consultation steps completed to date.
- **Preparing the plan - What happens next:** sets out the remaining plan preparation steps through to expected adoption in Autumn 2013.
- **Sustainability appraisal:** describes the SA process running alongside plan preparation.
- **Appropriate assessment:** describes the Habitats Regulations Assessment (HRA) process running alongside plan preparation.
- **Plan publication (Regulation 19 consultation):** describes why representations on this version of the plan should relate to soundness.
- **Vision and objectives:** confirms that the spatial planning objectives for this plan are the same as those in the JCS.
- **A positive approach to development management:** sets out measures being implemented by Norwich City Council to streamline the development management process and provides guidance on submitting a high quality submission for planning permission.
- **The policies for submission:** sets out the text of the DM policies, supporting text and alternative policy options considered.
- **How we will monitor the plan:** describes the local monitoring framework and indicators.

2.8 The DM Policies DPD also includes the following appendices:

- **Appendix 1:** Infiltration capacity drainage map
- **Appendix 2:** Health and Safety Executive areas
- **Appendix 3:** Areas affected by potential subsidence problems (may be deleted in final version in light of late changes to DM11)
- **Appendix 4:** Standards for transportation requirements within new developments
- **Appendix 5:** District and local retail centres and applicable thresholds for consideration of new development proposals
- **Appendix 6:** Community public houses
- **Appendix 7:** Local List for Norwich (buildings of local architectural or historic interest)
- **Appendix 8:** Local criteria for assessment of locally identified heritage assets
- **Appendix 9:** Long Views and Strategic Viewpoints

3 Sustainability Appraisal Methodology and Framework

- 3.1 The purpose of SA is to promote sustainable development through contributing to the integration of social, environmental and economic considerations into the preparation and adoption of plans. It should be viewed as an integral part of good plan making, involving on-going iterations to identify and report on the significant effects of the emerging plan and the extent to which sustainable development is likely to be achieved. This chapter describes the stages and tasks required in SA and how they correspond to the stages of plan preparation. It also sets out the detailed method used for this stage of the SA, to appraise the 33 DM policies and associated reasonable alternatives.

Stages and tasks in SA

- 3.2 The government guidance hosted by the Planning Advisory Service introduces the SA process and explains how to carry out SA as an integral part of the plan-making process. **Table 3.1** sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Table 3.1: Corresponding stages in plan making and SA

DPD Step 1: Pre-production - Evidence Gathering
SA stages and tasks
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> A1: Identifying other relevant policies, plans and programmes, and sustainability objectives A2: Collecting baseline information A3: Identifying sustainability issues and problems A4: Developing the SA Framework A5: Consulting on the scope of the SA
DPD Step 2: Production
SA stages and tasks
<p>Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> B1: Testing the DPD objectives against the SA Framework B2: Developing the DPD options B3: Predicting the effects of the DPD B4: Evaluating the effects of the DPD B5: Considering ways of mitigating adverse effects and maximising beneficial effects B6: Proposing measures to monitor the significant effects of implementing the DPDs
<p>Stage C: Preparing the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> C1: Preparing the SA Report

Stage D: Consulting on the Draft DPD and the Sustainability Appraisal Report

- D1: Public participation on draft DPD and the SA Report
- D2(i): Appraising significant changes

DPD Step 3: Examination

SA stages and tasks

- D2(ii): Appraising significant changes resulting from representations

DPD Step 4 & 5: Adoption and Monitoring

SA stages and tasks

- D3: Making decisions and providing information

Stage E: Monitoring the significant effects of implementing the DPD

- E1: Finalising aims and methods for monitoring
- E2: Responding to adverse effects

SA Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- 3.3 The first stage of the SA process, setting the context and objectives, establishing the baseline and deciding the scope, was undertaken by Norwich City Council and presented in the 2010 DM Policies DPD SA Scoping Report⁵. To ensure a consistent approach, the 2010 Scoping report took into account and built upon the 2007 Greater Norwich JCS SA Scoping Report⁶.
- 3.4 The preparation of the Scoping Report involved the following main tasks:
- Description of the SA methodology proposed.
 - Review of relevant international, national, regional, county and local level plans, programmes, strategies and studies.
 - Collection of baseline information and characterisation of Norwich city.
 - Identification of key sustainability issues and problems in Norwich city.
 - Development of an SA Framework (i.e. sustainability objectives against which to assess potential impacts of the DD Policies DPD).
 - Consultation with the three SEA Consultation Bodies (i.e. Natural England, English Heritage, Environment Agency) and other stakeholders.
- 3.5 The SA Scoping Report was published for consultation from 19 April to 24 May 2010.
- 3.6 Responses received as a result of this consultation that are of relevance to the DM Policies DPD are set out in **Table 3.2** along with a summary of how they have been addressed either within the DPD or the SA process.

Refinement of the SA Framework for appraising the DM Policies DPD

- 3.7 During Stage B of the appraisal process, the SA framework was reviewed to ensure the objectives and criteria were fit for purpose for the appraisal of sites in the DM Policies DPD. This is described at the relevant stage of the plan preparation process within Stage B below.

⁵ Norwich Local Development Framework Development Management Policies Development Plan Document Sustainability Appraisal Scoping Report, April 2010, Norwich City Council.

⁶ JCS for Broadland, Norwich and South Norfolk Sustainability Appraisal Scoping Report, December 2007. Broadland Council et al.

SA Stage B: Developing and refining options and assessing effects

- 3.8 Developing options for a plan is an iterative process usually involving a number of consultations with public and stakeholders. The SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In addition, the SEA Directive requires the assessment to identify, describe and evaluate '*the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives*' (LUC emphasis). The options for Norwich DM Policies DPD have been developed and refined through a number of stages as described below.

Regulation 18 (formerly Regulation 25) consultation

- 3.9 The DM Policies DPD was first published as a draft for consultation in January 2011, jointly with the Site Allocations Plan. The eight-week period of public consultation on both plans included a permanent exhibition, two one-day consultation events in the city centre and a series of individual presentations to neighbourhood community groups, developers and other local stakeholders. The December 2010 SA Report was published at this stage.
- 3.10 The consultation generated a relatively limited response but one which raised a wide range of issues on the proposed policies. There were 66 separate representations incorporating 244 individual comments. 23 of these supported the plan, with the remainder objecting to or otherwise commenting on the policies or suggesting changes.
- 3.11 Norwich City Council have confirmed that no substantive consultation responses were received on the method or conclusions of the December 2010 SA Report. A letter from the Environment Agency dated 23 March 2011 suggested that the SA contain an explanation on two matters relating to flood risk and Norwich City Council's application of PPS25. These are set out in **Table 3.2** along with a summary of how they have been addressed, either within the DPD or the SA process.

Table 3.2: Consultee comments on SA and responses

Comment on SA	SA/DPD response
Comments on April 2010 SA Scoping Report	
<p>Norfolk Landscape Archaeology – The following recommendations were made: reference should be made to non-designated assets detailed in the Historic Environment Record; it should be emphasised that the historic environment will be preserved and enhanced whilst being faced by widespread development pressure; and it should be made clear that the historic environment includes archaeological assets and is not solely ‘the built environment’.</p>	<p>SA objective ENV5(b) refers to maintenance and enhancement of heritage. SA objective ENV5(d) refers to protecting and enhancing features of historical, archaeological and cultural value. Policy DM9 provides protection for locally identified heritage assets, including defined areas of archaeological interest and gives consideration to the protection of heritage assets which have not been previously identified or designated but which are subsequently identified through the process of decision making, or during development. Additionally, DM9 requires an assessment of the significance of heritage assets by reference to the Historic Environment Record.</p>
<p>Norwich City Council (Environment, Transport and Development) – The following recommendations were made: the contribution of undesignated historic landscapes in creating local distinctiveness should be explicitly recognised; and the importance of understanding these historic landscapes at an early stage of the development process should be emphasised</p>	<p>SA objective ENV5(a) refers to protection and enhancement of the quality of landscapes, townscapes and countryside character; ENV5(b) refers to maintenance and enhancement of the distinctiveness of landscape/townscapes and heritage; ENV5(d) refers to protecting and enhancing features of historical, archaeological and cultural value. Policy DM9 provides protection for locally identified heritage assets. Additionally, the policy gives consideration to the protection of heritage assets which have not been previously identified or designated but which are subsequently identified through the process of decision making, or during development. The supporting text to DM9 makes clear that the definition of ‘heritage assets’ includes landscape and assets which are locally identified by the LPA. Developers are advised to consult the local Historic Environment Record at an early stage in the application process.</p>
<p>English Heritage – The following recommendations were made: baseline information should include information on development pressures and/or enhancements to the heritage assets and character of Norwich resulting from recent developments in the city, especially in the historic core; and recognition of potential pressures on the built environment should be widened to include reference to the archaeological resource.</p>	<p>The table of key sustainability issues in Section 4 of this report includes a number relating to heritage assets and the character of Norwich. As described above, SA objective 5(d) makes specific reference to archaeology whilst policy DM9 offers protection to areas of archaeological interest.</p>
<p>Environment Agency – The following recommendations were made: in addition to improving energy efficiency, tackling congestion and promoting reduction, reuse and recycling of waste, retrofitting of water efficiency measures/devices should</p>	<p>SA objective ENV2 is to improve the quality of the water environment. SA objective ENV8 is to provide for sustainable use and sources of water supply. SA sub-objective ENV9(a) is to minimise consumption of materials and resources,</p>

Comment on SA	SA/DPD response
<p>also be encouraged; and the protection of water quality is particularly important in the plan area, given that most of the Norwich City Council area lies within a Source Protection Zone and over a Principal Aquifer, and as such it should be noted that the improvement/protection of water quality extends to groundwater in addition to streams, rivers and lakes, and that contaminated land is adequately remediated before use in order to protect groundwater quality; support would be given to strict water efficiency targets.</p>	<p>including 'Design principles for housing/employment development which promote the reuse and recycling of materials during the construction process (including a requirement for waste management plans) and once development is in use (e.g. ensuring integration of recycling facilities into new development); design principles for water and energy efficiency; enabling use of sustainable modes of transport.' Policy DM1 requires proposals to make efficient use of resources, minimise the need to travel and reduce dependency on the private car and high-emission vehicles. Policy DM3 expects new development to re-use and convert existing buildings and reclaim, re-use and recycle construction materials. Policy DM11 requires proposals within a groundwater source protection zone or affecting a major aquifer to demonstrate that appropriate measures have been incorporated to minimise the risk of pollution to the water source.</p>
<p>Natural England – The following recommendations were made: the increased stress of climate change impacting water availability should be addressed; and Local Nature Reserves and County Wildlife Sites should be acknowledged as part of the key wildlife conservation designations in the plan area.</p>	<p>SA objective ENV6 is to adapt to and mitigate against the impacts of climate change. SA sub-objective ENV4(b) considers effects on biodiversity sites of local importance. SA objective ENV8 is to provide for sustainable use and sources of water supply, including conserving groundwater resources and minimising water consumption. SA sub-objective ENV9(a) is to minimise consumption of materials and resources, including design principles for water and energy efficiency. Policy DM1 requires proposals to make efficient use of resources and help combat the effects of climate change. Supporting text to Policy DM3 references the requirement in JCS policy 3 for new development to be water efficient. Policy DM6 provides protection to biodiversity sites of regional and local importance and the Yare Valley character area.</p>
Comments on Dec 2010 SA Report	
<p>Environment Agency – justification for Norwich City Council's local application of the PPS25 sequential test in relation to flood risk.</p> <p><i>"We also note that... the supporting text [to policy DM5] states that, for development within the city centre, the Sequential Test search area will be restricted to the city centre area only. In order to restrict the boundary your Authority will need to ensure that you have sufficient justification. We would recommend that this could be included as part of your sustainability appraisal."</i></p>	<p>Where development potentially vulnerable to flooding is proposed in Zone 2 or 3a, the appropriate search area for reasonable alternative locations for that development which are less vulnerable to flooding should normally be the whole of the local authority area. The supporting text to DM5 explains that for Norwich, the JCS prioritises city centre regeneration, and proposes high levels of housing and employment growth across greater Norwich. The JCS growth targets mean that to achieve them it will not be feasible to avoid development in Zone 2. This is confirmed by the conclusions of the Level 2 Strategic Flood Risk Assessment in relation to housing numbers. To implement the adopted strategy it is inevitable that a significant quantum of development must occur within areas of at least</p>

Comment on SA	SA/DPD response
	<p>moderate flood risk, particularly those large areas of the city centre in Zone 2. Accordingly, Norwich City Council have agreed with the Environment Agency that when undertaking a sequential test for flood risk for development proposed in the city centre, the search area for reasonable alternatives can be confined to city centre regeneration areas, or the city centre itself. Amendments made to policy DM5 since the Regulation 25 draft make this process and the reasoning for it somewhat clearer.</p> <p>Sustainability effects of DM5 which provides for a modified sequential test in the city centre are set out in Section 5 under the Environmental Design Theme. The subject is also dealt with at length in the SA of the Site Allocations and Site Specific Policies DPD.</p>
<p>Environment Agency – reasoning for selection of particular areas on the Proposals (Policies) Map in which specific uses will be prioritised.</p> <p><i>"In addition to the above comments, we note that your draft proposals map includes generalised areas in which certain types of development may be appropriate such as office areas, retail centres, district and local centres, leisure areas, late night zones and car parking areas. These generalised areas relate to proposed policies within your draft Development Management Policies DPD. A number of these areas, for example Whitefriars, fall wholly or partially within a zone of flood risk. However, having considered the DPD and the accompanying SA, it would appear that flood risk has not been considered in the identification of the general areas on the proposals map or the drafting of the accompanying policy. To date therefore, it does not appear to have been demonstrated that these areas are the most appropriate in terms of flood risk. We therefore wish to highlight that, unless reasoned justification can be provided at this stage, the areas shown on your proposals map should not prevent a full sequential test assessment being carried out at a planning application stage, which should initially consider the whole Local Authority area. With specific regard to the late night zones, we note that late night uses will only be permitted within these specific zones. When considering your proposals map, it would appear that there are only a small number of these zones, some of which fall wholly within an area at flood risk. In this respect, you should ensure that you have applied the PPS 25 Sequential Test and can adequately justify how these areas have been defined. We recommend that this could be included as part of your sustainability appraisal"</i></p>	<p>As noted above, Norwich's SFRA level 2 study concluded that development within flood zone 2 will be necessary in order to deliver the priorities for regeneration and the levels of housing and employment growth required in the JCS. The adopted JCS and the technical evidence in SFRA Level 2 study will be the primary justification for Norwich City Council's approach. It will inevitably mean that sites must be allocated and development priority areas must be identified (such as the office development priority area shown in policy DM19 and the Late Night Activity Zone in policy DM23) within areas of moderate flood risk. In relation to the Late Night Activity Zone, the area is already a focus for such uses although the area perceived to be at most risk of flooding is largely confined to the purpose built Riverside Leisure Quarter. This is designed so that the buildings which are most intensively occupied for late night leisure purposes are constructed well above flood level. Overriding justification for continuing to concentrate late night uses in a designated zone (as in the current (2004) Local Plan) is provided by the need to effectively manage crime and disorder and to avoid significant adverse impacts on residential amenity through noise and disturbance, which would be much more apparent were late night uses to be dispersed throughout the city centre. Norwich City Council accept that particular care will be needed to incorporate suitable flood mitigation measures in individual site FRAs for new development but do not necessarily accept that a sequential test search area would have to extend beyond the city centre for any proposals within city centre regeneration areas. Norwich City Council's argument is that since the principle of particular forms of development in potentially flood vulnerable regeneration areas has already been tested and accepted through the adopted JCS (and, in the Northern City Centre, the adopted Northern City Centre Area Action Plan), it</p>

Comment on SA	SA/DPD response
	<p>would be unreasonable to require developers to go back to square one and have to undertake a more onerous test for every new proposal in those areas. Equally, Norwich City Council do not see any compelling justification to have to revisit the reasoning for the particular priority areas for different forms of development shown on the policies map, since these are already shown in general terms in the JCS.</p> <p>The effects of the DM policies on flood risk are explored within Section 5 of this report, in particular within the appraisal of the Environmental Design policy theme.</p>

Regulation 19 (Pre-submission) consultation – Current stage

- 3.12 The current version of the DM Policies DPD (the Publication version) which is the subject of this SA Report is a final draft version of the plan which the city council now proposes to submit to the Secretary of State (see below). It incorporates a number of amendments, both in response to representations on the draft policies (including prior recommendations in the December 2010 SA report) and to take account of changes in planning legislation and in the national and strategic planning policy context since the consultation draft version of the plan was published in 2011.
- 3.13 In particular, it seeks to respond to the significantly simplified statement of national planning policy introduced by the government in March 2012, the National Planning Policy Framework (NPPF). Supplementary text to the policies in this plan explains how it seeks to incorporate the principles of the NPPF. This includes both the “Presumption in favour of sustainable development” in the NPPF and the need for a positive, proactive planning framework to help promote and secure sustainable development for the benefit of the city.
- 3.14 Following on from the Regulation 18 consultation described above, a total of 33 policies have been included in the Regulation 19 DM Policies DPD. **Appendix 4** sets out the alternative policy options considered by Norwich City Council and their reasons for not preferring these alternatives over the proposed policies.
- 3.15 **Table 3.3** shows the relationship between the policy numbers used at Regulation 18 stage (which at the time was known as Regulation 25) and those used in the current stage of the plan. It is apparent that the topics covered by the DM policies have seen little change between the Regulation 18 and Regulation 19 versions of the DPD. One notable exception to this is the addition of a new, overarching policy on sustainable development (DM1) that seeks to provide a local interpretation of the NPPF presumption in favour of sustainable development, for example the need to reduce car dependency. Former policy DM1 on information requirements for planning statements has been transferred to supporting text since DM policies should be concerned with assessing the impacts of proposed development rather than the process of validating the application. In addition, former policy DM32 on the role of Section 106 agreements and Community Infrastructure Levy (CIL) in funding transport infrastructure has been widened to cover planning obligations in general. **Appendix 5** provides further detail on how the DM Policies DPD has evolved between the Regulation 18 and Regulation 19 versions.

Table 3.3: Regulation 18 (formerly Regulation 25) stage and Regulation 19 stage plan policies

Policy at Reg. 18 stage	Equivalent policy at Reg. 19 stage
DM1 - Planning Statements	None - content added to introductory text of new policy DM1
None – new policy at Reg 19 stage	DM1 – Achieving and delivering sustainable development
DM2 - Amenity	DM2 – Amenity
DM3 – Design principles	DM3 – Design principles
DM4 – Energy efficiency and renewable energy	DM4 - Renewable energy
DM5 – Fluvial and tidal flooding	DM5 – Flooding
DM6 - Environmental assets	DM6 - Natural environmental assets
DM7 - Trees and development	DM7 - Trees and development
DM8 - Open space	DM8 - Open space
DM9 - The historic environment and heritage assets	DM9 - The historic environment and heritage assets
DM10 - Telecommunications	DM10 - Communications infrastructure
DM11 – Environmental protection	DM11 - Environmental hazards

Policy at Reg. 18 stage	Equivalent policy at Reg. 19 stage
DM12 - Principles for all residential development	DM12 - Principles for all residential development
DM13 - Flats, bedsits and houses in Multiple Occupation (HMOs)	DM13 - Flats, bedsits and larger houses in multiple occupation (HMOs)
DM14 - Gypsy and travellers and travelling showpeople	DM14 - Gypsies, travellers and travelling showpeople
DM15 - Loss of residential Accommodation	DM15 - Loss of existing housing
DM16 - Defined employment areas	DM16 - Employment and business development
DM17 - Protection of small and medium scale business sites and premises	DM17 - Protection of small and medium scale business sites and premises
DM18 - Town centre uses	DM18 - Main town centre uses
DM19 - Protection of offices	DM19 - Principles for new office development
DM20 - Primary and secondary retail areas and Large District Centres	DM20 - Managing change in the primary and secondary retail areas and Large District Centres
DM21 - District and local retail centres	DM21 - Management of uses within district and local centres
DM22 - Provision and enhancement of community facilities	DM22 - Provision and enhancement of community facilities
DM23 - Evening, leisure and late night uses	DM23 - Evening, leisure and late night uses
DM24 - Hot food takeaways	DM24 - Hot food takeaways
DM25 - Retail warehouses	DM25 - Use and removal of restrictive conditions on retail warehousing and other retail premises
DM26 - Development at the University of East Anglia (UEA)	DM26 - Development at the University of East Anglia (UEA)
DM27 - Norwich airport	DM27 - Norwich airport
DM28 - Encouraging sustainable travel	DM28 - Encouraging sustainable travel
DM29 - City centre public off-street car parking	DM29 - City centre public off-street car parking
DM30 - Access and highway safety	DM30 - Access and highway safety
DM31 - Car parking and servicing	DM31 - Car parking and servicing
DM32 - Car free or low car housing	DM32 - Car free or low car housing
DM33 - Transport contributions	DM33 - Planning obligations

- 3.16 The method followed during SA Stage B to assess the effects of the DM Policies DPD at Regulation 19 stage are detailed later in this section of the SA Report.

SA Stage C: Preparing the sustainability appraisal report

- 3.17 This SA Report details the process undertaken to date in conducting the SA of the Norwich DM Policies DPD (Pre-Submission Version) as well as setting out the findings of the appraisal.

SA Stage D: Consultation on the DM Policies DPD (Pre Submission Version) and this SA Report

- 3.18 Norwich City Council is inviting representations on the DM Policies DPD (Pre Submission Version) and this SA Report in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

SA Stage E: Monitoring Implementation of the DPD

- 3.19 This SA Report sets out recommendations for monitoring the social, environmental and economic effects of implementing the DM Policies DPD. These monitoring proposals should be considered within the context of the broader monitoring framework for the Local Development Framework and the Norwich City Council Annual Monitoring Report.

SA method for appraising pre-submission DM Policies DPD

- 3.20 This stage of the SA builds on the earlier SA work undertaken during the Scoping stage and at Regulation 18 stage (known as Regulation 25 at the time) during 2010.

Reviewing the SA Framework

- 3.21 The first task within this SA has been to review the SA framework to ensure the objectives and criteria are fit for purpose for assessment of the DM Policies DPD. Recognising that the DPD relates to delivery of development rather than location, in a few cases, those sub-objectives which do not relate to implementation on the ground have been screened out of the assessment. **Table 3.4** lists those sub-objectives that have been screened out, i.e. they were not taken forward for the appraisal of policies.

Table 3.4: Screened-out Sustainability Objectives

SA Objective	SA Sub-objective	Reasoning
ENV9 To make the best use of resources, including land and energy and to minimise waste production	ENV9 (b) Will it promote the use of land in sustainable locations that has been previously developed?	Use of land in sustainable locations that has been previously developed is most likely to be addressed by the JCS (Spatial Vision: 'Growth will be focussed on brownfield land in the Norwich urban area and in a very large mixed use urban extension within the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle') and through the Site Allocations and Site Specific Policies DPD.
	ENV9 (e) Will it avoid the loss of good quality agricultural land and preserve soil resources?	Avoiding the loss of good quality agricultural land and preserving soil resources is most likely to be addressed by JCS (JCS Objective 9: 'The use of previously developed land will be prioritised to minimise the loss of agricultural land and the countryside'), and through the Site Allocations and Site Specific Policies DPD. JCS prioritisation of brownfield land is also relevant – see above.
	ENV9 (j) Will it increase waste recovery for other means e.g. Energy Generation?	Increasing waste recovery for other means is most likely to be addressed by policies in the adopted Norfolk Minerals and Waste Core Strategy and DM Policies DPD, and in the emerging Norfolk Minerals and Waste Site Specific Allocations DPD.

SA Objective	SA Sub-objective	Reasoning
SOC1 To reduce poverty and social exclusion	SOC1(a) Will it reduce poverty and social exclusion in those areas most affected?	Reduction of poverty and social exclusion is most likely to be addressed by JCS policies regarding 'Supporting Communities', 'The economy', and 'Access', and through the Site Allocations and Site Specific Policies DPD.
SOC3 To improve education and skills	SOC3 (a) Will it improve qualifications and skills for both young people and amongst the workforce?	Improving qualifications and skills for both young people and amongst the workforce is most likely to be addressed by JCS policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (b) Will it help to retain key workers and provide more skilled workers from school leavers?	Helping to retain key workers and provide more skilled workers from school leavers are most likely to be addressed by JCS policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (d) Will it promote lifelong learning and skills training?	The promotion of lifelong learning and skills training are most likely to be addressed by JCS policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (e) Will links between lower levels of education and deprivation be addressed?	The links between lower levels of education and deprivation are most likely to be addressed by JCS policies regarding 'Supporting Communities' and 'The economy'.
SOC6 To offer more opportunities for rewarding and satisfying employment for all.	SO6 (b) Will it help to improve earnings?	Improving earnings overall is most likely to be addressed by JCS policies regarding 'The economy'.
EC1 To encourage sustained economic growth	EC1(c) Will it reduce vulnerability to economic shocks?	Reducing vulnerability to economic shocks is most likely to be addressed by JCS policies regarding 'The economy'.
EC2 To encourage and accommodate both indigenous and inward investment	EC2 (e) Will it support/encourage rural diversification?	Support/encouraging rural diversification is most likely to be addressed by JCS policies regarding 'Supporting communities' and 'The economy'.
EC3 To encourage efficient patterns of movement in support of economic growth	EC3(c) Will it reduce journey times between key employment areas and key transport interchanges?	Reducing journey times between key employment areas and key transport interchanges is most likely to be addressed by JCS policies regarding 'Access and Transportation' and in the Site Allocations and Site Specific Policies DPD regarding new sites for employment uses.
	EC3 (d) Will it improve efficiency and sustainability of freight distribution?	Improving efficiency and sustainability of freight distribution is most likely to be addressed by JCS policies regarding 'Access and Transportation' and in the Norwich Area Transportation Strategy.

Appraisal of Development Management Policies

- 3.22 To enable a more integrated approach, the appraisal has been structured by policy theme, with some themes containing several DM policies. The policy themes are: Environmental Design, Communications, Economy, Communities; University of East Anglia, Norwich Airport, Transport, Planning Obligations. The policies falling within each theme are set out in **Table 3.5**.

Table 3.5: Thematic policy groupings for appraisal

Environmental Design
DM1 – Achieving and delivering sustainable development
DM2 – Amenity
DM3 – Design principles
DM4 – Renewable energy
DM5 – Flooding
DM6 – Natural environmental assets
DM7 – Trees and development
DM8 – Open space
DM9 – The historic environment and heritage assets
DM11 – Environmental hazards
Communications
DM10 – Communications infrastructure
Housing
DM12 – Principles for all residential development
DM13 – Flats, bedsits and larger houses in multiple occupation (HMOs)
DM14 – Gypsies, travellers and travelling showpeople
DM15 – Loss of existing housing
Economy
DM16 – Employment and business development
DM17 – Protection of small and medium scale business sites and premises
DM18 – Main town centre uses
DM19 – Principles for new office development

DM20 - Managing change in the primary and secondary retail areas and Large District Centres
DM21 - Management of uses within district and local centres
Communities
DM22 - Provision and enhancement of community facilities
DM23 - Evening, leisure and late night uses
DM24 - Hot food takeaways
DM25 - Use and removal of restrictive conditions on retail warehousing and other retail premises
University of East Anglia
DM26 - Development at the University of East Anglia (UEA)
Norwich Airport
DM27 - Norwich airport
Transport
DM28 - Encouraging sustainable travel
DM29 - City centre public off-street car parking
DM30 - Access and highway safety
DM31 - Car parking and servicing
DM32 - Car free or low car housing
Planning Obligations
DM33 - Planning obligations

3.23 The SEA Directive requires the assessment to identify, describe and evaluate '*the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives*'. The SEA Directive also requires description of '*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme*'. These requirements have been met in Section 5 of the SA Report by:

- Appraising each thematic group of policies against each of the screened-in SA objectives, highlighting which individual policies are responsible for any significant effects that are identified. The findings are presented in the form of an appraisal matrix each policy theme. We have also assessed 'business as usual' (reliance on existing policy and guidance) which provides the baseline against which the effects of implementing the DM Policies DPD have been assessed and which also represents an additional reasonable alternative policy option.
- Appraising each of the reasonable alternatives considered by Norwich City Council in **Appendix 4** and summarising the findings of the appraisals relevant to the policy theme in the main body of the appraisal text (Section 5). It should be noted that Norwich City Council have not drafted detailed policy wording for alternative policy options, resulting in some uncertainty as to their sustainability effects and precluding the possibility of assigning precise sustainability scores to the alternatives. Instead, a sustainability commentary has been

provided which identifies the main sustainability effects likely to be associated with each alternative.

- Suggesting potential mitigation measures for any significant adverse effects identified.

Cumulative effects

- 3.24 The SA has appraised DM policies by theme rather than individually and has considered residual effects, taking into account mitigation from other policies within the DM Policies DPD and other local plan DPDs. This approach has ensured that interactions between policies have been identified. To supplement this assessment of cumulative effects, Section 6 also provides a summary and discussion of the SA scores achieved by all DM policy themes against each SA objective, highlighting significant effects.

Reasons for selecting the alternatives dealt with

- 3.25 Reasonable alternatives considered by Norwich City Council before selecting the policies contained within the DM Policies DPD are set out in **Appendix 4**. The description of each alternative also describes why it was not preferred over the policy selected for the DPD.
- 3.26 The process of selecting reasonable alternatives was not formalised at any stage but took account of the following factors:
- To what extent a potential alternative approach would be in meeting the identified objectives and decision making criteria in the sustainability appraisal framework.
 - To what extent a potential alternative approach would effectively implement national policy (including, at the most recent stage of plan preparation, the NPPF), deliver the council's own corporate objectives where relevant, and achieve consistency with the strategic objectives and emerging policies of higher level policy documents (in particular the East of England Plan and the emerging Joint Core Strategy and more recently the NPPF).
 - To what extent a potential alternative approach would ensure effective and efficient management of development to meet local needs and priorities and address the issues and problems particular to Norwich detailed in the SA Scoping Report.
 - To what extent a potential alternative approach could be pursued without placing an unreasonable burden on applicants and developers or an unreasonable impact on the decision-making process (e.g. through requirements for supporting information). This has been an important component of options generation in the latest iteration of the plan following the publication of the NPPF.
- 3.27 Norwich City Council's selection of alternatives and the drafting of policy content itself was also informed throughout the process by a selective review of "best practice" (i.e. examples of successful policies from other authorities), internal and external discussions, comments of consultees, members of the public and elected councillors and focused input from independent professional advisors - sometimes known as "critical friends" - principally the Planning Officers Society. In many cases policy alternatives have essentially been distilled into straightforward alternatives of "no local policy" (i.e. business as usual scenario), "more rigorous/detailed policy" and "less rigorous/detailed policy" although in some cases there may be differently detailed approaches informed by local circumstances. Decisions to transfer policy content in earlier drafts of the DM Policies DPD in whole or in part into supplementary text has also (by definition) generated the reasonable alternative of maintaining that transferred text as an explicit policy (e.g. in relation to information requirements for planning applications and issues around the Community Infrastructure Levy).

Difficulties encountered

- 3.28 There were no significant technical difficulties encountered during the preparation of this SA. Certain data issues did arise during the course of the SA, notably:
- A lack of data predicting the likely future baseline in the absence of the DM policies. For many sustainability issues, this was a matter of professional judgement.
 - The actual impacts of policies will depend very much upon how they are applied in specific locations to specific development proposals. Professional judgement has therefore had to be applied to identify likely effects of implementing generic DM policies.
- 3.29 Inevitably assumptions have had to be made during the appraisal work and in identifying the likely significant effects of the DM Policies DPD. The need to make a range of assumptions is an inherent challenge in undertaking SA and where possible these assumptions have been identified in the descriptions of assessments of the DM policy themes against each of the SA objectives.

4 Baseline Characteristics and Plan and Programme Review

- 4.1 Baseline information provides the context for assessing the sustainability of policies in the DM Policies DPD and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.
- 4.2 Annex 1(f) of the SEA Directive requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included, and is presented below under the headings of Environment, Economy and Society.
- 4.3 The baseline information collated in relation to Norwich was originally presented in the 2010 SA Scoping Report and this information has been re-presented below and updated where more recent data are available, using the following data sources:
- Affordable Housing Viability Study, Drivers Jonas Deloitte (2010)
 - Air quality review and assessment: Annual progress report 2011 Norwich City Council (2011)
 - An Economic Assessment of Greater Norwich: A companion document to the Greater Norwich Economic Strategy 2009 – 2014
 - Census data 2001 (see: <http://www.ons.gov.uk/>)⁷
 - The Ecological Footprint of Norwich (2006) (see: <http://www.norfolk.gov.uk/view/ncc054983>)
 - The English Indices of Deprivation 2010 (see: <http://www.communities.gov.uk/publications/corporate/statistics/indices2010>)
 - GCSE and equivalent results in England 2009/10, Department for Education (Jan 2011)
 - Greater Norwich Development Partnership Affordable Housing Viability Study (2010)
 - Greater Norwich Development Partnership Green Infrastructure Strategy: A proposed vision for connecting people places and nature (2007)
 - Greater Norwich Green Infrastructure Delivery Plan (2009)
 - Greater Norwich Housing Market Assessment UPDATE (2011)
 - Greater Norwich Infrastructure Needs and Funding Study (2009)
 - JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011
 - Norfolk Transport Monitoring (2010)
 - Norwich Local development framework: Annual monitoring report 2009-10 (December 2010) Norwich City Council⁸
 - Norwich City Council Strategic Flood Risk Assessment, Level 2: Final Report (2010)
 - Norwich Open Space Needs Assessment (2007)

⁷ Note that headline population estimates for the more recent 2011 census are expected to be released in mid-2012, with more detailed estimates to follow in 2013. Therefore, a lot of the baseline data dependent on the census has not yet been able to be updated.

⁸ Note that Annual Monitoring Reports are no longer prepared individually for Norwich and from the 2010-2011 monitoring year are incorporated as an appendix within the Joint Core Strategy Annual Monitoring Report.

- Norwich Sub Region: Retail and Town Centres Study (2007)
- Personal communication with Norwich City Council (May 2012)
- Planning Inspectorate report on the examination of the Joint Core Strategy for Broadland, Norwich and South Norfolk Development Plan Document (Feb 2011)
- River Basin Management Plan: Anglian River Basin District (December 2009) Environment Agency

4.4 Further baseline data, organised by SA objective, are presented in **Appendix 2**.

Character of the City of Norwich

Environment

Landscape

- 4.5 Norwich is characterised largely by its historic townscape and its green setting with significant areas of trees and woodland. 25 per cent of the city's area consists of open spaces, which form green wedges into the city. These include river valleys and other open spaces such as Mousehold Heath, parks and golf courses. A number form continuous green links out to open countryside and include provision for access on foot and by cycle. The Yare Valley forms a linear green space to the south of the city, providing an attractive gateway and maintaining clear separation between the urban edge and the rural area beyond. The Wensum Valley provides a green link through the city and, in places; steep wooded ridges provide viewpoints affording long views to and from the city centre.
- 4.6 Norwich has been able to meet many of its recent housing development needs by utilising brownfield or previously developed sites. In 2010/11, 94 per cent of housing completions were on previously developed land. The high level of allocations being made on brownfield sites is likely to continue within the city.
- 4.7 The 'fringe' area around Norwich benefits from a number of schemes that seek to improve its habitats, landscapes and recreational attractions. A green infrastructure strategy was produced in 2007 to guide the landscape, recreation and natural habitat policy as the population of the area expands, with the aim of creating linked networks throughout the greater Norwich area. The historic environment and many heritage features of the Norwich urban areas also make a valuable contribution to high quality green infrastructure. The strategy identifies a number of sustainability issues specific to the greater Norwich area that green infrastructure can address including:
- Environmental character and local distinctiveness.
 - Biodiversity and the natural environment.
 - Green spaces and access networks.
- 4.8 The green infrastructure strategy has also highlighted the following issues for the Norwich area:
- To the west of Norwich, there are extensive areas designated as county wildlife sites associated with the floodplains of the River Wensum and (to a lesser extent) River Tud (in the vicinity of Costessey), and associated with the floodplain of the River Yare (in the vicinity of Cringleford). It is also important to note that part of the River Wensum upstream of Hellesdon Mill is designated as a Special Area of Conservation, of which a small area falls within the Norwich city boundary).
 - If no action is taken within the Norwich area it is considered that climate change is likely to lead to increased stress on species populations, and that effects could potentially be intensified by changes to (non-planning related) land management activities. This makes it all the more important that a green infrastructure network is put in place that supports ecosystem function and promotes resilience to environmental change. The other issue that is likely to worsen in the future under a climate change scenario is flooding. This has implications for green infrastructure, as it is important that areas are not developed that may

have an 'opportunity value' when left as open space because they may be able to play a role in terms of flood prevention in the future.

Nature and historical environment

- 4.9 Key wildlife conservation designations in the city consist mainly of marshland and meadows in the river valleys and wooded former chalk pits. The only internationally designated site that falls within the Norwich City boundary is the River Wensum Special Area of Conservation (only a small part falls within the city boundary), although the Broadland Special Protection Area and Ramsar site and the Broads Special Area of Conservation lie outside the boundary to the south east and north east. Norwich also has 3.65 hectares of SSSI, with 100 per cent of these in 'favourable' or 'unfavourable recovering' condition in 2010/11. Domestic gardens play a key role in providing linked habitats and contributing to townscape in many parts of the urban area. The pressure from development on the city's natural features is reflected in there being some 455 tree preservation orders issued and more local nature reserves than elsewhere in greater Norwich.
- 4.10 Norwich's distinctive townscape contains conservation areas covering 17 per cent of the total area of the city, including virtually the whole of the city centre. Scheduled ancient monuments include the medieval cathedral, castle and city walls. 32 pre-reformation churches are located within the walled city and there is a wealth of listed buildings (1,580) and locally listed buildings (currently around 2,600, with a further 127 candidate buildings, building groups and areas on a local list supplement in preparation as at May 2012⁹). Historic parks help to define the character of many suburban areas. Preserving and enhancing the distinctive landscapes and townscapes will be a key concern when considering development within the greater Norwich urban area. Norfolk Historic Environment Record database has over 50,000 digital records online, with over 2,000 of those referring to features within Norwich City. These include buildings and sites of archaeological interest.

Table 4.1: Conservation and natural environment features in Norwich

	Type of feature	Number in Norwich
Built Heritage Features	Conservation Areas	17
	Listed Buildings	1,580
	Scheduled Ancient Monuments	24
Landscape Features	Historic Parks and Gardens	9
	Ancient Woodlands	1
	Tree Preservation Orders	455
Wildlife Conservation	International Sites (SPA, SAC, Ramsar)	1 (jointly with Broadland)
	Sites of Special Scientific Interest (SSSI)	5
	National Nature Reserve (NNR)	-
	Local Nature Reserve (LNR)	8
	County Wildlife Site (CWS)	29
	County Geodiversity Sites (CGS)	-

⁹ • Personal communication with Norwich City Council (May 2012)

	Roadside Nature Reserve (RNR)	1
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Water resources

- 4.11 East Anglia is recognised as one of the driest areas of the country, with pressure on water resource supplies being exacerbated by lower rainfall, widespread agricultural water use and new residential and employment growth. Water is a shared resource and is important for tourism in the area, so the pressures from development on water resources, quality, biodiversity and flood risk are also likely to be significant across boundaries, such as within the Broads Authority area. Development should be designed to be water efficient and to protect water quality.
- 4.12 The Water cycle study highlights the potential for some water resource and water quality issues to worsen in the future as climate change leads to more frequent drought conditions.
- 4.13 Nevertheless, water resources are not considered to be the major constraint on development within this area. Anglian Water Services and the Environment Agency have stated that there are sufficient water resources to meet the growth demands until 2031. To reduce pressure on those resources though, it is important that new development is water efficient.
- 4.14 In terms of wastewater, sewage treatment works (STW) within the study area range from having no spare capacity to considerable capacity, with Whitlingham STW having the most opportunity to receive additional flows. Development to the north east of Norwich would most likely discharge to Whitlingham. New strategic sewers will be needed to serve development.
- 4.15 The capacity of the receiving watercourse will be crucial to determining where new discharge consents can be considered, or where existing ones will need to be upgraded. It is assumed that the water quality of any increase in discharge can be discounted through design engineering.
- 4.16 In terms of water quality, phosphate and nitrate loading into the river systems provides the biggest impact to environmental designated sites within the study area. The cumulative impacts of individual development should also be considered. The study notes that flood risk is most relevant on some brownfield sites in Norwich and in the area in the vicinity of the Wensum and Tud to the West of Norwich, where development is proposed in Eaton/Costessey.

Strategic Flood Risk Assessment (SFRA)

- 4.17 The Partnership of Norfolk District Councils' SFRA was published in January 2008. It examines strategic flood risk across the three authorities covered by the Joint Core Strategy together with North Norfolk DC and the Broads Authority. The document states that fluvial flooding affects the upstream areas of some catchments. In Norwich the main threat is from extreme rainfall events in the Wensum or Yare catchments. However, unless there are extreme meteorological conditions, risk is likely to be relatively low because floods will be slow to rise. The SFRA notes that groundwater and surface water flooding can be significant issues (particularly surface water flooding in urban areas). As a consequence, these issues are now being considered through a DEFRA funded Surface Water Management Plan (SWMP) for the Norwich urban area. The SWMP (currently in its pre-publication draft stage) identifies areas at the greatest risk of surface water flooding and proposes solutions. It has also informed local plan policies to address such flood risk.
- 4.18 The SFRA highlights the importance of water from further development to the north east of Norwich draining northwards to the Bure catchment, rather than southwards towards the River Wensum and Norwich. It is thought that this should be achievable, but that further investigation is needed. It will also be important to consider any indirect impact on settlements downstream on the River Bure (some of which are already at risk from flooding) of development within Norwich City.
- 4.19 In the context of evolving proposals for the greater Norwich policy area and development proposals for north east Norwich, the SuDS mapping indicates that the potential for SuDS is generally much better in areas to the north and east of Norwich than it is to the south of Norwich.
- 4.20 A level 2 strategic flood risk assessment was completed in February 2010 solely for Norwich. This study developed the findings of the previous study further, and focused on the required outputs

from Planning Policy Statement 25 – Development and flood risk (this has since been superseded by the National Planning Policy Framework, however, the requirements for SFRA still remain).

4.21 Key recommendations and conclusions from this study include:

- Flood risk in Norwich is mainly fluvial, though there are tidal influences .
- There are very few areas of Norwich within Flood Zone 3 (1 in 100 year risk of flood and above).
- An extreme 1000 year event would result in significant flooding adjacent to the Wensum (zone 2).
- Flood risk defences give a degree of protection from flood in the area of the Cathedral Close and must be maintained, with developer contributions as appropriate.
- Regional housing targets cannot be met through development in zone 1 only.
- All development proposed in zones 2 and 3, is required to comply with limitations on uses in government policy in PPS25 and must be accompanied by a flood risk assessment and mitigate flooding. This includes SuDS and might also include raised floor levels and other attenuation schemes as appropriate. The study also gives detail on flood hazard to assess development potential.

Waste, energy and resources

- 4.22 Norwich has seen its recycling rate increase to 28 per cent and from 2006 to 2011, people living in the city reduced their waste collectively by over 20 per cent. This puts Norwich in the top ten areas from across the whole country for sending less waste to landfill. In the REAP report from 2006, Norwich residents were found to have a smaller ecological footprint than the rest of greater Norwich, and a lower level of CO2 emissions. However, no more up to date information is available to see if this trend continues.

Sustainable energy study

- 4.23 The sustainable energy study assesses the capacity for supplying new development with low carbon energy. The total technical potential for renewable energy within the GNDP area has been established to be 9.7 Million MWh or 163 per cent of the areas current energy consumption. Local biomass and wind resources have been identified as the lowest cost solutions to achieving zero carbon developments. The study proposes setting differing carbon standards for different parts of development sites, with stricter onsite targets for higher density areas. The fact that 70 per cent of new development within the GNDP area will consist of large scale developments should mean that low to zero carbon standards are more achievable, as the developments should be suitable for communal energy systems.

Economy

- 4.24 The Norwich area provides the largest concentration of jobs in the eastern region. The economy of Norwich is characterised by a high proportion of jobs in large businesses. 42 per cent of all jobs in Norwich are in large organisations (200+ employees). There are a significant number of high-level, professional jobs, and there is potential to increase this number.
- 4.25 The 2009 Economic Assessment of Greater Norwich showed that workers in Norwich are employed across a varied mix of sectors, though dependent on the service industry. The financial sector is particularly important (31 per cent of employment) in Norwich City, whilst public administration, education and health are the second largest sector for employment (26 per cent). The spread of employment in Norwich is seen in **Table 4.2** below, and compared against the average sector-based spread for East of England and Great Britain.

Table 4.2: Share of Employees by Sector, 2007 (Source: Economic Assessment of Greater Norwich 2009)

	Norwich (%)	East of England (%)	Great Britain (%)
Banking, Finance &	31.1%	20.7%	21.6

	Norwich (%)	East of England (%)	Great Britain (%)
Insurance, etc.			
Business & Professional Services	18.0%	17.7%	17.7
Construction	3.3%	5.5%	4.9
Creative Industries	6.7%	6.9%	7.7
Engineering	2.7%	4.4%	3.9
Financial Intermediation	12.1%	3.0%	4.0
Hotels & Restaurants	5.1%	5.9%	6.7
Manufacturing	7.8%	10.7%	10.6
Other Services	4.4%	4.8%	5.2
Public Administration, Education & Health	26.0%	25.5%	26.9
Retail	12.0%	11.4%	10.4
Tourism	7.3%	7.6%	8.2
Transport & Communications	5.0%	6.1%	5.9
Wholesale & Retail Trade	17.2%	18.8%	16.6

- 4.26 The evening and night-time economy is becoming increasingly important for the economy of Norwich, which has developed into something of a sub-regional hub for the cultural and evening economy; around 29,000 people visit the pubs and clubs of the city centre on a Saturday night, for example. The tourism and leisure industry accounted for approximately 7.3 per cent of total jobs in the city (2009 Economic Assessment of Greater Norwich). Norwich is also regularly ranked as one of the top ten most popular shopping destinations in the UK, with two major city centre malls and extensive pedestrianised shopping areas. Norwich city attracts five million day visitors per year for shopping, tourism and leisure interests.
- 4.27 Norwich is a regional cultural centre. For a city of its size, it is extremely well provided with a wide variety of cultural venues, including a range of theatres and museums, and the Norfolk and Norwich Millennium Library, one of the busiest libraries in the country. These facilities are mainly located within the city centre. A range of high quality and expanding higher education facilities are located in the greater Norwich area at the University of East Anglia (UEA), City College Norwich, Easton College and Norwich University College of the Arts.
- 4.28 Another notable aspect of Norwich's economy is the high retention of graduates, although they fill a large proportion of intermediate jobs for which they are over-qualified. As a consequence, this creates problems for less well-qualified people and those who grew-up in greater Norwich to access the jobs market, and it means that there are fewer opportunities to move from lower paid employment into intermediate employment.
- Greater Norwich retail and town centres study*
- 4.29 This study looks at the role of the city centre as a major regional centre as well as the roles of the smaller market towns and district centres in the greater Norwich area. The study looks at the

impact of predicted population increases in the region, as well as projected increases in household expenditure and changes in retail and leisure provision.

4.30 In terms of implications for the growth in and around Norwich:

- Norwich city centre should be promoted as a retail, cultural, leisure and education centre.
- Development and investment should be directed first to existing town centres, in order to enhance their vitality and viability.
- Development should be consistent with the scale, size and function of the town centre.
- It is suggested that mixed-use retail and leisure developments at town centre or edge-of-centre locations can be effective in supporting regeneration.

4.31 The study describes Norwich city centre as having a strong regional role and a relatively strong and attractive retail offer. There is a need to maintain this competitive position by continued investment in the retail centre, including the historic environment and tourist attraction of the centre.

Employment growth and sites and premises study

4.32 The study looks at the potential for, and impact of employment growth within the greater Norwich economy up to 2026. It also includes a review for employment sites and premises which assesses existing and potential land supply.

4.33 In terms of implications for the growth in and around Norwich:

- There is a need to focus on Norwich's strengths in relation to an attractive environment, knowledge based industries and strong economic growth prospects.
- A key focus should be to sustain growth in existing and new indigenous businesses, building on the knowledge economy and assisting business start-up growth.
- There is a need to promote growth of sectors with a greater proportion of higher and intermediate level jobs, which will increase the range of opportunities for under-utilised graduates as well as have knock-on benefits for those with lower levels of skills.
- There is potential for the spatial distribution of new employment opportunities to take into account accessibility to deprived sections of the population.
- There are some (constrained) brownfield opportunities in the northern city centre.
- Construction of the Northern Distributor Road will open up new employment areas north of the city.
- There is potential to promote Norwich as an Eco City as well as to promote arts and cultural institutions.
- The improvements of the A11 should be a priority for supporting economic growth in Norwich.
- Norwich airport already provides a highly significant asset and there is potential to expand its operations
- Specific opportunities for new areas of growth could be through development of environmental engineering competencies, or possibly in creating a local retail academy
- There are shortfalls in the range and variety of industrial land, particularly for smaller firms and in rural areas.
- Sectoral initiatives are suggested to promote: science-based industries, creative industries, tourism (including linking city and market town/rural area tourism promotion), construction (including promoting the development of a skilled labour force), advanced engineering (within a technology park)' financial services, retail and food.

4.34 In terms of existing land and premises provision:

- There is a need to afford strong protection to ring road sites and newer larger allocations.
- The city centre still contains significant long term capacity.
- Norwich Research Park has great potential and is suggested as a priority.

- There is a case for developing a new north city employment hub – realising the economic potential of the airport and the proposed Northern Distributor Road.

Transport and access

- 4.35 Greater Norwich contains the Norwich International Airport, the main part being within the city of Norwich, with some operational land being in Broadland. The airport carries over 400,000 passengers a year, and is a major link for tourism and business both nationally and internationally. Despite a recent short term decline in passenger numbers, it is expected that airport usage will grow in the future. The recently refurbished train and bus stations provide essential connections to rest of the country.
- 4.36 Access to jobs and services is an important issue. Public transport is generally available across the city. However, the main form of transport according to the 2001 census remains the private motor vehicle (51.5 per cent), although a large percentage of working population commute to work by foot or cycle. **Table 4.3** below shows the different methods by which residents travel to work. Despite the fact that over half of the residents commute by private motor vehicles; this is still significantly lower than the average for the region and England. This can be attributed to the urban nature of the authority. Public transport use is relatively low compared to regional and national levels.

Table 4.3: Travel to Work Data (resident working population) from 2001 Census

Modes of Travel to Work	Private Motor Vehicle (%)	Public Transport (%)	Foot or Cycle (%)	Work mainly at home (%)
Norwich	51.5%	9.9%	31.5%	6.7%
East of England	65.8%	11.3%	12.9%	9.4%
Great Britain	62.1%	15.4%	12.8%	9.2%

- 4.37 There are 38,806 people who both live and work in Norwich. Amongst the Norwich working population, 72.4 per cent work in the area. Of the Norwich workplace population, only 41.9 per cent live in the area. This coincides with the travel to work pattern in the neighbouring districts, with such a large proportion of the population in Broadland and South Norfolk commuting to Norwich for work. **Table 4.4** below illustrates the distances travelled to work, with comparison to East of England and England figures. Table 4.4 shows that a significant proportion of people had short journeys to work, which explains why the substantial numbers that walk or cycle.

Table 4.4: Travel to Work Data (resident working population) from 2001 Census

Distances Travelled to Work	Less than 2km (%)	2-20km (%)	More than 20km (%)	Work at or mainly from home (%)
Norwich	34.2%	46.0%	8.8%	6.7%
East of England	20.6%	54.4%	19.7%	9.4%
England	20.0%	53.5%	12.6%	9.2%

- 4.38 One of the main disadvantages of motor vehicle use is the pollution that is generated. Air pollution has an impact on the health of those people working and living in the areas of concentrated pollutants, so minimising pollutants' impacts is essential. Until 2011, Norwich contained four Air Quality Management Areas. NO₂ levels in these areas were higher than the maximum allowed by DEFRA, and therefore the local authority had to reduce these. These air quality management areas were:

- St Augustines Street;

- Riverside;
- Grapes Hill;
- Castle Meadow.

- 4.39 However, the Air Quality Review and Assessment found that other areas of the city centre had exceeded the annual mean NO₂ objective (King Street and Bull Close Road). Rather than declare a new AQMA, it has been decided to declare a larger area of Norwich city centre as an AQMA and revoke the existing four AQMAs. Despite a large AQMA, it should not be assumed that air quality issues are equal across the area, but localised air quality 'hotspots' will be able to be identified within the AQMA boundaries.
- 4.40 Traffic counts show that the number of motor vehicles crossing Norwich Inner Ring Road around the city centre declined by nearly 29,000 vehicles per day for the period 1998 to 2009. The total growth rate for the period between 2003 and 2009 is -12.7 per cent with the growth per annum being -2.2 per cent. In the same period there has been an increase in the number of pedestrians and cyclists with around 2,100 more cycles crossing the Inner Ring Road now than in 2001 (Norfolk Transport Monitoring, 2010). The data also suggests that the total number of bus passengers crossing the Inner Ring Road has increased by around 10,400 per day in the ten years between 1997 and 2007. A possible reason is the increasing quality of bus provision in the Norwich area and also the expansion of Park & Ride service providing access to the city centre. There are currently six Park & Ride sites with over 5,000 parking spaces round the periphery of the city. This has led to an increase in bus patronage to the city centre and a significant reduction in vehicle miles – in excess of two million by 2006 – and consequent carbon dioxide emissions.
- 4.41 Transport improvements for the area are included in Norfolk County Council's (the Transport Authority) Local transport plan, together with the Norwich area transport strategy. Current key proposals include high quality public transport improvements, pedestrian priority measures in the centre, and a range of traffic restraint measures. Another significant project is the provision of a Northern Distributor Road (NDR) to the north of Norwich, which will address orbital traffic movements and tackle congestion problems in the northern urban fringe, whilst providing opportunities for improvements for other travel modes. Government funding for the eastern section of the NDR was agreed in principle in December 2011, conditional on the implementation of a package of sustainable transport measures in the Norwich urban area.

Society

Demographics

- 4.42 Norwich is a distinctive urban area in Norfolk. The 2001 census data showed that 121,550 people lived in Norwich, of which 16.3 per cent were under 15 years old; 66.9 were of working age and 16.8 were of pensionable age. In 2010 the mid-year estimate for the population in Norwich was 143,500. Unlike the neighbouring rural districts, the age structure in the city will remain relatively stable as identified by the projection, although the percentage of working population has grown to 71.8%, with only 14.4% of pensionable age in mid-2010¹⁰.
- 4.43 In the 2001 census, black and minority ethnic populations comprised 6.5 per cent of the total population in Norwich (compared with 8.6 per cent for the Eastern region and 13 per cent for England) but there is likely to have been an increase in multi-ethnicity in recent years, not as yet identified in readily available data sources. Norwich's largest ethnic minority groups in 2001 were recorded as white other (2.7 per cent), white Irish (0.69 per cent), Indian (0.43 per cent), Chinese (0.39 per cent) and other ethnic group (0.48 per cent). Generally there is more diversity found in Norwich, where roughly 7 per cent of the population were not classed as 'white British' in 2001, although this was thought to have risen to 10.6 per cent in the ONS mid-2009 population estimates.
- 4.44 Traditionally, Gypsy and Traveller communities have always been drawn to the more agricultural and rural parts of the area. Across the county of Norfolk, Gypsies and Travellers form the second largest minority ethnic population after the Portuguese. Despite being an urban area, Norwich contains significant groups - 19 pitches and 26 vans according to 2011 data held by NCC.

¹⁰ ONS mid-2010 data: <http://www.ons.gov.uk/ons/publications/all-releases.html?definition=tcm:77-22371>

Deprivation

- 4.45 The Index of Multiple Deprivation is used to provide a wide variety of information, which is set out in 'domains' and updated regularly, the latest update is in 2010. Each domain measures various indicators, and shows both an overall ranking score for each local authority and a score for each theme individually. There are 326 local authorities in England that the rankings are scored against, with a lower score indicating greater deprivation (i.e. 1 = most deprived, 326 = least deprived). Norwich is ranked at 70 which is performing significantly worse than neighbouring authorities.
- 4.46 There are distinct differences in deprivation levels between different areas of the city, although overall Norwich is the second most deprived local authority within the East of England, and has higher crime rates than elsewhere in greater Norwich. It is immediately apparent that deprivation in Norwich is significantly worse than in Broadland or South Norfolk districts. Within Norwich it is most notable that the south/south west sector is the least deprived (with some areas roughly on a par with Broadland and South Norfolk). There is no sector within Norwich that stands out as the most deprived, although it is noted that the western sector is relatively deprived. Health standards are not markedly different to the rest of greater Norwich.
- 4.47 Even though a high proportion of all residents in Norwich have a high level of educational qualifications (many with current or prior connections to the university), a high proportion of residents of working age have no qualifications. There are however, significant differences in qualifications gained by school leavers. Norwich has a considerably lower level of educational attainment at GCSE standard (58 per cent of school leavers had 5 or more GCSE's at A*-C standard in 2009/10) when compared to the national average (75.4 per cent). The proportion of those in employment with qualifications at 'A'-level standard or equivalent (15 per cent) is also lower than the national average (19 per cent).

Housing

- 4.48 Norwich is characterised significantly by areas of terraced housing adjacent to the city centre, which, being older properties, comprise the largest proportion of homes that fail to meet the 'decent home' standards. There are higher-than-average numbers of 'vulnerable' residents in Norwich residing in non-decent homes. Norwich also contains higher proportions of households living in accommodation that is unsuitable for their needs.
- 4.49 Average house prices in the Greater Norwich area peaked in 2007 at £207,141, although this dropped by 18 per cent to £173,836 in 2009. According to the 2011 Housing Market Assessment, prices are back to their 2006 level (£192,160), which could be mainly attributed to national trends due to insecurity in the housing market. Norwich continues to provide the most affordable homes in greater Norwich, and actually contains the largest proportion in the East of England; some 36 per cent of the housing stock is social housing.

Housing market assessment

- 4.50 The Housing market assessment sets out a detailed picture of housing supply and demand. The study looked to assess if there was an appropriate housing mix of market housing, private rented and affordable housing. Affordability in the market is a problem. This is reflected in the large number of people who apply to the council housing registers in the sub-region. There is evidence of a particular lack of affordability in the first time buyers' market. To find a property within their budget first time buyers may need to choose cheaper locations or smaller homes. Single people and couples are the largest groups on the sub-region's housing register, as in addition to being priced out the market they often struggle to afford rents.
- 4.51 The 2011 update to the assessment acknowledges that affordable housing completions are lower now (392 completed in 2009-10) than they were in the period 2006-09 (over 500 completions each year). There has been an overall decrease in number of housing completions however, with the lowest level of construction completion in 6 years recorded in 2009-10 (1,242 homes in Greater Norwich), which means that just over 30% of housing completions were affordable.
- 4.52 The Joint Core Strategy (Policy 4) sets a target for 33% for affordable housing on sites of 16 dwellings or more. The target is lowered to 30% for sites of 10 to 15 dwellings, and to 20% for sites of 5 to 9 dwellings. These targets have been agreed after recommendations in the Inspector's Report proposed to reduce the 40% target for sites of 5 dwellings or more. The

Inspector's Report was informed by the 2010 Affordable Housing Viability Study prepared by Drivers Jonas Deloitte that recommended that the original 40% target would not be viable for housing schemes of less than 15 units.

Review of Plans, Policies and Programmes

- 4.53 The DM Policies DPD is not prepared in isolation, being greatly influenced by other plan, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level.
- 4.54 As part of the scoping stage of the SA in 2010, a review was undertaken of other relevant plans, policies and programmes in relation to their objectives, targets, and indicators and their implications for the DM Policies DPD and SA. This review has now been updated to reflect changes in the national policy context, and to capture updates to previously reviewed plans and programmes as well as new ones that have been published since 2010. **Table 4.5** lists the international, national, regional, county and local level plans and programmes that have been reviewed, and the full review is provided in **Appendix 3**.
- 4.55 The most significant development in terms of the policy context for the DM Policies DPD has been the recent publication of the new National Planning Policy Framework (NPPF) in March 2012, which replaced the existing suite of Planning Policy Statements (PPSs) and Planning Policy Guidance documents (PPGs). The NPPF is intended to streamline national planning policy, having reduced over a thousand pages of policy down to around 50 pages. Although most of the objectives within the NPPF are similar to the in the extant PPSs and PPGs, there is now a strong 'presumption in favour of sustainable development'
- 4.56 The NPPF also requires local plans to be 'aspirational but realistic'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 4.57 In addition to the new NPPF, the Localism Act 2011 abolished the regional tier of the planning system such that the former Regional Assemblies and Regional Development Agencies no longer exist. However, until central Government has formally revoked the Regional Strategies (consultation was completed in January 2012 on the Environmental Reports on the revocation of the Regional Strategies¹¹), they are still a material consideration when preparing local planning documents. Therefore, the East of England Regional Plan and various other regional strategies are still included in the relevant plans and programmes that have been reviewed.

Table 4.5 List of relevant international, national, regional, county and local level plans and programmes that have been reviewed

Document title
International
1. Johannesburg Declaration on Sustainable Development http://www.parliament.the-stationery-office.co.uk/pa/cm200203/cmselect/cmenvaud/98/9809.htm
2. The UNECE Convention on Access to Information, Public Participation in Decision Making and Access to Justice for Environmental Matters (The Aarhus Convention) (2001) http://europa.eu.int/comm/environment/aarhus/

¹¹ <http://www.communities.gov.uk/planningandbuilding/planningenvironment/strategiceenvironmentassess/> (Retrieved on 30th April 2012)

Document title
3. EC Directive on the assessment of the effects of certain plans and programmes on the environment 2001/42/EC
4. European Landscape Convention (2004) http://www.coe.int/t/dg4/cultureheritage/heritage/landscape/default_en.asp
5. The Habitats Directive 92/43/EEC http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1992L0043:20070101:EN:PDF
6. The Birds Directive 2009/147/EC http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:020:0007:0025:EN:PDF
7. The Ramsar Convention http://www.ramsar.org/cda/en/ramsar-documents-texts-convention-on/main/ramsar/1-31-38%5E20671_4000_0
8. The Water Framework Directive 2000/60/EC http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2000:327:0001:0072:EN:PDF
National
9. <i>Aviation White Paper: The Future of Air transport, 2003</i> http://www.dft.gov.uk/about/strategy/whitepapers/air/
10. <i>ODPM Safer Places: The Planning System and Crime Prevention (2004)</i> http://www.communities.gov.uk/publications/planningandbuilding/saferplaces
11. <i>The Environment Act 1995</i> http://www.opsi.gov.uk/acts/acts1995/Ukpga_19950025_en_1
12. <i>National Planning Policy Framework 2012</i> http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf
13. <i>Waste Strategy for England 2007 DEFRA</i> http://www.defra.gov.uk/ENVIRONMENT/waste/strategy/strategy07/pdf/waste07-strategy.pdf
14. <i>Climate Change: The UK Programme 2006</i> http://www.defra.gov.uk/environment/climatechange/uk/ukccp/pdf/ukccp06-all.pdf
15. <i>Securing the Future - UK Government sustainable development strategy– March 2005</i> http://www.defra.gov.uk/sustainable/government/publications/uk-strategy/
16. <i>UK Biodiversity Habitat Action Plan for Urban Areas</i> http://www.ukbap.org.uk/UKPlans.aspx?ID=754
17. <i>Working with the Grain of Nature: A Biodiversity Strategy for England, 2002 (DEFRA)</i> http://www.defra.gov.uk/wildlife-countryside/biodiversity/action-uk/e-biostrat.htm

Document title
18. <i>The Historic Environment: A Force for the Future</i> (Department for Culture, Media and Sport) http://www.culture.gov.uk/reference_library/publications/4667.aspx
19. <i>Air Quality Strategy for England, Scotland, Wales and Northern Ireland, DEFRA 2000 and February 2003 addendum</i> http://www.defra.gov.uk/environment/airquality/strategy/
20. <i>Energy White Paper: Our Energy Future – creating a low carbon economy 2003</i> http://www.berr.gov.uk/files/file10719.pdf
21. <i>Energy Review 2006</i> http://www.berr.gov.uk/files/file31890.pdf
22. <i>Saving Lives: Our Healthier Nation White Paper 2004</i> http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4118614
23. <i>The Natural Choice: securing the value of nature 2011 DEFRA 2011</i> http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf
Regional (Note that the regional tier of planning has been removed through the Localism Act 2011, therefore the regional plans and programmes prepared by the former Regional Assembly and Regional Development Agency have been removed from this review, but until the Regional Strategies are formally revoked by Government, the East of England Plan has been left in.)
24. <i>East of England Plan</i> (May 2008) http://www.gos.gov.uk/goeast/planning/regional_planning/
25. <i>Draft East of England Plan > 2031 Draft revision to the Regional Spatial Strategy for the East of England</i> (March 2010)
26. <i>Norfolk, Suffolk and Cambridgeshire Strategic Health Authority Health Strategy (Healthy Futures) 2005-2010</i> http://www.erpho.org.uk/Download/Public/18962/1/EERA%2040%20RHS.pdf
27. <i>The Broads Plan</i> (2004) http://www.broads-authority.gov.uk/authority/publications/general-publications.html
28. <i>The Broads Core Strategy</i> http://www.broads-authority.gov.uk/planning/planning-policy/local-development-framework/core-strategy-dpd.html
29. <i>Living with Climate Change in the East of England: Summary Report</i> http://www.sustainabilityeast.org.uk/pdf/Living%20with%20Climate%20Change%20Summary.pdf
30. <i>Woodland for Life: The Regional Woodland Strategy for the East of England</i> (2003) http://www.woodlandforlife.net/wfl-rep/default.html

Document title
31. <i>Environment Agency Water Resources for the Future: A Strategy for the Anglian Region (2001)</i> http://www.environment-agency.gov.uk/static/documents/Research/wr_anglia.pdf
32. <i>Towards Sustainable Construction – A Strategy for the East of England</i> http://www.sustainabilityeast.org.uk/pdf/Towards%20Sustainable%20Construction%20-%20A%20strategy%20for%20the%20East%20of%20England.pdf
33. <i>Sustainable Communities in the East of England</i> http://www.communities.gov.uk/documents/communities/pdf/143600.pdf
34. <i>Towns and Cities Strategy – Urban Renaissance in the East of England</i> http://www.inspire-east.org.uk/townsandcitiesstrategy_1.aspx
County Plans and Programmes
35. <i>Norfolk Community Strategy (Norfolk Ambition)</i> http://www.norfolkambition.gov.uk/
36. <i>Connecting Norfolk – Norfolk’s Transport Plan for 2026</i> http://www.norfolk.gov.uk/view/NCC073526
37. <i>Biodiversity – Supplementary Planning Guidance for Norfolk</i> http://www.norwich.gov.uk/intranet_docs/A-Z/Planning%20Policy/Biodiversity_SPG_adopted_Sept04.pdf
38. <i>Norfolk Housing Support Strategy 2011-2015 (Norfolk County Council, 2010)</i> http://www.norfolk.gov.uk/view/ncc088651
39. <i>Gypsies and Travellers Strategy for Norfolk (2005-2008) Note, this is the most recent strategy available.</i> http://www.equalbutdifferent.org.uk/pdfs/Norfolk%20strategy_for_gypsies_and_travellers.pdf
40. <i>Joint Municipal Waste Strategy for Norfolk 2006-2020</i> http://www.norfolk.gov.uk/consumption/groups/public/documents/article/ncc049079.pdf
41. <i>Learning Disability Employment Plan for Norfolk (2006)</i> http://www.committees.norfolk.gov.uk/papers/cabinet/cabinet290304/cabinet290304item18apdf.pdf
42. <i>Shaping the Future: The Economic Development Strategy for Norfolk: 2001 – 2010 Note, this is the most recent strategy available.</i>
43. <i>Tomorrow’s Norfolk, Today’s Challenge – A Climate Change Strategy for Norfolk (2008) Note, this is the most recent strategy available.</i> http://www.norfolkambition.gov.uk/consumption/groups/public/documents/article/ncc063866.pdf
44. <i>Norfolk Action - Norfolk’s Local Area Agreement 2008-11 (2008)</i> http://www.norfolkambition.gov.uk/consumption/groups/public/documents/article/ncc063700.pdf
Local Plans and Programmes

Document title
45. Greater Norwich Economic Strategy 2009-14 http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/GNDP_Economic_Strategy.pdf
46. JCS for Broadland, Norwich and South Norfolk, Adopted March 2011
47. City of Norwich Replacement Local Plan (2004) http://www.norwich.gov.uk/apps/local_plan/plan_index.htm#links
48. GNDP, Greater Norwich Employment Growth and Sites and Premises Study (2008) http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/3.Final-Report.pdf
49. Sport England, Sports Hall Provision in Norwich (2011) http://www.norwich.gov.uk/CommitteeMeetings/Sustainable%20development%20panel/Document%20Library/6/SportsHallprovisionNorwichV20111019.pdf
50. GNDP, Green Infrastructure Strategy (2007)
51 GNDP, Greater Norwich Green Infrastructure Delivery Plan (2009)
52. Partnership of Norfolk District Councils – Strategic Flood Risk Assessment (2008)
53. Norwich City Council Strategic Flood Risk Assessment level 2 (2010)
54. Norwich City Destination Strategy 2004 http://www.norwich.gov.uk/YourCouncil/Documents/TourismStrategy.pdf
55. Greater Norwich Housing Strategy 2008-2011 http://www.south-norfolk.gov.uk/democracy/866.asp
56. Norwich Area Transportation Strategy http://www.norfolk.gov.uk/consumption/idcplg?IdcService=SS_GET_PAGE&nodeId=3682
57. Norwich's Environmental Strategy 2011-2014 http://www.norwich.gov.uk/Environment/EcoIssues/Documents/EnvironmentalStrategy.pdf
58. Biodiversity Action Plan for the City of Norwich http://www.norwich.gov.uk/intranet_docs/A-Z/Green%20Spaces/Biodiveristy%20Action%20Plan%20for%20the%20City%20of%20Norwich%204.pdf
59. Greater Norwich Homelessness Strategy 2011-2014 http://www.norwich.gov.uk/Housing/HousingStrategies/documents/GNHomelessnessStrategy.pdf
60. Northern City Centre Area Action Plan (Adopted March 2010)
61. Norwich Community Safety Strategy and Audit Report Note this is the most recent version of this

Document title
strategy. http://www.norwich.gov.uk/intranet_docs/A-Z/Community/Community_Safety_Strategy.pdf
62. Norwich Sustainable Communities Strategy 2008-2020 http://www.norwich.gov.uk/YourCouncil/CityOfNorwichPartnership/documents/Sustainablecommunitystrategy.pdf
63. Norwich River Valleys Strategy 2001 www.norwich.gov.uk

Key sustainability issues and likely evolution without the DM Policies DPD

- 4.58 Reviewing the relevant plans and programmes, and considering the baseline character of the area highlights a number of sustainability issues facing Norwich, as set out in **Table 4.6**. These are relevant to producing the DM Policies DPD and have been considered throughout the SA process, in particular helping to inform the SA objectives developed at the Scoping stage. The table also sets out how these issues are likely to develop over time in the absence of the DM Policies DPD.

Table 4.6: Key sustainability issues and their likely evolution without the Norwich DM Policies DPD

Key Sustainability Issues	Likely Evolution without the Plan
Natural and Built environment	
Pressure on the character/quality of the natural and built environments from widespread development	Likely to continue and may be exacerbated without a planned approach to development
Requirement for green spaces and green corridors in and improved walking and cycling networks	Less opportunity to adopt a co-ordinated approach to the development of green spaces/green networks and walking and cycling networks without the Plan.
Requirement to enhance the historic core of Norwich and other distinctive heritage features, by making them more able to withstand development pressures in the immediate future such as traffic growth	National policy should help to protect and enhance heritage assets but whether or not this will help specific sites is uncertain
Climate change	
Significant areas in the city are at risk of flooding, including previously developed areas	The areas at risk of flooding will increase with climate change
Flood risk in areas like the Broads can also be exacerbated by developments upstream causing a change to natural watercourses and the water cycle	Without the Plan it will be more difficult to manage the effects of developments on flood risk, although all developments would need to take account of National policy on flood risk

Key Sustainability Issues	Likely Evolution without the Plan
Adapting to the effects of climate change will need to include the ability to design developments that are water efficient and recycle water resources as Norfolk is one of the drier parts of the country	Without the Plan it will be more difficult to adopt a co-ordinated approach to adapting to climate change. Conversely, new development needs to meet higher water efficiency standards and water companies must plan to reduce leaks from the water supply network as well as improve water efficiency
New developments in all sectors, land uses and activities will need to minimise their carbon emissions. The growth in the popularity and use of Norwich Airport will also need to be addressed through carbon-saving elsewhere	Emissions from new development are likely to be progressively reduced due to initiatives such as the Code for Sustainable Homes. Growth in use of the airport and consequent need for airport expansion is likely to be outside the direct control of local planning policy
Natural Resources	
There is increasing pressure on the natural resources needed to facilitate new development, which will impact on water quality and supply, air quality, energy and minerals use	This pressure will continue in the absence of the Plan
There is a need to reduce the amount of waste sent to landfill sites, and find alternative methods of disposal	Management of waste will be co-ordinated and planned for separately
Transport	
Over-reliance on the car to access facilities and services	Likely to continue in line with national trends.
Access to jobs needs to be improved; this includes provision of jobs closer to centres of population	Access to jobs is likely to remain at odds with the key centres of population
Population, Access to Services and Community	
Requirement to meet the needs of an increasingly ageing population	Responding to the needs of an ageing population may be less co-ordinated in the absence of the Plan. However, all new housing developments would need to meet the requirements of Lifetime homes.
Need to create balanced and integrated communities	Creation of genuinely balanced and integrated communities may be more difficult to achieve in the absence of a Planned approach
Household sizes are becoming smaller as more people remain single for longer or become single, as a result require more homes to cater for this trend	Likely to continue in line with national trends

Key Sustainability Issues	Likely Evolution without the Plan
Deprivation	
Deprivation is highest in urban areas	Likely to continue without appropriate Policy response although this is recognised in the JCS
Health	
Promoting healthy lifestyles will be important	Consideration of healthy lifestyles (including responding to issues such as obesity) will occur at the National level. Local level initiatives e.g. public health strategies will seek to respond to Norwich-specific issues
Health infrastructure required to meet increasing overall population and increasingly ageing population	Trend likely to continue
Traffic-related emissions are having an effect on the population of Norwich's health and wellbeing	Trend likely to continue, although future designation of city centre-wide AQMA may prevent worsening of the issue
Need for permanent gypsy and traveller sites to improve access to key facilities such as healthcare and education	Likely to continue because of the difficulty of finding suitable sites
Crime	
Some higher crime levels exist in the urban areas, particularly the more deprived wards	Likely to continue, linked to employment opportunities, education and skill levels
Leisure, culture and recreation	
Need to provide access to a good range of cultural and leisure facilities, including improved access to local green spaces	Likely to continue. Delivery may be less co-ordinated in absence of the Plan.
Education, Skills and Employment	
The retention and attraction of young people through jobs provision and access to the housing market will be a key priority	Retention/attraction of young people to Norwich may continue to be difficult, linked to accessible employment and affordable housing
Employment businesses need support to diversify (large employers tend to be located in the city and small employers in neighbouring districts). This will be particularly important to strengthening the tourism industry, although promoting the tourism product of the area will need to be done in a sustainable way	Employment trends likely to continue
Housing	
Difficulties in accessing the housing market	Likely to continue

Key Sustainability Issues	Likely Evolution without the Plan
Requirement for housing of all types and tenures	Likely to continue, although recognised through JCS.
Existing housing stock is of poor quality	Likely to continue, although JCS is now in place and its emphasis on urban and suburban regeneration alongside specific initiatives for neighbourhood renewal will help to address this issue.

4.59 In summary, the implications of the key sustainability issues for the DM Policies DPD are as follows:

- As the population grows, the need to supply facilities and services, and in particular the access to them will become increasingly pressing.
- The retention and attraction of young people through jobs provision and access to the housing market will be a key priority.
- The character/quality of natural and built environments must be preserved and enhanced whilst being faced by widespread development pressure.
- The Norwich area is part of the principal access to the Broads national park, and has a critical role in promoting tourism, preserving character and protecting the environment through its spatial policies.
- Reducing contributions to, and mitigating against the impacts of, climate change will be crucial to the long-term viability of Norwich as a place to live and work, to visit and to invest in.
- Reliance on the car should be reduced through improved access to public transport and improved cycling and walking links to local facilities/services.
- Creating balanced and integrated communities will be an essential aspect of providing new development.
- Promoting healthy lifestyles will be important throughout policy.
- Lifelong learning opportunities should be increased for all members of society, particularly in providing vocational training for school leavers.
- Difficulties in accessing the housing market must be minimised.
- Housing of all types and tenures is essential for mixed communities.
- Support will be needed for further diversification and expansion of the economy.

5 Appraisal of DM Policies and Reasonable Alternatives

- 5.1 The Norwich Pre-submission DM Policies DPD was appraised against the SA Framework as described in Section 3 and this section presents the findings of the SA.

Assumptions and factors taken into account during the SA

- 5.2 SA inevitably relies on an element of subjective judgement. In predicting and assessing the sustainability effects of the Pre-submission DM Policies DPD we have drawn partly on our analysis of the characteristics of Norwich and the sustainability issues it faces (see Chapter 4), together with professional experience. We have also drawn on the detailed information in the supporting text to the DM policies.

Determining significance

- 5.3 Annex II of the SEA Directive sets out criteria for determining the likely significance of effects. These criteria relate to:
- The characteristics of the plan or programme (in this case the Norwich DM Policies DPD).
 - The characteristics of the effects and of the area likely to be affected (in this case this will address the impacts of the preferred policies on the city of Norwich as a whole, other than those policies – for example DM26 and DM27 - which are place-specific).
- 5.4 In determining the significance of the effects of the Pre-submission DM Policies DPD, it is important to bear in mind its relationship with the other documents that together comprise the development plan for Norwich. These include the adopted East of England Plan (still in force until it is formally revoked) and the other Local Development Documents, such as the JCS and the Site Allocations and Site Specific Policies DPD. In addition, it is also important to take into account national planning policy contained in the National Planning Policy Framework. In assigning an SA score we have considered the incremental effects of implementing the DM policies in question over and above a 'business as usual' scenario i.e. reliance on existing local, regional and national planning policy.
- 5.5 The likely effects of the Pre-submission DM Policies DPD itself need to be determined in order that their significance can be assessed. This inevitably requires a series of judgements to be made and these have been set out where relevant. Our appraisal has attempted to differentiate between significant effects and other more minor effects through the use of symbols as shown below.

Key	
Score	Effects
++	Significant positive effect
+	Minor positive effect
0	Neutral or no effect
-	Minor negative effect

Key	
--	Significant negative effect
/	Mixed effects (e.g. -/+ minor negative effects and significant positive effects)
?	Uncertain effect (+? or -? Denote minor effects with uncertainty; ++?, --? or ? denote potentially significant effects with uncertainty)

- 5.6 The dividing line in making such a decision is often quite small. Where we have used either ++ or -- to distinguish significant effects from more minor effects (+ or -), this is because, in our judgement, the effect of the DM policy on the SA objective will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.
- 5.7 Finally, the scores in the policy theme appraisals take into account mitigation specified in the DM policies and their supporting text, or provided by policies in the JCS or emerging Site Allocations and Site Specific Policies DPD. It is assumed that such mitigation will be successfully implemented and relevant mitigating measures within policies have been referred to in the findings below.
- 5.8 The sustainability effects of 'business as usual' (BAU), i.e. reliance on existing policy (for example within the NPPF and adopted JCS), have also been assessed as these form the baseline against which the sustainability of the policies within the DM Policies DPD has been judged.
- 5.9 Any recommendations considered necessary for avoiding or mitigating potential significant adverse sustainability effects have been made for each policy theme. Sustainability scores do not assume that this further recommended mitigation will take place.
- 5.10 The remainder of this section presents the SA findings for each policy theme against each SA objective, identifying individual policies where significant effects are predicted.

Environmental design

Policy theme

- 5.11 This theme contains the following policies:
- DM1 – Achieving and delivering sustainable development
 - DM2 – Amenity
 - DM3 – Design principles
 - DM4 - Renewable energy
 - DM5 – Flooding
 - DM6 - Natural environmental assets
 - DM7 - Trees and development
 - DM8 - Open space
 - DM9 - The historic environment and heritage assets
 - DM11 - Environmental hazards
- 5.12 This policy theme seeks to ensure that sustainability criteria (social, environmental and economic) guide the design of new development. This is to ensure that development is delivered that promotes and enables safe, healthy and thriving communities, mitigates the causes and adapts to the effects of climate change, and that protects the natural and built environments.

Sustainability effects of business as usual (BAU)

- 5.13 A BAU approach would rely on national and regional policy and JCS policies to guide environmental design.
- 5.14 The NPPF's overarching theme is for planning to promote sustainable development. To do this there is a 'presumption in favour of sustainable development, which should be seen as a golden thread running through plan-making and decision-taking'. For plan-making this means LPAs should seek opportunities to meet the development needs of their area and develop local plans that meet objectively assessed needs, with sufficient flexibility to adapt, unless specific policies in the NPPF dictate otherwise or adverse impacts would significantly outweigh the benefits.
- 5.15 In relation to the various policy topics that come within this theme, the NPPF¹² aims to:
- reduce the need to travel and increase use of sustainable transport modes;
 - seek a good standard of amenity for all existing and future occupants of new developments;
 - promote high quality design, although it is noted that local planning authorities should develop design codes to help deliver high quality outcomes;
 - promote energy efficiency and the use and supply of renewable energy;
 - take full account of flood risk management, including accommodating the impacts of climate change; protect biodiversity and networks of natural habitats which are designated and undesignated nature conservation sites;
 - promote effective local planning for open space provision, based upon up-to-date assessments of need and opportunity;
 - recognise the value of heritage assets to current and future generations, and encourage the positive re-use of heritage assets;
 - improve health, social and cultural wellbeing for all and contribute to reducing pollution and also to protect these natural resources from pollution resulting from development.
- 5.16 Further supporting advice relating to flooding and minerals planning policy issues is also set out in the technical guidance¹³ that accompanies the NPPF, while waste development is dealt with in PPS10¹⁴, until it is superseded by the National Waste Management Plan for England. A consolidated national policy statement on gypsies and travellers¹⁵ has been published alongside, but separate from, the NPPF.
- 5.17 JCS¹⁶ policies relevant to this policy theme are:
- Policy 1 (Addressing climate change and protecting environmental assets) which seeks to ensure that '*all development will be located and designed to use resources efficiently, minimise greenhouse gas emissions and be adapted to a changing climate and more extreme weather*' including location of development to minimise flood risk. This policy also seeks to protect nature conservation and heritage assets and contribute to the provision of open space.
 - Policy 2 (Promoting good design) which seeks to ensure that '*all development will be designed to the highest possible standards, creating a strong sense of place*'.
 - Policy 3 (Energy and water) which states that '*development in the area will, where possible aim to minimise reliance on non-renewable high-carbon energy sources and maximise the use of decentralised and renewable or low-carbon energy sources and sustainable construction technologies*'. It also requires all new housing to meet level 4 for water efficiency of the Code for Sustainable Homes, with all other development seeking to maximise water efficiency.
 - Policy 6 (Access and transportation) which seeks to concentrate development close to services and facilities and improve public transport accessibility in order to encourage use of sustainable transport modes.

¹² National Planning Policy Framework: CLG, 2012.

¹³ Technical Guidance to the National Planning Policy Framework: CLG, 2012

¹⁴ Planning Policy Statement 10: Planning for Sustainable Waste Management. ODPM, 2005.

¹⁵ Planning policy for traveller sites: CLG 2012

¹⁶ JCS for Broadland, Norwich and South Norfolk: Adopted, 2011.

- 5.18 With regards to the performance of the overarching sustainability policy DM1, a BAU approach is considered to have significant positive effects on all scoped-in SA objectives. This is because NPPF principles and policies are geared around delivering sustainable development. If local plans/policies are out-of-date, silent or absent the proposed development will be assessed against the policies set out in the NPPF. The JCS reinforces the NPPF's promotion of sustainable development and the need to address climate change.
- 5.19 In relation to the thematic Environmental Design policies, reliance on the BAU framework would result in policy gaps, given the locally-specific sustainability issues of the plan area (highlighted in the SA Scoping Report, April 2010) and the need for a locally-specific policy framework to address these. For example, Norwich has a rich history dating back to the ninth century, with 17% of the city designated as conservation areas, including the whole of the city centre, and a wealth of registered heritage assets. The NPPF addresses nationally designated heritage assets and states that LPAs should set out in their local plan a strategy for the conservation and enjoyment of heritage assets. In addition, in the case of renewable energy proposals, the NPPF requires LPAs to determine planning applications in accordance with local requirements for decentralised energy supply
- 5.20 With regards to potential sustainability effects, a BAU approach scores relatively well. It is considered that a 'business as usual' approach would have an uncertain minor positive effect on SA objectives: ENV2, ENV3, ENV4, ENV5, ENV7, ENV8, ENV9, SOC1, SOC2, SOC5, SOC7 and EC4. The NPPF and JCS set out a broad brush approach that lacks the level of detail to ensure these SA objectives are addressed without uncertainty.

Sustainability effects of policy theme

- 5.21 Environmental Design DM policies build on the BAU policy framework by providing a layer of detail regarding the management of development that is not present in either the national or emerging local policy frameworks. This will better support the delivery of development that meets sustainability objectives for the plan area – for example: the detailing of locally significant views to inform development; the identification and protection of green spaces and natural areas contributing to the strategic green infrastructure network; policy detail regarding the protection of trees; protection for locally identified heritage assets and defined areas of archaeological interest, and promotion of heritage interpretation within new development schemes. One exception to this is the overarching sustainable development policy DM1 which provides little additional local detail or sustainability benefit relative to the BAU policy framework aside from making more explicit the objective of reducing dependency on private car use. Overall, the sustainability effects of this policy theme should be positive (including some significant positive effects) and long-term, with possible negative impacts resulting from potential development on sites prone to flood risk within regeneration areas. Effects would be both direct and indirect. For example, supporting the creation of a biodiversity-rich environment through landscaping criteria (Policy DM3) directly supports biodiversity objectives; comparatively, criteria regarding the provision of adequate open space should indirectly support healthier communities.
- 5.22 The detailed sustainability effects of the Environmental Design policy theme are assessed in **Table 5.1**.

Table 5.1: Sustainability of Environmental Design policies

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV1 To reduce the effect of traffic on the environment	+	Long term, indirect, minor positive effects on this SA objective relative to BAU policy result from acceptance of high density development in locations of high accessibility (DM3) and long term, direct, minor positive effects from the requirement for development within Air Quality Management Areas (AQMA) to mitigate further deterioration in air quality, e.g. by travel demand management (DM11).
ENV2 To improve the quality of the	+	Long term, direct, minor positive effects on this SA objective relative to BAU policy result primarily from the requirements for development within groundwater source protection zones or affecting a principal aquifer to minimise

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
water environment		risk of pollution to the water source and for development on contaminated land or former landfill sites identified on the Policies Map to deal with contamination before commencement (DM11). Protection of aquatic habitats and species will be afforded by the requirement for development to protect and enhance the natural environment, included designated nature conservation sites (DM6).
ENV3 To improve environmental amenity, including air quality	+	Long term indirect positive effects on this SA objective relative to BAU policy result from: minimising the need to travel and reducing dependency on the private car (DM1); improved standard of amenity and outlook e.g. the prevention of disturbance from noise, odour, vibration, air or artificial light pollution (DM2); green design enhancements which will help to mitigate air pollution and noise pollution (DM3); acceptance of high density development in locations of high accessibility (DM3); and direct positive effects from the requirement for development within Air Quality Management Areas (AQMA) to mitigate further deterioration in air quality, e.g. by travel demand management (DM11). Long term, direct positive effects on environmental amenity also result from the requirement for development on contaminated land to deal with contamination before commencement (DM11). Short and long term, direct positive effects on the objective result from requirements for noise mitigation (DM11).
ENV4 To maintain and enhance biodiversity and geodiversity	+	Long term, direct positive effects on this SA objective relative to BAU policy will result from DM policy requirements to: provide, where practicable, new and enhanced green infrastructure and built and natural features which help to safeguard habitats, create a biodiversity-rich environment (including through use of native plant species), and improve connectivity of habitats (DM3); avoid harm to listed categories of regional and local biodiversity and geodiversity sites, undesignated but significant areas of woodland, and the Yare Valley character area as identified on the Policies Map (DM6); retain existing trees and hedgerows and plant new street trees (DM7).
ENV5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	++	Long term, direct positive effects on this SA objective relative to BAU policy will result from DM policy requirements on: the design quality of development in proximity to identified gateways on the Policies Map (DM3); protection of long views of landmarks identified in an appendix to the DPD (DM3); layout and siting, including efficient use of land (DM3); density in keeping with existing character (DM3); height, massing, scale and form (DM3); design of roads and streets (DM3); use of appropriate materials and details (DM3); provision of green infrastructure (DM3); protection of the environmental quality of the Yare Valley character area (DM6); protection of trees and hedgerows and planting of new street trees (DM7); protection of locally identified heritage assets and archaeological interest (DM9); and minimisation of adverse visual impacts from communications infrastructure (DM10).
ENV6 To adapt to and mitigate against the impacts of climate change	+	Long term, positive effects on this SA objective relative to BAU policy will result from: minimising the need to travel and reducing dependency on the private car (DM1); acceptance of high density development in locations of high accessibility (DM3 – indirect benefit as a result of reduced need to travel); support for renewable energy generation proposals (DM4); retention of trees and support for planting of street trees and consequent indirect climate change adaptation (shading) and mitigation (carbon sequestration) benefits (DM7). Also, climate change adaptation is provided by measures to promote flood resilient design particularly in those areas prone to surface water flooding 'CDAs' (DM3 and DM5).
ENV7 To avoid, reduce and manage	-?/+?	Potential significant negative, direct, long term effects on this SA objective will result from policy DM5 in respect of development proposals in the city centre

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
flood risk		<p>because the search area for alternative development locations in lower areas of flood risk (sequential test required by NPPF) will be restricted to the boundary of the same regeneration area (for development in city centre regeneration areas) or to the city centre (for city centre development proposals not in a regeneration area) rather than the whole of the local authority. This focus on City Centre development is consistent with the adopted JCS and is needed in order to meet significant growth targets in a district where alternative locations are limited. In addition, policy DM5 fails to restrict new development within Critical Drainage Areas (areas within Flood Zone 1 at risk of surface water flooding from the drainage network) but only requires that proposals do not increase surface water flood risk on the site or in the wider area. This is of particular relevance because large areas of the city centre are in Flood Zone 2 or 3 or a Critical Drainage Area.</p> <p>Mitigation is available from the requirements of site-specific policies and/or supporting text within the Site Allocations DPD. These require appropriate flood risk mitigation measures for all allocated sites in Flood Zones 2 or 3, reducing the residual effect to minor negative but with uncertainty related to the effectiveness of the mitigation measures. No such mitigation is provided in the policies/supporting text for allocation in Critical Drainage Areas but alternative mitigation is available from policy DM3 of the DM Policies DPD and supporting text. This requires proposals in Critical Drainage Areas and their immediate catchments (as identified on the Policies Map) to be accompanied by a flood risk assessment which demonstrates the impact of development on surface water flood risk and for development to incorporate measures to manage surface water flood risk on the development itself. This reduces the residual effect on this SA objective in respect of surface water flooding to minor negative but with uncertainty related to the effectiveness of the mitigation measures for development in Critical Drainage Areas.</p> <p>A long term, direct, positive effect on the SA objective results from the requirements: in DM3 for development in Critical Drainage Areas and their immediate catchment to incorporate measures to manage surface water flood risk to others; and in DM5 for new proposals to implement sustainable drainage measures to reduce surface water flood risk in the wider area and for proposals in Critical Drainage Areas to demonstrate that the proposed development will have a neutral or positive impact on surface water flood risk on the wider area.</p>
ENV8 To provide for sustainable use and sources of water supply	0	Policy theme is relevant to this SA objective but issue is already adequately addressed by Policy 3 of JCS.
ENV9 To make the best use of resources, including land and energy and to minimise waste production	+	Long term, direct positive effects on this SA objective relative to BAU policy will result from the following DM policy requirements: minimising the need to travel and reducing dependency on the private car (DM1); to make the maximum practical use of reused/recycled materials (DM3); to achieve the highest practical standards of energy efficiency in design (DM3); to increase development density in locations of high accessibility (DM3); and to re-use or convert existing buildings (DM3);.
SOC1 To reduce poverty and social exclusion	+	Long term direct and indirect positive effects on this SA objective relative to BAU policy will result from DM policy requirements for development to: avoid adverse impact on the amenity of existing occupiers, provide for a high standard of living and working conditions for future occupiers and provide outdoor amenity space within residential developments (DM2); deliver high quality design in the built environment e.g. taking account of public accessibility and minimising opportunities for crime (DM3); protect and enhance open space

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		provision (DM8); and protect against environmental hazards such as from contaminated land or noise (DM11).
SOC2 To maintain and improve the health of the whole population and promote healthy lifestyles?	+	Long term, direct and indirect positive effects on this SA objective relative to BAU policy will result from DM policy requirements for development to: avoid adverse impact on the amenity of existing occupiers, provide for a high standard of living and working conditions for future occupiers and provide outdoor amenity space within residential developments (DM2); deliver high quality design in the built environment e.g. taking account of public accessibility and minimising opportunities for crime (DM3); protect and enhance the natural environment and incorporate green infrastructure (DM3, DM6); protect and enhance open space provision (DM8); and protect against environmental hazards such as from contaminated land or noise (DM11).
SOC3 To improve education and skills	0	Policy theme is not relevant to this SA objective.
SOC4 To provide the opportunity to live in a decent, suitable and affordable home	+	Long term, direct positive effects on this SA objective relative to BAU policy will result from DM policy requirements to: avoid adverse impact on the amenity of existing occupiers, provide for a high standard of living conditions for future occupiers and provide outdoor amenity space within residential developments (DM2); deliver high quality design in the built environment e.g. taking account of public accessibility and minimising opportunities for crime (DM3); protect and enhance the natural environment and incorporate green infrastructure (DM6); protect and enhance open space provision (DM8); and protect against environmental hazards such as from contaminated land or noise (DM11).
SOC5 To build community identity, improve social welfare and reduce crime and anti-social activity	+	Long term, direct positive effects on this SA objective relative to BAU policy will result from DM policy requirements to: respect and enhance local distinctiveness and provide routes and spaces which minimise opportunities for crime and disorder (DM3).
SOC6 To offer more opportunities for rewarding and satisfying employment for all.	0	Policy theme is not relevant to this SA objective.
SOC7 To improve the quality of where people live	+	Long term, direct positive effects on this SA objective relative to BAU policy will result from DM policy requirements for development to: avoid adverse impact on the amenity of existing occupiers, provide for a high standard of living and working conditions for future occupiers and provide outdoor amenity space within residential developments (DM2); deliver high quality design in the built environment e.g. taking account of public accessibility and minimising opportunities for crime (DM3); protect and enhance the natural environment and incorporate green infrastructure (DM3, DM6); protect and enhance open space provision (DM8); and protect against environmental hazards such as from contaminated land or noise (DM11).
SOC8 To improve accessibility to essential services, facilities and jobs	+	Long term, direct positive effects on this SA objective relative to BAU policy will result from DM policy requirements for development to: minimise the need to travel (DM1); provide routes and networks through the development which link effectively into existing routes and networks (DM3); and encourage enhancement of communications infrastructure (DM10).

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
EC1 To encourage sustained economic growth	+	Long term, indirect positive effects on this SA objective relative to BAU policy will result from DM policy requirements for development to: minimise the need to travel (DM1); provide routes and networks through the development which link effectively into existing routes and networks (DM3); and encourage enhancement of communications infrastructure (DM10).
EC2 To encourage and accommodate both indigenous and inward investment	+	Long term, indirect positive effects on this SA objective relative to BAU policy will result from DM policy requirements for development to: generally improve the urban environment, helping to attract and retain workers with skills that are in short supply and who therefore have the greatest choice about where to locate (DM3, DM5, DM7, DM8, DM11); provide routes and networks through the development which link effectively into existing routes and networks (DM3); and encourage enhancement of communications infrastructure (DM10).
EC3 To encourage efficient patterns of movement in support of economic growth	+	Long term, direct positive effects on this SA objective relative to BAU policy will result from DM policy requirements for development to: minimise the need to travel (DM1); provide routes and networks through the development which link effectively into existing routes and networks (DM3); and encourage enhancement of communications infrastructure (DM10).
EC4 To improve the social and environmental performance of the economy	+	Long term, direct positive effects on this SA objective relative to BAU policy will result from DM policy requirements for development to: avoid adverse impact on the amenity of the area or the working conditions or operations of neighbouring occupants (DM2); deliver high quality design in the built environment e.g. of appropriate heights and scale, with high energy efficiency, having a low carbon footprint, ameliorating urban heat island effect (DM3); protect and enhance open space provision (DM8); and protect against environmental hazards such as from contaminated land or noise (DM11).

Mitigation

- 5.23 No significant negative effects on SA objectives relative to BAU policy are predicted from the DM policies in this theme thus no further mitigation has been suggested.

Alternatives

- 5.24 The sustainability effects of reasonable alternative Environmental Design policies to those proposed in the DPD are detailed in **Appendix 4** which also describes Norwich City Council's reasons for not preferring each alternative over the proposed policy. Some of the reasonable alternatives considered would be likely to have more positive effects on certain SA objectives than the proposed policies. For example, the option for DM6 (Natural environmental assets) which would prohibit any form of development within national, regional or local sites would provide stronger protection for biodiversity (positive effect on ENV4) and landscape (positive effect on ENV5) but could also have negative effects on access to green infrastructure (negative effect on SOC2) by preventing the development of facilities for informal outdoor recreation. Overall we conclude that none of the reasonable alternatives considered for this policy theme performs significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD.

Communications

Policy theme

- 5.25 This theme contains the following policies:
- DM10 - Communications infrastructure

- 5.26 This policy outlines criteria for the development of telecommunication infrastructure. It seeks to ensure that such development is normally accommodated on shared sites and only occurs elsewhere where sharing would have unacceptable visual impacts. Development generally should not have an unacceptable impact on the character and appearance of the area and on amenity, should not cause interference and should be in conformity with latest radiation protection guidelines.

Sustainability effects of business as usual (BAU)

- 5.27 A BAU approach would rely on national policy and the adopted JCS policies to guide telecommunications development within the plan area. The NPPF requires local plans to support the expansion of electronic communications networks including telecommunication and high speed broadband, to keep the number of telecoms masts to a minimum, and where appropriate to require that new masts are sympathetically designed. It also sets out the necessary evidence that should support an application for telecommunications development.
- 5.28 JCS¹⁷ policies relevant to this policy theme are:
- Policy 6 (Access and transportation), an objective of which is to '*provision of IT links, telecommunications and promotion of home working*'.
- 5.29 The BAU framework provides outline policy guidance on telecommunications development, meaning the potential sustainability effects of such development would be managed to some extent. The main effects of communications development supported by the BAU will be ensuring sufficient provision of infrastructure to meet public and business demand (significant positive effects on SOC8, EC3, EC4) but with some inevitable negative impacts on landscape and townscape, mitigated by the requirement for sympathetic design (minor negative effects on ENV5).

Sustainability effects of policy theme

- 5.30 Policy DM10 builds on the BAU policy framework by providing more detailed, local criteria to be met and local definition of the types of heritage assets and open spaces to be afforded particular protection. As such, DM10 provides further certainty to developers helping to ensure that public and business demand for communication infrastructure will be met (minor positive effect on SOC8, EC1, EC2, EC3, EC4 relative to BAU), as well as additional protection to heritage and landscape (minor positive effect on ENV5 relative to BAU).
- 5.31 The detailed sustainability effects of the Communications policies are set out in in **Table 5.2**.

Table 5.2: Sustainability of Communications policy

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV1 To reduce the effect of traffic on the environment	0	Policy theme is not relevant to this SA objective.
ENV2 To improve the quality of the water environment	0	Policy theme is not relevant to this SA objective.
ENV3 To improve environmental amenity, including air quality	0	Policy theme is not relevant to this SA objective.
ENV4 To maintain and enhance biodiversity and	0	Policy theme is not relevant to this SA objective.

¹⁷ JCS for Broadland, Norwich and South Norfolk: Adopted, 2011.

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
geodiversity		
ENV5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	+	Local criteria to be met (e.g. no unacceptable impact on character and appearance of area; all reasonable steps to minimise effect on visual amenity) and local definition of the types of heritage assets and open spaces to be afforded particular protection provide positive effects on this SA objective relative to BAU policy.
ENV6 To adapt to and mitigate against the impacts of climate change	0	Policy theme is not relevant to this SA objective.
ENV7 To avoid, reduce and manage flood risk	0	Policy theme is not relevant to this SA objective.
ENV8 To provide for sustainable use and sources of water supply	0	Policy theme is not relevant to this SA objective.
ENV9 To make the best use of resources, including land and energy and to minimise waste production	0	Policy theme is not relevant to this SA objective.
SOC1 To reduce poverty and social exclusion	0	Policy theme is not relevant to this SA objective.
SOC2 To maintain and improve the health of the whole population and promote healthy lifestyles?	0	Policy deemed not relevant on the basis of the following information: <i>'The Government has advised that the planning regime is not the appropriate place for determining health safeguards. It is the responsibility of central Government to decide what measures are necessary to protect public health. Hence, as a matter of policy, if a proposed base station meets the recognised guidelines for public exposure to non-ionising radiation it should not be necessary for a planning authority, in processing an application, to consider further the health aspects and concerns about them. All radio base stations in the UK are built to comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for exposure to radio waves. The mobile operators have committed to present an ICNIRP certificate with each planning application.'</i> ¹⁸
SOC3 To improve education and skills	0	Policy theme is not relevant to this SA objective.
SOC4 To provide the opportunity to live in a decent,	0	Policy theme is not relevant to this SA objective.

¹⁸ <http://www.planningportal.gov.uk/planning/guides/mobilephonemasts/health>

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
suitable and affordable home		
SOC5 To build community identity, improve social welfare and reduce crime and anti-social activity	0	Policy theme is not relevant to this SA objective.
SOC6 To offer more opportunities for rewarding and satisfying employment for all.	0	Policy theme is not relevant to this SA objective.
SOC7 To improve the quality of where people live	0	Policy theme is not relevant to this SA objective.
SOC8 To improve accessibility to essential services, facilities and jobs	+	Detailed local definition of criteria to be met by communications development adds certainty for telecoms operators, helping to support delivery of the infrastructure, thus increasing access to communications facilities and indirectly to the jobs this infrastructure supports with positive effects on this SA objective relative to BAU policy.
EC1 To encourage sustained economic growth	+	Detailed local definition of criteria to be met by communications development adds certainty for telecoms operators, helping to support delivery of the infrastructure, thus supporting business development and competitiveness, with positive effects on this SA objective relative to BAU policy.
EC2 To encourage and accommodate both indigenous and inward investment	+	Detailed local definition of criteria to be met by communications development adds certainty for telecoms operators, helping to support delivery of the infrastructure, thus supporting business development and competitiveness, with positive effects on this SA objective relative to BAU policy.
EC3 To encourage efficient patterns of movement in support of economic growth	+	Detailed local definition of criteria to be met by communications development adds certainty for telecoms operators, helping to support delivery of the infrastructure, thus increasing the potential for tele-commuting or provision of jobs close to where people live, with positive effects on this SA objective relative to BAU policy.
EC4 To improve the social and environmental performance of the economy	+	Detailed local definition of criteria to be met by communications development adds certainty for telecoms operators, helping to support delivery of the infrastructure, thus increasing the potential for tele-commuting and indirectly reducing business travel impacts on the environment, as well as helping to attract new investment and skilled workers, with positive effects on this SA objective relative to BAU policy.

Mitigation

- 5.32 No changes to policy or other mitigation is recommended as no significant adverse effects relative to the BAU policy framework have been identified from implementing this policy theme.

Alternatives

- 5.33 The sustainability effects of reasonable alternative Communications policies to those proposed in the DPD are detailed in **Appendix 4** which also describes Norwich City Council's reasons for not preferring each alternative over the proposed policy. In summary, two alternative policy options to DM10 were considered by Norwich City Council. One of these is the BAU option of relying on other existing policy which is assessed above. The second option was a more restrictive policy but it was considered unlikely that this would allow for efficient development of the communications network to meet public and business need (negative effects on SOC8, EC1, EC2, EC3, EC4). The likely reduction in the amount of communications development would reduce potential impacts on landscape and townscape (positive effects on ENV5). Overall we conclude that none of the reasonable alternatives considered for this policy theme performs significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD.

Housing

Policy theme

- 5.34 This theme contains the following policies:
- DM12 - Principles for all residential development
 - DM13 - Flats, bedsits and larger houses in multiple occupation (HMOs)
 - DM14 - Gypsies, travellers and travelling showpeople
 - DM15 - Loss of existing housing
- 5.35 This policy theme seeks to ensure that sustainability objectives guide the siting, design and delivery of new housing development. As such, housing development should be delivered that meets the needs of its residents, effectively addresses the nature of housing demand in the plan area, and is sensitive to the local environment, townscape and landscape.

Sustainability effects of business as usual

- 5.36 A BAU approach would rely on national policy and the JCS policies to guide housing delivery within the plan area. In relation to the various policy topics that come within this theme, the NPPF seeks to deliver a wide choice of high quality homes and to boost the supply of housing. Detail is provided on how to achieve a mix of housing (both type and tenure) and how to maintain a supply of deliverable land for housing. The national policy framework is detailed but provides space for local specificity (e.g. affordable housing targets, provision for gypsy and traveller and travelling showpeople).
- 5.37 JCS¹⁹ policies relevant to this policy theme are:
- Policy 1 (Addressing climate change and protecting environmental assets) which seeks to ensure that 'all development is located and designed to use resources efficiently, minimise greenhouse gas emissions and be adapted to a changing climate and more extreme weather'. This policy also seeks to protect nature conservation and heritage assets and contribute to the provision of open space.
 - Policy 2 (Promoting good design) which seeks to ensure that 'all development will be designed to the highest possible standards, creating a strong sense of place'.
 - Policy 4 (Housing delivery) outlines an overall housing target for the plan area, then provides a broad outline of the approach for delivery, including housing mix, affordable housing (with a graduated requirement up to a maximum of 33%), and gypsy and traveller provision (with detailed pitch targets and locations based on requirements in the East of England Plan, albeit recognising that these can be superseded by more up to date local targets based on evidence of need).

¹⁹ JCS for Broadland, Norwich and South Norfolk: Adopted, 2011.

- Policy 12 (The remainder of the Norwich urban area, including the fringe parishes) which includes the objectives 'to identify and regenerate tired suburbs and promote neighbourhood-based renewal', and 'for small and medium-scale redevelopments to increase densities, where a design and access statement demonstrates that an improvement to townscape will result'.

5.38 'Business as usual' policies provide a framework to guide development. However, there would be no certainty relating to housing density and lifetime homes as no locally-specific target would be available. In addition, without a locally-specific policy framework, proposals for the conversion of existing buildings to flats, bedsits and houses in multiple occupation, and development resulting in the loss of residential units, would not be sufficiently addressed. Therefore, it is considered that the existing policy framework has minor positive effects against SA objectives: SOC1, SOC4, SOC5, and SOC7. However, as stated above the existing policy framework does lack detail which could be usefully provided by the DM Policies DPD.

Sustainability effects of policy theme

5.39 Most of the proposed policy within this theme builds on and adds further detail and local specificity to the existing national and local policy. The DM Policies DPD should help to deliver housing that: provides good access to services and facilities for residents (positive effect on SOC1 and SOC8); provides a suitable mix of housing to meet identified needs of local people and create a balanced community (positive effects on SOC4 and SOC5); is adaptable and sensitive to the needs of its residents (positive effect on SOC1, SOC4 and SOC7); and improves the quality of dwellings and people's health and satisfaction with their neighbourhood (positive effect on SOC2, SOC7) whilst conserving or enhancing biodiversity (positive effect on ENV4) and landscapes, townscapes and the historic environment (positive effect on ENV5) and makes efficient use of land and resources (positive effect on ENV9). It should be recognised that, whilst the DM Policies DPD seeks to limit these, housing delivery will inherently result in a number of negative sustainability impacts – additional road traffic and related environmental impacts (negative effects on ENV1 and ENV3); increased risk of pollution of sensitive water resources (negative effect on ENV2); and increased demand for scarce water resources (negative effect on ENV8). Mixed or mixed uncertain effects are predicted with respect to climate change mitigation and adaptation (ENV6) and flood risk reduction and management (ENV7).

5.40 The detailed sustainability effects of the Housing policy theme are assessed in **Table 5.3**.

Table 5.3: Sustainability of Housing policies

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV1 To reduce the effect of traffic on the environment	-	Long term, indirect negative effects relate to the general support for delivery of housing development and the increase in road traffic and associated environmental impacts that are likely to accompany this (DM12). These effects are only expected to be minor because of the mitigation provided by: policy DM1 which contains an explicit requirement to reducing dependency on the private car and high-emission vehicles; policy DM28 which requires development to encourage sustainable travel; policies which seek to prevent disturbance from air pollution (DM2) and which require development within AQMAs to mitigate against the effects of air pollution (DM11) and policy which seeks to reduce road traffic growth: support for higher density housing in the city centre, district and local centres and other locations of high accessibility (DM12); the requirements for multiple occupancy development to reduce car parking (DM13); for residential institutions to provide convenient and direct pedestrian access to local facilities and bus routes (DM13); and the requirement for any additional gypsy and traveller sites to have good access to public transport, services and facilities (DM14).
ENV2 To improve the quality of the water environment	-	The general support for delivery of housing development provided by this policy theme (DM12) has the potential for long term, direct negative effects on water quality, particularly in light of the fact (highlighted by Environment Agency consultation) that most of the Norwich City Council area lies within a Source

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		Protection Zone and over a Principal Aquifer. It is considered that the residual negative effect on ENV2 of the housing policies is reduced to a minor one by the protection afforded by policy DM11 in respect of contaminated land and development within source protection zones or affecting a major aquifer (see also appraisal of Environmental Design theme). Further mitigation is available from JCS policy 3 (release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements to ensure that water quality is protected or improved, with no significant detriment to areas of environmental importance.) and the environmental permitting regime operated by the Environment Agency.
ENV3 To improve environmental amenity, including air quality	-	Long term, indirect negative effects relate to the general support for delivery of housing development and the increase in road traffic and associated air pollution that is likely to accompany this (DM12). These effects are only expected to be minor because of the mitigation provided by: policy DM1 which contains an explicit requirement to reducing dependency on the private car and high-emission vehicles; policy DM28 which requires development to encourage sustainable travel; policies which seek to prevent disturbance from air pollution (DM2) and which require development within AQMAs to mitigate against the effects of air pollution (DM11) and policy which seeks to reduce road traffic growth: support for higher density housing in the city centre, district and local centres and other locations of high accessibility (DM12); the requirements for multiple occupancy development to reduce car parking (DM13); for residential institutions to provide convenient and direct pedestrian access to local facilities and bus routes (DM13); and the requirement for any additional gypsy and traveller sites to have good access to public transport, services and facilities (DM14). Other forms of potential indirect negative impact on amenity associated with housing development are expected to be avoided by policy protecting amenity (DM2 and DM12) and preventing the effects of noise (DM11).
ENV4 To maintain and enhance biodiversity and geodiversity	+	Long term, direct minor positive effects on this SA objective relate to the policy requirements to: have no detrimental impact on character and amenity of the surrounding area, including natural environmental assets (DM12, DM14). Further support for the objective is available from other policy themes such as the requirement to incorporate green infrastructure and biodiversity features in new development (DM3).
ENV5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	+	Long term, direct minor positive effects on this SA objective relate to the policy requirements to: have no detrimental impact on character of the surrounding area, including natural environmental and heritage assets (DM12, DM14); to achieve a density in keeping with existing character, taking account of the significance of heritage assets and the strong support for conversion and re-use of existing residential and commercial premises, especially where underused or long-term vacant (DM12).
ENV6 To adapt to and mitigate against the impacts of climate change	+/-	Long term, mostly indirect, mixed effects from the Housing policy theme are predicted on this objective. Minor positive effects are expected from requirements within this policy theme for all residential development to comply with the overall spatial planning objectives for sustainable development set out in JCS and policy DM1. Minor negative effects relate to greenhouse gas emissions from additional travel by unsustainable modes, as mitigated by other policies, as described for SA objective ENV1 above.
ENV7 To avoid, reduce and manage	-?/+?	See Environmental Design policy theme for discussion of the sustainability of the DM Policies DPD in relation to development within areas of high flood risk

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
flood risk		and policy measures to mitigate this risk.
ENV8 To provide for sustainable use and sources of water supply	-	As stated in Section 4, East Anglia is one of the driest areas of the country and although sufficient water resources are available to meet expected growth up to 2031, it is important that new development is water efficient in order to minimise additional pressure on water resources. The general support for delivery of housing development provided by this policy theme (DM12) has the potential for long term, direct negative effects on water resource availability but it is considered that the residual negative effect on ENV8 of the housing policies is reduced to a minor one by the water efficiency standards imposed by policy 3 of the JCS.
ENV9 To make the best use of resources, including land and energy and to minimise waste production	+	Long term, direct minor positive effects on this SA objective relate to the policy requirements to: maximise opportunities for the conversion and re-use of existing premises for housing (DM12); and to achieve a net density of at least 40 dwellings per hectare, subject to certain exceptions. Further support is available from other policy themes, for example the requirement to achieve high standards of energy efficiency in development design (DM3).
SOC1 To reduce poverty and social exclusion	+	Long term, indirect minor positive effects on this SA objective relate to the policy requirements to improve access to services and facilities for residents by: ensuring proposals contribute to achieving a diverse mix of uses in the locality (DM12); by increasing housing density in areas closest to local services and/or public transport (DM12); for residential institutions to provide convenient and direct pedestrian access to local facilities and bus routes (DM13); and the requirement for any additional gypsy and traveller sites to have good access to public transport, services and facilities (DM14).
SOC2 To maintain and improve the health of the whole population and promote healthy lifestyles?	+	Long term, indirect, minor positive effects on this objective are expected as a result of this policy theme's overarching support for suitable housing for all as well as the requirement (DM12) for 10% of larger developments to be built to Lifetime Homes standard, contributing to the housing needs of the estimated 14.4% of the population of pensionable age in 2010 ²⁰ .
SOC3 To improve education and skills	0	Policy theme is not expected to have an effect on this SA objective.
SOC4 To provide the opportunity to live in a decent, suitable and affordable home	++	Long term, direct significant positive effects on this SA objective relate to the overall support for residential development (DM12), HMOs (DM13) and residential institutions (DM13) as well as the requirements for: a mix of housing based on the Housing Needs Assessment; 10% of larger developments to be built to Lifetime Homes standard; provision for gypsies, travellers and travelling showpeople (DM14) and protection for existing housing (DM15).
SOC5 To build community identity, improve social welfare and reduce crime and anti-social activity	+	Long term, direct minor positive effects on this SA objective relate to the following policy requirements which will help to achieve a mixed and balanced community: a mix of housing based on the Housing Needs Assessment; 10% of larger developments to be built to Lifetime Homes standard; and provision for gypsies, travellers and travelling showpeople (DM14). Further support is available from other policy themes, for example the requirement for safe and secure layouts in design (DM3).
SOC6 To offer more	0	Policy theme is not expected to have an effect on this SA objective.

²⁰ Mid-2010 data - <http://www.ons.gov.uk/ons/publications/all-releases.html?definition=tcn:77-22371>

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
opportunities for rewarding and satisfying employment for all.		
SOC7 To improve the quality of where people live	+	Long term, direct minor positive effects on this SA objective relate to the following policy requirements which will help to improve the quality of dwellings and the satisfaction of people within their neighbourhoods: avoidance of residential development close to hazardous installations or in the Late Night Activity Zone (DM12); avoidance of adverse impacts on local character and amenity by housing (DM12) or gypsy and traveller sites (DM14); appropriate dwelling densities (DM12); high standards of amenity and living conditions, including provision of servicing, parking and amenity space, for residents of HMOs (DM13); satisfactory provision of servicing, warden accommodation and shared amenity space in residential institutions (DM13); location, size, design and management of gypsy and traveller sites (DM14); permission to upgrade, replace, reconfigure or reprovide existing dwellings (DM15).
SOC8 To improve accessibility to essential services, facilities and jobs	+	Long term, direct positive effects relate to: the requirement to contribute to achieving a diverse mix of uses in a locality (DM12); support for higher density housing in the city centre, district and local centres and other locations of high accessibility/proximity to local services and/or public transport (DM12); requirement for residential institutions to provide convenient and direct pedestrian access to local facilities and bus routes (DM13); and the requirement for any additional gypsy and traveller sites to have good access to public transport, services and facilities.
EC1 To encourage sustained economic growth	0	Policy theme is not expected to have an effect on this SA objective.
EC2 To encourage and accommodate both indigenous and inward investment	0	Policy theme is not expected to have an effect on this SA objective.
EC3 To encourage efficient patterns of movement in support of economic growth	0	Policy theme is not expected to have an effect on this SA objective since locations for major housing growth in relation to employment etc. are largely determined by the JCS spatial strategy and the Site Allocations and Policies DPD whilst sustainable transport policy is provided by the JCS, Norwich Area Transportation Strategy (NATS) and policy DM28.
EC4 To improve the social and environmental performance of the economy	0	Policy theme is not expected to have an effect on this SA objective.

Mitigation

- 5.41 No changes to policy or other mitigation is recommended as no significant adverse effects relative to the BAU policy framework have been identified from implementing this policy theme.

Alternatives

- 5.42 The sustainability effects of reasonable alternative Housing policies to those proposed in the DPD are detailed in **Appendix 4** which also describes Norwich City Council's reasons for not preferring each alternative over the proposed policy. Although some alternatives would result in more positive effects on certain SA objectives, this would be offset by more negative effects on other objectives compared to the proposed policies. For example, alternatives which place greater restriction on development of HMOs, residential institutions or gypsy and traveller sites or on loss of existing housing would help to secure the supply of general housing but would risk failing to meet the needs of specific groups and threaten the achievement of mixed and balanced communities. Overall we conclude that none of the reasonable alternatives considered for this policy theme performs significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD.

Economy

Policy theme

- 5.43 This theme contains the following policies:
- DM16 - Employment and business development
 - DM17 - Protection of small and medium scale business sites and premises
 - DM18 - Main town centre uses
 - DM19 - Principles for new office development
 - DM20 - Managing change in the primary and secondary retail areas and Large District Centres
 - DM21 - Management of uses within district and local centres
- 5.44 This policy theme seeks to ensure that development is managed to protect existing business and employment activities, enable future business and employment growth, ensure this growth is concentrated in locations that support sustainable access, and support and protect the vitality and diversity of town and local centres, including through seeking a balance between different centre uses.

Sustainability effects of business as usual

- 5.45 A BAU approach would rely on national and regional policy and JCS policies to guide economic growth and related developments. In relation to the various policy topics that come within this theme, the NPPF requires LPAs to plan proactively to meet the development needs of business and support an economy fit for the 21st century. The NPPF outlines key issues that planning policies should address when planning for sustainable economic growth, including pursuing policies to support the viability and vitality of town centres while planning positively for shared places and community facilities such as local shops, meeting places, sports venues, cultural facilities, public houses and places of worship.
- 5.46 JCS²¹ policies relevant to this policy theme are:
- Policy 5 (The economy) which seeks to ensure that *'the local economy will be developed in a sustainable way to support jobs and economic growth both in urban and rural locations'* and that sufficient employment land will be allocated in accessible locations to meet identified need.
 - Policy 9 (Strategy for growth in the Norwich Policy Area) which outlines the strategy for the delivery of employment development at strategic locations within this policy area (includes an office floorspace target of 100,000m²; and proposals for the expansion of health, higher education and science park activity)
 - Policy 11 (Norwich City Centre) which outlines development proposals for Norwich City Centre, including enhancing its retail and employment centre functions.

²¹ JCS for Broadland, Norwich and South Norfolk: Adopted, 2011.

- Policy 12 (The remainder of the Norwich urban area, including the fringe parishes) which outlines development proposals for this area, including the retention and improvement of local jobs, including through protecting existing employment allocations

5.47 Under the 'business as usual' framework, the NPPF outlines key objectives for sustainable economic growth and provides a broad framework which local plans should seek to 'flesh' out based upon their local evidence base and through policies that enable delivery against these objectives. The JCS policies outline the local strategies for economic development in the plan area as a whole, and in more specific policy areas, but detail is not included as to how these strategies will be delivered. For example, Policy 11 states that the role of Norwich City Centre will be promoted by '*expanding its function as an employment centre, including provision of high quality office premises*' without detailing how this will be delivered (e.g. by supporting upgrading or replacement of existing poor quality office space or requiring that new development in office development priority areas must provide an element of office floorspace). Therefore, in the absence of the proposed development policies in this theme, the JCS policies could not be effectively delivered. In addition, an element of control is necessary, particularly given the current economic climate, to ensure employment/indigenous investment is supported and protected. Therefore, the existing policy framework is considered to have uncertain minor positive effects on SA objectives: SOC6, EC1 and EC3. The effects are considered to be uncertain as the existing policy framework outlines and promotes but lacks the detail of delivery that is required to ensure the correct mix and quantity of economic development is delivered.

Sustainability effects of policy theme

5.48 All of the proposed policies within this theme build on and add further detail and local specificity to the national and local policy framework described above. The proposed DM policies provide a policy framework which should: support economic growth and related development within the plan area with related improvements to employment and community well-being (positive effect on SOC6, SOC8, EC1 and EC2); concentrate growth in accessible locations (i.e. the city centre and local/district centres) which will enable people to choose more sustainable modes of transport, and support and protect the vitality, diversity and townscape of town and local centres, including through seeking a balance between different centre uses (positive effect on ENV5, SOC7, EC1, EC2, EC3 and EC4). Whilst the policy framework seeks to promote sustainable access to employment and retail centres, economic growth within the plan area may still result in an increase in traffic and vehicle emissions as a result of increased passenger miles (negative effect on ENV1, ENV3, ENV3). This also applies to energy and water resources, with economic growth inherently adding extra demand for resources within and supplying the plan area (negative effect on ENV8) and increasing the risk of pollution to the water environment (negative effect on ENV2). Mixed or mixed uncertain effects are predicted with respect to climate change mitigation and adaptation (ENV6) and flood risk reduction and management (ENV7).

5.49 The detailed sustainability effects of the Economy policy theme are assessed in **Table 5.4**.

Table 5.4: Sustainability of Economy policies

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV1 To reduce the effect of traffic on the environment	-	The policies within this theme seek to promote economic growth within the plan area which has the potential to significantly increase vehicle movements and associated negative environmental impacts. Mitigation is provided within the Economy policy theme by requirements directing retail, leisure, other main town centre uses (DM18) and new offices (DM19) to defined centres; and restriction of further retail development at the Riverside Large District Centre unless accompanied by significantly enhanced sustainable transport linkages (DM18). Further mitigation is provided by policy DM1 which contains an explicit requirement to reducing dependency on the private car and high-emission vehicles; requirement for development to encourage sustainable travel (DM28); acceptance of high density development in locations of high accessibility (DM3) and from the requirement for development within Air Quality Management Areas (AQMA) to mitigate further deterioration in air quality, e.g. by travel demand management (DM11). The residual effect on this SA objective is

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		judged to be long term, indirect minor negative.
ENV2 To improve the quality of the water environment	-	The policies within this theme seek to promote economic growth within the plan area which has the potential for negative effects on water quality (e.g. from contaminated surface run-off from roads subject to increased traffic, development of contaminated sites or discharges from commercial operations) particularly in light of the fact (highlighted by Environment Agency consultation) that most of the Norwich City Council area lies within a Source Protection Zone and over a Principal Aquifer. It is considered that the residual negative effect on ENV2 of the Economic policies is reduced to a long term, indirect, minor one by the protection afforded by policy DM11 in respect of contaminated land and development within source protection zones or affecting a major aquifer (see also appraisal of Environmental Design theme) and by policies seeking to reduce the need travel and increase use of sustainable transport modes (see appraisal of ENV1 above). Further mitigation is available from the environmental permitting regime ²² operated by the Environment Agency.
ENV3 To improve environmental amenity, including air quality	-	Long term, indirect negative effects relate to the general support for delivery of economic development from this policy theme and the increase in road traffic and associated air pollution that is likely to accompany this. These effects are only expected to be minor because of the mitigation provided by policies which seek to prevent disturbance from air pollution (DM2), accept high density development in locations of high accessibility (DM3) and which require development within AQMAs to mitigate against the effects of air pollution (DM11). Further mitigation is provided within the Economy policy theme by requirements directing retail, leisure, other main town centre uses (DM18) and new offices (DM19) to defined centres; and restriction of further retail development at the Riverside Large District Centre unless accompanied by significantly enhanced sustainable transport linkages (DM18). Other forms of potential indirect negative impact on amenity associated with economic development are expected to be avoided by policy protecting amenity (DM2 and DM12) and preventing the effects of noise (DM11).
ENV4 To maintain and enhance biodiversity and geodiversity	0	Policy theme is not expected to have an effect on this SA objective since potential impacts on areas of high biodiversity value will principally be affected by spatial policies for economic development within the JCS and Site Allocations and Site Specific Policies DPD whilst support for biodiversity protection and enhancement is provided within the Environmental Design policy theme.
ENV5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	+	Long term, direct minor positive effects on this SA objective relate to requirements for: development of main town centre uses within or adjacent to centres to, where reasonably practicable, improve the public realm and attractiveness of the centre (DM18); new office development to be of a scale appropriate to a centre's position in the hierarchy of centres established by the JCS (DM19); redevelopment of office space to ensure the replacement accommodation is of an equal or higher standard and support for upgrading of poor quality office space provided that negative impact on landscape or streetscape do not outweigh the benefits of improvements (DM19); support for development within retail frontages which would have a beneficial effect on the character of an area or would bring heritage asset or vacant building back into beneficial use (DM20); development within district and local centres to avoid unacceptable environmental effects which could not be overcome by the imposition of conditions (DM21).

²² Under the Environmental Permitting (England and Wales) Regulations 2010

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV6 To adapt to and mitigate against the impacts of climate change	+/-	Long term, mostly indirect, mixed effects from the Economy policy theme are predicted on this objective. Minor negative effects relate to greenhouse gas emissions from additional travel by unsustainable modes, as mitigated by other policies, as described for SA objective ENV1 above. Additional greenhouse gas emissions can also be expected from the additional economic activity supported by policies in this theme (in support of economic growth policies of the JCS), as mitigated by sustainability policies within the JCS and policies such as DM1 and DM28 within the DM Policies DPD. Minor positive effects are expected from the support lent by this policy theme to the spatial strategy of the JCS which directs employment development to more central and sustainable locations within the city rather than allowing major development at less sustainable locations outside of the city.
ENV7 To avoid, reduce and manage flood risk	-?/+?	See Environmental Design policy theme for discussion of the sustainability of the DM Policies DPD in relation to development within areas of high flood risk and policy measures to mitigate this risk.
ENV8 To provide for sustainable use and sources of water supply	-	As stated in Section 4, East Anglia is one of the driest areas of the country and although sufficient water resources are available to meet expected growth up to 2031, it is important that new development is water efficient in order to minimise additional pressure on water resources. The general support for delivery of economic development provided by this policy theme has the potential for long term, direct negative effects on water resource availability but it is considered that the residual negative effect on ENV8 of the economic policies is reduced to a minor one by the requirements of policy 3 of the JCS for all forms of development to maximise water efficiency and for sufficient water infrastructure to be in place in order for land to be released for development.
ENV9 To make the best use of resources, including land and energy and to minimise waste production	0	Policy theme is not expected to have an effect on this SA objective.
SOC1 To reduce poverty and social exclusion	0	Policy theme is not expected to have an effect on this SA objective.
SOC2 To maintain and improve the health of the whole population and promote healthy lifestyles?	0	Policy theme is not expected to have an effect on this SA objective.
SOC3 To improve education and skills	0	Policy theme is not expected to have an effect on this SA objective.
SOC4 To provide the opportunity to live in a decent, suitable and affordable home	0	Policy theme is not expected to have an effect on this SA objective.
SOC5 To build	0	Policy theme is not expected to have an effect on this SA objective.

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
community identity, improve social welfare and reduce crime and anti-social activity		
SOC6 To offer more opportunities for rewarding and satisfying employment for all.	++	Strong policy support for proposals which create high quality employment and business development, inward investment, adaptation and expansion of local firms and accessible and equitable job opportunities for all (DM16) will have a long term, direct, significant positive effect on this SA objective.
SOC7 To improve the quality of where people live	+	Long term, direct minor positive effects on this SA objective relate to requirements for: development of main town centre uses within or adjacent to centres to, where reasonably practicable, improve the public realm and attractiveness of the centre (DM18); new office development to be of a scale appropriate to a centre's position in the hierarchy of centres established by the JCS (DM19); redevelopment of office space to ensure the replacement accommodation is of an equal or higher standard and support for upgrading of poor quality office space provided that negative impact on landscape or streetscape do not outweigh the benefits of improvements (DM19); support for development within retail frontages which would have a beneficial effect on the character of an area or would bring heritage asset or vacant building back into beneficial use (DM20); development within district and local centres to avoid unacceptable environmental effects which could not be overcome by the imposition of conditions (DM21).
SOC8 To improve accessibility to essential services, facilities and jobs	++	Strong policy support for proposals which create high quality employment and business development, inward investment, adaptation and expansion of local firms and accessible and equitable job opportunities for all (DM16) will have a positive effect on employment, particularly in the main centres where they should promote access by sustainable modes. Policies within this theme also direct development of shops, leisure and other facilities to main centres where they will be most accessible. The policy theme is therefore expected to have long term, direct, significant positive effects on this SA objective.
EC1 To encourage sustained economic growth	++	The policies within this theme will protect and enhance the commercial function of the hierarchy of centres set out in the JCS, helping to provide for new and high quality employment opportunities and hence supporting economic growth. Long term, direct and indirect, significant positive effects are expected on this SA objective.
EC2 To encourage and accommodate both indigenous and inward investment	++	Policies within this theme make land and property available for business through their support for high quality employment and business development (DM16, DM17, DM18, DM19, DM20, DM21); support indigenous businesses by their protection of SME sites and premises (DM17); and help to attract inward investment by helping to improve the urban environment (see effects on ENV5 and SOC7 above). The policy theme is therefore expected to have long term, direct and indirect, significant positive effects on this SA objective.
EC3 To encourage efficient patterns of movement in support of economic growth	++	Strong policy support for proposals which create high quality employment and business development will support employment and economic growth, particularly in the main centres where they should promote access by sustainable modes. Policies within this theme also direct development of shops, leisure and other facilities to main centres where they will be most accessible. Application of a sequential approach based on the hierarchy of centres set out in the JCS will help to reduce the need to travel by providing space for shops,

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		facilities and employment close to where people live and/or where they can access them by sustainable modes. The policy theme (DM16, DM17, DM18, DM19, DM20, DM21) is therefore expected to have long term, indirect, significant positive effects on this SA objective.
EC4 To improve the social and environmental performance of the economy	+	By helping to improve the urban environment (see effects on ENV5 and SOC7 above) policies within this theme should help to attract new investment and skilled workers to the area. The policy theme is therefore expected to have long term, indirect, minor positive effects on this SA objective.

Mitigation

- 5.50 No changes to policy or other mitigation is recommended as no significant adverse effects relative to the BAU policy framework have been identified from implementing this policy theme.

Alternatives

- 5.51 The sustainability effects of reasonable alternative Economy policies to those proposed in the DPD are detailed in **Appendix 4** which also describes Norwich City Council's reasons for not preferring each alternative over the proposed policy. Although some alternatives would result in more positive effects on certain SA objectives, this would be offset by more negative effects on other objectives compared to the proposed policies. For example, alternatives which prioritise protection of prime employment sites whilst relaxing protection of others would have the advantage giving businesses more flexibility to respond to market signals but would also risk losing employment provision and economic activity associated with lesser quality sites. Overall we conclude that none of the reasonable alternatives considered for this policy theme performs significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD.

Communities

Policy theme

- 5.52 This theme contains the following policies:
- DM22 - Provision and enhancement of community facilities
 - DM23 - Evening, leisure and late night uses
 - DM24 - Hot food takeaways
 - DM25 - Use and removal of restrictive conditions on retail warehousing and other retail premises
- 5.53 This policy theme seeks to ensure that the provision of community, leisure, evening and large retail facilities and services is consistent with sustainability objectives, such that it supports the economic viability and vibrancy of centres and meets the needs of the community, whilst being sensitive to the character of the locality, the environment, and amenity issues.

Sustainability effects of business as usual (BAU)

- 5.54 A BAU approach would rely on national policy and the adopted JCS policies to guide 'community-related' development within the plan area. In relation to the various policies that come within this theme, the NPPF states plan-making should be underpinned by a number of core principles, one of which is to deliver sufficient community and cultural facilities and services to meet local needs. It also states that local plans should allocate a range of sites to meet the demand of retail,

leisure, commercial, office, tourism, cultural and community facilities needed in town centres. There is no national policy guidance regarding hot food takeaways.

5.55 JCS²³ policies relevant to this policy theme are:

- Policy 5 (The economy) which states that leisure industries will be promoted in the plan area.
- Policy 8 (Culture, leisure and entertainment) which states that *'existing cultural assets and leisure facilities will be maintained and enhanced. The development of new or improved facilities...will be promoted'*.
- Policy 11 (Norwich City Centre) which seeks to promote the role of the centre, including through expanding the early evening economy and leisure uses across the city centre, and late night activities focused in identified areas.
- Policy 12 (The remainder of the Norwich urban area, including the fringe parishes), which states that opportunities will be sought *"to retain and improve local services, and protect and enhance local and district centres"*.

5.56 The BAU framework does not provide sufficient detail regarding how sufficient community facilities will be delivered and how the evening, leisure and the late night economy will be both supported and managed to minimise negative impacts on amenity and character. For example, delivering sufficient community and cultural facilities is a core principle of the NPPF, but policy DM22 is needed to set out how to deliver this locally, e.g. with detailed criteria to protect existing facilities. Similarly, DM24 and DM25 address issues that are specific to the plan area - hot food takeaways and retail warehouses - and without this local policy detail these issues would not be addressed. Therefore it is considered that this policy theme is likely to have uncertain positive effects on SA objectives: SOC1, SOC5, SOC7, EC1, EC2 and EC3 as it is unclear whether these objectives can be accomplished without local detail. Although hot food takeaways and retail warehouses are not mentioned explicitly in the BAU policy framework, they are not considered significant enough factor to warrant downgrading the effects on SA objectives EC1, EC2 or EC3 to minor negative.

Sustainability effects of policy theme

5.57 This policy theme builds on the BAU policy framework by providing details on the provision of community facilities, hot food takeaways, removal or variation of condition for retail warehousing (or other retail premises) and leisure, evening and late night entertainment uses. Details within this theme include when permission should be granted, such as when community facilities are within adjacent to the city centre or existing and proposed local and district centres (DM22) and when development should not be permitted, such as when there would be significant environmental and amenity impacts (DM22, DM23 and DM24). The theme also stipulates that where necessary specific conditions can be imposed (DM23 and DM24). The implementation of these requirements has resulted in positive effects on SA objectives ENV2, ENV3, ENV5, SOC1, SOC2, SOC3, SOC5, SOC7, EC1 and EC4. The policy theme scored mixed effects against a number of the SA objectives (ENV1, ENV6, ENV9, SOC6, SOC8, EC2 and EC3) as the policy theme either does not deal with these objectives directly or may contain only partial coverage of the issues. However, the adverse effects the policy theme would have in isolation are mitigated by other policies in the DM Policies DPD, resulting in a mixed effect.

5.58 The sustainability effects of the Communities policies are assessed in **Table 5.5**.

Table 5.5: Sustainability of Communities policies

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV1 To reduce the effect of traffic on the environment	+/-	Long term, direct and indirect, minor positive effects on this SA objective relate to the policy requirements: to not permit educational development where there would be a significant impact on traffic (DM22) and that proposals for retail warehouses will only be permitted where they meet the criteria of policy DM1 and will not result in an increase in dependency of the private car (DM25). Furthermore Policy DM23 seeks to situate late night entertainment and leisure facilities within the city centre. This will improve accessibility to these services

²³ JCS for Broadland, Norwich and South Norfolk: Adopted, 2011.

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		due to the existing public transport infrastructure that runs to and from the city centre. Whilst policy measures to mitigate potential increases in private car use are not made explicit in respect of many of the types of community facility supported by this policy theme, including the evening, leisure and late night uses or hot food takeaways, the potential significant adverse effect on ENV1 is judged to be reduced to a minor one by the sustainable travel requirements of policy DM28.
ENV2 To improve the quality of the water environment	+	Long term direct, minor positive effects on this SA objective relative to BAU policy will result from this policy theme as permission will only be granted where the proposed development will not give rise to unacceptable environmental effects (DM22, DM23 and DM24). This will protect the water environments from potential hazardous surface run-off or ground contamination.
ENV3 To improve environmental amenity, including air quality	+	Long term indirect positive effects on this SA objective relative to BAU policy will result from this policy theme as permission will be granted: where the proposal will not give rise to unacceptable amenity and environmental effects (DM22, DM23 and DM24), where they meet the criteria of policy DM1 and will not result in an increase in dependency on the private car or high-emission vehicles (DM25). In addition to the above, policy DM22 will only permit development for educational facilities where it does not significantly impact traffic which could prevent a reduction in air quality.
ENV4 To maintain and enhance biodiversity and geodiversity	0	Policy theme is not expected to have an effect on this objective as it will be adequately dealt with by other policies.
ENV5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	+	Long term direct positive effects on this SA objective relative to the policy requirements that development resulting in the loss of historic and community public houses will only be permitted where strict criteria have been satisfied (DM22). Although in extreme cases this could result in the loss of pubs as assets of acknowledged historic and community value if they do not have any other statutory or policy protection, loss of the building itself would be only as a last resort after avenues to retain have been explored and discounted.
ENV6 To adapt to and mitigate against the impacts of climate change	+/-	<p>This policy theme is judged to have long term, indirect mixed effects on this SA objective relative to BAU policy. DM policy would only permit development where it is not in conflict with the criteria of DM1 or result in an increase in the dependency on the private car or high-emission vehicles (DM25). Policy DM22 stipulates that schools and education facilities will be permitted where they would not give rise to significant impacts on traffic, helping to avoid increased greenhouse gas emissions. However, this is only set out for schools and educational facilities, not the whole of the policy. Furthermore, policies DM23 and DM24 fail to address the impacts they could have on this objective. Neither policy looks to adapt or mitigate against the impacts these uses could have on climate change, such as an increase in greenhouse gas emissions due to greater car journeys. However, policy DM1 and DM28 address the need to encourage sustainable travel whilst the locational principles of DM18 will help to direct facilities that attract a large number of users to the most accessible locations. These policies will mitigate against the potentially significant adverse effects this policy theme could have on SA objective ENV6.</p> <p>Recommendation:</p>

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		Schools could significantly increase the number of private car journeys. Policy DM22, should explicitly state the need to keep private car travel as low as feasibly possible.
ENV7 To avoid, reduce and manage flood risk	0	Policy theme is not expected to have an effect on this objective as it will be adequately dealt with by other policies.
ENV8 To provide for sustainable use and sources of water supply	0	Policy theme is not expected to have an effect on this objective as it will be adequately dealt with by other policies.
ENV9 To make the best use of resources, including land and energy and to minimise waste production	+/-	Long term direct mixed effects on this SA objective relate to the policy requirements of DM25 to only grant permission where the proposal would not conflict with the criteria of DM1 or result in an increase in dependency on the private car or high-emission vehicles and DM22 where educational facilities would not give rise to significant impacts from traffic. However, the rest of DM22 and the policy theme fail to address the need to make the best use of resources, including, land and energy and to minimise waste production. However, these adverse effects are mitigated through the implementation of policies DM1, DM4, DM8 and DM27 of the DM Policies DPD. It is considered unnecessary for this policy theme to go into further detail as ENV9 is sufficiently dealt with by other policies.
SOC1 To reduce poverty and social exclusion	+	Long term direct positive effects on this SA objective relate to the policy requirements to grant permission where the proposal would contribute to wellbeing and social cohesion of local communities (DM22) and would support leisure, evening and late night entertainment uses (DM23).
SOC2 To maintain and improve the health of the whole population and promote healthy lifestyles?	+	Long term direct and indirect positive effects on this SA objective relative to BAU policy as this policy theme seeks to provide and enhance community facilities that include outdoor sport and recreation activities (DM22) and evening/leisure/late night entertainment uses (DM23). Policy DM24 seeks to manage the impact of hot food takeaways. Although the policy does not look to manage hot food takeaways on health grounds, the management and potential refusal of hot food takeaways could help communities to alternative food options which, in general may be healthier.
SOC3 To improve education and skills	+	Long term, direct minor positive effects on this SA objective relative to BAU policy as this policy theme explicitly seeks to permit schools and other educational development where the development would not undermine the criteria of policy DM1 nor give rise to significant adverse effects on the environment, highway safety or traffic and appropriate provision for student accommodation is possible (DM22).
SOC4 To provide the opportunity to live in a decent, suitable and affordable home	0	Policy theme is not expected to have an effect on this objective as it will be adequately dealt with by other policies.
SOC5 To build community identity, improve social welfare and reduce crime and anti-	+	Long term, direct minor positive effects on this SA objective relate to the policy requirements: to consult the local community to ensure that new and enhanced facilities meet their needs and aspirations, permit development where they contribute positively to the wellbeing and social cohesion of local communities (DM22) and implement planning conditions to minimise the potential for crime

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
social activity		and disorder (DM23). In addition to this, policy DM22 seeks to prevent the loss of existing community facilities. This will help to maintain existing community infrastructure, assisting in maintaining community identity and improving social activity.
SOC6 To offer more opportunities for rewarding and satisfying employment for all.	+/-	Long term direct mixed effects on this SA objective relative to BAU policy as this policy theme seeks to permit developments for the provision and enhancement of community facilities including schools and other educational facilities (DM22), and leisure, evening and late night uses (DM23). Policies DM24 and DM25 seek to manage and even restrict employment opportunities (potentially Black and Minority Ethnic communities ²⁴). This could have an adverse effect on providing opportunities for all.
SOC7 To improve the quality of where people live	+	Long term, direct and indirect, minor positive effects on this SA objective relative to the BAU policy as this policy theme seeks to: permit developments for community facilities including indoor/outdoor sport and recreation activities (DM22), imposition of conditions to restrict opening hours/removing permitted development rights in order to protect the amenity of surround occupants and to not permit residential and other noise sensitive uses within the Late Night Activity Zone or outside this area in premises where the impact of noise from late night entertainment uses would result in a significant adverse effect on future occupants (DM23). Policy DM24 would also have a positive effect on SOC7 as hot food takeaways will be permitted where they would not give rise to unacceptable environment effects that cannot be overcome by imposing a condition, while also restricting opening hours (via a condition) to protect the amenity of surrounding occupants.
SOC8 To improve accessibility to essential services, facilities and jobs	+/-	<p>Long term, direct, mixed effects on this SA objective relative to the BAU policy as this policy theme seeks: to provide and enhance community facilities, including schools and other educational facilities (DM22), support and manage the provision of leisure, evening and late night uses (DM23). The support of these facilities could result in an increase in employment opportunities and community facilities. Policies DM22 and DM25 seek to only permit development that would not result in an increase in car dependency. Furthermore Policy DM23 seeks to situate late night entertainment and leisure facilities within the centre. This will improve accessibility to these services due to the existing public transport infrastructure that runs to and from the centre. Policy DM24 does not require proposals for hot food takeaways to reduce dependency on the private car which is considered to have an adverse effect on this objective. However, policy DM28 seeks to encourage sustainable travel. The implementation of this policy will assist in ensuring that developments that are subject to policy and DM24 encourage the use of sustainable transport to and from these facilities.</p> <p>It is considered unnecessary for this policy theme to go into further detail of sustainable travel as this is adequately covered by other policies within the DM Policies DPD.</p>
EC1 To encourage sustained economic	+	Long term, direct and indirect, minor positive effects on this SA objective relative to BAU policy will result from DM policy requirements for the provision or enhancement of community facilities to be located within or adjacent to the

²⁴ The text says that it 'potentially' could have an impact as data is not available regarding the nature of employment within hot food takeaways in Norwich; however, it is often the case that hot food takeaway units are owned or provide employment primarily for BAME communities. Refer to Appendix 1: Barking and Dagenham LDF: Representations from the Mayor of London: www.london.gov.uk/.../barking_&_Dagenham_LDF_pre_submission_of_core_strategy_appendix.rtf and the Equality Impact Assessment for Waltham Forest's SPD on Hot Food Takeaways: <http://www.pas.gov.uk/pas/aio/590466>

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
growth		city centre or existing/proposed local district centres (DM22). The location of community facilities within close proximity to retail uses favours "linked trips" offering the opportunity for users of such facilities to shop before or after they reach their intended destination. Policy DM25 will permit the removal of restrictive conditions which could allow for retail warehouses or other premises to sell different goods only where there wouldn't be an impact on existing centres. This will secure and maintain the vitality and viability of the city centre and local and district centres. Policy DM23 seeks to enhance the vibrancy of the city centre, local and district centres through the provision of leisure, evening and late night entertainment uses. These uses could bolster Norwich's night time economy which in turn will have a positive effect on the economic diversity of Norwich.
EC2 To encourage and accommodate both indigenous and inward investment	+/-	Long term, direct, minor mixed effects on this SA objective relative to BAU policy as this policy theme seeks to enhance the vibrancy of the city centre, local and district centres by granting permission to leisure, hospitality and late night entertainment uses (DM23). This could have positive effects on indigenous and inward investment. Policy DM24 seeks to manage and even restrict hot food takeaways and this could result in reduced indigenous and inward investment (negative effect on EC2).
EC3 To encourage efficient patterns of movement in support of economic growth	+/-	<p>Long term direct and indirect mixed effects on this SA objective relate to the policy requirement to not permit development where there would be a significant impact on traffic (DM22) for schools and other educational development. In addition to this, DM22 stipulates that permission will be granted for community facilities that are within or adjacent to the city centre or existing and proposed local or district centres. This could encourage users to travel via public transport, on foot or bicycle due to the central location. Policy DM25 states that the removal or variation of a condition on retail warehousing or other retail premises will only be permitted where they meet the criteria of policy DM1 and will not result in an increase in dependency of the private car or high emission vehicles. Apart from these scenarios, this policy theme fails to recognise the need to encourage efficient patterns of movement in support of economic growth. However, policy DM28 of the DM Policies DPD seeks to encourage sustainable travel. Policy DM28 will need to be taken into consideration when determining a proposal that affects this policy theme, mitigating the potential adverse effects the theme could have on encouraging efficient patterns of movement if considered as policies by themselves.</p> <p>It is considered unnecessary for this policy theme to go into further detail to set out how it will encourage efficient patterns of movement in support of economic growth.</p>
EC4 To improve the social and environmental performance of the economy	+	Long term direct positive effects on this SA objective relate to the policy requirements to grant permission subject to conditions that would restrict hours of opening to protect the amenity of surrounding occupants (DM23 and DM24) and to ensure no residential or other noise sensitive uses will be permitted with the defined Late Night Activity Zone or outside the area in premises where the impact of noise from late night uses will have a harmful impact of living/working conditions (DM23). The implementation of these requirements will assist in reducing the impact on existing and future residents from businesses. Policies DM22 and DM23 stipulate that permission should not be granted if significant environmental impacts would arise from development while policy DM25 states that permission will be granted if the proposal is not in conflict with the criteria of policy DM1 which could prevent any adverse impacts on the environment and existing residents. Furthermore, holistically the policy theme will attract new investment to the Norwich area (DM22 and DM23), although policies DM24 and

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		DM25 could restrict hot food takeaways and the removal or variation of conditions on retail warehouses and other retail premises.

Mitigation

- 5.59 No significant adverse effects have been identified from this policy theme, thus no mitigation has been recommended.

Alternatives

- 5.60 The sustainability effects of reasonable alternative Community policies to those proposed in the DPD are detailed in **Appendix 4** which also describes NCC's reasons for not preferring each alternative over the proposed policy. There were two alternative options for policies DM22, DM23 and DM25 and three alternative options for DM24. Although some alternatives would result in more positive effects on certain SA objectives, this would be offset by more negative effects on other objectives compared to the proposed policies. For example, extending or reducing the boundaries of the defined leisure and Late Night Activity Zone could produce negative/positive effects on SOC6, SOC7, EC1, EC2, and EC4 depending on whether it was extended or reduced (DM23 second alternative option). The second alternative option for DM24 would be to cap the number of hot food takeaways within the district and local centres (and elsewhere e.g. the Late Night Activity Zone). This option was considered to restrict the economy within the applicable policy areas (potentially negative effects on EC1 and EC2) but assist in reducing odour pollution and encourage communities to alternative, potentially healthier food options (positive effects on ENV3, SOC2 and SOC7).
- 5.61 Overall we conclude that none of the reasonable alternatives considered for this policy theme performs significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD.

University of East Anglia

Policy theme

- 5.62 This theme contains the following policies:
- DM26 - Development at the University of East Anglia (UEA)
- 5.63 This policy regards the delivery of development within the UEA campus, and seeks to ensure that such development does not negatively impact on the landscape and townscape of the locality, that the potential transport impacts resulting from the growth of the university are managed (through the UEA Travel Plan), and that development has a positive impact on access to public open space. The policy has been informed by a suite of Masterplanning and related documents developed in close consultation with Norwich City Council.

Sustainability effects of business as usual (BAU)

- 5.64 There is no national policy guidance regarding the University of East Anglia (UEA), although generic National policy would still apply. Therefore a BAU approach would rely on the JCS policies to guide development within the UEA campus. JCS²⁵ policies relevant to this policy:
- Policy 7 (Supporting communities) states that the 'learning city' role of Norwich will be promoted by facilitating the continuing enhancement of tertiary education facilities including the University of East Anglia.

²⁵ JCS for Broadland, Norwich and South Norfolk: Adopted, 2011.

- Policy 9 (Strategy for growth in the Norwich Policy Area) which states that employment development, in relation to health, higher education and science, will be supported at the University of East Anglia.
- Policy 12 (Remainder of the Norwich urban area, including the fringe parishes): Norwich will be promoted as a 'learning city' and the expansion of existing further and higher education opportunities will be encouraged.

5.65 The BAU framework provides overarching policy support for enhancing the role of UEA, but there is no detail regarding the delivery of this objective. Other proposed development management policies would apply to development at UEA to ensure negative sustainability effects are minimised (e.g. on amenity (DM2), landscape and townscape (DM3), energy efficiency (DM4) and environmental assets (DM6)). However, DM26 provides site-specific criteria (e.g. retaining a green edge, and implementing the UEA travel plan), and these factors would not be addressed solely through the BAU framework. A lack of policy guidance regarding the UEA travel plan could result in negative sustainability effects on greenhouse gas emissions (negative effect on ENV1, ENV3, ENV6 and ENV9). However the existing policy framework is considered to have uncertain minor positive effects on objectives SOC3, EC1, EC2 and EC3 as the framework seeks employment development and enhancement of the UEA.

Sustainability effects of policy theme

- 5.66 The proposed policy within this theme builds on and adds further detail and local specificity to JCS policies 7 and 9. Overall, this policy has performed positively against most SA objectives. The policy theme was considered to have minor positive effects on many of the objectives (ENV5, SOC1, SOC2, SOC4, SOC6, SOC7, SOC8, EC1, EC2, EC3, EC4). The policy theme was considered to have significant positive effects on objective SOC3. It was considered to be significant because the policy theme specifically promotes the development of university related uses which could significantly improve access to education and increase the number of skilled workers/key workers retained in Norwich.
- 5.67 The policy theme was considered to have mixed effects on two of the environmental objectives (ENV3 and ENV4). The positive effects mainly relate to expected increases in access to open space and conservation and enhancement of the natural environment on the campus but with negative effects from the potential increase in car journeys by an increased number of students and employees, albeit mitigated by sustainable transport measures.
- 5.68 Minor negative effects are expected on SA objectives ENV1, ENV6, ENV9, again relating the potential increase in car journeys by an increased number of students and employees, as mitigated by sustainable transport measures.
- 5.69 The sustainability effects of the University of East Anglia policy are assessed in **Table 5.6**.

Table 5.6: Sustainability of UEA policy

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV1 To reduce the effect of traffic on the environment	-	The supporting text of the policy states that it seeks to support growth of UEA. Although some students will live on the (expanded) campus, many others as well as staff will travel to the site on a daily basis and a larger campus may also increase the need to travel other than on foot. The increased need to travel is likely to result in some increase in private car use but this should be mitigated by the requirement within DM26 to implement the UEA Travel Plan where relevant, promoting public transport/walking/cycling (within and to and from the university), encouraging shared car use, and minimising single-occupancy car trips. These initiatives could mitigate or even prevent an increase in car travel, thus reducing the effect of traffic on the environment. The residual effect on ENV1 is judged to be long term, indirect, minor negative.
ENV2 To improve the quality of the water environment	0	The UEA campus lies within a groundwater source protection zone (SPZ2 and SPZ3). The campus is also located close to and upslope of the River Yare/UEA Broad with the potential for surface water to drain to the watercourse which

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		forms the core of a Local Nature Reserve, 'UEA Marsh'. Mitigation is provided by legislation (pollution of ground or surface waters is an offence under the Water Resources Act 1991), the Environment Agency's environmental permitting regime ²⁶ , and the provisions of policy DM6 on protection of natural environmental assets and DM11 on prevention of pollution of water resources. The residual effect on SA objective ENV2 is judged to be negligible.
ENV3 To improve environmental amenity, including air quality	+/-	Long term, direct and indirect mixed effects on this SA objective relative to BAU policy will result from policy DM26. Potentially significant adverse effects on environmental amenity, in particular air quality, due to increased road traffic will be mitigated as described under ENV1, resulting in a minor adverse residual effect. A minor positive effect will result from policy support for increased access to open space on the university campus.
ENV4 To maintain and enhance biodiversity and geodiversity	+?/-?	Policy DM26 requires developments, where relevant, to conserve the landscape and retain a green edge to the campus. This is judged to have minor positive effects on habitats but with uncertainty due to the lack of an explicit reference in DM26 to biodiversity protection and enhancement. The policy's promotion of public access to open space could result in habitat damage or disturbance due to an increase in footfall to these open spaces, including at three designated sites on or adjoining the campus: UEA Marsh LNR, Earham Park Woods LNR and The Heronry and Violet Grove CWS (minor negative but with uncertainty relating to whether local habitats are sensitive to visitor access). Potential adverse effects on UEA Marsh due to water pollution are judged negligible, as described under ENV2. Policy DM6 should avoid potential direct adverse effects on habitats from construction as developments are expected to take all reasonable opportunities to protect and enhance the natural environment of Norwich, including sites and species.
ENV5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	+	Long term, direct, minor positive effects on this SA objective relative to BAU policy will result from policy DM26 requirements for developments to conserve the landscape and architectural significance of the UEA and retain a green edge and significant vistas to and from its campuses. Positive effects are also expected on the setting of Earham Hall Grade II* listed building and the surrounding parkland which lie close to the campus, informed by a 'Vision and Development Document' prepared by the university in connection with a separate proposal (within Site Allocations and Site Specific Policies DPD) to secure refurbishment and beneficial long-term use of the hall and promote complementary new development around it.
ENV6 To adapt to and mitigate against the impacts of climate change	-	Long term, indirect, minor negative effects on this SA objective relative to BAU policy will result from policy DM26. Potentially significant adverse effects on greenhouse gas emissions due to increased road traffic will be mitigated as described under ENV1, resulting in a minor adverse residual effect.
ENV7 To avoid, reduce and manage flood risk	0	Flood zones associated with the River Yare and UEA Broad lie immediately to the west and south of the UEA campus. These zones, are, however outside of the campus boundary within which all development proposed by DM26 will take place, thus the policy theme is not expected to have an effect on this objective. The requirements of DM5 (Flooding) in respect of sustainable drainage provide assurance that development at UEA will not contribute to raised flood risk in downstream flood zones.
ENV8 To provide for	0	East Anglia is one of the driest areas of the country and although sufficient

²⁶ Under the Environmental Permitting (England and Wales) Regulations 2010

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
sustainable use and sources of water supply		water resources are available to meet expected growth up to 2031, it is important that new development is water efficient in order to minimise additional pressure on water resources. The general support for delivery of university development provided by this policy theme has the potential for long term, direct negative effects on water resource availability but it is considered that the residual negative effect on ENV8 of the UEA policy is reduced to a negligible one by the water efficiency standards imposed by policy 3 of the JCS.
ENV9 To make the best use of resources, including land and energy and to minimise waste production	-	Long term, indirect, minor negative effects on this SA objective relative to BAU policy will result from policy DM26. Potentially significant adverse effects on energy use due to increased road traffic will be mitigated as described under ENV1, resulting in a minor adverse residual effect. The university campus does not lie on best and most versatile agricultural land.
SOC1 To reduce poverty and social exclusion	+	Policy DM26 is judged to have a long term, direct minor positive effect on this objective due to increased provision of accessible open space, reducing this aspect of deprivation for local neighbourhoods.
SOC2 To maintain and improve the health of the whole population and promote healthy lifestyles?	+	Long term, indirect minor positive effects on this SA objective relative to BAU policy will result from policy DM26 as it requires developments, where relevant, to promote public access to open spaces and promote walking and cycling within and to the university. The promotion of these will encourage people to take outdoor exercise, thus promoting healthy lifestyles.
SOC3 To improve education and skills	++	Long term direct significant positive effects on this objective relative to BAU policy will result from policy DM26. The policy seeks to permit development proposals providing they are for university related uses and are in accordance with the UEA masterplan, thus having a significant positive effect on providing facilities for higher education and helping to retain key workers within Norwich.
SOC4 To provide the opportunity to live in a decent, suitable and affordable home	+	The provision of additional student accommodation enabled by this policy theme will have a long term, direct, minor positive effect on this SA objective.
SOC5 To build community identity, improve social welfare and reduce crime and anti-social activity	0	Policy theme not expected to have an effect on this objective.
SOC6 To offer more opportunities for rewarding and satisfying employment for all.	+	Long term, direct and indirect, minor positive effects on this objective relative to BAU policy will result from policy DM26. Development within the UEA campus as defined on the Policies Map will be permitted providing it is for university related uses and is in accordance with the UEA masterplan. The provision of university related uses will aid in the provision of employment for and the retention of key workers.
SOC7 To improve the quality of where people live	+	Long term, direct, minor positive effects on this objective relative to BAU policy will result from policy DM26 as it requires developments to promote public access to open space where relevant.

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
SOC8 To improve accessibility to essential services, facilities and jobs	+	Long term, direct, minor positive effects on this objective relative to BAU policy will result from policy DM26 due to increased public access to open space, promotion of sustainable transport modes such as public transport, walking and cycling, and improved access to educational facilities and university-related jobs. Additionally, policy DM28 could increase accessibility to community infrastructure as sport and leisure facilities could be used by the public.
EC1 To encourage sustained economic growth	+	Long term, direct and indirect, minor positive effects on this objective relative to BAU policy will result from policy DM26. The policy states that development will only be permitted within the UEA campus as defined in the Policies Map if it is for university related uses. The provision of university related uses, such as educational facilities will assist in strengthening the local economy as the UEA could assist in providing a highly skilled workforce. Furthermore, the development of education facilities could contribute to retaining key workers within Norwich.
EC2 To encourage and accommodate both indigenous and inward investment	+	Long term, indirect, minor positive effects on this objective relative to BAU policy will result from policy DM26 as it requires developments with the UEA campus as defined in the Policies Map to only be permitted for university related uses, thus raising the profile of Norwich with knowledge-based industries and encouraging inward investment with Norwich. Moreover, policy DM26 seeks to permit developments that promote public access to open space while conserving the existing landscape, significant vistas and architectural significance. The provision and retention of the above could encourage inward investment by providing a high quality urban environment.
EC3 To encourage efficient patterns of movement in support of economic growth	+	Long term, direct, minor positive effects on this objective relative to BAU policy will result from policy DM26. The policy specifically states that developments must implement the UEA Travel Plan while also promoting public transport use, walking and cycling (within and to and from the university), encourage shared car use, minimise single-occupancy car trips and reduce the overall need to travel by car. In addition to the above, DM26 seeks to permit development for university related uses. This could not only improve the provision of local jobs (including jobs for key workers) but also provide key community infrastructure such as sports and leisure facilities.
EC4 To improve the social and environmental performance of the economy	+	Long term, direct, minor positive effects on this objective relative to BAU policy will result from policy DM26. Policy DM26 seeks to conserve the landscape and retain green edges which shall help in reducing the impact on the environment. The policy also seeks to mitigate and reduce potential impacts on residents from development by ensuring where relevant developments implement the UEA travel plan, promote sustainable transport modes such as public transport, walking and cycling, encourage shared car use, minimise single occupancy car trips and reduce the overall need to travel by car. These initiatives will help to ensure new developments do not increase local traffic and congestion. Additionally, policy DM26 seeks to promote public access to open space which could increase existing community's access to open space.

Mitigation

- 5.70 No significant adverse effects have been identified from this policy them, thus no mitigation has been recommended.

Alternatives

- 5.71 The sustainability effects of reasonable alternative University of East Anglia policies to the proposed policy in the DPD are detailed in **Appendix 4** which also describes Norwich City Council's reasons for not preferring each alternative over the proposed policy. An alternative option is to have no specific policy on the UEA and to rely on other policies in this DPD and the JCS - this is the BAU scenario assessed above. A second alternative is to prevent any further growth of the UEA but as this is directly contrary to the JCS, it is not considered a reasonable alternative and has not been assessed. A third option is for the policy to cover a different area, either retaining the Local plan boundary or expand to cover a larger area. Expanding the area was considered to have a negative effect on the environment (ENV2 and ENV4) and positive effect on SOC3, EC1 and EC2 whilst restricting the area would have the opposite effects. Overall we conclude that none of the reasonable alternatives considered for this policy theme performs significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD.

Norwich Airport

Policy theme

- 5.72 This theme contains the following policies:
- DM27 - Norwich airport
- 5.73 This policy sets out what development would be acceptable within the airport boundary (airport operational purposes, uses ancillary to the function of the airport, and providing improved transport links). No masterplan is yet available for the development of the airport but if a future Masterplan shows that site R32 in the Site Allocations Plan 'The Paddocks' at Holt Road is necessary to accommodate expansion of airport operational uses within the plan period, policy DM27 will also apply to that site.

Sustainability effects of business as usual

- 5.74 The Aviation White Paper (2003) provides a national policy framework regarding the development of airport capacity in the UK. It does not itself authorise or preclude any particular development, but acts as a guide for decisions on future planning applications. The paper proposes a balanced approach which recognises the importance of air travel to economic prosperity but seeks to reduce and minimise the impacts of airports on those who live nearby and on the natural environment. With regard to Norwich Airport, the paper states that *'there is scope for the airport to grow to satisfy local demand'*.
- 5.75 The NPPF states that when planning for 'airports and airfields that are not subject to separate national policy statements, plans should take account of their growth and role in serving business, leisure, training and emergency service needs'. It also says that plans should take account of the principles in the Government Framework for Aviation²⁷. This consultation document published in 2011 sets out the government's view that many of the provisions of the 2003 White Paper are 'no longer fit for purpose...fail to recognise the importance of addressing climate change and give insufficient weight to the local environmental impacts of aviation'. In relation to sustainable travel, the NPPF says that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised and that they are supported by a Transport Statement or Transport Assessment. To support the move to a low carbon future, the NPPF also requires that local planning authorities should plan for new development in locations and ways which reduce greenhouse gas emissions.
- 5.76 JCS²⁸ policies relevant to this policy are:

²⁷ Developing a Sustainable Framework for UK Aviation, UK Government, March 2011.

²⁸ JCS for Broadland, Norwich and South Norfolk: Adopted, 2011.

- Policy 6 (Access and transportation) which seeks to support growth and the regional significance of Norwich International Airport for both leisure and business travel; and implementation of the Norwich Area Transportation Strategy (NATS) including construction of the Northern Distributor Road (NDR).
- Policy 9 (Strategy for growth in the Norwich Policy Area) which supports employment opportunities at a new business park of around 30 hectares associated with the Airport and focused on uses benefiting from an airport location; and significant improvement to the bus, cycling and walking network, including Bus Rapid Transit on key routes in the Norwich area linking major growth locations.
- The sustainability of Site R32 (The Paddocks, Holt Road) in the Site Allocations and Site Specific Policies DPD was appraised as part of the SA of that document. The SA found significant adverse effects on ENV9 due to presence of Grade 3 agricultural land in the north west of the site which would be lost to development and uncertain effects on ENV3 because of potential adverse effects on air quality from further development of the airport but with an uncertain contribution to these from development on this particular site.

5.77 The BAU framework provides an overarching aim for potential growth at Norwich Airport; it does not provide necessary detail regarding the type of development that would be allowed on the site. Therefore it is considered that a BAU approach would have uncertain minor positive effects on objectives EC1 and EC2. Whilst there is uncertainty as to the type of development that would be allowed within the boundary under BAU policy, operational growth of the airport is strongly supported by JCS policy 6 and this is considered to have significant adverse effects on objectives ENV3, ENV6 and SOC7 due to increased noise, air pollution and greenhouse gas emissions associated with additional aircraft movements, and to a lesser extent increased surface transport movements to and from the airport by non-sustainable modes.

Sustainability effects of policy theme

- 5.78 The Norwich Airport policy builds on the BAU policy framework by providing a layer of detail regarding the types of economic development that will be permitted within that part of the airport boundary falling within Norwich city (the remainder of it falls within Broadland district) as defined on the Policies Map.
- 5.79 Expansion of airport operations and ancillary economic activities are likely to have significant positive effects on jobs and economic growth and related wellbeing benefits in Norwich and neighbouring districts. Because DM27 builds on national and local policy, notably JCS policy 6, the incremental positive effects attributable to the DM policy are only judged to be minor positive (on SOC6, SOC8, EC1, EC2) with mixed minor effects on EC4.
- 5.80 Negative effects of DM27 relate to the additional aircraft movements and the additional surface traffic to and from the airport that are likely to accompany airport related development. The negative effects of additional flights that could arise as a result of additional airport related development (greenhouse gas emissions, air pollution, noise) on the environment and on amenity of local residents will be difficult to mitigate whilst the potential large increases in road traffic should be reduced by strong support for sustainable transport provided by JCS and DM policies, including planned upgrade of public transport links between strategic employment areas such as the airport and the city centre. Once again because DM27 builds on national and local policy, notably JCS policy 6, the incremental positive effects attributable to the DM policy are only judged to be minor negative, with uncertainty relating to the effectiveness of policies designed to bring about a shift from private car use to sustainable modes (negative effects on ENV1, ENV2, ENV3, ENV4, ENV5, ENV6, SOC2, SOC7, EC3) with mixed minor effects on EC4.
- 5.81 The only potentially significant effect attributable to DM27 relates to presence of greenfield land in Agricultural Land Classification zones 1-3 within the airport boundary which could be lost to development. Uncertainty relates to the fact that the land may fall into ALC classification 3b rather than 3a which is not 'best and most versatile' but data are unavailable to make this distinction.
- 5.82 It is recommended that the Norwich Airport Masterplan, once complete, is subject to Sustainability Appraisal/Strategic Environmental Assessment.
- 5.83 The sustainability effects of the Norwich Airport policy are assessed in **Table 5.7**.

Table 5.7: Sustainability of Norwich Airport policy

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV1 To reduce the effect of traffic on the environment	-?	Development proposed under DM27 is highly likely to increase surface transport movements to and from the airport. If all of these additional movements were by unsustainable transport modes, significant negative effects on the environment (greenhouse gas emissions, air pollution, noise, contaminated surface run-off etc.) would result. Although the policy allows for development of facilities that improve transport links, the policy itself does not make other forms of development conditional upon such transport improvements nor stipulate that these improvements must be to public transport. In isolation, the policy would therefore be likely to have significant negative effects on SA objective ENV1. Mitigation is provided, however, by policies DM1 and DM28 (cross-referenced in DM27) which stipulate that cumulatively and as far as is practicable, development does not produce any net growth in travel by private car and that new developments incorporate public transport corridors and that travel planning is integral. In addition, improvements to accessibility of the airport site which will result from the requirements of JCS policies 6 and 9 (see above) to construct the NDR and make public transport improvements linking strategic employment areas (including Norwich Airport) to the city centre. Together, this mitigation is judged to reduce the potential negative effect to minor but with some uncertainty relating to the timing of construction of the NDR relative to airport expansion, the extent to which airport users will choose the sustainable travel options which become available and extent to which the objective of no net growth in private car use will be deemed 'practicable'. Greater certainty of mitigating potential adverse effects of traffic on the environment could be secured by making development for airport operational purposes and ancillary uses contingent on completion of specified improvements in sustainable transport links set out in the Norwich Area Transport Strategy, JCS or elsewhere.
ENV2 To improve the quality of the water environment	-?	The southern and eastern part of the airport boundary fall within the outer part (SPZ3) of a Groundwater Source Protection Zone. The airport site also appears to have the potential for surface water to drain to a watercourse to its north near Horsham St Faith which in turn drains to the Broads, including parts of the internationally designated wetland interest of Broadland SAC, SPA and Ramsar site. There is the potential for significant adverse effects on SA objective ENV2 due to water pollution from increased airport operations (e.g. aviation fuel spillage) and other commercial activity, increased traffic movements (e.g. contaminated road run-off) and construction work, potentially on land contaminated by past airport operations. Mitigation is provided by legislation (pollution of ground or surface waters is an offence under the Water Resources Act 1991), the Environment Agency's environmental permitting regime ²⁹ , and the provisions of policy DM6 on protection of natural environmental assets and DM11 on remediation of contaminated land and prevention of pollution of water resources. The residual effect on SA objective ENV2 is judged to be minor, with uncertainty relating to the fact that policy requirements to avoid future water pollution may not be as effective as planned and due to a lack of information about existing arrangements for managing pollution risk and their ability to operate effectively for an expanded airport.
ENV3 To improve environmental amenity, including air quality	-/-?	As discussed under ENV1, the development of Norwich Airport for airport operational purposes and ancillary functions is likely to result in a significant increase in surface transport movements but the environmental effects of this (including on air quality and noise) should be mitigated by strong policy support for sustainable access to the airport. Residual effects of increases in surface

²⁹ Under the Environmental Permitting (England and Wales) Regulations 2010

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		traffic are therefore judged to be the same as on ENV1 i.e. minor negative but uncertain. Further mitigation is provided by the stipulation within DM27 that where necessary, development must include mitigation to reduce impact on neighbouring uses and the more general requirements of DM2. Additionally, increased airport operations are likely to result in increased aircraft noise and air pollution for those living under the flight path and/or in proximity to the airport. Although these effects will be difficult to mitigate and are judged likely to have a significant negative effect on SA objective ENV3, they are judged to be largely attributable to JCS policy 6. The incremental effect of policy DM27 on ENV3 due to increased airport operations is judged to be minor negative.
ENV4 To maintain and enhance biodiversity and geodiversity	-?	As discussed under ENV2, there is the potential for airport development supported by DM27 to result in pollution of surface waters, including those hydrologically connected to internationally designated wetland interest of Broadland SAC, SPA and Ramsar site but mitigation provided by DM6, DM11, legislation and the environmental permitting regime are judged to reduce the residual effect to minor uncertain. An additional potential adverse effect on biodiversity is from air pollution associated with increases in aircraft and surface traffic movements, although the latter are expected to be mitigated by policies on sustainable transport (see assessments of effects on ENV1 and ENV3). The closest designated sites are Fiddle Wood and Night Plantation CWS (more than 1 km to the south of the airport boundary) and Catton Chalk Pit SSSI more than 2 km to the south. Potential air pollution effects are judged likely to be no more than minor at this distance, with uncertainty relating to the sensitivity of the designated features to air pollution.
ENV5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	-?	Long term indirect positive effects on this SA objective relative to BAU policy will result from policy DM27. Development at Norwich airport could result in an increase in air pollution from aircraft movements that arise as a result of airport related development and surface traffic movements that could result in negative impacts on heritage buildings. Given its prominent location on the northern edge of Norwich, further development at this location could have adverse impacts on views from neighbouring areas of Broadland district, which are predominantly rural in nature, or on the setting of heritage assets. However, no particular heritage assets likely to be adversely affected have been identified by the SA. The airport also lies approximately 5 km to the south east of the nearest part of The Broads National Park although inter-visibility between the two is unknown. The policy itself states mitigation measures should be secured to reduce the impact on neighbouring uses whilst DM3 (Design Principles) requires the design of all development to have regard to the character and local distinctiveness of the surrounding area and to protect long views of major landmarks. In light of this mitigation the residual effect on SA objective ENV5 is judged to be long term, direct, minor adverse with uncertainty relating to the design of any proposals which come forward.
ENV6 To adapt to and mitigate against the impacts of climate change	-	As discussed under ENV1 and ENV3, the development of Norwich Airport for airport operational purposes and ancillary functions is likely to result in a significant increase in surface transport movements but the environmental effects of this (including on greenhouse gas emissions) should be mitigated by strong policy support for sustainable access to the airport. Residual effects of increases in surface traffic on greenhouse gas emissions are therefore judged to be the same as for effects on ENV1 i.e. minor negative but uncertain. Additionally, however, increased airport related development is likely to result in increased aircraft movements and significant associated greenhouse gas emissions. Although this effect will be difficult to mitigate and is judged likely to have a significant negative effect on SA objective ENV6, it is judged to be largely attributable to JCS policy 6. The incremental effect of policy DM27 on

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		ENV6 due to increased airport operations is judged to be minor negative.
ENV7 To avoid, reduce and manage flood risk	0	Policy theme not expected to have an effect on this objective as there are no areas of high flood risk within or adjoining the airport boundary.
ENV8 To provide for sustainable use and sources of water supply	0	Policy theme not expected to have an effect on this objective.
ENV9 To make the best use of resources, including land and energy and to minimise waste production	--?	As discussed under ENV1 and ENV3, the development of Norwich Airport for airport operational purposes and ancillary functions is likely to result in a significant increase in surface transport movements but the environmental effects of this (including on minimising energy consumption) should be mitigated by strong policy support for sustainable access to the airport. Residual effects of increases in surface traffic on energy consumption are therefore judged to be the same as for effects on ENV1 i.e. minor negative but uncertain. Additionally, however, increased air traffic is likely to result in increased aircraft movements and significant associated energy/fuel consumption although this is only one element of ENV9. Although these effects will be difficult to mitigate and are judged likely to have a long term, direct significant negative effect on SA objective ENV9 they are judged to be largely attributable to JCS policy 6 with DM27 having only a minor negative incremental effect. Significant potential adverse effects relate to the presence of greenfield land in Agricultural Land Classification zones 1-3 within the airport boundary which could be lost to development. Uncertainty relates to the fact that the land may fall into ALC classification 3b rather than 3a which is not 'best and most versatile' but data are unavailable to make this distinction.
SOC1 To reduce poverty and social exclusion	0	Policy theme not expected to have an effect on this objective.
SOC2 To maintain and improve the health of the whole population and promote healthy lifestyles?	-?	Long term, indirect negative effects on this SA objective relative to BAU policy will result from policy DM27. As stated for ENV1 and ENV3, an increase in air pollution could result from development at Norwich airport although as previously described, mitigation exists for increases in surface traffic reducing the magnitude of the likely effect and introducing uncertainty. No AQMAs exist in proximity to the airport boundary although existing AQMAs in the city centre (and the larger city centre-wide AQMA currently proposed) could be affected by a net increase in car journeys from the city to the airport. DM27 also stipulates that where necessary, development proposals must include mitigation measure to reduce the impact on neighbouring uses, in turn reducing the potential impact on the health of the community.
SOC3 To improve education and skills	+	Long term indirect mixed effects on this SA objective relative to the BAU policy will result from policy DM27. Policy DM27 states permission will be granted for uses ancillary to the function of an airport and airport operational uses. This could result in the development of ancillary educational buildings that specialise in aerospace engineering and other aviation-related disciplines.
SOC4 To provide the opportunity to live in a decent, suitable and	0	Policy theme not expected to have an effect on this objective.

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
affordable home		
SOC5 To build community identity, improve social welfare and reduce crime and anti-social activity	0	Policy theme not expected to have an effect on this objective.
SOC6 To offer more opportunities for rewarding and satisfying employment for all.	+	Long term direct positive effects on this SA objective relative to BAU policy will result from policy DM27. The development for airport operational purposes and uses ancillary to the function of the airport could provide more employment opportunities to the Norwich area.
SOC7 To improve the quality of where people live	-	Although the policy theme not expected to have an effect on most of the aspects of this SA objective (e.g. quality of dwellings and open space), the loss of environmental amenity described under ENV3 also produces significant, long term negative effects on SOC7. Although these effects will be difficult to mitigate and are judged likely to have a significant negative effect on SA objective SOC7, they are judged to be largely attributable to JCS policy 6. The incremental effect of policy DM27 on SOC7 due to increased airport operations is judged to be minor negative.
SOC8 To improve accessibility to essential services, facilities and jobs	+	Long term direct positive effects on this SA objective relative to BAU policy will result from policy DM27 as development will be permitted where it is for: airport operational purposes, uses ancillary to the function of the airport and facilities that will improve transport links. These developments will provide more employment opportunities, more facilities and increased accessibility to Norwich airport.
EC1 To encourage sustained economic growth	+	Long term, direct minor positive effects on this objective relative to BAU policy will result from policy DM27. DM27 adds further detail to JCS policy 6 and increases certainty for developers about the types of economic activity that will be supported as this policy seeks to encourage development that is for airport operational purposes or uses that are ancillary to the function of the airport. As a result the policy is likely to encourage sustained economic growth through an increase in local employment levels while also attracting national and international companies to the airport and to Norwich.
EC2 To encourage and accommodate both indigenous and inward investment	+	Long term, direct minor positive effects on this objective relative to BAU policy will result from policy DM27 as it seeks to permit airport operational purposes and uses ancillary to the function of the airport, adding weight and certainty to JCS policy 6. This could attract inward investment from across the country and the world as well as encouraging indigenous business within the aviation sector.
EC3 To encourage efficient patterns of movement in support of economic growth	-?	Long term direct mixed effects on this objective relative to BAU policy will result from policy DM27 as it seeks to permit development that will provide improved transport links which could include public transport. However, as stated above many of the additional journeys to and from the airport may be made via private cars and DM27 does not stipulate that new transport facilities must be for sustainable transport. As detailed under ENV1, mitigation from other policies and strategies should ensure that sustainable transport opportunities are maximised and that growth of private car use only has a minor negative but uncertain effect on this objective

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
EC4 To improve the social and environmental performance of the economy	+/-	DM27 seeks to permit development that is ancillary to the function of the airport or is for airport operational purposes. This will help to attract new investment and skilled workers to the area with a long term, indirect, minor positive effect on local communities. Long term, direct, minor negative effects relate to the effects of air traffic growth arising as a result of airport related development (and to a lesser extent surface traffic growth) on the environmental amenity of local residents, as described under ENV3.

Mitigation

- 5.84 This policy theme was considered to have significant adverse but uncertain residual effects on ENV9 due to potential loss of best and most versatile agricultural land. It is recommended that the potential agricultural value of greenfield land within the airport boundary and of site R32 in the Site Allocations and Site Specific Policies DPD are confirmed to inform a future airport Masterplan and to confirm the potential effects of allocating site R32. In addition, it is recommended that the safeguards to ensure that the potential for pollution from airport related development arising as a result of policy DM27 will not have a significant effect on watercourses draining to the Broadland SAC, SPA and Ramsar site are confirmed with Natural England and the Environment Agency.

Alternatives

- 5.85 The sustainability effects of the reasonable alternative Norwich Airport policy to those proposed in the DPD are detailed in **Appendix 4** which also describes Norwich City Council's reasons for not preferring each alternative site over the proposed policy. In summary, options which constrain further growth of the airport (contrary to the JCS) would have potentially significant adverse effects on supporting economic growth (particularly on EC1, EC2, and SOC8) but would also avoid the potentially significant negative effects on the environment and amenity associated with the increased number of aircraft and surface traffic movements which may result from the combined effects of JCS policy 6 and DM policy 27 (avoids significant negative effects on ENV3, ENV6, SOC7 and EC4 as well as other minor negative effects). Conversely, options for greater airport growth, e.g. an expanded boundary, would have the opposite effect. Although the proposed policy attempts to strike a balance between these opposing effects and to be consistent with the JCS, the Aviation White Paper and the expected direction of policy in the forthcoming National Framework for Sustainable Aviation, some significant adverse environmental effects are nevertheless likely to result from the proposed policy in combination with JCS policy 6.

Transport

Policy theme

- 5.86 This theme contains the following policies:
- DM28 - Encouraging sustainable travel
 - DM29 - City centre public off-street car parking
 - DM30 - Access and highway safety
 - DM31 - Car parking and servicing
 - DM32 - Car free or low car housing
- 5.87 This policy theme seeks to ensure that development is managed to support sustainable transport objectives outlined within national and emerging local policy. It also seeks to ensure that the transport implications of new development, such as parking and servicing requirements and

access issues, are appropriately addressed through development type, design and developer contributions.

Sustainability effects of business as usual

- 5.88 A 'business as usual' approach would rely on national policy and the JCS policies to guide transport planning within the plan area. In relation to the various policy topics that come within this theme, the NPPF states that when preparing local plans, LPAs should encourage patterns of development that support the use of sustainable modes of transport. The NPPF also states local parking policies for residential and non-residential development should take into account the accessibility of the development, its type and mixture, local car ownership, the need to reduce the use of high-emission vehicles and availability of sustainable modes of transport. . Encouragement should be offered to solutions that will aid in the reduction of greenhouse gas emissions and reduction in congestion. Furthermore the NPPF requires that *'all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment'* and that plans should ensure development with significant movements are located where the need to travel will be minimised and exploit opportunities to use sustainable transport modes.
- 5.89 JCS³⁰ policies relevant to this policy theme are:
- Policy 6 (Access and transportation) which states that *'the transportation system will be enhanced to develop the role of Norwich as a Regional Transport Node, particularly through the implementation of the Norwich Area Transportation Strategy'*.
 - Policy 9 (Strategy for growth in the Norwich Policy Area) which includes proposals for transport improvements in this policy area to support the delivery of the strategy.
 - Policy 10 (Locations for major new or expanded communities in the Norwich Policy Area) which includes the objective to achieve a modal shift away from the car and proposals to increase walking cycling for local journeys and public transport for longer journeys. (Although JCS Policy 10 is not directly relevant to Norwich as the growth areas covered are all outside the city, the travel demand generated from the growth areas will have direct and indirect transport impacts on Norwich.
 - Policy 11 (Norwich City Centre) which includes the objective to support sustainable transport access to and within the city centre in accordance with the Norwich Area Transportation Strategy.
 - Policy 12 (The remainder of the Norwich urban area, including the fringe parishes) which includes the objective to establish a comprehensive cycle and walking network and to implement a Bus Rapid Transit network through the construction of the Northern Distributor Road.
- 5.90 When comparing the proposed development management policy framework with BAU framework, the national policy framework is very thorough and as such there are cases where policy wording does not add greatly to existing national policy (e.g. Policy DM28 predominantly repeats national policy, although extra detail is provided through reference made to the Riverside Walks and setting the requirement for the inclusion of a car club). The sustainability effects of the 'business as usual' framework would be both positive and negative, with the NPPF supporting sustainable transport choices and reducing the need to travel (with positive effects, for example, in reducing greenhouse gas emissions); Where the development management policy framework adds detail is, in enabling the implementation of national objectives. For example, the NPPF states that parking standards for residential/non-residential development should depend on the accessibility of the development. Therefore the proposed development management policy framework is needed to guide car parking provision and development in the plan area (e.g. policy DM32 (car free or low car housing) provides policy guidance for car free housing sites identified in the Site Allocations and Site Specific Policies DPD).
- 5.91 With regard to the adopted JCS, policies outline the local strategies for transport planning in the plan area as a whole and in more specific policy areas, whilst the proposed development management policy framework provides an essential additional layer of detail regarding how these

³⁰ JCS for Broadland, Norwich and South Norfolk: Adopted, 2011.

strategies will supported through the delivery of development, such as through car free or low car housing, or through transport contributions. It is therefore considered that a BAU approach is likely to have only minor positive effects on ENV1, ENV3, ENV6, SOC8 and EC3 as the existing policy framework does provide a required level of detail.

Sustainability effects of policy theme

- 5.92 The Transport DM policies build on the BAU policy framework by providing a layer of detail regarding the management of development that is not present in the NPPF or the JCS. The policy theme is considered to have minor positive, long term direct and indirect effects on five of the SA objectives (SOC7, EC1, EC2, EC3 and EC4). The policy theme scored long term significant positive direct and indirect effects on SA objective SOC8. The policy theme scored mixed effects on one of the SA objectives (ENV5). The policy theme was considered to have positive uncertain effects on five of the objectives (ENV1, ENV3, ENV6, ENV9 and SOC2). These were deemed positive uncertain as the policy theme seeks the provision of car free residential development in appropriate locations (DM32), a required minimum level of cycle parking prescribed to the correct level (DM31) and to maximise the opportunity for sustainable transport (DM28). However, policy DM29 was considered to have uncertain effects on these objectives. Uncertainty of positive effects relates to whether the proposed parking cap, as part of a basket of policy measures to encourage a shift from private car use to more sustainable transports modes, will actually succeed in halting the underlying trend of increased private car use or whether it could lead to increased congestion with a greater number of cars competing to use a capped number of parking spaces (e.g. by increasing queues of cars waiting to access spaces in off-street car parks). The sustainability effects of the Transport policy are assessed in **Table 5.8**.

Table 5.8 Sustainability of Transport policies

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV1 To reduce the effect of traffic on the environment	+?	<p>Long term, direct, minor positive uncertain effects are predicted on this SA objective. Positive effects will result from DM policy requirements for development to: ensure cycle/pedestrian links and public transport corridors are incorporated to maximise sustainable transport, (DM28), provide car parking set out within the minimum and maximum limits, provide a space for the operation of a car club within a site, provide cycle parking to the required minimum level (DM31), and provide car free developments (DM32).</p> <p>Policy DM29 will maintain a cap on public off-street parking provision in the city centre at 10,000 spaces. Car traffic and demand for parking are expected to continue to increase in the absence of measures to encourage a shift to sustainable modes. Alongside other measures within the DM Policies DPD (e.g. policy DM28) and outside it (e.g. bus rapid transit and cycle path schemes promoted by NATS), a parking cap should help to encourage a shift from the private car to more sustainable modes in the medium to long term (as car users become aware that parking is likely to be difficult this could discourage car trips into the city centre), with a resulting positive effect on SA objective ENV1. Uncertainty of this effect relates to whether the parking cap, NATS, DM28 and other sustainable transport measures will actually succeed in halting and reversing historic trends of increased use of the private car. In addition, it is possible that in the short term, capping parking spaces to less than the level demanded could result in an increase in the number of idle cars waiting for car parking spaces within the city centre and consequent increases in air pollution and greenhouse gas emissions.</p>
ENV2 To improve the quality of the water environment	0	Policy theme not expected to have an effect on this objective.
ENV3 To improve environmental	+?	Long term direct and indirect positive uncertain effects are predicted on this SA objective. These relate to transport emissions, as discussed under ENV1, which

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
amenity, including air quality		the sustainable transport policies, if successful, should help to address. The uncertainty relates to the effectiveness of the policies in changing entrenched trends and behaviours that have led to increased car use in the past, and whether there could be localised effects on air quality from cars queuing to access the capped number of off-street car parking spaces.
ENV4 To maintain and enhance biodiversity and geodiversity	0	Policy theme not expected to have an effect on this objective.
ENV5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	+/-	Long term direct mixed effects on this SA objective relative to BAU policy will result from policy DM30 only permitting new highway access where it does not have significant adverse effect on the existing street scene. Car park proposals for a minimum of 500 spaces and decked car parks (DM29) could have adverse effects on objective ENV5. However, DM9 will help to mitigate this potential adverse effect as car parks will have to be designed so that they do not adversely affect the quality of landscapes, townscapes and the historic environment which is prominent within Norwich.
ENV6 To adapt to and mitigate against the impacts of climate change	+?	Long term direct and indirect positive uncertain effects are predicted on this SA objective. These relate to transport emissions, as discussed under ENV1.
ENV7 To avoid, reduce and manage flood risk	0	Policy theme not expected to have an effect on this objective as proposed car parks will be considered against policy DM5 of the DM Policies DPD. In addition to this, any sites that are over 1 hectare in size will be required to submit a flood risk assessment with their proposal, providing further mitigation measures.
ENV8 To provide for sustainable use and sources of water supply	0	Policy theme not expected to have an effect on this objective.
ENV9 To make the best use of resources, including land and energy and to minimise waste production	+?	Long term direct and indirect positive uncertain effects are predicted on this SA objective as a result of the impacts of the policy theme on car traffic and a shift to sustainable modes, as discussed under ENV1, and the energy use associated with this traffic. In addition to this, policy DM29 stipulates that development for car parking provision will only be permitted where it replaces/consolidates existing provision elsewhere and makes efficient use of land through the use of decking. The implementation of the above could free up existing single level car parks providing land for redevelopment while ensuring that that higher capacity car parks are secured on smaller footprints.
SOC1 To reduce poverty and social exclusion	0	Policy theme not expected to have an effect on this objective.
SOC2 To maintain and improve the health of the whole population and promote healthy	+?	Long term direct and indirect positive uncertain effects are predicted on this SA objective as a result of the impacts of the policy theme on car traffic and a shift to sustainable modes, as discussed under ENV1, and the health effects of vehicle emissions associated with this traffic. In addition, walking (and associated health benefits) will be encouraged by the policy requirements to

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
lifestyles?		provide the relevant section of a riverside walk if development takes place adjacent to the River Wensum and Yare (DM28).
SOC3 To improve education and skills	0	Policy theme not expected to have an effect on this objective.
SOC4 To provide the opportunity to live in a decent, suitable and affordable home	0	Policy theme not expected to have an effect on this objective.
SOC5 To build community identity, improve social welfare and reduce crime and anti-social activity	0	Policy theme not expected to have an effect on this objective.
SOC6 To offer more opportunities for rewarding and satisfying employment for all.	0	Policy theme not expected to have an effect on this objective.
SOC7 To improve the quality of where people live	+	Long term indirect positive effects on this objective relative to BAU policy will result from policy DM28. Policy DM28 requires new developments to safeguard existing cycle and pedestrian links to nearby services (including bus stops) and where necessary enhance these links. The provision of links to services, could improve the satisfaction of people with their neighbourhoods.
SOC8 To improve accessibility to essential services, facilities and jobs	++	Long term indirect significant positive effects on this objective relative to BAU policy will result from DM policy requirements to: ensure, cycle/pedestrian links and public transport is incorporated into development proposals, safeguard the inclusion of a travel plan or travel information plan, guarantee developments maximise accessibility to and permeability within a site, safeguard access to bus services from developments (DM28), provide the required minimum level of cycle parking on-site or off-site and provide appropriately for car parking and parking for disabled drivers (DM31).
EC1 To encourage sustained economic growth	+	Long term indirect positive effects on this objective relative to BAU policy will result from DM policy requirements to: encourage sustainable travel by ensuring developments have easy access to bus services and bus stops, incorporate pedestrian/cycles links into a development, include travel plans or travel information plans as part of a proposal, improve and enhance the strategic and local cycle network (DM28), provide for appropriate levels of car parking, cycle parking and parking for disabled drivers, ensure the delivery of electric car charging points and a parking space for the operation of a car club within the site (DM31).
EC2 To encourage and accommodate both indigenous and inward investment	+	Long term indirect positive effects on this objective relative to BAU policy will result from DM policy requirements to: require all parts of a development to have easy access to bus services and bus stops, provide improvements to cycle and pedestrian links to nearby services where required, enhance the local and strategic cycle network if required (DM28), improve the balance and distribution of car parking within city centre (DM29), and provide appropriately for car

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		parking, disabled parking and cycle parking (DM31).
EC3 To encourage efficient patterns of movement in support of economic growth	+	Long term direct positive effects on this objective relative to BAU policy will result from DM policy requirements to: ensure the submission of travel plans and travel information plans with proposals, incorporate cycle and pedestrian links and public transport corridors into a plan to maximise sustainable transport options, provide enhancements to the strategic and local cycle network (DM28) and provide the required minimum level of cycle parking and charging points for electric cars (DM31).
EC4 To improve the social and environmental performance of the economy	+	Long term direct positive effects on this objective relative to BAU policy will result from DM policy requirements to: require development proposals to be accompanied by a travel plan or travel information plan, ensure development proposals overall would not result in net growth across the City in travel by private car, improve pedestrian/cycle links to nearby services (including bus stops), ensure developments maximise accessibility, guarantee all parts of the development have easy access to bus services/bus stops (DM28), only permit public off-street car parking that discourages all day commuter car parking (DM29) and provide the required minimum level of cycle parking on-site or off-site if on-site is not feasible (DM31).

Mitigation

- 5.93 No significant adverse effects have been identified from this policy them, thus no mitigation has been recommended.

Alternatives

- 5.94 The sustainability effects of reasonable alternative Transport policies to those proposed in the DPD are detailed in **Appendix 4** which also describes NCC's reasons for not preferring each alternative to the proposed policy. In summary, the alternative option to policy DM28 is to rely on the BAU policy framework and have no policy on encouraging sustainable travel at a local level. The effects of the BAU policy framework on the SA framework are considered to be minor positive effects (ENV1, ENV3, ENV6, SOC8 and EC3).
- 5.95 Policy DM29 has four alternative options. The first is the BAU framework which is considered above. The second alternative option is to relax the criteria for new off street car parking. This was considered to have an adverse effect on SA objectives ENV5, ENV9, SOC7, EC1 and EC2 as this could reduce the opportunities for new well located car parking designed to help support the vitality of the city centre.
- 5.96 The third alternative option is to reduce the overall number of parking spaces within the city centre. This was considered to have positive effects on ENV1, ENV3, ENV6 and EN9, SOC2, SOC7 and EC2 as it would reduce dependency on the car and free up land for retail, business and residential development. However, it would have an adverse effect on the economy (EC1 and EC2) as it would not provide for future need as result of growth in the Norwich Policy Area. Although this option could potentially have more positive environmental effects, the NATS stipulates that city centre parking provision should not be capped below 10,000. To do this would result in a DM policy that does not conform to the JCS (which the NATS is a part of). It is also considered that a parking restraint below 10,000 would not conform to the NPPF as it seeks to ensure sufficient levels of car parking to sustain a vital and viable city centre and support business. This alternative cannot, therefore, be considered a reasonable alternative. It should be noted that capping the number of off street car parking spaces at a level similar to that which currently exists means that there will be fewer off street car parking spaces per dwelling/job at the end of the plan period than at the beginning – the ease of parking will become increasingly constrained. The final alternative option is to maintain the 10,000 spaces but to not identify areas for an overall reduction or increase in parking. This was considered to have positive and adverse

effects on SA objectives ENV1, ENV3, ENV6, SOC2, SOC7, EC1, and EC3. The positive effect would be the outcome of parking development falling within areas that would support the viability and vitality of the economy (positive effects on EC1 and EC3). The adverse effects would come from parking proposals falling within areas that are already over supplied (negative effects on ENV1, ENV3, ENV6, SOC2, SOC7, EC1 and EC3).

- 5.97 Policy DM30 has no alternative options as the national policies and JCS do not provide policy guidance on access and highway safety. This was considered to have adverse effects on objectives ENV5, SOC2 and SOC7. Consideration was given to incorporating more technical standards as applied by Norfolk County Council outside the city. However, it was considered that these standards are not always appropriate or achievable in the urban context of Norwich, therefore they are deemed unnecessary for this policy.
- 5.98 Policy DM31 has two alternative options. One option is to not have a policy setting out parking standards. This was considered to have negative effects on ENV1, ENV3, ENV6, ENV9, SOC7 and EC2 as it could result in levels of parking that are excessive and would work against the requirements of NATS. The second alternative option is to apply more/less restrictive car parking standards. Reducing the proposed levels of car parking was considered to have positive effects on ENV1, ENV3, ENV6, ENV9, SOC7, EC1 and EC2. Increasing the proposed levels of car parking was considered to have negative effects on ENV1, ENV3, ENV6, ENV9, SOC7, EC1 and EC2.
- 5.99 Policy DM32's alternative option is to have no policy on car free housing or low car housing. This could result in the provision of excess levels of car parking in highly accessible locations. This was considered to have negative effects on ENV1, ENV3, ENV6, ENV9, SOC8 and EC3. Although it is not considered an alternative option, consideration was given to extending the criteria for car free housing to other areas of the city (positive effects on ENV1, ENV3, ENV6 and ENV9). It was considered that although this policy does not stop other areas from being car-free it would be counterproductive for less accessible areas to be car free as it could increase on-street car parking and traffic congestion resulting in negative effects on ENV1, ENV3 and SOC7. In addition to the effects on the above SA objectives, it is considered that a policy that seeks car-free housing everywhere could push development away from Norwich as schemes would become less viable as car ownership still plays a fundamental role in people's lives. This could in turn reduce the number of developments coming forward within Norwich, and significantly affect Norwich's ability to meet its required housing delivery over the plan period.
- 5.100 Overall we conclude that the majority of the reasonable alternatives considered for this policy theme do not perform significantly better in sustainability terms than the corresponding policy proposed in the DM Policies DPD. The third alternative option for policy DM29 is considered to perform better in environmental terms and less well in economic terms than the proposed policy DM29. Furthermore, it is not considered to constitute a reasonable alternative for the reasons explained.

Planning obligations

Policy theme

- 5.101 This theme contains the following policies:
- DM33 - Planning obligations
- 5.102 This policy theme outlines the requirement for all planning applications to deliver essential infrastructure on or adjoining a site which:
- Is only necessary as a direct consequence of the proposed development.
 - Cannot be served via a planning condition.
 - Is not identified as infrastructure through the Community Infrastructure Levy
- 5.103 Planning obligations will be required to secure infrastructure which is necessary to ensure the delivery of affordable housing, pedestrian and highway safety improvements, on-site open space and play space to directly serve the development and to ensure the delivery of sustainable development.

Sustainability effects of business as usual

- 5.104 A business as usual approach would rely on national policy and the JCS to guide planning obligations within the plan area. The NPPF states that local plans should consider whether unacceptable developments could be made acceptable through the use of planning obligations. Planning obligations should only be sought after where it is not possible to address the unacceptable impacts through planning conditions attached to a planning permission. The NPPF states that planning obligations should only be used when they meet the following tests:
- *'Necessary to make the development acceptable in planning terms.'*
 - *Directly related to the development.*
 - *Fairly and reasonably related in scale and kind to the development'.*
- 5.105 In addition to planning obligations, the NPPF discusses the implementation of Community Infrastructure Levy (CIL) charges. These should be developed and tested alongside the Local Plan and should support new development by *'placing control over a meaningful proportion of the funds raised with the neighbourhoods where developments takes place'*.
- 5.106 Policy 20 of the JCS seeks contributions from all residential and commercial development made through area-wide CIL and appropriate site specific planning obligations. Until a local CIL and its subsequent Regulation 123 List have been introduced, Norwich City Council should continue to gather contributions made through planning obligations (Section 106 agreements) in line with existing legislation and national policy. It is considered that a BAU approach would have uncertain effects on SA objectives ENV1, ENV4, ENV6, SOC1, SOC2, and SOC4. Both the NPPF and JCS documents state the requirement for planning obligations and the tests they must pass but do not go into detail about what planning obligations can and should be used for.

Sustainability effects of policy theme

- 5.107 Policy DM33 builds on the BAU policy framework by providing details on when a planning obligation should be sought. In addition to this, further detail is provided stating when it is necessary to secure infrastructure via planning obligations. As such DM33 provides a level of assurance that sustainable development, affordable housing, open space/play space and pedestrian/highway safety improvements will be secured via planning obligations (minor positive effect on ENV1, ENV3, ENV6, SOC1, SOC2, and SOC7). Policy DM33 scores a significant positive effect against SOC4 as planning obligations will be used directly to secure affordable housing. ENV2, ENV4 and SOC8 were scored as minor positive uncertain as they rely partially on the implementation of CIL (and partially on Planning Obligations) and whether planning obligations will be needed at all (ENV2). Policy DM33 is considered to have mixed effects on ENV5, ENV8, ENV9, SOC5, SOC6, EC1, EC2, EC3 and EC4 as they also partially rely on the implementation of CIL. In addition to this, it is deemed that policy DM33 fails to address part of these 9 SA objectives which should be covered in planning obligations.
- 5.108 The sustainability effects of the Planning Obligations policy are assessed in **Table 5.9**.

Table 5.9: Sustainability of Planning Obligations policy

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
ENV1 To reduce the effect of traffic on the environment	+	Long term indirect positive effects on this SA objective relative to the BAU policy will result from the DM policy which requires satisfactory access to the proposed development to be secured via a range of modes of transport, which will include methods of sustainable transport helping to ensure the delivery of a sustainable development.
ENV2 To improve the quality of the water environment	+?	Potential long term direct positive effects on this SA objective result from the requirements for policy DM33 to ensure the delivery of sustainable development through compliance with other policies in the DM Policies DPD which include minimising risks to water quality (DM11). Uncertainty relates to whether planning obligations will in fact be needed to avoid/minimise water pollution,

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		particularly in light of the protection available from other regulatory regimes.
ENV3 To improve environmental amenity, including air quality	+	Long term indirect positive effects on this SA objective relative to BAU policy will result as the DM policy seeks to ensure sustainable development and secure acceptable access to the proposed development via a range of modes of transport, including methods of sustainable transport.
ENV4 To maintain and enhance biodiversity and geodiversity	+?	<p>Potential long term direct positive effects on this SA objective result from the requirements for policy DM33 to ensure the delivery of sustainable development through compliance with other policies in the DM Policies DPD which include protection and enhancement of the natural environment (DM6). Uncertainty relates to whether planning obligations will be used to secure biodiversity benefits (e.g. from green infrastructure provision) in addition to the types of infrastructure listed in the policy.</p> <p>The 'Community Infrastructure Levy: Background and context' publication document³¹ (from now on called the CIL background document) lists in Appendix 1 that green infrastructure should be funded through S106 obligations (S278 of the Highways Act or other legislation and planning conditions). It states that green infrastructure to particular strategic sites such as the Old Catton, Sprowston, Rackheath, and Thorpe St. Andrew Growth Triangle (and the purchase of biodiversity credits) should be funded via the above routes.</p> <p>If any strategic green infrastructure to serve major developments in Norwich is intended to be funded by planning obligations, it is recommended that it is included within this policy theme.</p>
ENV5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	+/-	<p>Potential mixed long term direct effects on this objective relative to BAU policy will result from this policy theme. The CIL background document states that on-site interpretation and the protection, examination and recording of the historic environment should be funded through S106 obligations (S278 of the Highways Act or other legislation and planning conditions). However, the absence of this from the policy is partially mitigated by the CIL and policy DM5.</p> <p>If on site interpretation and the protection, examination and recording of the historic environment are intended to be funded via planning obligations, it is recommended that they are included within this policy theme.</p>
ENV6 To adapt to and mitigate against the impacts of climate change	+	Long term indirect positive effect on this SA objective relative to the BAU policy result from policy DM33 seeking to ensure the delivery of sustainable development, including the delivery of pedestrian and highway safety improvements necessary to secure access to the development using a variety of modes of transport, which include methods of sustainable transportation.
ENV7 To avoid, reduce and manage flood risk	0	Policy theme not expected to have an effect on this objective as it will be adequately dealt with through other policies of the DM DPD. It is also the intention of the CIL to provide funding for strategic flood defences where not related to specific developments. Where defences are required for specific developments this will be dealt with under policy DM5.
ENV8 To provide for sustainable use and sources of water supply	+/-	Potential mixed, long term, direct effects on this objective relative to BAU policy will result from this policy theme. The CIL background document states that the establishment and on-going maintenance of SuDS and other water infrastructure should be funded through S106 obligations (S278 of the Highways Act or other legislation and planning conditions). However, the absence of this from the policy is mitigated as policy DM5 outlines the use of

³¹ http://www.qndp.org.uk/content/wp-content/uploads/downloads/2012/02/Background_Context_CIL_DCS_rdcld.pdf

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
		<p>SuDS which will reduce surface run off.</p> <p>If the establishment and on-going maintenance of SuDS and other water infrastructure are intended to be funded via planning obligations, it is recommended that they are included within this policy theme.</p>
ENV9 To make the best use of resources, including land and energy and to minimise waste production	+/-	<p>Potential mixed long term direct effects on this objective relative to BAU policy will result from this policy theme. The CIL background document states that the establishment and on-going maintenance of on-site or nearby low carbon or renewable energy installations associated with new development (including district heating/cooling systems) should be funded through S106 obligations (S278 of the Highways Act or other legislation and planning conditions). However, the absence of this from the policy is partially mitigated as the CIL will secure funding for renewable energy infrastructure.</p> <p>If the establishment and on-going maintenance of onsite or nearby low carbon or renewable energy installations are intended to be funded via planning obligations, it is recommended that they are included within this policy theme.</p>
SOC1 To reduce poverty and social exclusion	+	Long term direct positive effects on this objective relative to BAU policy as policy DM33 seeks to secure infrastructure that is necessary to deliver affordable housing, on-site open space and play space and secure the necessary highway safety improvements necessary to secure a satisfactory level of access to users of the site.
SOC2 To maintain and improve the health of the whole population and promote healthy lifestyles?	+	Long term indirect significant positive effects on this objective relative to BAU policy will result from policy DM33 as it seeks to provide on-site open space and play space and the pedestrian and highway safety improvements required to secure satisfactory to the access the development via a range of modes of transport (including sustainable modes), all of which can contribute indirectly to improved health and healthier lifestyles.
SOC3 To improve education and skills	0	Policy theme alone would have no effect on this this objective. However, this is mitigated through the CIL as stated in the CIL background document. The CIL will collect funding for the <i>'provision for which the Local Education Authority has a statutory responsibility, including early years, primary and secondary (covering ages 3-19)'</i> . Therefore, although policy DM33 would not secure educational infrastructure, this will be secured through the CIL.
SOC4 To provide the opportunity to live in a decent, suitable and affordable home	++	Long term direct significant positive effects on this objective relative to BAU policy will result from policy DM33 securing infrastructure (open space, green infrastructure, highway improvements, schools) that is necessary to ensure the delivery of affordable housing.
SOC5 To build community identity, improve social welfare and reduce crime and anti-social activity	+/-	<p>Potential mixed long term indirect effects on this objective relative to BAU policy will result from this policy theme. The CIL background document states in Appendix 1 that infrastructure should be provided via planning obligations: in respect of community infrastructure provided within a residential/commercial building, this should support the administration and setting up of local community groups to serve new communities and community development support. Policy DM33 provides no security to aid in the delivery of these.</p> <p>If community infrastructure is intended to be funded via planning obligations, it is recommended that it is included within this policy theme.</p>
SOC6 To offer more opportunities for	+/-	<p>Potential mixed, direct and indirect, long term effects on this SA objective. Policy DM33 fails to secure opportunities for rewarding and satisfying</p>

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
rewarding and satisfying employment for all.		<p>employment for all, resulting in a minor adverse effect on this objective. However this effect is partially mitigated through the proposed CIL. The CIL background document states that economic development infrastructure such as off-site start-up business units and assistance with the provision of broadband will be funded through CIL. Planning obligations (S278 of the Highways Act or other legislation and planning conditions) should secure on-site infrastructure and non-infrastructure initiatives such as skills and training. In addition to this, policy DM10 encourages the enhancement of communications infrastructure which could have an indirect positive effect on offering more opportunities for rewarding and satisfying employment for all.</p> <p>If securing on site infrastructure and non-infrastructure initiatives such as skills and training are intended to be funded via planning obligations, it is recommended that they are included within this policy theme.</p>
SOC7 To improve the quality of where people live	+	<p>Long term indirect positive effects on this SA objective relative to the BAU policy will result from the requirement of policy DM33 to secure the necessary infrastructure to deliver on-site open space and play space to directly serve the development.</p>
SOC8 To improve accessibility to essential services, facilities and jobs	+/?	<p>Long term indirect positive effect on this SA objective relative to BAU policy will result from policy DM33 and the need to secure infrastructure for pedestrian and highway safety improvements necessary to secure satisfactory access to the development via a range of modes of transport, including sustainable transport methods. In addition to this Appendix 1 of the CIL background document states the CIL will seek funding for off-site starter business units, which could be located around particular housing sites, thus improving access to essential services, facilities and jobs. Planning obligations (S278 of the Highways Act or other legislation and planning conditions) should secure on site infrastructure and non-infrastructure initiatives such as skills and training. In addition to this, policy DM10 encourages the enhancement of communications infrastructure. Both the CIL and DM10 will enhance the possibility of improving accessibility to services, facilities and jobs.</p> <p>If securing on site infrastructure and non-infrastructure initiatives such as skills and training are intended to be funded via planning obligations, it is recommended that they are included within this policy theme.</p>
EC1 To encourage sustained economic growth	+/-	<p>Potential mixed, direct and indirect, long term effects on this SA objective. Policy DM33 fails to secure infrastructure that will directly affect sustained economic growth. However, policy DM33 does seek to secure highway safety improvements that are necessary to secure access to the development via a range of sustainable transport modes, creating a positive indirect long term effect. In addition to the above, Appendix 1 of the CIL background document states that the economic development infrastructure that will be funded or part funded through CIL will include off-site starter business units and support to other employment initiatives. Planning obligations (S278 of the Highways Act or other legislation and planning conditions) should secure on site infrastructure and non-infrastructure initiatives such as skills and training. Policy DM10 encourages the enhancement of communications infrastructure. Both the CIL and DM10 will enhance the possibility of encouraging sustained economic growth, producing mixed effects on this objective.</p> <p>If securing on site infrastructure and non-infrastructure initiatives such as skills and training are intended to be funded via planning obligations, it is recommended that they are included within this policy theme.</p>
EC2 To encourage	+/-	<p>Potential mixed, direct and indirect long term effects on this SA objective.</p>

SA Objective	Score	Reasoning (including policies responsible for any significant effects)
and accommodate both indigenous and inward investment		<p>Policy DM33 fails to secure infrastructure that will directly encourage and accommodate both indigenous and inward investment. However, policy DM33 does seek to secure highway safety improvements that are necessary to secure access to the development via a range of sustainable transport modes, creating a positive indirect long term effect, which in turn could improve the economic performance across Norwich. In addition to this, Appendix 1 of the CIL background document states that the economic development infrastructure that will be funded or part funded through CIL will include off-site starter business units and support to other employment initiatives. Planning obligations (S278 of the Highways Act or other legislation and planning conditions) should secure on site infrastructure and non-infrastructure initiatives such as skills and training. Furthermore, policy DM10 encourages the enhancement of communications infrastructure. Both the CIL and DM10 could have a direct indirect positive effect respectively on accommodating indigenous and inward investment, producing a mixed effect on this objective.</p> <p>If securing on site infrastructure and non-infrastructure initiatives such as skills and training are intended to be funded via planning obligations, it is recommended that they are included within this policy theme.</p>
EC3 To encourage efficient patterns of movement in support of economic growth	+/-	<p>Potential mixed indirect and direct long term effects on this SA objective. Policy DM33 seeks to secure pedestrian and highway safety improvements to create a level of access that enables people to travel to the site using a range of sustainable modes. However, this policy theme does not seek to secure any type of employment based infrastructure, producing an indirect negative effect against this objective. In addition to this, Appendix 1 of the CIL background document states that the economic development infrastructure that will be funded or part funded through CIL will include off-site starter business units. Planning obligations (S278 of the Highways Act or other legislation and planning conditions) should secure on site infrastructure and non-infrastructure initiatives such as skills and training. Policy DM10 encourages the enhancement of communications infrastructure. Both DM10 and the CIL could have an indirect and direct positive effect respectively on encouraging efficient patterns of movement in support of economic growth, producing a mixed effect on this objective.</p> <p>If securing on site infrastructure and non-infrastructure initiatives such as skills and training are intended to be funded via planning obligations, it is recommended that they are included within this policy theme.</p>
EC4 To improve the social and environmental performance of the economy	+/-	<p>Potential mixed indirect and direct long term effects on this SA objective. This policy theme will not attract new investment and skilled workers to the area, producing a negative indirect effect on this objective. Appendix 1 of the CIL background document states that the economic development infrastructure that will be funded or part funded through CIL and will include off-site starter business units producing an indirect positive effect on this objective. Planning obligations (S278 of the Highways Act or other legislation and planning conditions) should secure on site infrastructure and non-infrastructure initiatives such as skills and training. In addition to this, policy DM10 encourages the enhancement of communications infrastructure which could encourage efficient patterns of movement in support of economic growth, producing a mixed effect on this objective.</p> <p>If securing on site infrastructure and non-infrastructure initiatives such as skills and training are intended to be funded via planning obligations, it is recommended that they are included within this policy theme.</p>

Mitigation

- 5.109 No significant adverse effects have been identified from this policy them, thus no mitigation has been recommended.

Alternatives

- 5.110 In summary two alternative policy options to DM33 were considered by Norwich City Council. One of these is the BAU option of relying on other existing policy which is assessed above. The second option considered was a more detailed policy that added more content on specific matters covered by the planning obligations and the procedure to deliver them. It was considered that this level of detail is inappropriate for a Local Plan policy. This was considered to have positive effects on ENV1, ENV3, ENV4, ENV5, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC4, SOC5, SOC6, SOC7, SOC8, EC1, EC2, EC3 and EC4.
- 5.111 It is considered that although a more detailed policy is inappropriate for a Local Plan policy the benefits of listing the types of the infrastructure that can be funded through planning obligations are significant. Therefore it is recommended that an Appendix is created for this policy that lists the following infrastructure:
- Transportation
 - Green infrastructure
 - Community infrastructure
 - Historic environment
 - Waste recycling
 - Renewable energy infrastructure
 - Flood prevention and drainage
 - Economic development infrastructure (and associated skills and training)
- 5.112 This would provide security in ensuring that funding for essential infrastructure is a material consideration of a proposed development.

6 Conclusions

Summary and potential for cumulative effects

- 6.1 This section provides a graphical summary of the appraisals of all the policy themes by SA objective (**Table 6.1**) and discusses the potential for cumulative effects. Significant effects have been shown in bold text.
- 6.2 It is apparent that the sustainability effects of the DM Policies DPD are generally minor. This is to be expected since the DM policies represent the lowest tier in a hierarchy of planning policies, adding local detail to implement the broader principles of policies within the NPPF and JCS. The fact that that the effect of the DM policies over and above the business as usual policy framework is generally positive is also to be expected since many of these policies are designed to avoid or mitigate some of the potential adverse effects of the development provided for in the JCS, by addressing local issues.

Table 6.1: Summary of SA scores

DM Policy theme / SA Objective	Environmental Design	Communications	Housing	Economy	Communities	University of East Anglia	Norwich Airport	Transport	Planning Obligations
ENV1	+	0	-	-	+/-	-	-?	+	+
ENV2	+	0	-	-	+	0	-?	0	+
ENV3	+	0	-	-	+	+/-	-/-?	+	+
ENV4	+	0	+	0	0	+?/-?	-?	0	+
ENV5	++	+	+	+	+	+	-?	+/-	+/-
ENV6	+	0	+/-	+/-	+/-	-	-	+	+
ENV7	-?/+?	0	-?/+?	-?/+?	0	0	0	0	0
ENV8	0	0	-	-	0	0	0	0	+/-
ENV9	+	0	+	0	+/-	-	--?	+	+/-
SOC1	+	0	+	0	+	+	0	0	+
SOC2	+	0	+	0	+	+	-?	+	+
SOC3	0	0	0	0	+	++	+	0	0
SOC4	+	0	++	0	0	+	0	0	++
SOC5	+	0	+	0	+	0	0	0	+/-
SOC6	0	0	0	++	+/-	+	+	0	+/-
SOC7	+	0	+	+	+	+	-	+	+
SOC8	+	+	+	++	+/-	+	+	++	+/?
EC1	+	+	0	++	+	+	+	+	+/-
EC2	+	+	0	++	+/-	+	+	+	+/-
EC3	+	+	0	++	+/-	+	-?	+	+/-
EC4	+	+	0	+	+	+	+/-	+	+/-

- 6.3 Looking across the DM policies DPD at the cumulative effect of all DM policies, the large number of minor positive effects combined with some significant positive effects and relatively few negative effects are judged to produce **significant positive effects** for the following SA objectives:
- ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic
 - SOC1: To reduce poverty and social exclusion
 - SOC3: To improve education and skills
 - SOC4: To provide the opportunity to live in a decent, suitable and affordable home
 - 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
 - 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 the social and environmental performance of the economy
- 6.4 Looking across the DM policies DPD at the cumulative effect of all DM policies, no significant negative cumulative effects were identified.
- 6.5 Relatively few policy themes attracted purely negative (as opposed to mixed) sustainability effects as a result of the mitigation provided by other policies and within the same policy. The potential negative environmental effects of many of the policies supporting housing and economic development, for instance, are mitigated by policies such as DM1 (Achieving and delivering sustainable development), DM6 (Natural environmental assets) and DM9 (the historic environment and heritage assets).
- 6.6 In addition, the position of the DM Policies DPD at the bottom of a hierarchy of planning policies meant that the incremental effect of implementing the DM policies tended to be minor since reliance on BAU policy alone would often produce a similar effect. For example, increased airport related development is likely to result in increased aircraft movements and significant associated greenhouse gas emissions. Although this effect will be difficult to mitigate, it is judged to be largely attributable to BAU policies, notably the Aviation White Paper 2003 and JCS Policy 6 (Access and transportation). The incremental effect of policy DM27 (Development at Norwich Airport) on ENV6 (To adapt to and mitigate against the impacts of climate change) due to increased airport operations was therefore judged to be limited to a minor negative one.
- 6.7 In light of the above, the only significant negative residual effect identified for an individual policy theme was the effect of DM27 on ENV9 (To make the best use of resources, including land and energy and to minimise waste production). This relates to the presence of greenfield land in Agricultural Land Classification zones 1-3 within the airport boundary which could be lost to development. Uncertainty relates to the fact that the land may fall into ALC classification 3b rather than 3a which is not 'best and most versatile' but data are unavailable to make this distinction.

Monitoring

- 6.8 The SEA Directive requires that "*member states shall monitor the significant environmental effects of the implementation of plans or programmes... in order, inter alia, to identify at an early stage, unforeseen adverse effects, and be able to undertake appropriate remedial action*" (Article 10.1) and that the environmental report should provide information on "*a description of the measures envisaged concerning monitoring*" (Annex 1 (i)). Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

- 6.9 The government's SA Guidance (hosted on the Planning Advisory Service website) states that it is not necessary to monitor everything. Instead, monitoring should be focussed on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. The monitoring measures proposed in this SA Report therefore focus on the predicted significant effects only.
- 6.10 As discussed in **Chapter 5**, a number of the policies in the DM Policies DPD could have potential significant effects (both positive and negative) on the SA objectives. However, there are a number of SA objectives where no significant effects have been identified. Therefore, it is recommended that monitoring of sustainability effects due to implementation of the DM Policies DPD is undertaken in relation only to those objectives where significant effects were identified.
- 6.11 Monitoring the sustainability effects of implementing the DM policies should be conducted as part of an overall approach to monitoring the sustainability effects of the whole local plan for Norwich (i.e. including the JCS and the Site Allocations and Site Specific Policies DPD). Annual Monitoring Reports are already produced for the JCS (including an appendix specific to Norwich), and monitoring proposals for the Site Allocations and Site Specific Policies DPD and the DM Policies DPD will be developed in the final versions of those DPDs. It is recommended that monitoring of the potential sustainability effects be undertaken as part of the annual monitoring process carried out for the local plan.
- 6.12 **Table 6.2** sets out a number of suggested indicators for monitoring the potential significant sustainability effects of implementing the DM Policies DPD, drawing on indicators that are also used for the JCS monitoring where relevant. Note that the indicators proposed are included as suggestions at this stage, as it is recognised that many datasets may not be available for monitoring some of the sustainability effects of the DM Policies DPD, and that the indicators included may change as Norwich City Council finalises the monitoring framework for the DPD itself.
- 6.13 In addition, the data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators.

Table 6.2: Monitoring Indicators for the Development Management Policies DPD

SA objectives for which potential significant effects have been identified	Proposed indicators
ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic	<ul style="list-style-type: none"> Heritage at risk – Number of: <ul style="list-style-type: none"> a) listed buildings, and b) scheduled ancient monuments on the buildings at Risk Register. <p><i>Source: English Heritage (Buildings at Risk)</i></p> <ul style="list-style-type: none"> Number of listed buildings lost/demolished <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p> <ul style="list-style-type: none"> Reviews of townscape character/historic environment assessments could help to determine improvements or negative effects on Norwich's townscape and conservation areas. <p><i>Source: Not currently collected.</i></p>
SOC1: To reduce poverty and social exclusion	<ul style="list-style-type: none"> The proportion of households without a car in rural areas able to access a market town or key service centre at least twice a week

SA objectives for which potential significant effects have been identified	Proposed indicators
	<p>by public transport in 30 minutes</p> <ul style="list-style-type: none"> Percentage of completions scoring at least 14 out of 20 (silver standard) in Building for Life (BfL) criteria Employment rate of working age population Number in employment in rural area Building for Life Transport criteria – proportion of schemes which achieve 3 out of 5 Reduction in overall crime Number of Lower Super Output Areas in national most deprived 20% <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p>
SOC3: To improve education and skills	<ul style="list-style-type: none"> Workforce qualifications - % of working age population with qualifications at NVQ Level 4 or above. <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</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 Development Framework: Annual monitoring report. Norwich City Council</i></p>
SOC4: To provide the opportunity to live in a decent, suitable and affordable home	<ul style="list-style-type: none"> Affordable housing completions New house completions by bedroom number, based on the proportions set out in the most recent Sub-regional Housing Market Assessment Housing to meet the needs of older people, defined as a key group in the housing market assessment. Assessed by satisfaction of people over 65 with both home and neighbourhood Provision of Gypsy and Traveller pitches to meet the RSS review requirements <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p>
SOC6: To offer more opportunities for rewarding and satisfying employment for all	<ul style="list-style-type: none"> Amount of floorspace developed by employment type Employment rate of working age population

SA objectives for which potential significant effects have been identified	Proposed indicators
	<ul style="list-style-type: none"> Percentage of workforce employed in higher occupations (managers and senior officials, professional occupations and associate professional and technical occupations) Percentage of completed town centre uses in identified centres and strategic growth locations <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p>
SOC7: To improve the quality of where people live	<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 (indicator pending). <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p>
SOC8: To improve accessibility to essential services, facilities and jobs	<ul style="list-style-type: none"> Percentage of completed town centre uses in identified centres and strategic growth locations The proportion of households without a car in rural areas able to access a market town or key service centre at least twice a week by public transport in 30 minutes Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900) Percentage of people crossing Norwich's inner ring road on foot or bike Building for Life Transport criteria – proportion of schemes which achieve 3 out of 5 <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p>
EC1: To encourage sustained economic growth	<ul style="list-style-type: none"> New business registration rate per 10,000 population 16+ Percentage of completed town centre uses in identified centres and strategic growth locations Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900)

SA objectives for which potential significant effects have been identified	Proposed indicators
	<ul style="list-style-type: none"> Building for Life Transport criteria – proportion of schemes which achieve 3 out of 5 <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p>
EC2: To encourage and accommodate both indigenous and inward investment	<ul style="list-style-type: none"> Amount of floorspace developed by employment type Office space 07-26: 100,000m2 Norwich City Centre 100,000m2 NRP 50,000m2 BBP 50,000m2 elsewhere Percentage of workforce employed in higher occupations (managers and senior officials, professional occupations and associate professional and technical occupations) Net change in retail floorspace in city centre <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p>
EC3: To encourage efficient patterns of movement in support of economic growth	<ul style="list-style-type: none"> Percentage of completed town centre uses in identified centres and strategic growth locations Number in employment in rural area <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p>
EC4: To improve the social and environmental performance of the economy	<ul style="list-style-type: none"> Total CO2 emissions per capita Decentralised and renewable or low carbon energy sources permitted in major developments Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900) Percentage of developed land which is vacant for more than 5 years Number of Tree Preservation Orders (TPOs) where trees are lost through development <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Development Partnership.</i></p>

SA objectives for which potential significant effects have been identified	Proposed indicators

Appendix 1: SA framework and screening of objectives

The table in this appendix list the SA objectives developed as a framework against which to assess the DM Policies DPD and indicates by shading which sub-objectives were screened out from further consideration, along with the reasons for screening them out.

SA Objective	Sub-objective	Reasoning
ENV 1 To reduce the effect of traffic on the environment	ENV1(a) Will it reduce traffic volumes, ease the flow of traffic and reduce congestion?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; parking policies which restrict high car use; density of development (congestion) ; accessibility of key services.
	ENV1(b) Will it increase the proportion of journeys using modes other than the car?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; parking policies which restrict high car use; accessibility of key services.
	ENV1(c) Will it reduce the effect of HGV traffic on people and the environment?	Managed through criteria for development regarding air pollution, traffic and congestion, and health and safety (which can be enacted through conditions attached to any granted permission).
	ENV1(d) Will it encourage more benign modes of travel?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of pedestrian pathways within and between developments, and the inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; accessibility of key services.
	ENV1(e) Will new development be located such to reduce the need for people to travel?	Principles for the design and delivery of housing/employment development, such as provision of services and ensuring development links to existing network of foot/cyclepaths; delivery and protection of services in town/local/neighbourhood centres.
ENV 2 To improve the quality of the water environment	ENV2(a) Will it improve the quality of the water environment (streams, rivers, lakes etc)?	Environmental protection policy; protection/mitigation/enhancement criteria for proposed development in relation to environmental assets.
	ENV2(b) Will it help to support wetland habitats and species?	Environmental protection policy (water quality, air and noise pollution); protection/mitigation/enhancement criteria for proposed development in relation to environmental assets; design principles for housing/employment development in relation to green infrastructure (e.g.

SA Objective	Sub-objective	Reasoning
		green links for wetland species).
ENV 3 To improve environmental amenity, including air quality	ENV3(a) Will it improve air quality?	Environmental protection policy (air pollution); enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; parking policies which restrict high car use; density of development (congestion).
	ENV3(b) Will it reduce the emission of atmospheric pollutants?	Environmental protection policy (air pollution); enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; parking policies which restrict high car use; density of development (congestion).
ENV 4 To maintain and enhance biodiversity and geodiversity	ENV4(a) Will it conserve/enhance natural or semi-natural habitats, and promote habitat connections?	Protection/mitigation/enhancement criteria for proposed development in relation to environmental assets; design principles for housing/employment development in relation to green infrastructure (e.g. creating new and connecting existing green links, with consideration given to how these can address potential impacts of climate change).
	ENV4(b) Is it likely to have a significant effect on sites designated for international, national or local importance?	Protection/mitigation/enhancement criteria for proposed development in relation to environmental assets.
	ENV4(c) Will it conserve/enhance species diversity, and in particular avoid harm to protected species?	Protection/mitigation/enhancement criteria for proposed development in relation to environmental assets; design principles for housing/employment development in relation to green infrastructure (e.g. creating new and connecting existing green links, with consideration given to how these can address potential impacts of climate change).

SA Objective	Sub-objective	Reasoning
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	ENV5(a) Will it protect and enhance the quality of landscapes, townscapes and countryside character, including the character of the Broads and it's setting where relevant?	Protection/mitigation/enhancement criteria for proposed development in relation to heritage assets and designated landscapes; principles for the design of development, including landscaping (i.e. sensitivity to surrounding townscape / landscape).
	ENV5(b) Will it maintain and enhance the distinctiveness of the landscapes/townscapes and heritage?	Protection/mitigation/enhancement criteria for proposed development in relation to heritage assets and designated landscapes; principles for the design of development, including landscaping (i.e. sensitivity to surrounding townscape / landscape).
	ENV5(c) Will it reduce the amount of derelict, underused land?	Housing density criteria; principles for regeneration.
	ENV5(d) Will it protect and enhance features of historical, archaeological and cultural value?	Protection/mitigation/enhancement criteria for proposed development in relation to heritage assets and designated landscapes; principles for the design of development, including landscaping (i.e. sensitivity to surrounding townscape / landscape).
ENV 6 To adapt to and mitigate against the impacts of climate change	ENV6(a) Will it reduce emissions of greenhouse gases by reducing energy consumption?	Design principles for housing/employment development (i.e. regarding integration of energy efficient design principles); enabling use of sustainable modes of transport (e.g. inclusion of cycle storage and cycle lanes in new development); provision of travel plans alongside proposed developments; parking policies which restrict high car use.
	ENV6(b) Will it lead to an increased proportion of energy needs being met from renewable sources?	Principles for housing/employment development regarding the integration of on-site and off-site renewable energy.
	ENV6(c) Will it increase the capacity of the area to withstand the effects of climate change?	Design principles for housing/employment development which consider potential effects of climate change (e.g. flood storage features, SUDs, natural ventilation design features)
	ENV6(d) Will it ensure that the risks to lives, land and property are minimised?	Design principles for housing/employment development which consider potential effects of climate change (e.g. flood storage features and SUDs); Health and Safety principles for development.

SA Objective	Sub-objective	Reasoning
ENV 7 To avoid, reduce and manage flood risk	ENV7(a) Will it minimise the risk of flooding to people and property?	Design principles for housing/employment development which consider potential effects of climate change (e.g. flood storage features and SUDs).
	ENV7(b) Can it incorporate new designs to adapt to possible flood risk?	Design principles which ensure housing/employment development is flexible and adaptable to incorporation of new design features which addressed flood risk.
ENV 8 To provide for sustainable use and sources of water supply	ENV8 (a) Will it promote the use of sustainable drainage systems to reduce run off?	Design principles for housing/employment development which include SUDs.
	ENV8 (b) Will it conserve groundwater resources?	Design principles for housing/employment development, including landscaping and how this will be managed, which include water efficiency.
	ENV8(c) Will it minimise water consumption?	Design principles for housing/employment development, including landscaping and how this will be managed, which include water efficiency.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production	ENV9 (a) Will it minimise consumption of materials and resources?	Design principles for housing/employment development which promote the reuse and recycling of materials during the construction process (including a requirement for waste management plans) and once development is in use (e.g. ensuring integration of recycling facilities into new development); design principles for water and energy efficiency; enabling use of sustainable modes of transport.
	ENV9 (b) Will it promote the use of land in sustainable locations that has been previously developed?	Use of land in sustainable locations that has been previously developed is most likely addressed by JCS policies regarding the efficient use of land, and through the Site Allocations and Site Specific Policies DPD .
	ENV9(c) Will it use land efficiently?	Principles for housing/employment development regarding efficient use of space and the density of development.
	ENV9(d) Will it minimise the loss of 'greenfield' land?	Principles for resisting development on garden land.
	ENV9 (e) Will it avoid the loss of good quality agricultural land and preserve	Avoiding the loss of good quality agricultural land and preserving soil resources are most likely addressed by JCS policies, and through the Site

SA Objective	Sub-objective	Reasoning
	soil resources?	Allocations and Site Specific Policies DPD .
	ENV9 (f) Will it minimise energy consumption and promote energy efficiency?	Design principles for housing/employment development regarding energy efficiency; enabling use of sustainable modes of transport.
	ENV9 (g) Will it promote the use of renewable energy sources?	Principles for housing/employment development regarding the integration of on-site and off-site renewable energy.
	ENV9 (h) Will it lead to less waste being produced?	Design principles for housing/employment development which promote the reuse and recycling of materials during the construction process (including a requirement for waste management plans) and once development is in use (e.g. ensuring integration of recycling and composting facilities into new development).
	ENV9(i) Will it lead to less waste being disposed, by promoting more recycling and composting?	Design principles for housing/employment development which promote the reuse and recycling of materials during the construction process (including a requirement for waste management plans) and once development is in use (e.g. ensuring integration of recycling and composting facilities into new development).
	ENV9(j) Will it increase waste recovery for other means e.g. Energy Generation?	Increasing waste recovery for other means is most likely to be addressed by waste planning policies.
SOC 1 To reduce poverty and social exclusion	SOC1(a) Will it reduce poverty and social exclusion in those areas most affected?	Reduction of poverty and social exclusion is most likely to be addressed by JCS policies regarding 'Supporting Communities', 'The economy', and 'Access', and through the Site Allocations and Site Specific Policies DPD .
	SOC1(b) Will it help to reduce deprivation levels?	Overall improvement of built environment (open space provision, designing out crime, provision of housing that meets the diverse needs of the community, pollution prevention etc.)
	SOC1(c) Will it help to meet the needs of residents most effectively?	Principles for housing development which address provision of services, accessibility of development, flexibility and adaptability of development.

SA Objective	Sub-objective	Reasoning
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles?	SOC2(a) Will it improve access to high quality health facilities?	Principles for housing development which address provision of key services, accessibility.
	SOC2(b) Will it encourage healthy lifestyles?	Principles for housing/employment development regarding enabling walking/cycling; provision of open space and amenity facilities; provision of key services (e.g. shops that meet day-to-day needs such as fresh food).
	SOC2(c) Will it provide adequate health infrastructure for existing and new communities?	Principles for housing development which address provision of key services.
	SOC2(d) Will the links between poorer health and deprivation be addressed?	Overall improvement of built environment (open space provision, designing out crime, provision of housing that meets the diverse needs of the community, pollution prevention etc.)
	SOC2(e) Will links to the countryside be maintained and enhanced?	Principles for housing/employment development regarding green infrastructure and green links (creation of new links and enhancement of existing links).
SOC 3 To improve education and skills	SOC3(a) Will it improve qualifications and skills for both young people and amongst the workforce?	Improving qualifications and skills for both young people and amongst the workforce is most likely to be addressed by JCS policies regarding 'Supporting Communities' and 'The economy'.
	SOC3(b) Will it help to retain key workers and provide more skilled workers from school leavers?	Helping to retain key workers and provide more skilled workers from school leavers are most likely to be addressed by JCS policies regarding 'Supporting Communities' and 'The economy'.
	SOC3(c) Will adequate education infrastructure be provided for existing and new communities?	Principles for housing development regarding provision of key services.
	SOC3(d) Will it promote lifelong learning and skills training?	The promotion of lifelong learning and skills training are most likely to be addressed by JCS policies regarding 'Supporting Communities' and 'The economy'.

SA Objective	Sub-objective	Reasoning
	SOC3(e) Will links between lower levels of education and deprivation be addressed?	The links between lower levels of education and deprivation are most likely to be addressed by JCS policies regarding 'Supporting Communities' and 'The economy'.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home	SOC4(a) Will it increase the range of types, sizes and affordability of housing for all social groups?	Principles for housing development regarding design, densities, multiple occupancy, gypsy and travellers and travelling showpeople.
	SOC4(b) Will it reduce the housing need and ensure that housing provision addresses the needs of all?	Principles for housing development regarding design, densities, multiple occupancy, gypsy and travellers and travelling showpeople.
	SOC4(c) Will it provide the most appropriate solutions to address the housing requirements needed for creating sustainable communities?	Principles for housing development regarding design (including adaptability and flexibility, energy and water efficiency), densities, multiple occupancy, gypsy and travellers and travelling showpeople.
	SOC4(d) Will it make the best use of existing housing stock?	Principles regarding the refurbishment of existing housing development.
SOC 5 To build community identity, improve social welfare and reduce crime and anti-social activity	SOC5(a) Will it encourage engagement in community activities?	Principles for engaging the community in the development of their local facilities and services, and where proposed developments may impact upon amenity etc.
	SOC5(b) Will it contribute to the achievement of a mixed and balanced community?	Principles for housing development regarding densities, multiple occupancy, gypsy and travellers and traveling showpeople.
	SOC5(c) Will it reduce actual levels of crime?	<i>Safety-by-design</i> principles for housing/employment development and the public realm will indirectly impact actual levels of crime.
	SOC5(d) Will it reduce the fear of crime?	<i>Safety-by-design</i> principles for housing/employment development and the public realm.
SOC 6 To offer more	SOC6(a) Will it reduce unemployment overall?	Principles to protect employment land, office space and SMEs may have an indirect impact on unemployment.

SA Objective	Sub-objective	Reasoning
opportunities for rewarding and satisfying employment for all.	SOC6(b) Will it help to improve earnings?	Improving earnings overall is most likely to be addressed by JCS policies regarding 'The economy'.
SOC 7 To improve the quality of where people live	SOC7(a) Will it improve the quality of dwellings?	Principles for the design of housing development and the refurbishment of existing housing stock.
	SOC7(b) Will it improve the quality of local open space?	Principles for enhancing open space alongside housing and employment development, including integrating new spaces within new development.
	SOC7(c) Will it improve the satisfaction of people within their neighbourhoods?	Principles for housing/employment development regarding the design of the private and public realms, safety-by-design principles, access to key services, provision of open space and amenity facilities etc.
SOC 8 To improve accessibility to essential services, facilities and jobs	SOC 8(a) Will it improve accessibility to key local services and facilities (including health, education, leisure, open space, the countryside and community facilities)?	Principles regarding the provision of accessible key services and facilities alongside housing development.
	SOC8(b) Will it improve accessibility for all whilst reducing dependency on the private car?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; accessibility of key services (both by walking/cycling and public transport).
	SOC8(c) Will it improve access to jobs and services for all?	Principles regarding the provision of accessible key services and facilities alongside housing development.
EC1 To encourage sustained economic growth	EC1(a) Will it assist in strengthening the local economy?	Protection and enhancement of town/local/neighbourhood centres.
	EC1(b) Will it improve business development and enhance	Through improvements to transport infrastructure (both within the plan area, and connecting the plan area nationally and internationally).

SA Objective	Sub-objective	Reasoning
	competitiveness?	
	EC1(c) Will it reduce vulnerability to economic shocks?	Reducing vulnerability to economic shocks is most likely to be addressed by JCS policies regarding 'The economy'.
	EC1(d) Will it promote growth in key sectors?	Protection and enhancement of town/local/neighbourhood centres.
	EC1(e) Will it increase vitality & viability of town centres and improve economic diversity?	Protection and enhancement of town/local/neighbourhood centres; principles regarding change of use.
EC 2 To encourage and accommodate both indigenous and inward investment	EC2(a) Will it encourage indigenous businesses?	Protection of SMEs may have an indirect impact on indigenous businesses.
	EC2(b) Will it encourage inward investment?	Overall improvement of urban environment and provision of suitable housing will indirectly influence attracting new investment and skilled workers.
	EC2(c) Will it make land and property available for business?	Principles for retail space and maintaining rental space for businesses; the night-time economy.
	EC2(d) Will it improve economic performance across the Greater Norwich area?	Principles to protect employment land and office space; proposed improvements to the transport infrastructure to support connectivity.
	EC2(e) Will it support/encourage rural diversification?	Support/encouraging rural diversification is most likely to be addressed by JCS policies regarding 'Supporting communities' and 'The economy'.
	EC2(f) Will it support/encourage small city businesses?	Principles regarding the protection of small to medium scale business; principles for change of use.
EC 3 To encourage	EC3(a) Will it improve provision of local jobs?	Principles for protecting employment land, office space and SMEs.

SA Objective	Sub-objective	Reasoning
efficient patterns of movement in support of economic growth	EC3(b) Will it improve accessibility to work, particularly by public transport, walking and cycling?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments.
	EC3(c) Will it reduce journey times between key employment areas and key transport interchanges?	Reducing journey times between key employment areas and key transport interchanges is most likely to be addressed by JCS policies regarding 'Access and Transportation' and in the Site Allocations and Site Specific Policies DPD regarding new sites for employment uses.
	EC3(d) Will it improve efficiency and sustainability of freight distribution?	Improving efficiency and sustainability of freight distribution is most likely to be addressed by JCS policies regarding 'Access and Transportation' and in the Norwich Area Transportation Strategy.
	EC3(e) Will it support provision of key communities infrastructure?	Principles for the provision of key services alongside housing/employment development.
EC 4 To improve the social and environmental performance of the economy	EC4(a) Will it reduce the impact on the environment from businesses?	Design principles for employment development regarding energy/water efficiency, protection/mitigation/enhancement of environmental assets, provision and enhancement of green infrastructure.
	EC4(b) Will it reduce the impact on residents from businesses?	Design principles for employment development regarding energy/water efficiency, accessibility criteria for new development (e.g. ensuring business development does not increase local traffic and congestion), provision and enhancement of green infrastructure / open space.
	EC4(c) Will it attract new investment and skilled workers to the area?	Overall improvement of urban environment and provision of suitable housing will indirectly influence attracting new investment and skilled workers.
	EC4(e) Will it maintain existing business and employment provision?	Principles regarding protecting town/local/neighbourhood centres; protection of small and medium sized businesses.

Appendix 2: Baseline data table

SA objective indicator	Most recent Norwich value	Trends			Comparison value	Target	Comments
Environment baseline							
ENV 1: % of residents who travel to work: a) by private motor vehicle b) by public transport c) by foot or cycle d) work at or mainly from home. <i>Source: 2001 Census</i>	2001: a) 51.5 b) 9.9 c) 31.5 d) 6.7	No data available at present.			East of England 2001: a) 65.8 b) 11.3 c) 12.9 d) 9.4	(a) decrease (b) increase (c) increase (d) increase.	
ENV 2: % of river length assessed as: a) good biological quality b) good chemical quality. <i>Source: Environment Agency-River Basin Management Plan: Anglian River Basin District (Dec 2009)</i>	2009 a) 27% b) 29% Note that December 2009 data is for the Broadland rivers catchment area, which covers more than Norwich city.		a) 2000 2001 2002 2003 2004 2005 2006	b) 85.0 62.2 62.2 100.0 100.0 100.0 99.8 99.8 35.1 35.1	2007 national average a. 72.3% b. 76.2%	New targets included in the River Basin Management Plan for Anglian River Basin District for 2015: a) 27% of water bodies assessed at good or high biological status b) 100% of water bodies assessed at good chemical status	Both biological and chemical quality declining

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
<p>Development permissions granted contrary to Environment Agency advice on water quality grounds.</p> <p><i>Source: Norwich Local Development Framework: Annual monitoring report 2009-10 (December 2010) Norwich City Council</i></p>	09/10 - 1	<p>08/09 - 1</p> <p>07/08- None</p>	None	To have no applications permitted contrary to EA advice	<p>Reasons were as follows:</p> <p>1) objection was received after a resolution was made to granted permission</p> <p>2) application granted on appeal.</p>
<p>ENV 3:</p> <p>Number of designated Air Quality Management Areas (AQMA's).</p> <p><i>Source:</i></p> <p><i>Air quality review and assessment: Annual progress report 2011 (Norwich City Council)</i></p>	4 (Grapes Hill, Castle Street, St. Augustines, and Riverside)	<p>Three AQMA's have been identified since 1997. Riverside Road was declared as an AQMA in December 2009.</p> <p>Norwich City are in the process of revoking the four AQMA's and declaring a larger AQMA that will cover the city centre.</p>	There are six Air Quality Management Areas in Norfolk	To remove the need for Air Quality Management Areas in the long-term	The three Air Quality Management Areas in Norwich are all designated due to their Nitrogen Dioxide Levels being of concern
<p>Concentrations of selected air pollutants ($\mu\text{g}/\text{m}^3$):</p> <p>a) annual average concentration of Nitrogen Dioxide (NO_2)</p> <p>b) annual average particulate matter levels (PM_{10}).</p>	<p>2004:</p> <p>a: 21.5</p> <p>b: 25.4</p>	<p>2001:</p> <p>a: 28.9</p> <p>b: 22.7</p> <p>Overall air quality seems to be varied, with good reductions in NO_2 levels,</p>	n/a	To reduce levels of air pollution overall	Forecasts actually show that pollutant levels should improve, particularly for Nitrogen Dioxide

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
<p>Source:</p> <p>Defra - www.airquality.co.uk</p>		but slight increases in particulate level			
<p>ENV4:</p> <p>% of SSSI sites in 'favourable' or 'unfavourable recovering' condition</p>	<p>May 2009</p> <p>27.4</p>	<p>May 2007</p> <p>27.4</p>	<p>Norfolk County:</p> <p>May 2007: 87.9%</p> <p>Jan 2009: 88.66%</p> <p>All England,</p> <p>2006: 72%</p> <p>2009: 84.69%</p>	<p>PSA Target: 95% of SSSIs in 'favourable' or 'unfavourable recovering' condition</p>	<p>Norfolk Wildlife Trust will soon expand this data source to include a similar County Wildlife Site surveys</p>
<p>% of SSSIs are in:</p> <p>a) Favourable condition</p> <p>b) Unfavourable recovering</p> <p>c) Unfavourable no change</p> <p>d) Unfavourable declining</p> <p>e) Destroyed / part destroyed</p> <p>Source: Natural England (English Nature).</p> <p>www.naturalengland.org.uk</p>	<p>a – 27.4</p> <p>b – 0</p> <p>c – 72.6</p> <p>d – 0</p> <p>e – 0</p>	<p>a – 27.4</p> <p>b – 0</p> <p>c – 72.6</p> <p>d – 0</p> <p>e – 0</p>	<p>Norfolk May 2009</p> <p>a – 75.8</p> <p>b – 13.2</p> <p>c – 9.0</p> <p>d – 1.9</p> <p>e – 0</p>		<p>Overall status of site conditions, particularly compared to Norfolk figures, poor</p>
<p>ENV5:</p> <p>Heritage at risk – Number of:</p> <p>a) listed buildings, and</p>	<p>2008</p> <p>a – 32</p>	<p>2006</p> <p>a – 40</p>	<p>Nationally, 2006: 8% of Grade I and II* buildings on the 'at risk' register.</p>	<p>To show an overall decrease in buildings and monuments on the</p>	<p>Buildings at Risk in 2006 formed 2.4% of the listed buildings stock in greater</p>

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
b) scheduled ancient monuments on the buildings at Risk Register. <i>Source: local authority reports; Norfolk Buildings at Risk Register</i>	b – 2	b – 2	East of England buildings at risk average is between 2 and 3%	'at risk' register	Norwich
Number of tree preservation orders (TPOs). <i>Source: local authority reports</i>	08/09: 8	2007-2008: 10	None available at present	No TPO trees to be lost as a result of development	TPOs indicate the extent of development pressures on the heritage
ENV6: Total CO ₂ emissions per capita (tonnes carbon equivalent). <i>Source: Norwich Local Development Framework: Annual monitoring report 2009-10 (December 2010) Norwich City Council</i>	2009/10: 5.2 tonnes per capita	2008/09: 5.9 tonnes per capita 2007/08: 6.2 tonnes per capita	UK National average: 7.4 tonnes per capita	To reduce the overall carbon emissions	Local emissions below national average and local comparators
Renewable energy generating capacity installed by type. <i>Source: Norwich Local Development Framework: Annual monitoring report 2008-09 (December 2009) Norwich City Council</i>	2008-09 <ul style="list-style-type: none"> Armes Street-permission granted for air source heat pumps 95 Philadelphia 	2007-08 <ul style="list-style-type: none"> 1 Biomass powered CCHP (Combined Cooling, Heat and Power) 1 on-site CHP A number of small 	East of England 2006: generated 4.5% of electricity from renewables	Regionally, 14% of electricity to come from renewable sources by 2010	The area has no major renewable sites at present, although biomass may prove influential in the future

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
	Lane – the redevelopment of the former Crawshay Arms PH site provided 13 flats that met CfSH level 4 requirements	scale projects: eg solar panels. 2006-07 – none 2005-06 – none			
CO ₂ Carbon Footprint of area (global hectares per capita). <i>Source: Local Authority REAP tool</i>	2008: 5.24	2006: 5.49	UK: 5.3 East of England: 5.53	To reduce the overall size of the footprint	The REAP tool used to assess the ecological footprints of an area was developed in 2006
ENV7: Development permissions granted contrary to Environment Agency advice on flood risk. <i>Source: Norwich Local Development Framework: Annual monitoring report 2009-10 (December 2010) Norwich City Council</i>	2009/10 - 0	2008/09 – 1 2007/08 – 1	2005-06 – 1 2006-07 – 0 2007-08- 1	To have no development that is permitted without being to the satisfaction of the EA	Level 2 SFRA should enable effective implementation of flood risk policy
ENV8: Daily domestic water use (per capita consumption). <i>Source: JCS for Broadland,</i>	2010/11: 144.5 Litres per person per day	2009/10: 142.7 2008/09: 148.1 2007/08: 141.0	National average: 154 litres per person per day	Overall decrease per person	JCS policies aimed at promoting water efficiency

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
<i>Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>					
ENV9: Dwellings built on previously developed land or as conversions. <i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>	2010-11 – 94%	2009-10 – 99% 2008-09 – 95% 2007-08 – 93% 2006-07 – 88% 2005-06 – 71%	East of England average: 2005/06: 71%	95% of all development to be on Previously Developed Land	There has been an improvement in both the proportion of dwellings built on previously developed land
% new dwellings completed at: a) less than 30 per hectare b) 30- 50 per hectare, and c) more than 50 per hectare. <i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>	2010-11: a- 0.6% b- 16% c- 83%	2009-10: a- 2.7% b- 17% c- 80% 2008-09: a- 1.9% b- 18.5% c- 79.6% 2007-08: a – 0.4 b – 17.2 c – 82.4 2006-07: a – 2.2	n/a	40 dwelling per hectare minimum	

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
		b – 25.2 c – 72.5			
<p>Waste arisings:</p> <p>a) Kilograms of waste produced per head of population, and</p> <p>b) % change on previous year.</p> <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i></p>	<p>2010-11</p> <p>a – 316</p> <p>b – -4%</p>	<p>2009-10</p> <p>a – 328</p> <p>b – -4%</p> <p>2008-09</p> <p>a – 341</p> <p>b – -10%</p> <p>2007-08</p> <p>a – 379.2</p> <p>b – +0.4%</p> <p>2006-07</p> <p>a – 377.7</p> <p>b – -6.26%</p> <p>2005-06</p> <p>a – 403</p> <p>b – -7.8%</p>	<p>All England</p> <p>a – 433</p> <p>b – -1.8</p>	<p>Overall reduction in waste produced and sent to landfill sites</p>	
<p>Recycling - % of household waste:</p> <p>a) recycled, and</p> <p>b) composted.</p> <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-</i></p>	<p>2010-11</p> <p>a – 28%</p> <p>b – 10%</p>	<p>2009-10</p> <p>a – 28%</p> <p>b – 6%</p> <p>2008-09</p> <p>a – 28%</p>	<p>All England</p> <p>a – 21.9</p> <p>b – 12.2</p>	<p>Overall increase in waste recycled as a % of total</p>	<p>The overall performance has been improved in recent years</p>

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
2011		b – 6% 2007-08 a – 22.49% b – 1.11% 2006-07 a – 18.37% b – 0% 2005-06 a – 15.5% b – 0%			
Social Baseline					
SOC1: Child poverty - % of children living in low-income households. <i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>	2010: 29.2%	2007: 29.8% 2004: 30.3%	No data available	To improve the performance by minimising the instances of child poverty and unemployment and improving the ranking in the Indices of Multiple Deprivation	
Index of Income Deprivation (IMD) – Ranking for scores in the IMD. <i>Source: The English Indices of Deprivation 2010</i>	2010: 98 out of 326 (1 = most deprived)	2007: 94 out of 354 2004: 92 out of 354			

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
Index of Multiple Deprivation (IMD) – Ranking for overall score in the IMD. <i>Source: The English Indices of Deprivation 2010</i>	2010: 70 out of 326 (1 = most deprived)	2007: 62 out of 354 2004: 61 out of 354			
Population of working age (16-74 yrs old) who are long-term unemployed. <i>Source: Audit Commission</i>	1.30%		Norfolk county: 0.89%		
SOC2: % of population receiving incapacity benefits (August 06) <i>Source: National Statistics</i>	8	August 04: 8	East of England: 5 All England: 7	To reduce the number of people receiving incapacity benefit through improved healthy lifestyles	
Life expectancy (yrs) at birth, of: a) males b) females. <i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>	2008-10 a) – 77.8 b) – 83.5	2006-08 a) – 77.7 b) – 83.2 2006-08 a) – 77.8 b) – 83.0 Jan04 - Dec06 a) – 76.8 b) – 82.6	East of England a – 78.3 b – 82.3 All England a – 77.3 b – 81.6		

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
SOC3: Workforce qualifications - % of working age population with qualifications at NVQ Level 4 or above. <i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>	2010/11: 39.1%	2009/10: 30.5% 2008/09: 28.6% 2007/08: 31.6%	East of England: 17.14		
School leaver qualifications - % of school leavers with 5 or more GCSEs at A*-C grades. <i>Source: Norwich Local Development Framework: Annual monitoring report 2009-10 (December 2010) Norwich City Council</i>	2009/10: 58.06%	2008/09: 55.64% 2007/08: 52.63%	2005: East of England: 56.7% England: 56%	To increase proportion of school leavers with five or more GCSEs at A*- C grades	
SOC4: Affordable Housing stock provision: a) % of total housing stock that is affordable housing. b) Total affordable housing unit completions in past year. c) % of past years' dwellings completions that are affordable.	2010-11 a) 25% b) 112 c) 30%	2009-10 a) 25% b) 92 c) 23% 2008-09 a) 27% b) 235 c) 45%		To increase the overall provision of affordable housing and its proportion amongst the total housing stock	

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011		2007-08 a) n/a b) 291 c) 28% 2006-07 a) n/a b) 277 c) 27%			
Total unfit dwellings in housing stock. Source: Audit Commission	Apr 2005: 7.4%		Total unfit dwellings, April 2005: East of England: 3.2% England: 4.4%	To reduce the proportion of unfit dwellings in the total housing stock	
SOC5: Incidences of crime committed per 1,000 households: a) Domestic burglaries b) Violent offences c) Theft of a vehicle. Source: Audit Commission	2007/08: a) 5 b) 26 c) 3.4	2004/05: a) 12.05 b) 32.92 c) 4.1		To reduce the incidences of crime overall	All three indicators have seen a reduction
SOC6: % of the economically active population (16-74yrs) who are unemployed. Source: JCS for Broadland,	2010/11: 7.1%	2009/10: 9.7% 2008/09:	East of England: 2.6%	To reduce the proportion of unemployed people amongst the working age population	

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
Norwich and South Norfolk: Annual Monitoring Report 2010-2011		4.3% 2007/08: 2.3%	England: 3.35%		
% of unemployed people of working age (16-74yrs) who are long-term unemployed. <i>Source: National Statistics online</i>	2001 Census: 31.49%		East of England: 27.13% England: 30.26%		
SOC7: Unfit housing – % of homes from overall housing stock not meeting the 'Decent Homes Standard'. <i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>	2010-11: 6.5%	2009-10: 6.6% 2008-09: 7.4% 2007-08: 7.4%	2005/06 England: 30.1%	To reduce the proportion of homes not meeting the decent homes standards	Most non-decent homes appear to be in older housing, and as private rented tenure, such as terraced housing areas adjacent to the city centre
% of public housing stock built to the standard of the Code for Sustainable Homes (indicator pending). <i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>	2010/11: Level 1 – 12% Level 3 – 75% Level 4 – 13%	2009/10: L3 – 80% L4 – 20% 2008/09: L1 – 28% L3 – 72%	No data available at present	To improve the overall sustainability of housing	
SOC8: % of residents who travel to			East of England		Norwich has a high

SA objective indicator	Most recent Norwich value	Trends		Comparison value	Target	Comments
work: a) by private motor vehicle b) by public transport c) by foot or cycle d) work at or mainly from home <i>Source: 2001 Census</i> <i>Other indicators for access to services and access deprivation to be developed in the future</i>	2001: a – 51.5 b – 9.9 c – 31.5 d – 6.7			2001: a – 65.8 b – 11.3 c – 12.9 d – 9.4	(a) decrease (b) increase (c) increase (d) increase	proportion of people who travel to work by foot or cycle
Economic Baseline						
EC1: % change in the total number of VAT registered businesses <i>Source: NOMIS</i>	2007: 3.82	2001 2002 2003 2004 2005 2006	2.33% 0.00% 2.74% 0.74% 2.20% 1.44%	East of England: 2.52 Great Britain: 3.00	To increase the number of VAT registered businesses overall	
Average weekly pay by residence, full time workers. <i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>	2010/11: £461	2009/10 2008/09 2007/	£432 £413 £404	East of England: 509.4 Great Britain: 491.0	To improve weekly earnings	

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
		08			
EC2: Number of small businesses (not including farm-based agriculture) <i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2010-2011</i>	2010/11: 3,215	2009/10 3,315 2008/09 3,375 2007/08 2,380	No data available	To increase small businesses and local entrepreneurs	
EC3: % of residents who travel to work by: a – private motor vehicle b – public transport c – foot or cycle d – works at or mainly from home <i>Source: Census, 2001</i>	2001: a – 51.5 b – 9.9 c – 31.5 d – 6.7		Travel to Work trends, 2001 East England: a) 65.8 b) 11.3 c) 12.9 d) 9.4 England: a) 62.1 b) 15.4 c) 12.8 d) 9.2	To increase number of jobs per resident a) to decrease b) to increase c) to increase d) to increase ..	There is a high cycling/walking use in Norwich where access to the workplace may be easier and the need to work from home is less
Average distance travelled to the workplace by residents	Census 2001: 10.83 km		East England: 15.88 km	To provide more employment opportunities closer	

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
<i>Source: National Statistics online</i>			England: 13.31 km	to home to reduce the distance to work overall	
EC4: % of various employment development types on previously developed land or as conversions: a – B1 uses (Business) b – B2 uses (General industrial) c – B1 and B2 uses combined d – use undefined e – use unknown <i>Source: Norwich Local Development Framework: Annual monitoring report 2008-09 (December 2009) Norwich City Council</i>	2008-09 a – 100 b – n/a c – 100 d – 100 e – 100	2007-08 a – 100 b – 100 c – 100 d – 100 e – n/a 2006-07 a – 4.9% b – n/a c – 4.9 d – 0 e – n/a	East of England average figure, 2005/06: 64%	To maximise development on Brownfield land	
Growth in passenger numbers at Norwich Airport. <i>Source: Norwich Airport</i>	07/08- 680,927	"Aircraft movements" in and out of the airport rose by 24 percent in 2006 to some 21,350 Since 07/08 forecasts predict significant fall in passenger numbers as	n/a	To minimise the number of flights necessary from the airport	

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
		followed: 08/09- 536,652 09/10- 408,614			
Ecological footprint – Global Hectares (gha) required per capita to support current production and consumption of resident lifestyles. <i>Source: Local Authority REAP assessment report</i>	2006: 5.49 gha per capita	No previous data available	Global average: 2.2 gha per capita	Sustainable world footprint: 1.8 gha per capita	
Unemployment benefit receipt: a) % of population in receipt of Job Seekers Allowance (JSA) b) Claimants of JSA by age range: A – 16-24 yrs old B – 25-49 yrs old C – 50+ yrs old <i>Source: National Statistics online</i>	April 2009: a) 4.7 b) A – 29.1 B – 56.9 C – 13.4	April 2008 a) 3.1 b) A - 28.6 B - 55.3 C - 14.9 April 2007 a) 3.3 b) A - 30.2 B - 53.0 C - 15.0	Norfolk April 2009 a) 3.7% b) A – 30.4% B – 52.1% C – 17.0% East of England April 2009 a) 3.5% b) A – 28.6% B – 53.4%	To reduce unemployment overall, and increase the ability of young people to find work	More people are unemployed from the 25-49yrs age group, and there is far less unemployment amongst people over 50 years old than Norfolk and East of England

SA objective indicator	Most recent Norwich value	Trends	Comparison value	Target	Comments
			C – 17.4%		

Appendix 3: Review of other relevant plans and programmes

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
International				
<p>1. Johannesburg Declaration on Sustainable Development</p> <p>http://www.parliament.the-stationery-office.co.uk/pa/cm200203/cmselect/cmenvaud/98/9809.htm</p>	<ul style="list-style-type: none"> Promote sustainable development – economic development, social development and environmental protection – at local, national, regional and global levels. Promote sustainable consumption and production patterns. 	<p>Ensure environmental sustainability.</p> <p>Integrate the principles of sustainable development into country policies and programmes and reverse loss of environmental resources.</p>	<ul style="list-style-type: none"> Promotion of sustainable development patterns. Promotion of renewable energy and energy efficiency. Protection and enhancement of biodiversity. Protection of natural resources. Promotion of health and economic well-being. 	Addressed by whole SA framework.
<p>2. The UNECE Convention on Access to Information, Public Participation in Decision Making and Access to Justice for Environmental Matters (The Aarhus Convention) (2001)</p> <p>http://europa.eu.int/comm/environment/aarhus/</p>	<p>Access to environmental information held by local authorities.</p> <p>Requirement for public participation in environmental decision-making.</p>		The DPD should involve public consultation throughout.	SA should involve public consultation and make environmental information available.

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
3. EC Directive on the assessment of the effects of certain plans and programmes on the environment 2001/42/EC	<p>"To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation of plans and programmes with a view to promoting sustainable development."</p> <p>"Environmental assessments" should be carried out for plans which are likely to have significant effects on the environment.</p>		<p>The DPD should be accompanied by a SA to ensure:</p> <ul style="list-style-type: none"> the policies in the plan will contribute to sustainable development that there is full stakeholder and public consultation in the process. 	Addressed by this whole SA report, as the SEA is integrated within the SA.
4. European Landscape Convention (2004) http://www.coe.int/t/dg4/cultureheritage/heritage/landscape/default_en.asp	<p>Aim:</p> <p>'The aims of this convention are to promote landscape protection, management and planning, and to organise European co-operation on landscape issues.'</p> <p>General measures:</p> <ul style="list-style-type: none"> Recognise landscapes in law as an essential component of people's surroundings...and a foundation of their diversity. Establish and implement landscape policies aimed at landscape protection, management and planning through the adoption of 		<ul style="list-style-type: none"> Promote and recognise landscapes that need to be protected from development. Recognise landscapes that need to be managed to maintain a high quality landscape network. 	Addressed within SA framework: ENV2, ENV4, ENV5 and EC4

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	<p>specific measures.</p> <ul style="list-style-type: none"> Establish procedures for the participation of regional/local authorities, general public and other parties with an interest in the formulation of the landscape policies. Integrate landscape into regional and town planning policies and into environmental, cultural, agricultural, social and economic policies. 			
<p>5. The Habitats Directive 92/43/EEC</p> <p>http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1992L0043:20070101:EN:PDF</p>	<p>Aim:</p> <p>'Contribute towards ensuring biodiversity through the conservation of natural habitats and of wild fauna and flora in the European territory of the Member States to which the treaty applies'.</p> <p>'Encourage the management of features of the landscape which are of major importance for wild fauna and flora'.</p>		<p>Policies in the plan should protect European habitats sites.</p> <p>The DPD should protect linear and continuous structures (such as rivers with their river banks) which are essential for migration, dispersal and genetic exchange of wild species.</p>	<p>Addressed within SA framework: ENV2, ENV4 and EC4</p>
<p>6. The Birds Directive 2009/147/EC</p> <p>http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2009L147:20090701:EN:PDF</p>	<p>The preservation, maintenance, and re-establishment of biotopes and habitats shall include the following measures:</p> <ul style="list-style-type: none"> Creation of protected areas. 		<p>The DPD shall make sure that the upkeep of recognised habitats is maintained and not damaged from</p>	<p>Addressed within SA framework: ENV2, ENV3, ENV4 and EC4</p>

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iServ.do?uri=OJ:L:2010:020:0007:0025:EN:PDF	<ul style="list-style-type: none"> Upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones. Re-establishment of destroyed biotopes. Creation of biotopes. 		<p>development.</p> <p>The DPD shall avoid pollution or deterioration of habitats or any other disturbances effecting birds.</p>	
<p>7. The Ramsar Convention</p> <p>http://www.ramsar.org/cda/en/ramsar-documents-texts-convention-on/main/ramsar/1-31-38%5E20671_4000_0</p>	<p>Recognising the interdependence of man and his environment.</p> <p>Considering the fundamental ecological functions of wetlands as regulators of water regimes and as habitats.</p> <p>Stem the encroachment on and loss of wetlands.</p>		<p>Protect and enhance the conservation of wetlands and waterfowl habitats.</p>	<p>Addressed within SA framework: ENV2, ENV4 and EC4</p>
<p>8. The Water Framework Directive 2000/60/EC</p> <p>http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2000:327:0001:0072:EN:PDF</p>	<p>Aims:</p> <ul style="list-style-type: none"> Prevent deterioration and protect and enhance the status of aquatic ecosystems, terrestrial ecosystems and wetlands directly dependent on aquatic ecosystems. Promote sustainable water use based on a long-term protection of available water resources. Protect and enhance the aquatic environment through reducing discharges, emissions and the 		<p>The DPD should protect aquatic and terrestrial ecosystems and wetlands dependent on water.</p> <p>Promote sustainable water use.</p> <p>Protect water environments from emissions and hazardous substances.</p> <p>Contribute to reducing flood risk.</p>	<p>Addressed within SA framework: ENV2, ENV4, ENV7, ENV8 and EC4</p>

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	<p>cessation or phasing out of hazardous substances.</p> <ul style="list-style-type: none"> Progressive reduction of pollution of groundwater and prevent further pollution. Contribute to mitigating the effects of floods and droughts 			
National				
<p>9. <i>Aviation White Paper: The Future of Air transport, 2003</i></p> <p>http://www.dft.gov.uk/about/strategy/whitepapers/air/</p>	<p>Balanced approach to airport development:</p> <ul style="list-style-type: none"> Policy approach to balance the benefits of increased air travel (including growth of regional economy) against the environmental impacts, (including emissions to impact that airports can have on those living nearby). <p>Growth of Norwich airport:</p> <ul style="list-style-type: none"> There is scope for the airport to grow to satisfy local demand. 	<p>Demand for air travel is high and predicted to rise rapidly in the region due to the strength of its economy.</p>	<p>The DPD will have to take account of potential growth at Norwich Airport as main public transport links between airport and bus/train stations pass through area.</p>	<p>Addressed within SA framework: ENV1, ENV6, ENV9, SOC6, SOC8, EC1, EC3 and EC4</p>
<p>10. <i>ODPM Safer Places: The Planning System and Crime</i></p>	<p>Promote early consideration of crime</p>	<p>Contribution to</p>	<p>Ensure that the DPD</p>	<p>Addressed within SA</p>

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<i>Prevention (2004)</i> http://www.communities.gov.uk/publications/planningandbuilding/saferplaces	prevention as part of the design process to deliver safer places.	reduction of crime rates.	policies take account of the need to design out crime.	framework: SOC5 and SOC7
11. <i>The Environment Act 1995</i> http://www.opsi.gov.uk/acts/acts1995/Ukpga_19950025_en_1	Air Quality Management Action Plans can be produced for areas where controls are necessary to reduce pollution.	To improve air quality in defined AQMA areas.	Any development in the AQMA areas should be targeted as primary areas for pollution reduction and potential solutions outlined in LTP should be considered.	Addressed within SA framework: ENV3
12. <i>National Planning Policy Framework 2012</i> http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf	Presumption in favour of sustainable development. Delivering sustainable development by:		The DPD needs to take into account all of the objectives set out in the NPPF by: Plan for new developments that reduce greenhouse gas emissions	Addressed within SA framework: ENV1, ENV6, ENV9, SOC8, and EC3
	<ul style="list-style-type: none"> Building a strong, competitive economy. 		Set out clear economic visions for that particular area.	Addressed within SA framework: EC1, EC2, EC3, EC4
	<ul style="list-style-type: none"> Ensuring vitality of town centres. 		Recognise the city centre as the heart of the community.	Addressed within SA framework: EC1

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	<ul style="list-style-type: none"> Promoting sustainable transport 		To implement sustainable transport modes depending on nature/location of the site, to reduce the need for major transport infrastructure.	Addressed within SA framework: ENV1, ENV6, SOC8, EC3
	<ul style="list-style-type: none"> Delivering a wide choice of high quality homes. 		Identify size, type, tenure and range of housing that is required in particular locations.	Addressed within SA framework: SOC4
	<ul style="list-style-type: none"> Requiring good design. 		Establish a strong sense of place to live, work and visit.	Addressed within SA framework: SOC5
	<ul style="list-style-type: none"> Promoting healthy communities. 		Promote safe and accessible environments with a high quality of life and community cohesion.	Addressed within SA framework: SOC2, SOC5 and SOC7
	<ul style="list-style-type: none"> Meeting the challenge of climate change, flooding, and coastal change. 		Use opportunities offered by new development to reduce causes/impacts of flooding.	Addressed within SA framework: ENV7
	<ul style="list-style-type: none"> Conserving and enhancing the natural environment. 		Recognise the wider benefits of biodiversity.	Addressed within SA framework: ENV2, ENV4, SOC2 and SOC7
	<ul style="list-style-type: none"> Conserving and enhancing the historic environment 		Sustain and enhance heritage assets and put	Addressed within SA framework: ENV5

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			them to viable uses consistent with their conservation.	
	<ul style="list-style-type: none"> Facilitating the use of sustainable materials. 		Encourage prior extraction of minerals where practicable and environmentally feasible.	Addressed within SA framework: ENV9
13. <i>Waste Strategy for England 2007 Defra</i> http://www.defra.gov.uk/ENVIRONMENT/waste/strategy/strategy07/pdf/waste07-strategy.pdf	Future of waste management – the government commitment. <ul style="list-style-type: none"> Tackle the amount of waste produced, by breaking the link between economic growth and waste production. Put waste which is produced to good use through substantial increases in re-use, recycling, composting, and recovery of energy. 	To recycle or compost at least 30% of household waste by 2010. To reduce the amount of waste landfilled.	Assess how the DPD can encourage the minimisation of waste production and the maximization of recycling and re-use of materials.	Addressed within SA framework: ENV9
14. <i>Climate Change: The UK Programme 2006</i> http://www.defra.gov.uk/environment/climatechange/uk/ukccp/pdf/ukccp06-all.pdf	Integrated policies and measures to: <ul style="list-style-type: none"> improve business's use of energy, stimulate investment and cut costs stimulate new, more efficient sources of power generation cut emissions from the transport sector promote better energy efficiency in the domestic sector 	UK Kyoto target to cut its greenhouse gas emissions by 12.5%, domestic goal to cut carbon dioxide emissions by 20% below 1990 levels by 2010.	The DPD should consider how the climate change issue can be addressed and implemented.	Addressed within SA framework: ENV6 and ENV9

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	<ul style="list-style-type: none"> improve energy efficiency requirements ensure the public sector takes a leading role. 			
<p>15. <i>Securing the Future - UK Government sustainable development strategy– March 2005</i></p> <p>http://www.defra.gov.uk/sustainable/government/publications/uk-strategy/</p>	<p>1. Justification for promotion of sustainable development to reduce:</p> <ul style="list-style-type: none"> effects of climate change stress on environmental resources + loss of biodiversity inequality (both for moral reasons and as it is in the nations interests). <p>3. Goals for sustainable development in UK – integrated approach which allows:</p> <ul style="list-style-type: none"> a sustainable, innovative and productive economy that delivers high levels of employment a just society that promotes social inclusion, sustainable communities and personal wellbeing protection and enhancement of the physical and natural environment efficient use of resources and energy <p>4. Guiding principles</p> <ul style="list-style-type: none"> Living within environmental limits. Ensuring a strong, healthy and just 	<p>National baseline indicators and targets established (in “Sustainable Development indicators in your Pocket”).</p>	<p>Assess how the DPD can help to promote sustainable development as defined in the strategy and can help to achieve targets.</p> <p>The DPD should promote identified goals and consider the possibility of encouraging exemplar projects.</p> <p>Ensure the DPD is based on these principles with policies reflecting the</p>	<p>Addressed by whole SA framework.</p>

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	<p>society.</p> <ul style="list-style-type: none"> • Achieving a sustainable economy. • Using sound science responsibly. • Promoting good governance. <p>5. Shared priorities for UK action:</p> <p>Sustainable consumption and production:</p> <ul style="list-style-type: none"> • How goods and services are produced, impacts of products and materials across their whole lifecycle. • Building on people's awareness of social and environmental concerns. • Reducing the inefficient use of resources, to boost competitiveness and to break the link between economic growth and environmental degradation. <p>Climate change and energy:</p> <ul style="list-style-type: none"> • Secure a change in the way we generate and use energy, and in other activities that release these gases. 		<p>needs of sustainability and promote public involvement.</p> <p>The established priorities should be promoted through policies within the DPD.</p>	

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	<ul style="list-style-type: none"> • Prepare for the climate change that cannot now be avoided. • Set a good example and will encourage others to follow it. <p>Natural resource protection and environmental enhancement sustainable communities at the local level to:</p> <ul style="list-style-type: none"> • achieve good design • involve community in decisions • overcome inequality. 			
<p>16. <i>UK Biodiversity Habitat Action Plan for Urban Areas</i></p> <p>http://www.ukbap.org.uk/UKPlans.aspx?ID=754</p>	<p>Definition of urban wildlife habitats: Green spaces and the associated ecological niches found within built up areas. They consist of:</p> <ul style="list-style-type: none"> • managed green spaces, including town parks, amenity grassland and private gardens • naturally seeded urban areas or industrial sites. <p>Conservation direction.</p>	<p>. Maintain existing diversity and extent of wildlife in all urban areas. Length of green links in area.</p>	<p>The DPD should preserve existing green spaces and attempt to identify locations for further green space provision.</p> <p>To protect existing green</p>	<p>Addressed within SA framework: ENV2, ENV4 and SOC7</p>

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	<p>Maintain the existing diversity and extent of wildlife in all urban areas, expanding the range and distribution of rare and common species and enabling this resource to be utilised as an educational tool.</p> <p>Measures to be considered further include:</p> <ul style="list-style-type: none"> • Survey and evaluate the full range of urban habitats (including buildings) in terms of their importance in maintaining wildlife interest. • Protect sites important for wildlife from changes in land use. • Encourage the integration of green networks (incorporating a full range of wildlife habitats) in planning and developments within the urban environment. • Implement strategies to enable the use of vacant and derelict land, either temporarily or permanently as wildlife habitats. • Incorporate the conservation and enhancement of wildlife into the management of urban green space. 		<p>space and ensure development protects and enhances biodiversity, most particularly through the provision of green links.</p>	

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	<ul style="list-style-type: none"> Encourage community action to survey, plan for and manage wildlife habitats. Promote wild space in urban areas as an educational resource to inform communities about local wildlife in the context of the wider environment. 			
<p>17. <i>Working with the Grain of Nature: A Biodiversity Strategy for England, 2002</i> (DEFRA) http://www.defra.gov.uk/wildlife-countryside/biodiversity/action-uk/e-biostrat.htm</p>	<p>In urban areas biodiversity needs to become a part of the development of policy on sustainable communities, urban green space and the built environment.</p> <p>Para 1.8 National aims. The general acceptance of biodiversity's essential role in enhancing the quality of life.</p> <p>Para 6.1 National aim for woodland. To increase woodland's role in enhancing people's quality of life.</p>	<p>English Nature Accessible Urban Green Space Standards.</p>	<p>The DPD should address issue of biodiversity protection and enhancement in a densely developed urban area.</p> <p>The DPD should raise awareness of importance of role of biodiversity in the local area.</p> <p>Consider how the DPD can promote access to woodland.</p>	<p>Addressed within SA framework: ENV2, ENV3, ENV4 and SOC7</p>

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	<p>Para 7.1 Vision for urban areas.</p> <p>Towns and cities which have a place for wildlife, and in which a flourishing biodiversity makes a real contribution to the quality of life of urban residents, workers and visitors. Development that makes minimal impact on wildlife habitats and contributes to the conservation of biodiversity.</p> <p>Para 7.1 Aims for urban areas.</p> <ul style="list-style-type: none"> • To ensure that cities, towns and other settlements contribute fully to the goals of biodiversity conservation. • To ensure that construction, planning, development and regeneration have minimal adverse impacts on biodiversity and enhance it where possible. • To ensure that biodiversity conservation is integral to sustainable urban communities, both in the built environment, and in parks and green spaces. • To increase access to biodiversity. 		<p>Consider how the DPD can protect and enhance biodiversity.</p>	

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<p>18. <i>The Historic Environment: A Force for the Future</i> (Department for Culture, Media and Sport)</p> <p>http://www.culture.gov.uk/reference_library/publications/4667.aspx</p>	<p>Para 9: Vision.</p> <p>The government looks to a future in which the historic environment:</p> <ul style="list-style-type: none"> • has a clear leadership and policy framework to match public interest • is accessible and can be identified with by everyone and used as a learning resource • is protected and sustained for the benefit of our own and future generations • is harnessed as an economic asset. 	<p>No. of listed buildings.</p> <p>Condition of listed buildings.</p> <p>No. of buildings on the local list grants for listed building improvements.</p>	<p>The DPD should take account of government's vision for the preservation and enhancement of the historic environment and policies should consider its use as an economic asset and regeneration tool.</p>	<p>Addressed within SA framework: ENV5</p>
<p>19. <i>Air Quality Strategy for England, Scotland, Wales and Northern Ireland, DEFRA 2000 and February 2003 addendum</i></p> <p>http://www.defra.gov.uk/environment/airquality/strategy/</p>	<p>Objectives and standards.</p> <p>Sets objectives and standards for eight specific air pollutants to:</p> <ul style="list-style-type: none"> • protect health • provide monitoring structure. <p>Responsibility of local authorities (chapter 5).</p> <p>Local authorities should achieve the air quality objectives locally, using local air quality management strategies (LAQMs), smoke control, local traffic powers, public</p>	<p>The targets established in the LAQM plan should be applied.</p>	<p>The DPD should contribute to limiting air pollutions.</p>	<p>Addressed within SA framework: ENV1, ENV3, ENV6, SOC2, SOC8 and EC3</p>

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	<p>information and education.</p> <p>Role of land use planning (chapter 5).</p> <p>Land use planning and strategies should also have a direct effect on improving air quality through:</p> <ul style="list-style-type: none"> • local transport plans • local traffic reduction targets • low emissions zones • green transport plans • parking controls and management. 			
<p>20. <i>Energy White Paper: Our Energy Future – creating a low carbon economy</i> (2003) http://www.berr.gov.uk/files/file10719.pdf</p>	<p>The white paper defines a long-term strategic vision for energy policy combining our environmental, security of supply, competitiveness and social goals.</p>	<p>To put ourselves on a path to cut the UK's carbon dioxide emissions-the main contributor to global warming – by some 60% by about 2050 with real progress by 2020.</p>	<p>The local plan should aim to minimise CO₂ and other greenhouse gas emissions.</p>	<p>Addressed within SA framework: ENV1, ENV6, ENV9, SOC8 and EC3</p>
<p>21. <i>Energy Review 2006</i> http://www.berr.gov.uk/files/file31890.pdf</p>	<p>This Review aims to put the UK in a position to meet two major long-term challenges in UK energy policy: The need to tackle climate change by reducing</p>	<ul style="list-style-type: none"> • Setting stretching energy efficiency levels for the Code for Sustainable 	<p>The DPD should address issues of energy efficiency.</p>	<p>Addressed within SA framework: ENV1, ENV6 and ENV9</p>

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	carbon dioxide emissions; and the need to deliver secure, clean energy at affordable prices, as we move to increasing dependence on imported energy.	<p>Homes.</p> <ul style="list-style-type: none"> • Making clear that these will govern the future direction of building regulations. • Reviewing the building regulations guidance to improve compliance with them. • Requiring all government-funded housing to meet at least Level 3 of the Code for Sustainable Homes. • Introducing energy performance certificates for new and existing houses. • Strongly urging 		

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		English planning authorities to set ambitious policies on renewable energy.		
22. <i>Saving Lives: Our Healthier Nation White Paper 2004</i> http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4118614	This white paper sets out the government's action plan for tackling poor health by improving the health of everyone, and of the worst off in particular. The paper provides ten tips for better health. Our healthier nation looks at a new approach to saving lives and at the aims and advances in public health.	It sets tough but attainable targets in priority areas. To achieve better health for everyone and especially for the worst off the government is: <ul style="list-style-type: none"> • putting in more money: £21 billion for the NHS alone to help secure a healthier population • tackling smoking as the single biggest preventable cause of poor health • integrating 	Promoting healthier lifestyles should be one of the objectives of the SA.	Addressed within SA framework: SOC1, SOC2 and SOC7

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		<p>government, and local government, work to improve health</p> <ul style="list-style-type: none"> • stressing health improvement as a key role for the NHS • pressing for high health standards for all, not just the privileged few. 		
<p>23. <i>The Natural Choice: securing the value of nature 2011</i></p> <p>http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf</p>	<p>Key Measures</p> <p>Reconnecting nature</p> <p>'Biodiversity offsetting' new way for developers to ensure we don't lose wildlife sites and make them better by making and improving other sites.</p> <p>Connecting people and nature for better quality of life</p>	<p><i>Key indicators to be developed by Spring 2012.</i></p>	<p>Arrest the decline in habitats and species and the degradation of landscapes.</p> <p>Protect priority habitats and safeguard vulnerable non-renewable resources for future generations.</p> <p>Growth will be green as it is intrinsically linked to the health of the country's</p>	<p>Addressed within SA framework: ENV2, ENV4, ENV5, SOC2, SOC5, SOC7, EC1, EC3 and EC4</p>

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	<p>Green Areas Designation allowing local communities to give protection to areas that are important to them for recreation, the view or their importance for wildlife.</p> <p>Better urban green spaces for the benefit of cities and towns.</p> <p>More children experiencing nature by learning outdoors, through practical support to schools and reducing red-tape for outdoor learning.</p> <p>Strengthening local public health activities which connect people with nature for better health.'</p>		<p>natural resources.</p> <p>The economy will capture the value of nature.</p> <p>More people to enjoy the benefits of nature by giving them freedom to connect with it.</p> <p>Help people take more responsibility for their environment, putting local communities in control.</p>	
<p>• Regional (Note that the regional tier of planning has been removed through the Localism Act 2011, therefore the regional plans and programmes prepared by the former Regional Assembly and Regional Development Agency have been removed from this review, but until the Regional Strategies are formally revoked by Government, the East of England Plan has been left in.)</p>				
<p>24. East of England Plan (May 2008)</p> <p>http://www.gos.gov.uk/goeast/</p>	<ul style="list-style-type: none"> To reduce the region's impact on, and exposure to, the effects of climate change. 		<ul style="list-style-type: none"> Locate development so as to reduce the need for travel. 	<p>Addressed within whole SA framework.</p>

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
planning/regional_planning/	<ul style="list-style-type: none"> To increase housing opportunities for people in the region. To realise the economic potential of the region and its people. To improve the quality of life for the region's people. To improve and conserve the region's environment. 		<ul style="list-style-type: none"> Encourage a major shift in travel towards public transport, walking and cycling and away from car use. Maximise the energy efficiency of development and promoting the use of renewable and low carbon energy sources. Reduce the risk of damage from flooding. Secure the delivery of additional housing (particularly in the Key Centres for Development and Change). Give priority to the provision of affordable housing to meet identified needs. Facilitate the 	

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			<p>development needed to support business, improving skills and widening opportunities.</p> <ul style="list-style-type: none"> • Provide job growth, broadly matching housing provision, and improve the alignment between the locations of workplaces and homes. • Maintain and strengthen inter-regional connections. • Ensure adequate and sustainable transport infrastructure. • Ensure new development fulfils the principles of sustainable communities, providing a well-designed living environment 	

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			<p>adequately supported by social and green infrastructure.</p> <ul style="list-style-type: none"> • Promote social cohesion by improving access to work, services and other facilities, especially for those who are disadvantaged. • Maintain cultural diversity and address the distinctive needs of different areas. • Promote regeneration and renewal of disadvantaged areas. • Increase community involvement in implementation. • Ensure the protection and enhancement of environmental assets, including the built and historic environment, landscape and water. 	

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
			<ul style="list-style-type: none"> • Re-use previously developed land, and seek environmental as well as development gains from the use of undeveloped land. • Protect, and where appropriate, enhance biodiversity through the protection of habitats and species and through creating new habitats through development. • Provide a network of multi-function accessible green space • Reduce the demand for and use of water and other natural resources, and reduce waste and increase the sustainable management of waste. 	

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
25. Draft East of England Plan > 2031 Draft revision to the Regional Spatial Strategy for the East of England (March 2010)	<p>This revised plan takes the region forward to 2031, deepens key policy areas including climate change, energy and waste and refreshes other policy areas including transport and economic development. Amendments include:</p> <ul style="list-style-type: none"> • The strategy seeks to bring about sustainable development by applying climate change adaptation and mitigation principles including the aim of achieving regional reduction in CO2 emissions to 60 per cent of their 1990 level by 2031. • The East of England is faced with rising sea levels, wetter winters, hotter drier summers, and more frequent extreme weather events. It is vital to plan and prepare for these changes whether in the design of buildings, the protection of vital infrastructure or maintaining the supply of drinking water. • A risk based approach should be applied to developing plans and policies. 		The DM Policies DPD should be consistent with and address issues raised within the Regional Spatial Strategy for the East of England. Although this plan is in draft it shows the intended direction of Go-East.	Addressed within whole SA framework.

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	<ul style="list-style-type: none"> • Authorities must develop sequential avoidance and mitigation strategies to protect the integrity of European sites. Particular pressures are water quality/ resource issues and recreational pressure. • The indicative net additional jobs that should be created in Norwich between 2011 and 2031 are 12,100. The RSS aims to support regeneration and its role in bio-technology. Cross boundary working is required to ensure that there is the most effective distribution of economic growth. • Employment opportunities at Norwich Airport should be safeguarded from other uses. • Norwich should be considered for additional provision to support financial and business services, agricultural and food production, environmental technologies and low carbon energy and the creative industries. • Provision should be made for an 			

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	<p>additional 37,000 dwellings from 2011 to 2031 in the Norwich Policy Area. At least 35% of all dwellings should be affordable subject to viability.</p> <ul style="list-style-type: none"> LDDs should consider the role that green infrastructure can play in the conservation, restoration and enhancement of important landscapes. LDDs should also set out clear delivery and implementation mechanisms to ensure green infrastructure is delivered. New development should be resilient to unavoidable climate change. Policies should set demanding, evidence based targets for carbon dioxide emission reduction from new development. They should also contribute towards the national aspiration of sourcing 12% of our heat from renewable sources by 2020. By 2015 at least 16% of the electricity consumed in the region should be generated from renewable 			

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	<p>sources, rising to at least 20% by 2020.</p> <ul style="list-style-type: none"> LDDs should specify water efficiency standards. <p>LDDs should plan to site new development so as to maximise the potential of existing water/waste water treatment infrastructure and minimise the need for new infrastructure.</p>			
<p>26. <i>Norfolk, Suffolk and Cambridgeshire Strategic Health Authority Health Strategy (Healthy Futures) 2005-2010</i></p> <p>http://www.erpho.org.uk/Download/Public/18962/1/EERA%2040%20RHS.pdf</p>	<p>East of England's first regional health strategy intended to improve the overall health of people in the region. The strategy has three main purposes:</p> <ul style="list-style-type: none"> To raise awareness of the issues surrounding the health of people in the East of England, and the extent of health inequalities. To demonstrate that responsibility for the health of people in the East of England is, genuinely, a shared one, and. To provide a basis for a meaningful dialogue – in both directions – between health care policy makers and professionals, and other public agencies and organisations operating 	<ul style="list-style-type: none"> To ensure that the social, economic and environmental foundations of healthy lifestyles are designed creatively into new and existing communities in the East of England, recognising the range of factors that contribute to health outcomes. To provide infrastructure and sustained support 	<p>The DPD should try to contribute to these outcomes.</p>	<p>Addressed within SA framework: SOC2</p>

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	in the East of England, in order to improve health within the East of England and to reduce health inequalities.	<p>to build social capital, particularly among those communities which are experiencing poor health outcomes, recognising the key role of family and community relationships and the need to support them.</p> <ul style="list-style-type: none"> • To make it possible for communities to 'choose health' positively and more easily, recognising the general importance of access, appropriate information and health literacy, but also harnessing the particular 		

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		<p>opportunities linked to the 2012 Olympics/Paralympics in encouraging healthy lifestyles.</p> <ul style="list-style-type: none"> • To ensure that children and young people in the East of England can get off to a healthy start in life, linking in with the National Service Framework for children, young people and maternity services, and recognising the 5 key outcomes set out in Every Child Matters (ECM) • To encourage better health for people in the East of England 		

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		<p>throughout their working lives, recognising the links between people's health and the range of experiences relating to work and workplaces, and worklessness.</p> <ul style="list-style-type: none"> To support people in the East of England in 'active ageing' and adding life to years, linking in with the National Service Framework for older people, highlighting the needs and opportunities linked to an ageing population, and recognising and supporting the 		

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		<p>contribution made by older people to all aspects of life in the East of England.</p> <ul style="list-style-type: none"> • To recognise and respond to the practical implications of international gateways for health and health inequalities within the East of England, acknowledging the needs and opportunities linked to increasing international mobility. • To harness the East of England's international position to 		

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		<p>encourage learning, knowledge development and research development for health, recognising the opportunities to learn from elsewhere.</p> <ul style="list-style-type: none"> To understand and plan for the impacts of climate change and the more sustainable use of resources within the region, in terms of health and health inequalities issues, embracing the imperative to formulate a clear regional response in terms of adaption and 		

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		mitigation and linking particularly to the first priority.		
27. <i>The Broads Plan (2004)</i> http://www.broads-authority.gov.uk/authority/publications/general-publications.html	The Broads Plan vision promotes walking, cycling, boat use and visiting historic sites, in a way that is environmentally sensitive and socially acceptable.		The DPD should promote the vision as set out in <i>The Broads plan</i> .	Addressed within SA framework: ENV1, ENV2, ENV4, ENV5, ENV6, ENV9, SOC2 and SOC7
28. <i>The Broads Core Strategy</i> http://www.broads-authority.gov.uk/planning/planning-policy/local-development-framework/core-strategy-dpd.html	<p>Policy CS10 – gateways and entrances between the Broads and settlements will be created and those already existing will be enhanced.</p> <p>Encourage regeneration initiatives in adjoining communities including through local plans and planning applications of adjoining districts.</p>	<ul style="list-style-type: none"> • Estimated no. of visitor days. • Estimated visitor spend. • Number of passengers on Broads Authority sustainable boat trips. 	The DPD should enhance/encourage the regeneration of the riverside.	Addressed within SA framework: ENV1, ENV2, ENV6 and SOC8
29. <i>Living with Climate Change in the East of England: Summary Report</i> http://www.sustainabilityeast.org.uk/pdf/Living%20with%20Climate%20Change%20Summary.pdf	<p>Threats</p> <ul style="list-style-type: none"> • Increases in flood risk. • Increases in subsidence. • Increases in water shortage. 		The DM Policies DPD should take account of the threats and opportunities resulting from climate change.	Addressed within SA framework: ENV2, ENV6, ENV7, and ENV8

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	<p>Opportunities</p> <p>By planning ahead we can avoid the worst impacts of climate change and take advantage of opportunities:</p> <ul style="list-style-type: none"> • Tourism. • Environmental technologies to deal with the impacts of climate change. • Live with the impacts of climate change in the long term, rather than fight against them in the short term. <p>The area Norwich lies in is:</p> <ul style="list-style-type: none"> • the least vulnerable area in terms of water supply deficiencies, subsidence and flood risk • the most likely area to benefit in the region as it offers opportunities in climate change terms, for housing and economic growth. <p>Planning for adaptation</p> <ul style="list-style-type: none"> • Keeping options open and flexible so that extra measures can be added in future. 		<p>The DM Policies DPD should promote efficient use of water resources, subsidence and flood risk.</p>	

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	<ul style="list-style-type: none"> Avoiding making decisions that make it more difficult to cope with climate change in future. Trying to find no-regrets options that deliver benefits whatever the extent of climate change. <p>Specific policy approaches</p> <ul style="list-style-type: none"> New development should be designed to cope with climate change eg increased flood risk. Existing development should be retrofitted where possible. Likelihood of increased air pollution problems and spread of pollution via flooding should be addressed. 			
<p><i>30. Woodland for Life: The Regional Woodland Strategy for the East of England (2003)</i></p> <p>http://www.woodlandforlife.net/wfl-rep/default.html</p>	<p>Vision: trees and woodland are widely recognized as high quality sustainable benefits to all who live and work in the East of England.</p> <p>Three relevant themes: (para 69)</p> <ol style="list-style-type: none"> How trees and woodland can improve the quality of life of 		<p>The DM Policies DPD should promote a network of green links tree planting associated with new development.</p>	<p>Addressed within SA framework: ENV2, ENV4, and SOC7</p>

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	<p>individuals (Quality of life).</p> <p>2. The places in which they live and work (Spatial Planning).</p> <p>6. Underpinning everything is the wider environment (Natural environment).</p> <p>Initiatives for the Urban Fringe and the Built Environment:</p> <ul style="list-style-type: none"> SP1 Promote sustainable developments set within well-designed green space of which trees and woodland play a functional part. SP2 Improve protection of existing woodland and trees. 			
<p>31. <i>Environment Agency Water Resources for the Future: A Strategy for the Anglian Region (2001)</i></p> <p>http://www.environment-agency.gov.uk/static/documents/Research/wr_anglia.pdf</p>	<p>Vision: Abstraction of water that is environmentally and economically sustainable providing the right amount of water for people, agriculture, commerce and industry and an improved water related environment.</p> <p>Relevant objectives: manage water resources in a way that causes no long term degradation of the environment.</p>		<p>The DPD should include water conservation measures.</p> <p>SUDs should be implemented in the area.</p>	<p>Addressed within SA framework: ENV2 and ENV8</p>

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	Strategy: demand management measures, including water conservation and waste minimisation measures for households.			
<p>32. <i>Towards Sustainable Construction – A Strategy for the East of England</i></p> <p>http://www.sustainabilityeast.org.uk/pdf/Towards%20Sustainable%20Construction%20-%20A%20strategy%20for%20the%20East%20of%20England.pdf</p>	<p>Quick Wins (relevant to planning)</p> <ul style="list-style-type: none"> • Reuse existing physical resources on-site to save on import and export costs. • Reduce waste in materials delivered to site. • Use sustainable urban drainage systems. • Plan and construct to protect and enhance site biodiversity. <p>High level aims and objectives:</p> <ul style="list-style-type: none"> • The aim of the strategy is to improve quality of life, environment and infrastructure for all the people of the region through the pursuit of more sustainable construction. 		The DM Policies DPD should promote sustainable construction.	Addressed within SA framework: ENV2, ENV4, ENV8, ENV9, SOC7
<p>33. <i>Sustainable Communities in the East of England</i></p> <p>http://www.communities.gov.uk</p>	<p>Key issues</p> <ul style="list-style-type: none"> • Addressing problems of high and 	<p>House prices</p> <ul style="list-style-type: none"> • Identifies Norwich as 	The DPD should address the key issues. The	Addressed within SA framework: ENV8,

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
/documents/communities/pdf/143600.pdf	<p>rapidly rising house prices.</p> <ul style="list-style-type: none"> Improving transport infrastructure to meet the needs of economic growth. Ensuring that the benefits of economic growth are spread across the region, particularly to those urban communities facing problems of deprivation and peripherality. Addressing the development consequences of scarce water resources throughout the region. 	having problems with transport infrastructure and deprivation.	importance of addressing deprivation in Norwich area is recognised at the regional level.	SOC1, EC1 and EC3
<p>34. <i>Towns and Cities Strategy – Urban Renaissance in the East of England</i></p> <p>http://www.inspire-east.org.uk/townsandcitiesstrategy_1.aspx</p>	<p>1.1 Value of Towns and Cities (Aim of Strategy and Action Plan).</p> <p>This is the East of England’s response to national policy in Urban White Paper and Sustainable Communities Plan. Its purpose to bring about urban renaissance in the East of England.</p> <p>Page 14 The strategy in outline examples provided of best practice in terms of different types of development across region.</p> <ul style="list-style-type: none"> People shaping the future of their community. Attractive, well-kept towns and cities. 		<p>The DPD should promote urban renaissance. Account should be taken of best practice in formulating policies</p> <p>The DPD should implement the strategy for an urban renaissance at the local level.</p>	Addressed within SA framework: ENV1, ENV5, SOC4, SOC7 and EC1

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	<ul style="list-style-type: none"> • Good design and planning which makes it practical to live in a more environmentally sustainable way. • Towns and cities able to create and share prosperity. • Good quality services. <p>Page 20 Towns and Cities type in the East of England Identified typical problems, opportunities and potential solutions facing urban centres in East Anglia:</p> <p>—</p> <p>Problems</p> <ul style="list-style-type: none"> • Achieving good building design, affordable housing + mix of uses. • Large daytime population influx. • Congestion. • Threat of loss of distinctiveness of local shops and services. • Lack of regeneration funding. • Historic building deterioration. <p>Opportunities</p> <ul style="list-style-type: none"> • Established centres with good public 		<p>The DPD should take account of identified problems and solutions in regional and sub-regional centres.</p>	

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	<p>transport.</p> <ul style="list-style-type: none"> • Distinctive character and history. • Industrial restructuring. • Growth of service sector. <p>Potential solutions</p> <ul style="list-style-type: none"> • Plans: area action plans, development briefs and masterplans for key sites. • Design competitions. • Image promotion. • Promoting distinctive character. • Public spaces in centres. • Promoting events and markets. • Living over the shop. 			
County plans and programmes				
<p>35. <i>Norfolk Community Strategy (Norfolk Ambition)</i></p> <p>http://www.norfolkambition.gov.uk/</p>	<p>Vision for 2023: "To improve the quality of life for all of the people of Norfolk". This means in 2023 Norfolk will be recognised as a county:</p> <ul style="list-style-type: none"> • where all individuals have the opportunity to achieve a good quality of life • where people enjoy healthy lifestyles 	<p>The strategy identifies a number of baseline indicators, based on the themes, which will be monitored to assess progress and will be addressed through</p>	<p>The DPD should implement the county wide vision at the local level in deprived areas. Baseline indicators could be used in Annual Monitoring of the DPD.</p>	<p>Addressed in SA framework: ENV2, ENV4, SOC2, SOC3, SOC5, SOC7 and EC1</p> <p>Indicators may be useful for</p>

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	<p>and have equitable access to high standards of health and social care</p> <ul style="list-style-type: none"> • where people in communities feel safe • with excellent educational attainment and opportunities for learning at all stages throughout life • where individuals from all backgrounds can play an active part in community life • where the high quality environment is respected and enhanced for everyone's enjoyment and is matched by a strong reputation for renewable energies • which is renowned for its culture, creativity and spirituality • with a distinctive economy characterised by innovative and dynamic businesses • where the physical and virtual communications infrastructure meets the needs of a forward-looking county. 	annual action plans.		monitoring SA effects.

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<p>36. Connecting Norfolk – Norfolk’s Transport Plan for 2026</p> <p>http://www.norfolk.gov.uk/view/NCC073526</p>	<p>Norfolk’s Transport Vision:</p> <p>A transport system that allows residents and visitors a range of low carbon options to meet their transport needs and attracts and retains business investment in the county.</p> <ul style="list-style-type: none"> • To bring about an improvement in the condition of Norfolk’s highway network. • Footways and cycleways of local importance should be kept in good condition to enhance use. • Increase journey time reliability, particularly for public transport. • Likely impacts on climate change on the highway network should be addressed with a risk based approach. • Transport decisions should take into account of the historic environment, landscape and biodiversity. • New development should be well 		<p>The DPD should support sustainable transport measures including, pedestrian, cycling and public transport, and help to locate new development in proximity to existing facilities to minimise the need to travel.</p>	<p>Addressed in SA framework: ENV1, ENV6, SOC8 and EC3</p>

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	<p>located and connected to existing facilities to minimise the need to travel and reduce reliance on the private car.</p> <ul style="list-style-type: none"> • Priority should be given to public transport, walking and cycling from new development sites to ensure sustainable economic growth. • Support a shift to more efficient vehicles, and the facilitation of the necessary infrastructure. • Enhance travel choice where options offer a viable alternative to single occupancy car travel. • Priority in town centres and urban area should be to reduce the level of traffic, i.e work with operators of buses to reduce emission levels in AQMAs. 			
<p>37. <i>Biodiversity – Supplementary Planning Guidance for Norfolk</i></p> <p>http://www.norwich.gov.uk/internet_docs/A-Z/Planning%20Policy/Biodiversity_SPG_adopted_Sept04.pdf</p>	<ul style="list-style-type: none"> • Need for on-site habitat surveys prior to development identified, particularly for riverside development. Case study 4 gives advice for a typical riverside brownfield site. 		Relate to priorities established for urban areas in UK Habitat Action Plan.	Addressed in SA framework: ENV2 and ENV4

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	<ul style="list-style-type: none"> Identifies protected species which may be found in Norwich. Gives advice on protection, enhancement and mitigation in relation to biodiversity, including promotion of green links. 			
<p>38. <i>Norfolk Housing Support Strategy 2011-2015 (Norfolk County Council, 2010)</i></p> <p>http://www.norfolk.gov.uk/view/ncc088651</p>	<p>Vision statement "To commission and ensure good quality housing support services. Housing support services should focus particularly on the prevention of loss of independence through helping people who are vulnerable to access suitable housing, retain their accommodation, live as independently as possible, and participate fully in the social and economic life of the community. These services should be available to people from all sections of communities."</p> <ul style="list-style-type: none"> Objectives to focus resources on needs and outcomes. To keep people that need services at the heart of the programmes. To improve our partnerships with other organisations including those which provide services. To improve the joint planning and delivery of services with other 		<p>Consider how the DPD can use land use policies to promote the provision of suitable housing with support services for vulnerable people and promote social inclusion.</p>	<p>Addressed in SA framework: SOC1 and SOC4</p>

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	<p>commissioners.</p> <ul style="list-style-type: none"> To increase efficiency and reduce bureaucracy. 			
<p>39. <i>Gypsies and Travellers Strategy for Norfolk (2005-2008)</i> Note, this is the most recent strategy available. http://www.equalbutdifferent.org.uk/pdfs/Norfolk%20strategy_for_gypsies_and_travellers.pdf</p>	<p>Vision: A Norfolk where Gypsies and Travellers have equality of opportunity with other members of the community to enable them to access services provided by agencies working together in an inclusive, cohesive and transparent manner.</p> <p>The objectives that will help to meet this vision are:</p> <ul style="list-style-type: none"> To standardise the method of collating data on Gypsies and Travellers to provide information to enable existing services to be reviewed and developed where necessary. To identify where new services are needed and how those services can be provided. To work with Gypsies and Travellers and local communities to promote better understanding and mutual respect. To work with the media to 	<ul style="list-style-type: none"> To strengthen links with Gypsies and Traveller communities. To establish more stopping places and to deal with Traveller matters in a fair and open way. To monitor the number of privately owned sites. Improve health status of Gypsies and Travellers. Increase school attendance by 3% over the 2003/4 baseline of all Travellers receiving TES support. 	<p>The DPD will need to consider the provision for Gypsies and Travellers.</p>	<p>Addressed in SA framework: SOC4</p>

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	encourage balanced coverage of Gypsies and Traveller issues.	<ul style="list-style-type: none"> The TES and Youth Service look to identify young Gypsies and Travellers who are: underachieving in education, not currently in education; offending or encountering prejudice from the community in which they live. 		
<p>40. Joint Municipal Waste Strategy for Norfolk 2006-2020</p> <p>http://www.norfolk.gov.uk/consultation/groups/public/documents/article/ncc049079.pdf</p>	<p>The key objectives that form the basis of the strategy are:</p> <ul style="list-style-type: none"> To reduce the growth in municipal waste by promoting waste reduction and reuse initiatives. To promote waste awareness through public education and awareness campaigns. To increase recycling and composting of waste to achieve 	Influenced by a number of key national policies and legislation. Targets used in the Waste Strategy can be used.	The DM Policies DPD should contribute to limiting waste arising and ensure adequate space for storage of waste for recycling etc.	Addressed in SA framework: ENV9

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	<p>statutory performance standards and national recycling and recovery standards.</p> <ul style="list-style-type: none"> • To progressively increase the recovery and diversion of biodegradable waste from landfill in accordance with the Landfill allowance Trading Scheme. • To deliver an efficient, effective and affordable waste management service that promotes the implementation of the most practical, social, environmental and economically acceptable solutions. • To procure appropriate technologies to manage and treat residual municipal waste. • To ensure that the way residual waste is treated will support practices higher up the waste hierarchy. • To minimise as far as possible the residual waste requiring treatment and final disposal, and • The Norfolk Authorities will work together to achieve the objectives 			

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	and actions within the waste management strategy.			
<p>41. <i>Learning Disability Employment Plan for Norfolk (2006)</i></p> <p>http://www.committees.norfolk.gov.uk/papers/cabinet/cabinet290304/cabinet290304item18apdf.pdf</p>	<p>Develop the employment plan and enable more people with learning difficulties to participate in all forms of employment and to make sure services help people to do the jobs and activities they want.</p>	<p>Develop policy for payment/employment rights for people doing work in day services and focus on monitoring progress.</p>	<p>The DPD should support the aim of this Plan and promote equality for those with disabilities.</p>	<p>SA framework does not cover learning disabilities explicitly but partially addressed by SOC3 and SOC6</p>
<p>42. <i>Shaping the Future: The Economic Development Strategy for Norfolk: 2001 – 2010 Note, this is the most recent strategy available.</i></p>	<p>Targets established to increase economic development throughout Norfolk for:</p> <ul style="list-style-type: none"> • growth rate • employment • business creation • qualifications. 	<ol style="list-style-type: none"> 1) Raise the annual average rate of growth over the period 2001 – 2010 from 23% to 28%. 2) Employment: Create by 2010 an additional 7,500 jobs above the projected figure of 372,000. 3) Unemployment in Norfolk should be no higher than the mid-point between the East of England and the UK as a whole. 4) Business creation: Achieve a mid-point between East of England and 	<p>Explore whether the DPD can facilitate in achieving parts of these targets.</p>	<p>Addressed within SA framework: SOC6 and EC1</p>

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
		England. 5) NVQ-level 3 qualifications up to 54% in 2010.		
<p>43. <i>Tomorrow's Norfolk, Today's Challenge – A Climate Change Strategy for Norfolk (2008)</i> <i>Note, this is the most recent strategy available.</i></p> <p>http://www.norfolkambition.gov.uk/consumption/groups/public/documents/article/ncc063866.pdf</p>	<p>To cut carbon emissions by reducing energy consumption and promoting a shift to low-carbon technology (<i>mitigation</i>).</p> <p>To improve Norfolk's resilience to the changing climate, including reduction of the socio-economic and environmental risks associated with flooding and coastal erosion (<i>adaptation</i>).</p>	<p>Norfolk LAA target is an 11% reduction in CO2 emissions across Norfolk by 2011.</p> <p>LAA target is to reach Level 3 of the Government's performance framework by 2011.</p>	<p>The DPD should consider means for reducing emissions and designing / locating development that deals with the risks from climate change.</p>	<p>Addressed within SA framework: ENV6 and ENV7</p>
<p>44. <i>Norfolk Action - Norfolk's Local Area Agreement 2008-11 (2008)</i></p> <p>http://www.norfolkambition.gov.uk/consumption/groups/public/documents/article/ncc063700.pdf</p>	<p><i>Note that the central government requirement for local areas to have a Local Area Agreement ended in October 2010. The performance reward grant linked to the LAA was withdrawn and the requirement to prepare a third Local Area Agreement, to commence in April 2011, was ended.</i></p>			
LOCAL PLANS AND PROGRAMMES				

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
<p>45. Greater Norwich Economic Strategy 2009-14 http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/GNDP_Economic_Strategy.pdf</p>	<p>This strategy sets out the economic vision and priorities for the Greater Norwich area. It explains how the effects of the recession can be minimised and equips the area to flourish in the subsequent recovery. It offers detailed plans to drive future job growth and nurture new employment sectors. It also identifies the infrastructure improvements needed to support all of this.</p> <p>Vision:</p> <p>"Greater Norwich will be recognised as one of England's major city regions with a rapidly growing diverse and sustainable economy providing all its residents with opportunities and a great quality of life."</p> <p>Objective 1: Enterprise - To strengthen the area's economy, maximise diverse employment opportunities and ensure that businesses can flourish</p> <p>Objective 2: People and Skills - To improve the skills of the labour force to ensure that it matches the needs of existing and potential employers and local people benefit from job growth</p> <p>Objective 3: Infrastructure for Business - Ensure that the area has the necessary infrastructure and quality of environment to attract and retain investment and support business growth</p>	<ul style="list-style-type: none"> • New business start-up rate (as % business stock). • Proportion of the workforce in knowledge driven sectors (Eurostat Definition). • New business survival rate after 3 years. • Overall employment rate. • Working age people on out-of-work benefits. • Employment in rural area. • % of working age population at level 2+. • % of working age population at level 3+. • % of working age population at level 	<p>The DM Policies DPD should:</p> <ul style="list-style-type: none"> • Improve access to jobs. • Provide facilities and services for all. • Protect and enhance the natural and built environment. • Encourage economic development. • Promote sustainable development. 	<p>Addressed in SA framework: ENV4, ENV5, SOC6, SOC8, EC1, EC2, EC3 and EC4</p>

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	<p>Objective 4: Profile and Investment - To raise the profile of Greater Norwich as a high quality place to live work and visit.</p>	<p>4+</p> <ul style="list-style-type: none"> • Median earning of employees in the area • % employed in higher occupations (managers, and senior officials, professional occupations and associate professionals and technical occupations) • Amount of floorspace developed for employment by type • Amount of employment land lost to residential development • National retail ranking for Norwich – CACI 		

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
		Retail Footprint <ul style="list-style-type: none"> • Number of Evolutive property searches in Greater Norwich area • Number of international students studying at UEA and NUCA • Number employed in tourism industry 		
46. JCS for Broadland, Norwich and South Norfolk, Adopted March 2011	Sets out long term development strategy and policies for the greater Norwich Area up to 2026. Strategic Objectives: <ul style="list-style-type: none"> • To minimise the contributors to climate change and address its impact. • To allocate enough land for housing, and affordable housing, in the most sustainable settlements. • To promote economic growth and diversity and provide a wide range of jobs 	Identify sites for at least 47,500 new homes between 2001 and 2026. Target for growth in employment to provide 27,000 new jobs between 2008 and 2026.	The JCS is a key plan within the local plan. The DPD has to be in accordance with the JCS.	Addressed in whole SA framework.

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	<ul style="list-style-type: none"> • To promote regeneration and reduce deprivation • To allow people to develop their full potential by providing educational facilities to support the needs of a growing population. • To make sure people have ready access to services. • To enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact. • To positively protect and enhance the individual character and culture of the area. • To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of nature habitat or nature conservation value. • To be a place where people feel safe in their communities. • To encourage the development of healthy and active lifestyles. • To involve as many people as 			

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	possible in new planning policy.			
<p>47. City of Norwich Replacement Local Plan (2004) http://www.norwich.gov.uk/apps/local_plan/plan_index.htm#links</p>	<p>Sets out the strategic vision to 2011 where the JCS has now replaced this document. However, there are a number of policies that are saved and are still in use alongside the JCS.</p> <p>Strategic Objectives:</p> <ul style="list-style-type: none"> To establish Norwich as a dynamic regional centre with a strong local economy which continues to create wealth and jobs to meet the needs of local people. To create conditions for sustainable long term regeneration of the City, taking account of the needs of the present population without threatening the viability of the environment or service on which future generations will depend. To protect and enhance the City's assets, including its natural environment, its heritage, its character and its economic vitality. To ensure that development contributes to a healthier 	<p>Proportion of A1 retail uses shall not fall below 85% within the Primary Retail Area (unless proposed Class A3 uses would have a beneficial effect on the vitality and viability of the area).</p> <p>Use class A1 uses shall not fall below 60% within the District and Local Centres, defined on the proposals map.</p>	<p>Although the Local Plan has been superseded by the JCS, there are a number of Local Plan policies that are still in use and the DPD has to be in accordance with these policies.</p>	<p>Addressed in whole SA framework.</p>

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	<p>environment and one that enables people to feel secure.</p> <ul style="list-style-type: none"> To promote equality of opportunity in all aspects relevant to spatial planning. To promote a 'well connected' City for all residents and visitors, using a choice of modes of transport as well as through telecommunications. To ensure that resources are used in a sustainable manner. To involve people in the changes affecting the City. 			
<p>48. GNDP, Greater Norwich Employment Growth and Sites and Premises Study (2008)</p> <p>http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/3.Final-Report.pdf</p>	<ul style="list-style-type: none"> Supporting the growth of the knowledge economy. Improving transport links. Changing the perceptions of Norwich (e.g. the city has a strong well known cultural and historical heritage but also strong lesser known finance and life sciences sectors). Attract inward investment with key sector growth opportunities. Ensure the provision of employment land and premises. 	<p>30,000 jobs forecast between 2006-2026 in the greater Norwich area.</p> <p>Baseline forecast an additional 250ha of employment land will be required by 2026, including 126ha of B1 and 124ha for B2 and B8 uses.</p> <p>Potential to expand the science based industry by 4,000 jobs by 2026.</p> <p>3,200 increase in construction jobs is</p>	<p>The DPD should:</p> <ul style="list-style-type: none"> Support the growth of the economy. Improve transport links. Attract inward investment. Ensure there is a supply of land for employment use. 	<p>Addressed with SA framework: SOC6, SOC8, EC1, EC2 and EC3</p>

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	<ul style="list-style-type: none"> Prioritise sectors for support. Greater provision of sites for smaller and start-up businesses. 	forecasted by 2026.		
<p>49. <i>Sport England, Sports Hall Provision in Norwich (2011)</i> http://www.norwich.gov.uk/CommitteeMeetings/Sustainable%20development%20panel/Document%20Library/6/SportsHallprovisionNorwichV20111019.pdf</p>		<p>Norwich has an oversupply of +2.14 courts</p> <p>Utilised capacity of sports halls is 73.1%.</p>	Not a strong case for additional sports hall facility provision in Norwich at the present time, but there is stronger evidence for not losing any existing facilities.	Addressed within SA framework: SOC2 and SOC8
<p>50. <i>GNDP, Green Infrastructure Strategy (2007)</i></p>	Looks to establish a strategy for green infrastructure that will complement and support good quality housing and substantial economic growth by providing high quality, accessible green infrastructure within a comprehensive landscape structure; promoting ecological networks and continuity and links between habitats; improving quality of life; helping to address climate change; improving access to habitats and green space; and encouraging community wellbeing.		The DPD should protect, and where appropriate, enhance biodiversity through the protection of habitats and species and through creating new habitats through development.	Addressed in SA framework: ENV2, ENV4 and EC4
<p>51. <i>GNDP, Greater Norwich Green Infrastructure Delivery Plan (2009)</i></p>	Focusing on growth areas and the connections with Norwich city this plan identifies a robust methodology to		The DPD should seek to protect and enhance biodiversity through the protection of habitats and	Addressed in SA framework: ENV2, ENV4 and EC4

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	<p>prioritise Green Infrastructure projects. Green Infrastructure Priority Areas (GIPAs) have been developed as a refinement of some of the GI corridors in the 2007 study and have reflected the more detailed biodiversity information and the known locations for strategic growth. A detailed profile has been produced for each of five GIPAs.</p> <p>The Delivery Plan also reviews the existing arrangements for managing open space. It examines the three main options for future management: local authority, private management companies and trusts.</p>		species especially in the green infrastructure priority areas.	
<i>52. Partnership of Norfolk District Councils – Strategic Flood Risk Assessment (2008)</i>	<p>Ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Where new development is, exceptionally, necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and where possible, reducing flood risk overall.</p>		Consider the implications of flood risk for development.	Addressed in SA framework: ENV7
<i>53. Norwich City Council Strategic Flood Risk Assessment</i>	<p>A more detailed level 2 SFRA has been done for Norwich to enable a detailed assessment of flood risk and its</p>		Consider the implications of flood risk when	Addressed in SA framework: ENV7

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
<i>level 2 (2010)</i>	<p>implications for development. It concludes that:</p> <ul style="list-style-type: none"> • Flood risk in Norwich is mainly fluvial, though there are tidal influences; • Some areas within Norwich are in flood zone 3 (1 in 100 year risk of flood and above); • An extreme 1000 year event results in significant flooding adjacent to the Wensum (zone 2); • Flood risk defences give a degree of protection from flood in the area of the Cathedral Close and must be maintained, with developer contributions as appropriate; • Regional housing targets cannot be met through development in zone 1 only; • All development proposed in zones 2 and 3, must comply with limitations on uses in government policy in PPS25, must be accompanied by a flood risk assessment and must mitigate impacts of flooding. This 		developing policies for the DPD.	

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	includes SuDS and might also include raised floor levels and other attenuation schemes as appropriate. The study also gives detail on flood hazard to assess development potential.			
54. <i>Norwich City Destination Strategy 2004</i> http://www.norwich.gov.uk/YourCouncil/Documents/TourismStrategy.pdf	<p>Priorities for strategy:</p> <ul style="list-style-type: none"> • Enhance facilities for residents and develop pride in city. • Build on strengths – heritage, retail, culture, events, night time economy, sports and leisure, business tourism. • Attract new visitors from UK and Europe: promote high value tourism, business tourism and increase overnight stays. • Promote Image and co-ordination between bodies in partnerships. • Need to promote Norwich as a “living city” rather than a “show city” + develop “sense of place”. • Address constraints: labour availability and levels of investment. 		The DM Policies DPD should help to promote Norwich as an attractive City and develop pride in the city.	Addressed in SA framework: ENV5, SOC5, SOC6, SOC7, EC1 and EC2
55. <i>Greater Norwich Housing</i>	Strategic aims:		The DPD should seek to	Addressed in SA

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
<p><i>Strategy 2008-2011</i></p> <p>http://www.south-norfolk.gov.uk/democracy/866.asp</p> <p><i>Note that South Norfolk District Council's website states they are currently producing a Housing Strategy for 2011-2016. It's not clear if it will be for Greater Norwich. Norwich City Council's housing webpage only has links to the 2008-2011 Strategy, with no reference to a more up to date one.</i></p>	<ul style="list-style-type: none"> • Moving towards a balanced housing market. • Building sustainable and thriving communities. • Maximising opportunities for delivering more affordable housing. • Achieving decent, healthy and environmentally sustainable homes across all tenures. • Providing choice and fair access to services. • Delivering outcomes through effective partnership working. 		<p>maximise the provision of affordable housing and encourage environmentally sustainable housing developments and enhanced accessibility for tenures.</p>	<p>framework: SOC1, SOC4 and SOC5</p>
<p><i>56. Norwich Area Transportation Strategy</i></p> <p>http://www.norfolk.gov.uk/consultation/idcplg?IdcService=SS_GET_PAGE&nodeId=3682</p>	<p>Vision: To provide the highest possible level of access to and within the strategy area to benefit people's individual needs and enhance the economic health of the strategy area. To ensure that journeys minimise any adverse impact on people and the built and natural environment.</p> <p>Overall objectives of strategy:</p> <ul style="list-style-type: none"> • Promote a vibrant city centre, and other commercial centres, by improving accessibility for people 		<p>Consider the need for policies that address the vision and objectives.</p>	<p>Addressed in SA framework: ENV1, ENV2, ENV3, ENV6, SOC1, SOC5, SOC6, SOC8, EC1, EC3,</p>

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	<p>and goods.</p> <ul style="list-style-type: none"> • Cater for the travel consequences arising from growth aspirations, including the airport. • Maximise transport choice for all travellers. <p>Other main objectives:</p> <ul style="list-style-type: none"> • Reduce social exclusion. • Enhance access for non-car modes. • Reduce the need to travel. • Reduce congestion and pollution. • Promote economic vitality. • Maximise safety and security. <p>Action plan:</p> <ul style="list-style-type: none"> • Through traffic to be managed more efficiently + removed from city centre when NDR complete, along with inner ring road improvements. • Further development of travel plans. • Walking + cycling – identify and improve core networks. • Public transport – focus on bus priority where effected by 		<p>Consider how action plan measures should be promoted through policies within the DPD.</p>	

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	congestion.			
<p>57. <i>Norwich's Environmental Strategy 2011-2014</i></p> <p>http://www.norwich.gov.uk/Environment/EcoIssues/Documents/EnvironmentalStrategy.pdf</p>	<p>Objectives:</p> <ul style="list-style-type: none"> Increasing energy efficiency in council-owned properties. Promotion of domestic energy efficiency. Reducing disposal of waste to landfill. Increasing recycling. Prevention of groundwater pollution and contamination of the land. Protection and enhancement of biodiversity. 		Consider how the objectives can be promoted through policies in the DM Policies DPD.	Addressed in SA framework: ENV2, ENV4, ENV6, ENV9 and EC4
<p>58. <i>Biodiversity Action Plan for the City of Norwich</i></p> <p>http://www.norwich.gov.uk/intranet_docs/A-Z/Green%20Spaces/Biodiversity%20Action%20Plan%20for%20the%20City%20of%20Norwich%204.pdf</p>	<p>Relevant objectives:</p> <p>To identify and document natural resources (habitats and species) present in the city.</p> <p>To establish actions and targets for all partners in order to protect and enhance biodiversity within the city taking into account both national and</p>	<p>Promoting Local Biodiversity</p> <p>Identifies local biodiversity habitats and objectives for each:</p> <ol style="list-style-type: none"> 1. Churchyards – maintain, protect and promote for wildlife. 2. Parks (Gildencroft) – 	The DPD should protect biodiversity habitats from development and create new ones where possible when new development occurs, particularly through the provision of green links and street	Addressed in SA framework: ENV2, ENV4 and EC4

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	<p>local priorities.</p> <p>To monitor progress by establishing a long term monitoring and review programme.</p>	<p>manage to benefit wildlife.</p> <p>3. The River Wensum- improve wildlife value.</p> <p>4. The city wall – chemical free wildlife friendly maintenance.</p> <p>5. Wildlife corridors – maintain and protect.</p> <p>Also identifies the importance of domestic gardens and street trees in promoting biodiversity.</p>	trees.	
<p>59. <i>Greater Norwich Homelessness Strategy 2011-2014</i></p> <p>http://www.norwich.gov.uk/Housing/HousingStrategies/documents/GNHomelessnessStrategy.pdf</p>	<p>Vision:</p> <p>To prevent and respond to homelessness by ensuring the provision of a range of effective targeted services that are responsive to customer needs.</p> <p>Aims:</p> <ul style="list-style-type: none"> • Deliver early intervention to prevent homelessness. • Placing the customer at the centre of 		The DPD should help to provide housing to people at risk of becoming homeless.	The SA framework does not explicitly cover homelessness, however, SOC4 indirectly addresses it.

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	<p>service delivery.</p> <ul style="list-style-type: none"> Maximising resources and effecting partnership working. Provide a wide range of sustainable housing solutions to people at risk of being homeless. 			
60. <i>Northern City Centre Area Action Plan (Adopted March 2010)</i>	Detailed policies and proposals are set out in the AAP, including site specific allocations.	A number of targets and indicators are set out to assess progress of plan.	The DPD should promote the regeneration of Northern city centre area.	Addressed in SA framework: SOC4, EC1
61. <i>Norwich Community Safety Strategy and Audit Report Note this is the most recent version of this strategy.</i> http://www.norwich.gov.uk/internet/docs/A-Z/Community/Community_Safety_Strategy.pdf	Increase community safety and make Norwich a city that is attractive to live in, work in and visit by working together with a wide range of organisations and the community to tackle crime and disorder.	<p>The Norwich Community Safety partnership has agreed the following targets for the period 2005-2008</p> <ul style="list-style-type: none"> To reduce crime in Norwich by 21% by 2007-08 	Consider how the DM Policies DPD can contribute to lowering the targets set out by the report.	Addressed in SA framework: SOC5
62. <i>Norwich Sustainable Communities Strategy 2008-2020</i>	<p>To work together to enable Norwich to be recognised as a model city of:</p> <ul style="list-style-type: none"> economic growth and enterprise 	The strategy identifies a number of baseline indicators based on the	Consider how the DM Policies DPD can promote the identified themes	Addressed in SA framework: ENV1, ENV2, ENV3, ENV4,

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
http://www.norwich.gov.uk/You/Council/CityOfNorwichPartnership/documents/Sustainablecommunitystrategy.pdf	<ul style="list-style-type: none"> • environmental excellence • culture and creativity • safe and strong communities • health and well-being • learning and personal development. <p>Key objectives are:</p> <ul style="list-style-type: none"> - to help enterprise flourish - to raise aspirations, skills and achievement - to develop the right infrastructure business - to raise Norwich's profile - to promote the well-connected city through sustainable transport 	objectives which will be monitored to assess progress.	achieve objectives.	ENV5, ENV6, SOC2, SOC3, SOC5, SOC6, SOC8, EC1, EC2, EC3, and EC4
<p>63. <i>Norwich River Valleys Strategy 2001</i></p> <p>www.norwich.gov.uk</p>	<p>The main areas of concern to achieve maximum benefit applicable to the strategy are:</p> <ul style="list-style-type: none"> • Implementing the strategy. • Environmental and landscape improvements, wildlife and wildlife and habitat protection and enhancement. 	Achieve sustainability through enforcing actions on the objectives and monitoring them.	Consider how the objectives can be promoted through policies within the DPD.	Addressed in SA framework: ENV1, ENV2, ENV4, ENV6, SOC2, SOC7, SOC8, EC4

Document title	Key relevant objectives	Key relevant targets and indicators	Implications for DM Policies DPD	Implications for SA
	<ul style="list-style-type: none"> • Access, and • Education and Interpretation. 			

Appendix 4: Reasonable alternative policies

The table in this appendix lists the alternative policy options put forward by Norwich City Council in the DM Policies DPD and LUC's sustainability commentary on each of these. Where Norwich City Council have put forward business as usual (BAU) as an alternative (i.e. having no DM policy and instead relying on existing policy and guidance), the sustainability effects have already been appraised as a baseline scenario within Section 5 of the SA Report and are not repeated here. The description of each reasonable alternative also sets out why it was not preferred by Norwich City Council over the policy proposed in the DPD.

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
Environmental design		
DM1 - Achieving and delivering sustainable development	It is considered that the only reasonable alternative is not to have Policy DM1 and to rely on the NPPF and the overall vision and objectives of the JCS. It is considered that DM1 is necessary because its objectives provide a local interpretation of the NPPF presumption in favour of sustainable development and Policy DM1 is cross referenced in several other policies of the plan. Bullet point 3 is particularly important in emphasising the need to reduce car dependency and the overall need to travel, and gives other policies (especially DM28 on sustainable transport and DM25 on the location of retail warehousing) additional force.	Sustainability of BAU policy framework is assessed in Section 5.
DM2 - Amenity	One alternative option is to have no policy or guidance on protecting the amenity of existing and future occupiers. This would not reflect the emphasis of previous national planning policy of the precautionary principle of identifying and addressing potential problems before they arise. Not having any coverage of amenity considerations in development is considered to have substantial risks since neither the NPPF nor the JCS contain detailed amenity standards suitable for use at a local level, albeit that the need for a good standard of amenity is addressed in general terms by the NPPF	Sustainability of BAU policy framework is assessed in Section 5.
	A second alternative is to have no detailed guidelines for internal space standards and to determine all applications on a case by case basis. It is considered that the internal space standards represent an appropriate and achievable guideline to ensure that all new homes have sufficient space for comfortable and flexible living. These standards are appropriate for urban areas with comparable standards being set out in the London Housing Design Guide and by the RIBA.	Removing guidelines for internal space standards may result in proposals not sufficiently addressing the need to ensure sufficient provision of space and facilities to enable residents to live comfortably and conveniently (negative effect on SOC2, SOC4 and SOC7). Removing the guidelines may also result in a slower development management process as applications may need to go through a greater degree of alteration before they are deemed acceptable.
	A third option concerns external amenity space for residential developments. An alternative would be to set guidelines for external space standards and prohibit conversions to residential use where these standards were not met. This approach is likely to be overly restrictive and limit opportunities for the beneficial use of upper floors of commercial premises within the city centre and in local and district retail centres. It might also discourage development which promoted regeneration or safeguarded the future of heritage assets.	Provision of standards for external amenity space would provide developers with greater certainty as to the requirement of DM2 for 'appropriate' external amenity space and help to ensure that the benefits of such space were secured for residents (positive effects on ENV5, SOC2, SOC4, SOC7). However, such a requirement could make it more difficult to achieve housing growth targets and city centre regeneration (e.g. through conversion of upper floors of commercial

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
	Consequently this approach would be likely to conflict with national policy, the JCS and other policies within this plan which seek to prioritise regeneration and enable beneficial mixed use development.	premises) or conservation of heritage buildings by bringing them back into appropriate use and could have adverse effects on the efficient use of land (negative effects on ENV5, ENV9, SOC4).
DM3 - Design principles	The alternative options include more prescriptive standards. This option would not support the approach for having flexible criteria-based guidelines that allow for site specific considerations to be taken into account in securing high quality sustainable design.	The exact nature of the standards would shape the potential sustainability effects arising from this policy. Including more prescriptive standards may compromise the potential for site specific characteristics and considerations to effectively be considered to ensure design principles are adopted that suit the site (e.g. the layout of a development should make efficient use of land and maximise the potential for energy efficient measures; if standards are too prescriptive, the potential for these positive sustainability effects may be minimised with negative effects on ENV6, ENV9).
	In relation to green design, consideration has been given to more stringent standards of green design, including mandatory requirements for green and brown roofs and wildlife-friendly features across the city as a whole or in selected areas. In particular, requiring enhanced green design standards within the "green opportunity corridors" identified as part of the Norwich Green Grid in the Green Infrastructure Study may have offered more scope to enhance ecological networks and facilitate the migration of wildlife. Practical difficulties in identifying the precise boundaries of these corridors and considerations of the potential cost burden on developers have discounted this option. However, the requirement for enhanced standards of green design as part of flood resilience measures within the critical drainage areas will contribute positively to flood mitigation and is required to combat the significantly greater risk of flooding from surface water runoff identified in technical evidence from the Surface Water Management Plan.	This option would potentially secure more of the multiple benefits associated with green infrastructure provision, including improvements to landscape/townscape, biodiversity and open space (positive effects on ENV4, ENV5, SOC2, SOC7). At the same time, the cost burden on developers could threaten the viability of some housing provision and increase the time needed to secure planning permission because of uncertainties regarding the boundaries of green opportunity corridors (negative effects on SOC4).
	The other alternative is to have no standards, and rely on national policies and the JCS. This approach would not provide design criteria specific to Norwich which are detailed enough to ensure that local distinctiveness and local concerns form a key consideration when determining planning applications.	Sustainability of BAU policy framework is assessed in Section 5.
DM4 - Renewable	The option of not having a policy to set out the criteria that will be applied in assessing applications for renewable energy proposals would be contrary to	Since the no policy option is contrary to the NPPF, it is not considered to constitute a 'reasonable alternative' within the meaning of the SEA

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
energy	national policy in the NPPF. No other alternatives were considered.	Regulations and does not, therefore, require appraisal. It is nevertheless assessed in Section 5 in order to establish the BAU policy baseline against which the proposed policy has been assessed.
DM5 – Flooding	The alternative option is to rely on national planning policy and the JCS. This approach would not take account of all types of flooding including specific local issues and concerns and would not provide the necessary level of detail on fluvial, tidal and surface water flooding, sustainable drainage and surfacing materials which are necessary at a local level.	Sustainability of BAU policy framework is assessed in Section 5.
DM6 – Natural environmental assets	A second option is to provide stronger protection for Norwich’s environmental assets and to prohibit any form of development within national, regional and local sites or the Yare Valley character area. This approach would rule out all development, some of which may be appropriate and acceptable within these areas, and would not comply with the NPPF’s presumption in favour of sustainable development.	This option would provide a greater degree of protection for designated environmental assets and green infrastructure protection areas (positive effect on ENV4, ENV5); however, it may be the case that treating these areas as ‘no go’, whilst ensuring these areas are protected, may result in undesignated environmental assets being negatively impacted as development is squeezed into a smaller area (negative effect on ENV4, ENV5). In addition, as stated, preventing development within valued areas of natural environment may prevent enhancement of green infrastructure assets or improvements to their accessibility and use for outdoor recreation (negative effects on ENV4, ENV5, SOC2).
	A third option is to have a single policy on the management of green infrastructure as opposed to its separate aspects being addressed by DM3, DM6 and DM8. This approach would have the benefit of consolidating all relevant issues together; however it might result in an over lengthy, complex and confusing policy.	This option is essentially a change of presentation rather than substance and would therefore have the same sustainability effects as the proposed policies.
DM7 - Trees and development	An alternative option would be to not have a policy on trees and development and to rely on national planning policy and circulars. This may result in the unnecessary loss of trees and significant hedge and shrub masses, the damage of trees during development and a lack of the provision of new trees as part of development proposals.	Sustainability of BAU policy framework is assessed in Section 5.
DM8 - Open space	An alternative option would be to not provide detailed guidance on the protection and provision of open space. This would not achieve the aims of national policy to deliver new and enhanced open space to meet community	This option may result in inadequate provision and protection of open space (negative effect on SOC2 and SOC7). As such it is considered to be contrary to PPG17 and is not a reasonable alternative. It is

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
	needs in the NPPF.	nevertheless assessed in Section 5 in order to establish the BAU policy baseline against which the proposed policy has been assessed.
	A second option is to provide stronger protection and insist that all existing areas of open space are retained in perpetuity; however this may result in the persistence of areas of open space which are undersized, impractical, difficult to put to an effective recreational or other use and not cost effective to maintain at public expense. In these circumstances open space is more likely to become unsightly, neglected and disused. It would also reduce opportunities to improve local recreational facilities if these are offered by new development.	This option would provide a greater degree of protection for existing open space (positive effect on SOC2 and SOC7). However, it is important that existing provision of open space makes the most efficient use of space, such that where open space provision does not meet local need (e.g. because of its location), these spaces should be made available for other uses, otherwise negative effects may result on the efficient use of land (ENV9).
	<p>New open space and the enhancement of existing open space is expected to be delivered mainly through the community infrastructure levy and as such options are limited. The open space needs assessment which was carried out in 2007, set out that development is expected to provide 5.69 ha of open space per 1000 people. The study acknowledges that within city centre locations, it is unlikely that significant provision could be made on site because of lack of space available and as such financial contributions will be sought for off-site facilities through a S106 agreement. As this study was carried out before the introduction of the community infrastructure levy this option has been discounted.</p> <p>The only reasonable alternative approach for the provision of open space could be to require on-site child play space and informal open space on smaller development than currently proposed within the policy, however, this may result in some developments becoming unviable and may result in pockets of open space which are not used due to their size and location.</p>	The requirement for on-site child play space and informal open space on smaller developments would support higher levels of provision of open space (positive effect on SOC2 and SOC7), but as stated, this may result in some developments becoming unviable (negative effect on SOC4) and may result in provision of open space that does not meet the requirements of residents (negative effect on SOC7).
DM9 - The historic environment and heritage assets	The alternative option is to have no policy on locally identified and non identified heritage assets and to rely on the NPPF, national guidance and the JCS. This would not reflect the local distinctiveness of Norwich's history and would not provide enough detail to supplement national and local strategic policies. This approach may result in the significance of many of Norwich's heritage assets being lost or harmed.	Sustainability of BAU policy framework is assessed in Section 5.
DM11 - Environmental	An alternative option is to not have a policy on the management of environmental hazards and to rely on national advice. It is considered that the	Sustainability of BAU policy framework is assessed in Section 5.

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
hazards	<p>policy is required to supplement national policy as it sets criteria to ensure that the potential for ground contamination, air and water quality and noise, and any risks arising are properly assessed where it is appropriate to undertake that assessment through the planning process and that development, where necessary, incorporates measures to deal with risks.</p> <p>There are no reasonable alternatives with regard to Health and Safety Executive Areas and subsidence as national policies and the JCS do not provide sufficient guidance on these important issues.</p>	
Communications		
DM10 - Communication s infrastructure	An alternative option is to have no policy on communications infrastructure and to rely on national policy and guidance and other policies within this plan. This would be contrary the provisions of the NPPF which makes clear that local plans should include proper consideration of communications infrastructure issues. The absence of a detailed policy may result in the development of communications infrastructure having an unacceptable impact on the character and appearance of an area, residential amenity or highway safety.	Sustainability of BAU policy framework is assessed in Section 5.
	A second alternative is to have a more restrictive policy. This approach may not allow enough flexibility for the efficient development of the network and the demands imposed by the technology and would run counter to the advice in the NPPF for policies which help to support the delivery of high quality communications infrastructure.	The exact nature of the policy wording would shape the potential sustainability effects arising from this policy. As stated, having a heavily prescriptive approach may not allow for efficient development of the network to meet need (negative effect on EC3)
Housing		
DM12 - Principles for all residential development	The alternative option is to omit detailed criteria on residential development. This would mean relying on national guidance in the NPPF, the JCS and other policies within this plan. It is not considered that these would provide sufficient detail to address the housing need in Norwich, would not meet the requirement of the NPPF for detailed policies to guarantee the delivery of a wide choice of quality homes and set out local requirements and standards for meeting	Sustainability of BAU policy framework is assessed in Section 5.

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
	housing need.	
DM13 - Flats, bedsits and larger houses in multiple occupation (HMOs)	One alternative option is not to have a separate policy on the conversion of buildings to flats, HMOs and residential institutions and to rely on policy DM12, other policies within this plan and national guidance. It is considered that a separate policy is appropriate as this form of development has particular impacts and implications over and above those of purpose built and general needs housing. It is important that any proposal for this form of development takes into consideration its impacts on the surrounding area and ensures high standards of amenity for prospective occupiers and immediate neighbours.	Sustainability of BAU policy framework is assessed in Section 5.
	An alternative approach is to manage this form of development more systematically by applying percentage limits on the number of properties which can be converted to institutions or forms of multiple occupation, to ensure that these do not become over-dominant in any one street or area. It is considered that this approach would not allow sufficient flexibility to deal with individual cases or take account of the character and context of different parts of the city, and may be difficult to monitor. Such an indiscriminate policy approach could not readily distinguish between the widely differing impacts of different kinds of communal development, but there is a risk that it might be used to impose value judgements about the generic impact of one particular form of multiple occupation, such as student housing, when there would be no basis in planning law to do so. This being so it is considered more appropriate to determine applications on a case by case basis by reference to a criteria-based policy.	This alternative option would ensure that HMOs and residential institutions do not over-dominate, helping to secure balanced communities (positive effect on SOC4 and SOC5) but having a more inflexible policy approach may mean that housing provision does not efficiently meet the need for this type of accommodation (negative effect on SOC4).
	In relation to residential institutions, a third approach would be to adopt a more restrictive policy prohibiting any form of institutional development on allocated housing land as proposed in the draft version of this plan. Sites allocated for general needs housing may also offer particular locational advantages for institutional development. A total embargo would unreasonably restrict choice and fail to implement policy 7 of the JCS in relation to meeting identified elderly care needs in Norwich. To allow flexibility, it is considered more appropriate to accept such proposals where they are appropriately designed and accessibly located and where the potential impact of the loss of allocated housing land on the five year housing supply is not critical.	This policy option would make it easier to maintain an adequate supply of land for general needs housing (positive effect on SOC4) but make it difficult to meet the need for this type of accommodation or to achieve mixed and balanced communities (negative effects on SOC4 and SOC5).

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DM14 - Gypsies, travellers and travelling showpeople	One alternative option is not to have a policy and to rely on national guidance and the JCS. It is not considered that there are sufficient detailed criteria within national guidance or the JCS to assess future planning applications.	Sustainability of BAU policy framework is assessed in Section 5.
	Other options are to have more stringent or less stringent criteria. It is considered that the preferred policy achieves the right balance as it is flexible enough to meet the need identified within the JCS and subsequent local evidence studies whilst ensuring that any new sites are accessible, have safe access, are of sufficient size and do not have a detrimental impact upon the character of the area.	Having more stringent criteria for the development of gypsy and traveller and travelling showpeople accommodation may support positive effects in relation to accessibility of sites, safe access, ensuring sites are of a sufficient size, and minimising any detrimental impact upon the character of the area (positive effects on SOC4, ENV1, ENV2, ENV3, ENV4, ENV5, ENV7 etc.), but may be too prescriptive so as to restrict the delivery of acceptable sites that would meet the need of residents (negative effect on SOC4); having less stringent criteria may result in negative effects on the factors above (negative effect on SOC4 and environmental SA objectives) and whilst enabling sites to be more easily delivered, may result in sites being accepted that do not sufficiently meet need (negative effect on SOC4).
DM15 - Loss of existing housing	One alternative approach is not to have a policy on the loss of housing. It is not considered that national guidance and the JCS contain sufficient detail on this issue.	Sustainability of BAU policy framework is assessed in Section 5.
	Other options are to have more stringent or less stringent criteria. It is considered that the preferred policy achieves the right balance as it is flexible enough to allow the loss of housing where there are clear benefits to sustainability, conservation/regeneration or community cohesion and enables on-going improvements to the standard of residential accommodation whilst resisting its loss in most circumstances. The significant loss of housing stock would restrict quality and choice contrary to national guidance and tend to run counter to the JCS's objectives relating to new housing development, in particular to provide an additional 3,000 dwellings on top of existing commitments up to 2026.	Having more stringent criteria for the loss of residential accommodation would provide stronger protection for the loss of residential accommodation (positive effect on SOC4), but may restrict the potential for positive community and regeneration effects. Having less stringent criteria would provide an insufficient degree of protection for residential accommodation, in turn resulting in an unacceptable amount of housing loss (negative effect on SOC4).
Economy		
DM16 - Employment	One alternative approach is not to designate existing employment areas at all and to consider proposals for alternative uses on their merits. This approach	Sustainability of BAU policy framework is assessed in Section 5.

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
and business development	<p>could be argued to be more consistent with the NPPF's requirement for a more business-supportive and flexible approach which responds to market signals. The council's view is that this approach would not be NPPF-compliant since it would fail to meet objectively assessed longer term economic needs set out in the 2008 Arup study. It would result in extreme uncertainty for prospective developers and investors, potentially leading to dispersal of main town centre uses to peripheral locations, diversion of business and inward investment to less sustainable locations on the Norwich urban fringe, (which evidence shows is already occurring), and almost certainly to loss of scarce employment land in the city through development for other uses. It would thus fail to support essential economic growth and inward investment priorities causing significant harm to the local economy, failing to implement JCS policy 5 and running directly contrary to the evidence base which supports it.</p>	
	<p>A second alternative is to differentiate between prime and general employment areas (as in the 2004 City of Norwich Replacement Local Plan), prioritising B class employment uses on selected better quality estates and allowing flexibility for a wider range of uses in others. Superficially this approach would again appear more NPPF compliant but would not be in accordance with the 2008 Arup study which contains a clear recommendation to safeguard all employment sites for their designated purpose and to consider introducing stronger policy protection for them, alongside strategies to promote their regeneration and secure their qualitative improvement. JCS policy 5 has followed this approach.</p>	<p>Protection and further development of only the best sites for employment uses would fail to recognise the findings of the 2008 Arup study that all current employment sites will continue to play a significant role in future employment. Failure to protect and develop non-prime sites would therefore risk less positive effects on employment provision and economic growth (SA objectives EC1, EC2, EC3 and EC4).</p>
	<p>A third alternative is to accept only B class employment uses on designated employment areas and to not allow other forms of economic development. Although this rigorous approach follows the recommendations of the 2008 Arup study, it would be contrary to subsequent national policy advice both in the NPPF and its predecessor PPS4, advising local planning authorities to plan positively for and to proactively encourage sustainable economic growth.</p>	<p>This policy option would have similar effects to the proposed policy DM16 except that non-B class employment uses such as retail and leisure will exceptionally be permitted in employment areas, subject to stringent criteria set out in DM18. Sustainability effects are likely to be similar to those described for the proposed policy DM16.</p>
	<p>A final alternative is to allow greater levels of flexibility with regards to main town centre uses. This approach is likely to have harmful impacts on local and district centres and the city centre, running contrary to the NPPF requirement that policies should aim to promote and sustain town centres. It would reduce</p>	<p>Having greater levels of flexibility with regards to town centre uses may have a negative effect on the role of district and city centres (where employment and retail is concentrated) (negative effect on EC1), including their role in supporting use of sustainable modes of transport</p>

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	the availability of a range and choice of employment sites to support essential economic growth and would tend to promote a less sustainable pattern of development by increasing dependence on and use of the private car and other high-emission vehicles.	(negative effect on ENV1).
DM17 - Protection of small and medium scale business sites and premises	An alternative is to not have a policy protecting small and medium scale sites and premises and to rely on national policies and the JCS. It is not considered that these provide sufficient detail and consequently such a strategy could result in the significant loss of small and medium scale business sites and premises, with resultant harm to the local economy.	Sustainability of BAU policy framework is assessed in Section 5.
	Consideration has also been given to designating specific priority sites for small business purposes on the Policies Map, an option suggested by some objectors to the draft version of this plan. This approach may offer more certainty, and could be argued to follow the NPPF's advice to "Identify priority areas for economic regeneration." However this would create considerable inflexibility. It would involve a value judgement on which areas were most important or suitable for small businesses, and might mean favouring development for certain uses in arbitrarily chosen areas of the city at the expense of perhaps equally well located and suitable premises elsewhere which, if not identified, might not be adequately protected by other policies. In addition it would not allow scope for consideration of one-off schemes or ad hoc proposals beneficial to small businesses which emerged over the plan period. The result would be an over-prescriptive locational policy for small businesses which would tend to restrict quality and choice. That would be counterproductive and difficult to justify, and would not incorporate the necessary flexibility to meet changing circumstances over the plan period which the NPPF requires. Should a need arise to reserve particular small business sites to meet local needs, they might be identified within site-specific proposals in the Site allocations plan, or more usefully brought forward through neighbourhood plans or other small area plans which could be reviewed more frequently if circumstances were to change.	Designating sites on the proposals map would offer more certainty with regards protecting small and medium scale businesses (positive effect on EC2); however, the rigidity of such an approach may also negatively impact on the efficient use of available space within the plan area (negative effect on ENV9) and on the local economy (negative effect on EC1 and EC2) by failing to allow small and medium scale sites to come forward outside of designated small business priority areas and failing to allow for changes in local circumstances during the plan period.
	Final options are to have more stringent or less stringent criteria. It is considered that the preferred policy achieves the right balance. Whilst it is flexible enough to allow the loss of small and medium scale sites and premises	Having more stringent criteria would offer more certainty with regards protecting small and medium scale businesses (positive effect on EC2); however, it may also negatively impact on the efficient use of available

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	in certain circumstances, it also promotes small business development generally and protects small and medium sites and premises where there is demand.	space within the plan area (negative effect on ENV9) and may not be flexible enough to enable adaptability in changing circumstances. Having less stringent criteria will not provide sufficient protection to small and medium scale businesses (contrary to need outlined in the evidence base) (negative effect on EC2).
DM18 - Retail, leisure and other main town centre uses	An alternative option is not to have a policy on town centre uses and to rely on national guidance and the JCS. The preferred option clearly sets out the approach and criteria that will be used for determining applications for town centre uses within all parts of the city.	Sustainability of BAU policy framework is assessed in Section 5.
	A second alternative would be to relax the requirement for uses other than retail and leisure to justify out-of-centre locations. Whilst this may be seen as more flexible it would not be compliant with the NPPF which is clear that the "town centres first" principle applies to all main town centre uses. The strength of Norwich and its long term success as a regional shopping and visitor destination rely on maintaining a full range of complementary services and facilities and a substantial employment base to ensure continued vitality, viability and attractiveness and provide a sound basis for future expansion and growth. Allowing unmanaged dispersal of selected uses such as visitor accommodation and large scale office employment would increase the need for unsustainable travel and damage prospects for the regeneration and enhancement of the city centre and neighbourhood centres. This would also be directly contrary to the JCS.	As stated in the description of the alternative, this option would lead to dispersal of uses which attract large numbers of people to locations not well served by sustainable travel choices. The resulting increase in demand for unsustainable travel would have negative effects on SA objectives ENV1 and ENV3 as well as reducing accessibility of services and facilities (negative effect on SOC8) and making patterns of movement in support of economic growth less efficient (negative effect on EC3). Failure to direct these uses to centres would also reduce potential positive regeneration effects (reduced positive effects on EC4).
DM19 - Principles for new office development	An alternative option is not to have a policy on the protection of office space and to rely on national policy and the JCS. This option has been discounted because it could lead to the unmanaged loss of high quality office space, which could result in a significant harm to the local economy. It might also result in considerable pressure for the redevelopment of office space for other uses.	Sustainability of BAU policy framework is assessed in Section 5.
	Alternative options are to have more stringent or less stringent criteria for the protection of offices. It is considered that the preferred policy achieves the right balance as it is flexible enough to allow the loss of offices where it is not economically viable, practicable or feasible to retain them or where there are overriding benefits from alternative forms of development.	Having more stringent criteria for the protection of offices would provide a higher degree of certainty regarding their retention (positive effect on EC1 and EC2) but may not support a flexible enough approach that can respond to changing economic and social circumstances to ensure the most efficient use of available space. Having less stringent criteria for

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		the protection of offices would provide an insufficient degree of certainty regarding their retention (negative effect on EC1 and EC2).
	A further option is to only protect offices within the city centre. It is however considered that there are offices outside the city centre which may merit protection as they are sustainably located.	Only protecting offices within the city centre would not allow for the possibility that offices outside of the centre may, in some cases, also be sustainably located. The lack of flexibility could lead to the loss of existing, high quality office space, potentially leading to inadequate provision of office space to meet need (negative effect on EC1, EC2 and SOC8).
	In relation to the provision of new office space, one alternative is not to have a policy and to rely on national policy and the JCS. It is not considered that this approach would be robust enough to secure the provision of sufficient new office floorspace in the right locations, given that the evidence base justifies a need for major office development, particularly in the city centre. The policy has been given additional flexibility to respond to the NPPF and allow for appropriately located and appropriately scaled office development elsewhere in the city where consistent with other objectives. However to remain consistent with, and successfully implement, the JCS a local policy with a strong emphasis on the promotion of city centre office development and the protection of city centre office floorspace is essential. Without this policy there is a strong likelihood that Norwich's vibrant city centre could face decline.	Sustainability of BAU policy framework is assessed in Section 5.
	Other alternatives are to have a larger or smaller defined office area and to increase or decrease the site threshold. It is considered that the preferred policy achieves the right balance.	Having a larger defined office area whilst supporting sufficient provision of office space (positive effect on EC2) may mean there is overprovision within the plan area, not efficiently meeting need, whilst having a smaller defined office area may mean there is under provision of office space (negative effect on EC2). Failure to apply appropriate floorspace thresholds could result in under- or over-provision of office space relative to the size of the centre, resulting in a mismatch between employment opportunities and sustainable access to those opportunities by a local workforce (negative effect on ENV1, ENV3, EC3). The balance in the proposed policy is based on the available evidence and is therefore likely to achieve the most sustainable outcome.
DM20 -	One alternative option is to incorporate indicative percentage thresholds within	The choice of whether to set out thresholds for the proportion of retail

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Managing change in the primary and secondary retail areas and Large District Centres	<p>the body of the policy to manage the proportion of retail uses in different areas (as in the previous City of Norwich Replacement Local Plan and as proposed in the draft of this plan). This approach has merits in terms of increased certainty for applicants, but could not be readily varied to adapt to change without a complex and lengthy process of review and could rapidly become out of date. The option of including this detail in SPD will offer a greater degree of flexibility but could mean that decisions made in support of the policy reliant on retaining a minimum level of retail representation in a particular area would be more difficult to defend on appeal.</p>	<p>uses in different areas in the DM Policies DPD (as suggested by this option) or in an SPD (as in the proposed policy) is unlikely to significantly alter the sustainability effects of the policy.</p>
	<p>A second alternative is to not to change the percentage thresholds, frontage zone boundaries, defined retail frontages and areas which were used in the previous adopted local plan for the primary and secondary retail areas and the Large District Centres. As noted, this approach would not give sufficient regard to the changes in the character and function of individual areas of the centre which have occurred since the previous plan was adopted, nor would it take account of the need for a degree of flexibility to promote sustainable economic growth and support business.</p>	<p>This option would not only be inflexible but also be immediately out of date as the character and function of different areas change. It would therefore be likely to result in less positive effects on ensuring the vitality of town centres than the proposed policy, resulting in less sustainable patterns of movement and a poorer environment for economic growth (reduced positive effects on ENV1, ENV3, SOC7, SOC8, EC1, EC2).</p>
	<p>Another option is to set different thresholds for the acceptance of non-retail uses within specific retail frontages. Accepting a greater proportion of non-retail uses within the primary area core streets is likely to lead to significant loss of multiple stores and high value retailing and could significantly damage the city centre's attractiveness as a regional shopping destination. Strong protection of retail uses in the primary area has previously been supported in a number of appeal decisions which affect premises in these core streets. It is considered that there is no justification for departing from previous policy in these most critical parts of the centre, albeit that there is a case for a slightly more flexible approach in other areas to better reflect the JCS's emphasis on speciality and independent retailing and supporting the evening economy. Applying a more restrictive policy on non-retail uses could be equally damaging to vitality and viability, reducing opportunities for beneficial supporting uses and in particular not allowing for the growth in the evening economy and its expansion within the city centre. The proposed thresholds are considered to achieve a good balance between protecting critical vitality and viability and promoting an appropriate diversity of uses within different areas of the centre.</p>	<p>Lowering the threshold for non-retail uses within the retail frontages may negatively impact the city centre's role as a regional shopping centre (negative effect on EC1), whilst raising the threshold may result in an unbalanced provision of 'services' (e.g. restricting evening activities), negatively impacting on the vitality and viability of the city centre (negative effect on SOC7, SOC8, EC1, EC2).</p>

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	It is considered that not having any policy to manage change of use within the primary and secondary retail areas and Large District Centres and treating proposals on their merits is not an option as national policy and the JCS do not contain sufficient guidance to determine individual planning applications within these areas.	Sustainability of BAU policy framework is assessed in Section 5 to provide a baseline for the assessment of the proposed policy.
DM21 - Management of uses within district and local centres	It is considered that not having a policy on district and local centres is not an option as national policy and the JCS do not contain sufficient detail to determine individual planning applications within Norwich's district and local centres.	Sustainability of BAU policy framework is assessed in Section 5 to provide a baseline for the assessment of the proposed policy.
	One alternative is to adopt different boundaries for the district and local centres. The boundaries chosen are considered appropriate as they are defined so as to reflect the extent of retail and other complementary supporting services and to exclude uses which are clearly not contributors to the function of the centre. The boundaries reflect an up-to-date assessment.	The sustainability effects of this option would depend on the boundaries chosen for district and local centres but given that the proposed boundaries reflect a current assessment, the sustainability effects of this option would be likely to be less positive than the proposed, evidence-based boundaries.
	Another option is to continue the Local Plan approach which sets a uniform 60% minimum for the retention of retail uses in all local and district centres. It is considered that this does not acknowledge the higher proportion of supporting services in many centres or the need for flexibility to respond to change over the plan period.	Setting a uniform threshold for all local and district centres is not flexible enough as to recognise the different functions of the centres within the plan area (negative effect on EC1).
	A further option is to retain the approach taken in the draft version of this policy and introduce more differentiation in the thresholds applied to individual centres. This approach is now considered to be too inflexible in responding to change and, in particular, does not acknowledge that in many centres it is the retention of a main foodstore and not the existence of a particular minimum number of A1 shops elsewhere that is the key to protecting its vitality and viability. The proposed policy is considered to strike the appropriate balance between promoting vitality, viability and diversity and preventing damaging changes to the core functions of neighbourhood centres.	
Communities		

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DM22 - Provision and enhancement of community facilities	An alternative approach is to have no policy on the provision and protection of community facilities and to rely on national policy and the JCS. It is not considered that these provide sufficient guidance for the appropriate consideration of proposals involving the loss of community facilities.	Sustainability of BAU policy framework is assessed in Section 5.
	Alternative options are to have more stringent or less stringent criteria for the protection of community facilities. It is considered that the preferred policy achieves the right balance as it is flexible enough to allow the loss of community facilities where it is not economically viable, feasible or practicable to retain them, where satisfactory alternative provision exists or where redevelopment would result in a net improvement in community provision.	Having more stringent criteria for the protection of community facilities would provide a higher degree of certainty regarding their retention (positive effect on SOC8) but may not support a flexible enough approach that can respond to changing economic and social circumstances to ensure the need is met most effectively and available space is used most efficiently. Having less stringent criteria for the protection of community facilities would provide an insufficient degree of certainty regarding their retention (negative effect on SOC8).
DM23 - Evening, leisure and late night uses	An alternative is to not have a policy on the evening, leisure and late night economy and to rely on national policy and the JCS. Although the JCS sets out the general policy approach to the evening and late night economy and provides indicative leisure and late night areas, it is not considered that the policy or key diagram provides sufficient detail.	Sustainability of BAU policy framework is assessed in Section 5.
	As the broad approach is set out within the JCS, options are limited. The main alternatives are to extend or reduce the boundaries to the defined leisure and late night activity areas. It is considered that the proposed option is appropriate as it strikes an appropriate balance between promoting the evening and late night economy and protecting residential amenity and other potentially sensitive uses and interests.	Extending the boundaries of the leisure and late night activity areas may result in negative impacts on residential amenity (negative effect on SOC7) but positive impacts on the local economy (positive effect on EC1 and EC2) and provide a more evenly distributed provision of services. Reducing the boundaries would restrict the evening and late night economy, impacting on the local economy (negative effect on EC1 and EC2), potentially not meeting demand, but would result in positive impacts on residential amenity (positive effect on SOC7).
DM24 - Hot food takeaways	An alternative is to not have a policy on hot food takeaways and to rely on national policies, the JCS and other policies of this plan. It is considered that a separate policy on hot food takeaways is justified because of their particular amenity, environmental and highway impacts not common to other forms of development.	Sustainability of BAU policy framework is assessed in Section 5.

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	<p>A second alternative is to specify an absolute limit on the number of takeaway outlets which can be accepted in defined centres and other locations as suggested by some objectors to the draft version of this plan. This would not recognise that the impacts of takeaways vary from place to place, indeed different takeaway formats in use class A5 may have widely varying impacts. There are instances where several can be accommodated satisfactorily with no significant impacts on retail vitality and viability, amenity or traffic. Additionally such an inflexible approach would amount to an unjustifiable restriction on commercial competition between individual retailers, which would act against the NPPF's advice in relation to competitive town centre environments (Section 2).</p>	
	<p>A third alternative option is to also restrict hot food takeaways where they would be in close proximity to schools. It is not considered appropriate to include this as a criterion for three reasons. Firstly, such an approach would be a relatively 'blunt instrument' since it prejudices the role of takeaways: some takeaways can, and do, provide healthy options on their menus. Secondly, unhealthy food is not the sole preserve of hot food takeaways. Shops and cafes may also offer unhealthy 'junk' food routinely to school pupils and it is a matter of choice for individuals whether or not to buy it. The council does not consider that it is the role of planning policy to intervene in lifestyle choices to this extent. Thirdly, relatively few of the secondary schools in Norwich are located close to defined retail centres so the introduction of this criterion would be of little value.</p>	<p>Restricting hot food takeaways near schools may support school children to have a healthier diet (positive effect on SOC2), but may have a negative effect on the local economy and provision of jobs for all (negative effect on EC1 and EC2).</p>
DM25 - Use and removal of restrictive conditions on retail warehousing and other retail premises	<p>An alternative approach is to not have a policy on retail warehouses and rely solely on policy DM18. A lack of a strong policy may result in new retail warehouses being permitted in unsuitable locations and the removal of appropriate and necessary conditions on existing retail warehouses. This is likely to have a harmful impact on the vitality of the city centre and increase dependency on the private car and high emission vehicles.</p>	<p>Sustainability of BAU policy framework is assessed in Section 5.</p>
	<p>A second alternative is to restrict all new retail warehouse development to the defined retail warehouse parks (as proposed in the draft version of this policy) and to impose more rigorous restrictions on what can be sold there (i.e. bulky goods only). This runs contrary to national policy on competitive retail</p>	<p>A restriction on all new retail warehouse development to defined retail warehouse parks is considered to have negative effects on ENV1, ENV3, ENV6, EC1, EC2, EC3 as it would rely on the dependency of the car and restrict sustained economic growth within the Norwich Policy Area.</p>

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	environments as it would effectively constrain new development on the basis of need, which is no longer a relevant consideration. It does not recognise that there are retail warehouses in Norwich other than in the retail parks and there may be potentially suitable locations for new retail warehouse development which are sequentially preferable to either of the existing out of centre retail parks. A generic bulky goods only restriction may not be appropriate in all cases as there may be certain operators who may be able to justify out of centre locations with little or no impact on existing centres but who may not sell exclusively bulky goods. The more criteria-based policy now proposed, which requires justification in terms of impact on existing centres and sequential suitability, is considered more appropriate. This is because it meets the need for flexible and responsive policies which support competition in the NPPF, whilst acting to prevent unrestricted retail warehouse format development in clearly unsuitable and unsustainable locations.	However, restricting retail warehouse space to only retail warehouse parks could protect the character of the townscape within Norwich (positive effects on ENV5).
University of East Anglia		
DM26 - Development at the University of East Anglia (UEA)	An alternative option is to have no specific policy on the UEA and to rely on other policies in this plan, for example employment, transport and housing policies. It is considered necessary to have a dedicated policy addressing specific issues at UEA as the growth of the university is critical to the local economy. It is also essential that the special qualities of the campus and its setting are protected and enhanced, whilst also protecting neighbouring residential areas, parks and the Yare Valley.	Sustainability of BAU policy framework is assessed in Section 5.
	A second alternative is to amend the content of the policy to prevent any further growth of the UEA. This would be contrary to the JCS. The policy is informed by the JCS's expectation of managed growth and is determined by the above considerations which have been informed by work on an emerging masterplan undertaken by the university, with input from the city council and extensive public consultation.	Since this option is directly contrary to the JCS it is not considered a 'reasonable alternative' within the meaning of the SEA Regulations and has not, therefore been assessed.
	The third alternative is for the policy to cover a different area, either retaining the existing Local Plan boundaries, or expanding the area to cover a larger area than the campus proposed in this document and the Site Allocation plan. The spatial coverage of the policy is based on the masterplanning work and shows	Expanding the area covered by the campus may result in a negative environmental impact, particularly on the nearby Yare Valley/UEA Broad (negative effect on ENV2 and ENV4). Restricting the area covered by the campus may result in a positive environmental impact (positive effect on

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	the amount of land needed for expansion, taking account of the need for environmental protection. For the scale of growth to be accommodated to ensure the UEA maintains its strategic importance to the local and regional economy, the Masterplanning documents have shown that restricting development within the present university campus boundaries would not be practical: therefore limited expansion of the campus boundaries is proposed. Greater expansion of the boundaries is not a preferred option due to the environmental constraints imposed by its setting and the likely adverse environmental impacts of such unconstrained growth, particularly on the Yare Valley.	ENV2 and ENV4) but may negatively impact the needs of the university with regards growth and supporting the strategic role of UEA to the local and regional economy (negative effect on SOC3, EC1, and EC2).
	Consideration has been given to including more detailed requirements in the policy setting out the matters to be included in a development brief, covering issues in relation to design, form, massing, protection of long views and use of materials, as requested by an objector to the draft policy. The council takes the view that this level of detail is not appropriate to include in a general development management policy. A meaningful brief would necessarily need to cover these aspects and many of these requirements are already set out in generic policies DM2 (design principles) and DM9 (heritage assets). There is no need to reiterate them here.	This option would add greater detail in respect of environmental protection but it judged that this would not significantly alter the sustainability effects of the proposed policy requirements for conservation of the landscape, architectural significance of UEA, the green edge and significant vistas and generic environmental protection policies (such as DM6 and DM9).
Norwich Airport		
DM27 - Norwich Airport	An alternative option is to have a policy which constrains further growth of the airport. This would be contrary to the commitment of the JCS to appropriately managed airport expansion to support the economic growth necessary in greater Norwich. It is recognised that the 2003 Aviation White Paper which supports further airport development in principle, subject to relevant environmental considerations, is subject to review. However it is expected that regional airports such as Norwich will continue to play a vital role in meeting the transport and business needs of the local economy in the context of a sustainable aviation framework. It would be premature and inadvisable to depart from adopted policy unless and until a subsequently adopted national sustainable aviation framework suggests a significantly different policy approach is necessary for the airport.	Constraining further growth of the airport would be likely to have negative effects on its role in supporting growth and inward investment in the local and regional economy (negative effects on EC1, EC2 and SOC8 but would avoid the negative effects on the environment and amenity associated with additional aircraft and surface traffic movements (avoids significant negative effects on ENV3, ENV6, SOC7 and EC4 as well as other minor negative effects).

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
	A second alternative option would be to have no specific policy covering the airport and to rely on the JCS, other policies within this plan and national guidance.	Sustainability of BAU policy framework is assessed in Section 5.
	An alternative option would be to have a policy to cover a different area, either retaining the existing Local Plan boundary, or expanding the area to cover a larger area. The need for a separate local policy and its spatial coverage and content are all founded on the growth and likely access needs of the airport which has been established by the JCS. The proposed policy takes into consideration the specific operational requirements of an airport, balanced with the need to minimise impacts on neighbouring uses. In response to specific concerns of objectors to the draft policy that economic growth of the airport was emphasised over considerations of environmental protection, carbon reduction and sustainable accessibility, the supporting text has been significantly expanded to discuss these aspects in more detail and relate the policy to sustainable development priorities in the NPPF and requirements for sustainable transport in policy DM28 of this plan. It also makes clear that any major development contemplated at the airport must necessarily be approached in the context of a strategic masterplan, effectively integrating travel planning and a sustainable surface access strategy.	Expanding the area of the airport may result in negative effects on the environment, including in relation to air pollution and greenhouse gas emissions (notably ENV3 and ENV6) and amenity (EC4, SOC7). Retaining the local plan boundary may result in positive effects on the environment (including with regards emissions) (ENV3 and ENV 6) and amenity (EC4 and SOC7) but may negatively impact on the growth of the airport and its role in the local and regional economy (negative effect on EC1, EC2 and SOC8).
Transport		
DM28 - Encouraging sustainable travel	The alternative option is to have no policy on encouraging sustainable travel and to rely on national policies and the JCS. It is considered that the proposed detailed policy is necessary to support the objectives of NATS and the JCS in reducing car journeys and promoting alternative methods of transport.	Sustainability of BAU policy framework is assessed in Section 5.
DM29 - City centre public off-street car parking	One alternative is to have no policy on city centre public off-street car parking and to rely on the NPPF, NATS and the JCS. This approach would result in a lack of clarity and insufficient detail on how and where new parking provision should be provided. Operational information is needed to ensure that NATS and JCS policy 9 can be implemented.	Sustainability of BAU policy framework is assessed in Section 5.
	A second alternative is to relax the criteria for new off street car parking. This may result in low quality, non-permanent parking areas which do not make	Having less stringent criteria for off street parking may result in provision of a lower quality car parking (negative effect on ENV5, and

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
	efficient use of land. It would also reduce the opportunities for new well located, high quality strategic car parks which help to support the vitality of the city centre.	SOC7), that does not effectively and efficiently meet need (negative effect on ENV9). It may also impact on economic development and local businesses (negative effect on EC1 and EC2).
	A third alternative is to reduce the overall number of spaces within the city centre. It is considered that a reduction in overall car parking would be inappropriate as this would not provide for future need which will arise from growth within the Norwich Policy Area. Furthermore NATS does not indicate a reduced level of parking provision. Allowing increased levels of parking is not an option as this would be contrary to national and strategic sustainable transport policies and NATS.	Reducing the overall number of spaces within the city centre may result in positive environmental effects (relating to a potential reduction in car use) (positive effect on ENV1, ENV3, ENV6, ENV9 and SOC2) as well as enabling such spaces to be used for other uses, such as retail and offices (positive effect on SOC7, ENV9 and EC2). However, it may also mean that parking provision does not adequately meet demand, impacting on the local economy and the needs of the community within the plan area (negative effect on EC1 and EC2).
	The final alternative is to maintain levels at 10,000 spaces but to not identify areas for an overall reduction in parking and areas for an overall increase in parking. This may reduce opportunities to rebalance parking provision across the city centre. The preferred approach seeks to focus new parking provision within or near areas identified within the JCS and within this plan for retail and within this plan for retail and leisure development and to reduce parking provision within areas where there is currently an oversupply.	Not identifying areas for an overall reduction in parking and areas for an overall increase in parking would not enable a redistribution of parking provision that effectively meets needs within the city centre and uses space within the city centre most efficiently (negative effect on EC1, EC3 and ENV9).
DM30 - Access and highway safety	There are no reasonable alternatives to this policy as national policies and the JCS do not provide sufficient guidance on access and highway safety. Consideration has been given to incorporating more detailed and specific technical standards for the provision of access which reflect the standards currently applied by Norfolk County Council outside the city as requested in their response to the draft version of this policy. The city council regards the requirements of this policy as sufficient to ensure safety whilst offering necessary flexibility. The rigid technical standards for the design of new accesses onto the highway network applied by the County Council are not always appropriate or achievable in the urban context of Norwich, so it would be unhelpful to include them in the policy.	Sustainability of BAU policy framework is assessed in Section 5 to provide a baseline for the assessment of the proposed policy.
DM31 - Car parking and	The option of not having a policy setting out parking standards would be likely to result in levels of parking provision which are excessive and which would act against the requirements of NATS for growth in demand for travel across the	Sustainability of BAU policy framework is assessed in Section 5.

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
servicing	<p>Norwich area to be met by means other than the private car. An unregulated approach would not be in accordance with the NPPF's requirement to minimise the need to travel and maximise the use of sustainable transport modes. Not having a policy on servicing would result in unsatisfactory servicing arrangements as there are no detailed standards either within national guidance or the JCS.</p>	
	<p>Alternative options are to apply more stringent or less stringent car parking standards. It is considered that the preferred policy achieves the right balance for both residential and non-residential development. With regard to residential the proposed standards take into consideration car ownership levels, accessibility and the efficient use of land. For non-residential development the proposed levels help achieve the aims and objectives of NATS whilst not being so onerous as to discourage continued economic development and investment within the city.</p>	<p>Reducing the proposed levels of car parking may have positive environmental impacts with regards discouraging car use and in turn emissions (positive effect on ENV1, ENV3, ENV6, and ENV9) as well as enabling space that would otherwise have been for car parking to be used for other uses, such as open space, residential, retail and offices (positive effect on SOC7, EC1, EC2 and ENV9). Increasing the proposed levels of car parking may have negative environmental impacts with regards enabling greater car use and in turn resulting in an increase in emissions) (negative effect on ENV1, ENV3, ENV6, and ENV9) and would reduce the amount of land available for other uses, such as open space, residential, retail and offices (negative effect on SOC7, EC1, EC2 and ENV9).</p>
DM32 - Car free or low car housing	<p>An alternative is to have no policy on car free or low car housing. This approach may result in the provision of excessive levels of car parking in highly accessible locations. The proposed approach takes into consideration car ownership levels and accessibility. It promotes the efficient use of land and encourages sustainable lifestyles. Furthermore it encourages the reuse of upper floors of commercial premises (consistent with the aims of policies DM20 and DM21) and allows for housing within areas of the city centre which are inaccessible by car. The absence of criteria setting out where car free or low car housing will be acceptable may result in car free and low car housing being developed in inappropriate locations within the city. This may lead to on street parking problems.</p>	<p>Sustainability of BAU policy framework is assessed in Section 5.</p>
	<p>In response to representations to the draft policy, consideration has been given to extending the criteria for the acceptance of car free and low car housing to additional areas of the city, in particular residential areas which may have low levels of car ownership. The policy would certainly not preclude the</p>	<p>Extending car-free developments to other areas of the city may have further positive environmental impacts (ENV1, ENV3, ENV6, and ENV9). However, restricting car-parking in areas that are less accessible could increase on-street parking, resulting in an increase in traffic congestion</p>

Policy name and number	Norwich City Council description of alternative options and reason for not preferring each over the DPD policy	LUC sustainability commentary
	consideration of car-free schemes in other suitable locations if they were put forward, but the policy currently seeks to direct car free housing to locations of highest accessibility by non-car modes. It would be counterproductive to require car free housing in less accessible locations as there would be implications for on-street parking levels and traffic congestion – particularly in areas which do not have area-wide residents' parking controls through CPZs.	and a potential detrimental effect on highway and pedestrian safety (negative effect on ENV1, ENV3 and SOC7).
Planning obligations		
DM33 - Planning obligations	An alternative option is to have no policy on planning obligations or the community infrastructure levy and to rely on the JCS and national guidance. This approach would not adequately explain the operation of planning obligations in the Norwich context. The CIL charging schedule and regulation 123 list set out in broad terms the matters which will be covered by CIL, but does not relate those matters explicitly to the planning process. Accordingly specific local policies are considered necessary on these aspects both to give developers some certainty on these issues and to explain how the system will work in practice.	Sustainability of BAU policy framework is assessed in Section 5.
	A further option is to include much more content on the specific matters which will be covered by planning obligations and describe the procedures which will deliver them in detail. This level of detail is not appropriate to include in a local plan policy, since plans are required to be succinct, flexible and responsive. The regulations allow the scope of matters to be covered by planning obligations and CIL to be reviewed over the course of the plan period in response to changing community needs and aspirations. It is recognised that further advice and guidance will be needed on specific planning obligation issues, such as affordable housing, play space provision and transport contributions, to be set out in concise supplementary planning guidance and technical advice notes.	Providing a more detailed planning obligations policy will provide a higher degree of certainty when securing funding for particular types of infrastructure relevant to a particular site/s. It is considered that this option would have positive effects on environmental, social and economic objectives (ENV1, ENV3, ENV4, ENV5, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC4, SOC5, SOC6, SOC7, SOC8, EC1, EC2, EC3 and EC4.).

Appendix 5: Effects of the SA and evolution of the plan

This appendix sets out the recommendations made in the December 2010 SA Report (Regulation 18 consultation stage) and how Norwich City Council have taken these and others factors into account in arriving at the policies proposed in the current, Regulation 19 consultation version of the DM Policies DPD.

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
PLANNING STATEMENTS			
Planning Statements (DM1)	<p>It is recommended that a 'sustainability statement' is added to the list of required supporting documentary, covering topics such as efficient use of land, heritage management, pollution control and water management. As highlighted by the Environment Agency in their consultation response (see page 7), protection of water quality is particularly important in the plan area, given that most of it lies within a Source Protection Zone and over a Principle Aquifer. Water management, especially in the light of the impact of climate change on availability, is also a key issue (highlighted by the Environment Agency and Natural England). As such, ensuring water pollution and management are effectively addressed by applicants is very important. Criteria may be included detailing which types of developments a sustainability statement would apply to, if not for all e.g. for applications of a particular size.</p>	<p>It is clear from advice in the NPPF (paragraph 193) that "local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.</p> <p>An explicit requirement for a sustainability statement in supporting documentation is NOT ACCEPTED. This could be perceived as onerous and inflexible and could be prejudicial to the soundness of the DPD when judged against the NPPF's imperative for positively prepared plans and removal of policy burdens. We acknowledge the importance of applicants adequately documenting sustainability impacts in a supporting statement, we are confident that these requirements are properly and proportionately set out in the local validation checklist, which specifies what is required for appropriate forms and scales of development.</p> <p>The importance of addressing sustainability issues in the design, location and configuration of development is brought out in the policies pertaining to those issues (DM3, DM5, DM9, DM11), as well as in the adopted JCS. Old DM1 has been replaced by an overarching policy on sustainable development which will reinforce these requirements.</p>	<p>Draft policy DM1 on information requirements is now transferred to the supporting text ("The Benefits of good information") in the section "A positive approach to development management". We accept several objectors' views that DM policies should be concerned with assessing the actual impacts of proposed development, and not with the process of validating the paperwork. Validation process is covered under separate regulations and local and national validation requirements. A policy requiring adequate supporting information would merely relate to the content and quality of a submission which <i>describes</i> a proposal (the application), not the planning merits of the proposal itself (the development). It is important to appreciate that these are two separate things.</p> <p>Old DM1 has been replaced by an overarching policy on sustainable development.</p>
Planning Statements	It is also recommended that the following	NOT ACCEPTED. See above, basis of	See above, validation process not considered

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
(DM1)	change is made to policy wording to ensure it is consistent with national policy: 'Failure to provide support documents essential to the determination of the application will lead to the application being invalidated'.	national policy changed and a more flexible and proportionate approach is seen as necessary in the light of the NPPF. Equivalent wording incorporated in "A Positive Approach to Development Management" section: <i>Failure to provide supporting documents essential to the determination of the application may lead to delays or the potential refusal of planning applications.</i> Validation or invalidation is not relevant to the eventual decision which should be based on the planning merits of the proposal. Policies in this DPD should be concerned with assessing development on the basis of those merits.	a matter for a development management policy.
ENVIRONMENTAL DESIGN			
Amenity considerations (DM2)	Greater clarification should be provided regarding the meaning of 'high standard of amenity' and how this will be measured in relation to new development proposals.	ACCEPTED IN PART: The policy now includes a specific requirement to meet indicative internal space standards for residential development (where relevant). Matters such as avoidance of overlooking and overshadowing are given more emphasis in policy DM3 and covered further in the council's emerging design advice note for residential extensions which will supplement policies DM3 and DM12. In the interests of flexibility and conformity with NPPF advice, we do not consider it appropriate to include a series of prescriptive standards within the policy which could not be changed or supplemented during the plan period. Good practice advice, design briefs and (where necessary) SPD are the	Scope of policy extended to both residential and commercial occupiers and referred to avoidance of development which will "have an unacceptable impact on <u>living or working conditions or operations</u> of neighbouring occupants". In relation to future occupiers clause b requires that high standards of amenity " <u>can be achieved and maintained without preventing or unreasonably restricting the continued operation of established authorised uses and activities on adjacent sites</u> ". This reflects advice in the NPPF (Para 123).

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
		appropriate places for this level of detail.	
Amenity considerations (DM2)	Given that there are areas within Norwich where a significant number of properties fail to meet the 'decent home' standards (SA Scoping Report, April 2010), it is recommended that extra detail is included within this policy stating that the upgrading of poor quality housing will be supported.	Support for upgrading of poor quality housing is implicit in a number of aspects of this policy and policies DM3 and DM12, as well as in JCS policy 12 which promotes "regeneration of tired suburbs". Although a sentence to this effect in the policy (or in Policy DM12) would do no harm, in practice the upgrading of poor quality existing housing, rather than its replacement by new build is something that would not necessarily need planning permission and could thus not be influenced by this DPD.	See above.
Design principles (DM3)	In relation to landscaping criteria (i) and creating a biodiversity-rich environment (b), drought resistant native plant species could also be promoted to support a landscape that is adaptable to climate change.	Amended and consolidated clause (i) on green infrastructure, landscaping and biodiversity requires that development should help to " <u>create a biodiversity-rich environment through the design of built structures and landscaping, the latter to include the use of native plant species.</u> New clause (j) on energy efficiency and climate change requires development to <u>achieve the highest practicable standards of energy efficiency in design by means of internal and external layout, orientation, massing, materials, insulation, heat recovery, natural ventilation, shading and landscaping.</u> This recommendation may have been overlooked in the redraft but can be ACCEPTED . We would be happy to pick this point up by amending clause (j) to refer to "... ventilation, shading <i>and the use of landscaping and planting which is climate change resistant</i> ".	Various amendments made to policy wording and supplementary text to strengthen, and improve justification for, policy. Clause (f) on form and massing now makes clear that policy extends to extensions and alterations and use of incongruous or overbearing extensions is explicitly discouraged. Supplementary text cross-refers to good practice guidance on householder extensions. Merged and reworded green infrastructure and biodiversity section (i) (previously separate clauses (i) and (j)) strengthened. New Energy Efficiency and Climate Change clause (j) added to incorporate policy content previously in DM4 and to cover new policy requirements specific to critical drainage areas. Supplementary text expanded and amplified to justify these changes. Enhanced green design requirements in critical drainage areas are justified by findings of the Surface Water

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
			Management Plan.
Design principles (DM3)	Greater detail could be provided in relation to how the public realm within new developments can be designed to reduce fear of crime, and potentially actual levels of crime. Such 'safety by design' features' include providing for adequate natural surveillance, restricting high front boundary walls, avoiding secluded alcoves, and encouraging a mix of housing types in a development to increase the likelihood of occupation at different times of the day.	ACCEPTED: Picked up in sub-para (ii) of amended clause (d) "Proposals should be designed to provide a permeable and legible network of routes and spaces through the development, which takes account of public accessibility, links effectively with existing routes and spaces <u>and minimises opportunities for crime, disorder and anti-social behaviour. The public realm should be designed so that it is attractive, overlooked, safe and secure.</u> Secured by Design cross-referenced in text.	See above
Design principles (DM3)	Within h) Materials and details, a recommendation could be included regarding the adoption of waste management plans (particularly for large-scale developments) during the construction phase.	NOT ACCEPTED: Site waste management plans are required under regulations made under the Clean Neighbourhoods and Environment Act 2005, and are a statutory requirement for larger developments anyway. It would be inappropriate (and potentially ultra vires) for a development management policy to contain requirements of this nature. The DM Policies DPD can only include matters which it is appropriate to deal with under the council's statutory powers as a planning authority and which can be enforced through the planning acts and associated regulations. Applicants' attention is drawn to the need for site waste management plans within the section on Refuse and Servicing Statements in the council's local validation checklist.	See above. In relation to this issue in clause (h) the text has been amplified to state that <u>"Development will be encouraged to make the maximum practical use of sustainable and reused/recycled materials"</u> .
Design principles (DM3) and Open space (DM8)	Greater emphasis should be placed on the flexibility and adaptability of landscaping (Policy DM3(i)) and open spaces (Policy DM8)	We have attempted to make a distinction between the "design", "environmental" and "recreational" aspects of open space in DM3,	See above re policy DM3. Policy DM8: Amendments to include a clearer criterion for the acceptance of loss of

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
	to allow for multi-functional usage and to promote open space that more effectively meets the needs of all of its users. For example, providing open space which is not single-use or overly prescriptive, but that allows for a broad range of uses (e.g. recreation (including for children and youth), biodiversity enhancement, and food growing, and water management).	<p>DM6 and DM8 although these will inevitably overlap. See e.g. para 142 "In practice, most open spaces serve more than one function. For example, an open space such as Eaton Park is important for sport, play, biodiversity, amenity and recreation". Policy DM3 is primarily about design rather than usage considerations, so a clause about multi-functional use of space would sit awkwardly in it. Support for the multi-functional use of open space is explicit in JCS policy 1 <i>([development will] contribute to providing a multi-functional green infrastructure network, including provision of areas of open space, wildlife resources and links between them, both off site and as an integral part of the development)</i>t</p> <p>The supporting text to policy DM8 has been significantly expanded to explain the reasoning for the policy and relate it to the findings of the open space needs assessment, recognising that new open space provision, and the management of proposals involving its loss, should take full account of the potential of open space to meet a range of local needs.</p>	<p>recreational open space (only where the benefits to sport from new replacement provision outweigh the loss) and extending the application of the policy to use of any recreational buildings ancillary to the open space. Justification for the loss of open space now requires an assessment to show demonstrable unsuitability and no other reasonably practicable or viable means of retention (rather than just having to show space is "surplus to requirements").</p> <p>Criteria added for the acceptance of proposals for new allotments. Clarification on approach to be taken in cases where play areas already exist in proximity to the site. New clause on support for neighbourhood green spaces.</p>
Water (DM5)	Reference should be made, either in the policy or supplementary text, to the water efficiency requirements of new development outlined in proposed JCS Policy 3 (this does not require detail of Policy 3 requirements, but rather a justification for why water efficiency is not included within this DPD). Highlighting water efficiency requirements is important given the existing pressure on	NOT ACCEPTED: Policy DM5 does not contain these references because it does not deal with water efficiency, it's a policy on flood risk. Energy efficiency issues are covered in policy DM3 new clause (j), which was previously part of DM4. There is an appropriate reference in the DM3 supplementary text (para 90) to the water efficiency requirements of new development	Policy DM5 and supplementary text substantially redrafted to more clearly set out principles behind sequential and exceptions test procedure in relation to flood risk and explain application of the former in Norwich with particular reference to the Strategic Flood Risk Assessment and defined city centre regeneration areas. Paving of front gardens section expanded to cover approach

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
	<p>water resources in the plan area, with East Anglia being one of the driest areas of the country. This was highlighted in consultation responses from both the Environment Agency ('support should be given to strict water efficiency targets') and Natural England ('the increased stress of climate change impacting water availability should be addressed').</p>	<p>set out in JCS Policy 3. The JCS policy is supported by a joint supplementary advice note to developers available on the JCS website here. For clarity propose to add a sentence to paragraph 90 referencing the advice note and adding it to the list of documents at the end of the section.</p>	<p>to surface treatment generally. Sustainable drainage section amended to add reference to emerging drainage permissions regime operated by Norfolk County Council as lead local flood authority and SUDS approving body (will issue SAB approvals). Added specific requirements for measures to combat surface water flooding and particularly flood-resilient design in critical drainage areas – this is likely to be further refined in response to advice from the Environment Agency.</p>
Environmental assets (DM6)	<p>As well as within Green Infrastructure Opportunity Areas, it is also recommended that, where possible, opportunities are sought through all new development, to establish 'green links' between existing and new green spaces.</p>	<p>NOT ACCEPTED (we consider this requirement is implicit in DM3 and DM6 as well as being explicitly covered in JCS policy 1). The need to integrate green infrastructure and green links within the design of individual development schemes has been picked up to some extent in redrafted DM3 clause (i).</p> <p>Note: a decision has been made not to reference green infrastructure priority areas (GIPAs) in this policy and not to show these or the notional links between them explicitly on the policies map (we had intended to refer to these notional links as green opportunity corridors or GOCs). The reasoning for this is that such corridors are shown indicatively in the Green Infrastructure Delivery Plan and JCS but there is not sufficiently detailed local evidence to justify showing more precise boundaries for them on a DPD policies map, which must be drawn to a level of detail sufficient to identify individual properties. GOCs are likely to intersect large areas of privately owned land including domestic gardens. It would be unsound to impose</p>	<p>Redrafted to introduce more explicit presumption in favour of protection of natural areas of national significance and require exceptional justification for loss of assets of regional and local importance (taking account of NPPF sustainable development imperative, JCS priorities and the potential loss of policy protection for some assets in the NPPF). References to geodiversity added in policy and County Geodiversity Sites, rather than previous Regionally Important Geomorphology and Geodiversity Sites (RIGGS) now referenced in supplementary text). Reference to consideration of the impact of incremental development in the Yare Valley Character Area has been added in the supplementary text to address a concern of the Green Party.</p>

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
		policy requirements on householders related to a GOC boundary which was arbitrarily drawn and not justified by evidence, particularly when these policy requirements might not apply to neighbours in the same street.	
Open space (DM8)	As with Policy DM22, it is recommended that a statement is included within this policy regarding the involvement of the local community in developing appropriate solutions for the replacement and/or improvement of existing open spaces, including allotments.	<p>NOT ACCEPTED: Earlier drafts of this policy referred to community involvement in open space provision and specifically the acceptance of proposals for local green spaces within neighbourhood plans. While the local green spaces reference is retained, we consider that the provisions in the Localism Act for community involvement in the planning and development of their own neighbourhoods mean that this reference may be redundant, as it would be a statutory requirement to involve the community in significant proposals affecting open space as part of the pre-application process anyway. DM staff have also questioned whether the corresponding reference in DM22 is appropriate or should be supplemented and clarified.</p> <p>Further detail on community engagement in decision-making will need to be incorporated in a review of our SCI which could include appropriate references to community-led initiatives on open space and other facilities.</p>	<p>Amendments to include a clearer criterion for the acceptance of loss of recreational open space (only where the benefits to sport from new replacement provision outweigh the loss) and extending to use of any recreational buildings ancillary to the open space. Justification for the loss of open space now requires an assessment to show demonstrable unsuitability and no other reasonably practicable or viable means of retention (rather than just having to show space is "surplus to requirements").</p> <p>Criteria added for the acceptance of proposals for new allotments. Clarification on practical application of CIL funding for new neighbourhood open space and approach to be taken in cases where play areas already exist in proximity to the site. Site size threshold for requiring on-site open space reduced from 4 to 2 hectares (though this may need to be further justified by viability evidence and refined in the light of emerging mechanisms for open space delivery through CIL). New clause added on support for neighbourhood green spaces. Supporting text makes reference to Section 77 process for disposal of school playing fields.</p>

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
Open space (DM8)	It is recommended that additional detail is provided clarifying that any assessment of open space requirements includes both quantitative and qualitative data, such that the qualitative value of existing open spaces are recognised before these are deemed to be 'surplus to requirements'. In addition, where open spaces are deemed to be 'surplus to requirements' because the type of open space is not meeting local need and hence the space is not being used, these spaces should be modified to meet need rather than deemed surplus.	ACCEPTED: Amendments to include a clearer criterion for the acceptance of loss of recreational open space (only where the benefits to sport from new replacement provision outweigh the loss) and extending to use of any recreational buildings ancillary to the open space. Justification for the loss of open space now requires a quantitative and qualitative assessment to show demonstrable unsuitability and no other reasonably practicable or viable means of retention (rather than just having to show space is "surplus to requirements").	See above
Environmental protection (DM11)	In its consultation response, the Environment Agency highlighted the importance of protecting water quality in the plan area: 'the protection of water quality is particularly important in the plan area, given that most of the Norwich City Council area lies within a Source Protection Zone and over a Principle Aquifer, and as such it should be noted that the improvement/protection of water quality extends to groundwater in addition to streams, rivers and lakes, and that contaminated land is adequately remediated before use in order to protect groundwater quality'. It is recognised that the supplementary text states that any method of treatment of contaminated land must ensure that water resources and other environmental resources are not adversely affected. It is recommended that reference is made to water quality within the policy text,	ACCEPTED: Wording relating to the protection of water quality has been added in this policy (essentially replicating that in City of Norwich Replacement Local Plan saved policy EP14). We propose to take account of recent advice from the Environment Agency on a suitable form of words reflecting the updated designations describing aquifers and ground water source protection areas.	Amendments to include more detailed (and updated) consideration of air and water quality issues and consideration of noise pollution (cross-referring to policy DM2). Supplementary text expanded with further discussion and consideration of subsidence risk issue and forthcoming expansion of Air Quality Management Area to cover whole of city centre. The Policies Map now shows former landfill sites (the draft map did not). Cross-reference added in text to supporting Environmental Health guidance notes for developers on air quality and contamination at county level.

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
	whilst detail is included within the supplementary text, recognising that water resources refer to both groundwater and surface water.		
TELECOMMUNICATIONS			
Telecommunications (DM10)	None.	N/A	Policy renamed “communications infrastructure” and expanded to include consideration of broadband, data transfer networks and Wi-Fi installations as well as phone masts. Section in draft policy on prior approval moved to the supplementary text. Policy also covers the issue of potential interference of new development and/or infrastructure with existing broadcast and telecommunications services (as required in the NPPF).
HOUSING			
Principles for all residential development (DM12)	The SA Scoping Report (April 2010) identifies housing affordability as a key issue. It is recommended that this policy builds on the affordable housing target outlined in JCS Policy 4. For example: detail should be provided regarding how the provision of affordable housing will be guided by the nature of demand (e.g. the size and type of affordable housing, which may vary depending on the location of the housing development (should be guided by the findings of the Housing Needs Assessment)); an objective could be included to ensure that affordable housing is fully integrated within housing developments (i.e. to steer away	ACCEPTED IN PART: We acknowledge that affordable housing will need further elucidation in policy. The city council has published an affordable housing interim statement to cover the issue of on-site vs. off-site provision and forthcoming SPD scheduled for completion by the end of 2012 will contain further detail. It is currently not clear whether the provisions of CIL will be extended to fund the delivery of affordable housing. If they are, it would be premature to include a significant amount of detail in a policy (or SPD) intended to cover a fifteen year period when the mechanisms for affordable housing delivery are likely to	Minor changes only: embargo on residential use extended to areas immediately adjoining the Late Night Activity Zone and cases involving the loss of high quality office space (for consistency with DM19 and revised DM23). Supplementary text amended in relation to affordable housing (recognising lower revised JCS target of up to 33% rather than the 40% proposed in the submission version). Requirement for family housing and flats only applied where this is achievable within the configuration and constraints of the site. Policy allows for higher densities in district and local centres and locations of high accessibility

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
	from the tendency for affordable housing to 'stick out' within housing developments); and an objective could be included which supports the delivery of 'intermediate' housing, to meet the needs of those seeking to gain a first step on the housing ladder (as outlined in PPS3).	change.	
Principles for all residential development (DM12)	PPS3 states that local authorities should set out an approach for seeking developer contributions to facilitate provision of affordable housing. Whilst there is the presumption that affordable housing would be provided 'on-site', there may be situations where this is not feasible, and there may be a need to provide policy guide for such situations, such as off-site provision or a financial contribution in lieu of on-site provision (coupled with strict guidelines ensuring such an approach would contribute to the creation of mixed communities in the local authority area).	See above – the affordable housing interim statement covers this issue.	See above.
Principles for all residential development (DM12)	The SA Scoping Report (April 2010) states that there are significant areas of terraced housing adjacent to the city centre which comprise the largest proportion of homes that fail to meet the 'decent home' standards. A statement could be included within this policy regarding supporting the upgrading of the existing housing stock to meet housing criteria outlined in this policy.	NOT ACCEPTED: Support for upgrading of poor quality housing is implicit in a number of aspects of this policy and policies DM2 and DM3, as well as in JCS policy 12 which promotes "regeneration of tired suburbs". Although a sentence to this effect in the policy (or in Policy DM2) would do no harm, in practice the upgrading of poor quality existing housing, rather than its replacement by new build is something that would not necessarily need planning permission and could thus not be influenced by this DPD.	See above

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Principles for all residential development (DM12)	It is recommended that this policy cross-refers to policy DM4 regarding the requirement to maximise energy efficiency in all new development. Extra detail could be included regarding supporting schemes which seek to meet the highest level of the Code for Sustainable Homes (builds on JCS Policy 3).	NOT ACCEPTED: Policy DM3 now takes on board some of the energy efficiency requirements previously covered in DM4 and since DM3 (j) relates to all forms of built development it is unnecessary to reiterate requirements specific to housing in DM12 if they are essentially the same. The intention is that "highest practicable standards of energy efficiency" (DM3) would be assessed against whatever agreed standard constitutes best practice at the time, whether it is the Code for Sustainable Homes, BREEAM standards or some future higher standard superseding both of these (see para 91 under DM3). Specific reference to Code for Sustainable Homes standards for energy efficiency has been taken out of JCS policy 3 (Inspector's recommendation) except in relation to water efficiency: accordingly it is not appropriate to insist on CfSH compliant housing in a local policy because this would not now reflect what the JCS says. Specific detail on what standards are most appropriate is a matter for SPD and good practice advice (which will be prepared in support of JCS policy 3 and DM3 (j) and reviewed as necessary). Reference in the policy to a particular standard such as CfSH which applies now would not give the necessary flexibility to update those standards should the requirements change in future, or e.g. be absorbed within the Building Regulations.	See above
Principles for all residential development	PPS3 states that 'Local Planning Authorities should develop a shared vision with their	Community engagement in the planning process is now implicit in the provisions of	See above re DM12.

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
(DM12) and Gypsy and Travellers and Travelling Showpeople (DM14)	local communities of the type of residential environments they wish to see'. It is recommended that a positive statement is included within these policies regarding the involvement of the local community, including gypsy and traveller and travelling showpeople communities, in developing appropriate solutions for housing provision.	the Localism Act: consequently a reference of this kind in the policy may be redundant. Further detail on community engagement in decision-making will need to be incorporated in a review of our SCI which could include appropriate references to community-led initiatives on housing and traveller sites.	
Gypsy and Travellers and Travelling Showpeople (DM14)	It is recommended that further detail is included regarding appropriate on-site conditions, including ground conditions and levels of land, and provision of services (e.g. waste collection), and that reference is made to policy DM5 regarding not locating development within areas of flood risk.	These requirements would apply to all forms of development (flood risk issues covered in DM5, waste collection covered in DM31, for example). It is not considered necessary to reiterate those requirements specifically in relation to traveller sites.	<p>Policy largely unchanged but wording added to accept appropriate expansion or upgrading of both existing traveller sites. Supplementary text updated to refer to new national policy context (The National Policy Statement on Gypsies and Travellers issued on 25 March 2012) and the 2011 local accommodation needs assessment which supersedes JCS/RSS targets.</p> <p>We are aware that national policy requires specific site allocations and a supply of deliverable sites based on need. This may have implications for the soundness of the Site Allocations Plan (in not allocating any new sites): this is the subject of a standing objection from South Norfolk Council. We anticipate further discussions will be required to refine this policy before submission since the accommodation needs assessment is at the time of writing still in draft.</p>
Gypsy and Travellers and Travelling Showpeople (DM14)	It is recognised that gypsy and traveller and travelling showpeople communities may run their businesses from the site on which their caravans are stationed (ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites). It is recommended that a	ODPM Circular 1/2006 has been superseded by the national planning policy statement on traveller sites (March 2012) albeit that this requirement is retained in Policy F. We consider on the basis of our 2008 assessment of potential sites for travellers that	See above. We acknowledge the need for further discussions with housing services around policy DM14 to take account of emerging evidence and if appropriate this issue could be made more explicit in a

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	statement is included within this policy, or within the supplementary text, stating that wherever possible, sites will be supported that are suitable for mixed residential and business uses, having regard to safety and amenity of the occupants and neighbouring residents.	opportunities for providing new sites in Norwich will be extremely limited. Potential for expansion of the existing site at Swanton Road would not necessarily give any opportunity for business accommodation on site but there may be opportunities for the use of redundant business premises on adjoining sites,	subsequent redraft of the policy.
ECONOMY			
Protection of small and medium scale business (DM17)	It is recommended that reference is made to existing markets (street and farmers markets) within the plan area, with a policy aim to protect these and to support opportunities for additional markets where there is demand. This links to Policy 5 of the emerging JCS which states that the rural economy will be supported by the 'promotion of farmers markets, farm shops and cottage industry'. Street and farmers markets support small and medium scale businesses, can be important in linking food producers and consumers, and add to the diversity of retail options available to residents and visitors.	<p>NOT ACCEPTED: We take the view that this issue is sufficiently addressed by JCS policy 11 (City centre) which already has strong promotion for markets, stating that "other shopping areas within the centre will be strengthened to provide for retail diversity, with a particular focus on enhancing the character of <u>specialist retailing areas and markets</u>".</p> <p>Were a reference to markets considered necessary, the appropriate place for this would be in the shopping section (Policy DM20), rather than DM17. The existing 200-stall open Provision Market in the city centre already provides the principal resource for local independent market traders, supplemented by specialist one-off visiting street markets such as the regular European and World Village markets. Specialist markets in Norwich are not necessarily geared directly to supporting the rural economy (that is more the role of the smaller market towns) and as a large urban cosmopolitan authority Norwich's focus in relation to specialist retailing is much more diverse and multi-</p>	Minor changes: added criteria for the consideration of new sites specifically for small businesses; criteria for accepting the loss of small business sites consolidated and clarified, accepting loss where premises are no longer <i>viable, feasible or practicable</i> (rather than just "suitable") to retain. The acceptance of loss of small business premises on the grounds of overriding community benefit now requires the developer to show that such a benefit could not be achieved by locating the use in a more sustainable or accessible location.

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
		ethnic.	
Change of use within retail centres (DM20)	This policy refers to areas/premises that suffer from long term vacancies, and that on such sites permission may be granted for non-retail uses. There is detail within the supplementary text regarding vacant properties stating that 'temporary planning permission may be granted for community uses within vacant premises where this would improve the vitality of the area'. We recommend that this detail is included with the policy text to ensure that the potential for positive effects resulting from such an approach are more likely realised. In addition, this would support JCS Policy 5 which seeks to meet the 'needs of small, medium and start-up businesses' and use 'innovative approaches in new and existing residential developments to encourage local work and business opportunities'. The SA Scoping Report (April 2010) also states that a key focus in promoting growth in and around Norwich should be in assisting business start-up growth, and innovative use of vacant sites, such as pop-up shops , could be a possible mechanism through which this support could be provided.	NOT ACCEPTED: We consider that the criteria for the acceptance of community uses are adequately explained in DM22 and the reference in the supporting text to DM20 re beneficial community uses in long term vacant premises is sufficient. Norwich has been fortunate in not experiencing the levels of chronic long term shop vacancy experienced in many towns and cities and the reality is that even in the secondary retail areas and peripheral parts of the centre this is not a significant issue, in fact some areas such as St Augustines Street are experiencing a revival in retail fortunes. The supporting text has been significantly revised and expanded to explain the background to our policy approach and now makes reference to potential use of LDOs should circumstances change, and the role of the city centre management partnership in co-ordinating funding streams for area wide enhancement and promoting initiatives such as the emerging proposals for a city centre Business Improvement District.	Minor changes to policy for clarity, more substantial changes to the definition of retail frontage zones, in particular to reorganise some of the primary area zone boundaries to make them more logical and introduce a two-tier approach whereby the core shopping streets and the two malls would retain the requirement for a minimum indicative representation of 85% A1 retail uses to be maintained, with lower indicative thresholds applied elsewhere. A late decision has been made in the interests of flexibility to transfer the detailed consideration of retail thresholds to SPD, to enable these thresholds to be reviewed as necessary without the need to revisit the entire DPD. A criteria based approach would be introduced for retail areas where there is no defined frontage. Defined frontages in Elm Hill and the eastern end of London Street would be removed in favour of a similar criteria based approach taking into account impacts on vitality, viability and diversity and need to protect specialist retail functions of the streets concerned.
District and Local retail centres (DM21)	Greater emphasis could be placed on the role of local clusters of shops (sometimes referred to as 'neighbourhood centres') which play a crucial role in ensuring that residents' day-to-day needs can be met easily and without the need to use private motor vehicles. Whilst other centres within the hierarchy can meet	NOT ACCEPTED: As a densely populated urban authority, Norwich has good accessibility on foot and by cycle to local and district centres from all residential areas and we are not aware of any areas which have particularly poor accessibility. For Norwich the definition of "local centre" extends to	Major simplification. General expectation that district centres should maintain an indicative minimum of 60% retail and local centres 50%, alongside a policy of retaining retail floorspace in any anchor convenience store which serves the centre. Community facilities and other beneficial uses supported.

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	<p>this need (e.g. town, local and district centres), some residential areas may not be in easy access of these larger scale centres, reinforcing the importance of neighbourhood centres in meeting retail need.</p>	<p>quite small groups of shops (6 units and over) which might normally be regarded as neighbourhood centres, so effectively our definition covers both local <i>and</i> neighbourhood centres; similarly our “district centres” are more akin to large local centres. A review of the role and function of district and local centres was undertaken in 2010 which added some smaller parades of shops not previously represented into the local centre definition. We consider it more appropriate to concentrate and consolidate facilities in existing local centres which have the potential and the critical mass to sustain a range of facilities and services. Very small groups (or pairs) of shops on estates would not necessarily merit protection on that basis: these more isolated shops often fail to attract the custom necessary to remain viable because accessible alternatives exist in nearby local centres and it would be unreasonable to seek to protect demonstrably unviable shop locations.</p>	<p>NOTE: Recent internal discussion with development management officers has highlighted a potential need to revisit aspects of this policy - there are particular issues around the handling of A2 and A5 uses which tend not to support the daytime vitality and diversity of local/district centres, and a suggestion that a policy based on retaining a minimum proportion of A1 uses only was inappropriate, since it would not reflect the equally beneficial contribution of A3 and (some) A4 uses. Further discussion required to agree a suitable form of words for the pre-submission version of the policy.</p>
Priority areas	<p>The SA Scoping Report (April 2010) states that there is potential for the spatial distribution of new employment opportunities to take into account accessibility to deprived sections of the population (e.g. the western sector). It is recommended that the distinct differences in deprivation levels between the different areas of the city are referenced within text supporting the economic development policies (e.g. DM19), such that attention is given to capitalising on opportunities to support growth within more</p>	<p>Consideration has been given to the identification of priority areas for small businesses under DM17, but has been discounted for the reasons specified in the “alternative options” section to that policy and such opportunities might now be more appropriate to pursue through neighbourhood plans. The Policies Map makes clear that the distribution of defined employment areas already favours the most deprived areas of Norwich, particularly the western sector which includes Bowthorpe, Sweet Briar,</p>	<p>See text in column 2.</p>

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	deprived areas (e.g. where vacant sites exist in these areas).	Guardian Road/Bowthorpe Road, the City Trading Estate and other smaller employment areas, so it could be argued that the attraction of high quality employment to and regeneration of these key sites will be of some benefit to immediately adjoining areas of deprivation by definition. The council's economic development team are also involved in a number of initiatives to support start-up businesses some of which may be appropriate to refer to in site-specific policies.	
COMMUNITIES			
Evening, leisure and the late night economy (DM23)	PPS4 states that when assessing the need for leisure development local planning authorities should take account of both the quantitative and qualitative need for additional floorspace for different types of retail and leisure developments. The supplementary text for this policy details the quantity of additional leisure space required; if there is qualitative data within the Norwich Sub Region Retail and Town Centres Study, it is recommended that this also be included within the supplementary text to provide more detail regarding the types of leisure development that will be supported, and how this provision will seek to meet the needs of the whole community, particularly those living in the more deprived sections of the city.	<p>ACCEPTED: Now referenced in paragraph 335 of expanded supporting text. JCS Policy 11 under paragraph 6.27 also refers to the identified need for leisure floorspace. <i>(Research has also identified that a substantial amount of space is required for other service related uses, such as leisure and tourism The Retail and Town Centres Study suggests that new cafe, restaurant and bar development should be at least 15% over and above comparison goods floorspace. Consequently at least 3,000m2 should be provided by 2016).</i></p> <p>We acknowledge that the evidence base in relation to leisure floorspace is somewhat out of date and was predicated on a particular quantum of retail floorspace need forecast in the Retail and Town Centres Study 2007. This will need updating in the near future to provide a more reliable basis for future decision making and monitoring against this</p>	Generally minor changes, including extension of restriction on residential development to sites immediately adjoining the Late Night Activity Zone where the impact of late night noise could not be satisfactorily mitigated by condition (see also DM12). More detailed justification and discussion in the supplementary text.

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		policy.	
UNIVERSITY OF EAST ANGLIA			
University of East Anglia (DM26)	Whilst a presumption is made that development will be managed in line with policy DM6, policy DM6 does not make reference to local biodiversity assets that are not designated and as such it is recommended that DM26 includes criteria for minimising impacts on biodiversity.	NOT ACCEPTED: The categorisation of natural environmental assets under policy DM6 includes locally important sites and assets with no national, regional or county-level designation (e.g. local nature reserves, woodland, Yare Valley Character Area which adjoins the University). All of these are afforded protection by DM6 for their significance in terms of biodiversity or geodiversity. We see no compelling justification to reiterate these requirements in policy DM26. Should there be specific biodiversity issues around particular parts of the campus these issues can be picked up in site specific policies/development briefs.	Generally minor changes and updating of supplementary text re Earlham Hall to take account of the recently prepared Vision and Development Document for that site (note that Earlham Hall is not covered by DM26 but is subject to site specific policy R42 (Site Allocations and Site Specific Policies DPD).
University of East Anglia (DM26)	With regard promoting public access to open space, it is recommended that detail is provided regarding how this would be achieved through this policy/through development within the UEA campus as this is unclear at present.	Again these matters are appropriate for detailed consideration in development briefs.	See above
University of East Anglia (DM26)	It is presumed that policy DM26 will be delivered in parallel with all other development management policies, such as DM3 (Design principles) and DM4 (Energy efficiency); it is recommended that a cross-reference is made to such policies such that the priorities for development on the UEA site are more clearly articulated.	NOT ACCEPTED: The same argument applies as for DM6 i.e. it is inappropriate to reiterate requirements of other generic policies in site specific ones as it is taken as read that all relevant policies of the plan will apply.	See above

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NORWICH AIRPORT			
Norwich Airport (DM27)	As noted above, expansion of the airport and any resulting increase in usage will result in an increase in carbon emissions. The SA Scoping Report (April 2010) recommends that the policy approach for the airport balances the benefits of increased air travel against the environmental impacts (including impacts on the amenity of nearby residents). At present there is no recognition within this policy's supplementary text regarding the potentially large environmental impact of the airport's expansion; rather the emphasis is solely on the economic benefits of the airport. It is recommended that this is redressed, and that detail is provided regarding how the positive impacts outlined are to be balanced with the negative environmental impacts of the proposed expansion (as recommended within the SA Scoping Report, April 2010).	ACCEPTED: Significant redrafting of supporting text to respond to this point (also made by objectors, see right), aiming for a more appropriately balanced discussion of both economic benefits and environmental impacts of airport expansion and what would be necessary to mitigate the latter.	Minor but important changes to policy wording ensure any proposals meet sustainable development criteria in policy DM1 and sustainable travel priorities in DM28: significant redrafting of supplementary text to provide a better balance between environmental and economic considerations and to refer to changing policy context, especially emerging National Framework for Sustainable Aviation. Clear emphasis on the need for a masterplan to guide more major proposals for airport expansion.
Norwich Airport (DM27)	It is recommended that the Norwich Airport Masterplan, once complete, is subject to Sustainability Appraisal/Strategic Environmental Assessment.	Noted	N/A
TRANSPORT			
Encouraging sustainable travel (DM28)	It is recommended that a criterion is included regarding the provision of electric car charging points within new developments.	NOT ACCEPTED: Unnecessary in DM28. This recommendation is already picked up in policy DM29 (for public car parking) and DM31 (for development generally). Parking standards in Appendix 4 supporting policy DM31 include appropriate provision standards	Policy now includes a general expectation that proposals should reduce the need to travel consistent with DM1 and will not (so far as is practicable) result in a net increase in travel by car. The core cycling and walking networks are deleted from the policies map (apart from the Riverside Walks) in favour of

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
		for electric vehicle charging points.	a generic policy promoting universal accessibility and permeability in development.
City centre public off-street car parking (DM29)	It is recommended that special provision is made for car parking spaces reserved for car club vehicles	NOT ACCEPTED: The city council is in full support of the extended use of car club spaces, however the logistics of providing dedicated car club vehicles and effectively enforcing and policing such schemes within large commercially operated car parks would not make this option cost effective to implement through planning policy and would rely in any case on the support and goodwill of the operator. We take the view that it is more cost-effective to provide such spaces on street closer to the developments they would serve. A similar suggestion for reserved car-sharing spaces in car parks has been discounted for similar reasons.	Minor changes to policy to better explain the justification, purpose and operation of the 10,000 space "cap" on city centre public parking. Further discussion added in the supplementary text on the background to the policy approach and circumstances where temporary off-street parking proposals are appropriate.
Car free and low car housing (DM32)	This policy, whilst supporting the development of car free housing, restricts this to identified locations. It is recommended that the policy wording is broadened to include a general statement of support for car free housing proposals.	NOT ACCEPTED: Policy DM32 very deliberately restricts the acceptance of car free housing to locations of high accessibility where there are likely to be most opportunities for the use of alternative modes of travel, where car ownership is lower and where the availability of on-street space is already tightly regulated through controlled parking zone (CPZ) policy. We consider a more permissive approach would be imprudent and potentially unsound. In outer suburban areas of Norwich particularly our expectation is that an unregulated approach to car free housing would lead to serious impacts on the local highway network through traffic congestion and indiscriminate	Minor change had been proposed to make clear that this policy extends to flats and HMOs considered under policy DM13 (although further drafting is likely to be necessary prior to publication of the pre-submission version to respond to the issues around "professional occupier" HMOs, see left.

DM Policy (Reg. 18 stage)	SA recommendation (Reg. 18 stage)	Norwich City Council response to recommendation (Reg. 19 stage)	Other substantive policy changes since Reg. 18 stage
		<p>parking on street. Realistically we would see relatively little likelihood of private housing developers bringing forward car free housing schemes other than in those areas where they are mandatory, since a dwelling with parking is more profitable than one without and the availability of on-site parking spaces significantly improves scheme viability. The problem arises where larger family houses of fairly recent construction have been subdivided or occupied as HMOs aimed at young professional tenants who may <u>all</u> have cars. Many of the problems associated with on street parking outside CPZs arise from this relatively new (but increasingly popular) form of low-cost accommodation, accordingly the policy is likely to require further review to address specific and recently emerging concerns around HMOs.</p>	
New policy wording	<p>PPS4 states that specific consideration should be given to development that generates substantial transport movements, and to locate or co-locate this in accessible locations (including by rail and water transport where feasible). Whilst not repeating national policy, it is recommended that policy detail is included regarding development that generates substantial transport movements, including heavy goods vehicles. Detail could be included identifying existing sustainable transport routes that could be optimised as well ensuring options for co-location are sought before new sites are proposed.</p>	<p>Much of this is already covered adequately in JCS policy 6 and the Norwich Area Transport Strategy (NATS). Policy DM28 makes clear that the transport impacts of development must be adequately addressed through effective travel planning measures commensurate with the likely travel demand generated. It also sets out the imperative to reduce the overall growth in vehicular traffic. Policy DM1 requires development to be located to minimise the need to travel. The inclusion of a statement along these lines would not add much to what is already implicit in national and local transport policy.</p>	