

Norwich Local Plan

Sustainability appraisal of the Norwich development management policies local plan:

Environmental adoption statement (December 2014)

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1. Introduction

1.1 Norwich City Council adopted the *Development management policies local plan (DM policies plan)* on 1st December 2014. In accordance with the requirements of Article 9 of the Strategic Environmental Assessment Directive (SEA) 2001 and regulations 16 (3) and (4 a-f as summarised below) of the Environmental Assessment of Plans and Programmes Regulations, 2004, the purpose of this *Environmental adoption statement* is to set out:

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

1.2 The purpose of SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of plans. The SA also meets the legal requirement to undertake a Strategic Environmental Assessment (SEA), which covers only the environmental considerations relating to plan making. Whilst the European legal requirement in the SEA Directive is for this *Environmental adoption statement* to cover how environmental considerations have been covered in the environmental report (the SA), since the national interpretation of this through the Environmental Assessments of Plans and Programmes Regulations is that social and economic considerations in decision making should also be covered, this statement focuses on all three areas. In fact, since issues determining decisions in plan making are often inter-related, this approach is necessary.

2. Background

- 2.1 Norwich City Council commenced preparation of the *DM policies plan* in 2010. For most of its plan preparation period the plan was prepared in tandem with the *Site allocations plan*. The strategic plan guiding these plans, the *Joint core strategy for Broadland, Norwich and South Norfolk (JCS)*, was adopted in 2011.
- 2.2 The plan making and SA process are iterative in nature and the report shows how the SA and public consultation have influenced the development of the plan.
- 2.3 The plans were submitted together to the Secretary of State in April 2013 and the public examination hearings took place consecutively in late February-early March 2014. The Inspector's report of the examination into both plans was received in October 2014. The council resolved to adopt both plans on 25 November, and this took effect on 1 December 2014.
- 2.4 This report sets out how the legal requirements in paragraph 1.1 have been addressed for the *DM policies plan*. The report structure reflects the requirements of the SEA Directive above, with the exception of (d) relating to trans-national boundaries. Since there are no European trans-boundary issues associated with the plan, this issue is not covered further in this report.
- 2.5 Please note that the final SA report constitutes the June 2012 SA Report and the June 2014 SA Addendum. This approach was agreed with the Inspector during the public examination process and reflects the fact that the Regulation 19 *DM policies plan* was taken by the Inspector as the starting point for the public examination process rather than the Regulation 22 ('Submission') plan. The June 2014 SA Addendum complements the June 2012 SA report and should be read alongside it. The January 2013 SA Report is therefore effectively superseded and does not form part of the final SA Report.

- 2.6 This *Environmental adoption statement* is published alongside the *Town and Country Planning Regulations adoption statement*.

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

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

Table 1 – SA framework

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

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

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

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

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

Plan making stage	SA / SEA stage
<p>Evidence gathering and consideration of options</p> <p>January to October 2010</p>	<p>The <i>SA scoping report</i> was prepared by Norwich City Council in early 2010. This was the first stage of the SA process, which set the context, established the baseline and decided the scope of the SA. It presented the outputs of the scoping phase of the SA and the proposed sustainability framework (a set of sustainability objectives and criteria) against which the <i>DM policies plan</i> has since been assessed. The report is available at:</p> <p>http://www.norwich.gov.uk/YourCouncil/Consultations/ClosedConsultations/2010/pages/DevelopmentManagementPlanScopingReport.aspx.</p>
<p>Public consultation on the draft policies</p> <p>January to March 2011 (‘Regulation 25 stage’)</p>	<p>The <i>December 2010 Sustainability appraisal report</i> was prepared for Norwich City Council by Land Use Consultants (LUC).</p> <p>This was consulted on with the ‘regulation 25’ draft of the <i>DM policies plan</i> from January to March 2011. The SA report is available at:</p> <p>http://www.norwich.gov.uk/YourCouncil/Consultations/ClosedConsultations/2011/documents/Dmpoliciessa.pdf</p> <p>The SA appraised the draft policy options in ‘clusters’ and assessed their likely effects, providing recommendations for how draft policies could be amended to make them more sustainable. The SA report then assisted with the development of preferred policies for the <i>DM policies plan</i>.</p>

<p>Pre-submission consultation August to October 2012¹ (‘Regulation 19’ stage).</p>	<p>LUC produced the June 2012 SA report to reflect the content of the draft pre-submission <i>DM policies plan</i>. It is available at http://www.norwich.gov.uk/Planning/Documents/DMPSA_ReportReg19.pdf</p> <p>The report restated the methodology and framework used for the appraisal and reiterated and updated baseline information where necessary. It appraised the draft DM policies in ‘clusters’ and the reasonable alternatives to them as set out after each policy in the draft plan. It also set out recommendations for monitoring the significant social, environmental and economic effects of implementing the <i>DM Policies plan</i>.</p> <p>The SA was not updated at this stage to reflect the sustainability effects of changes made to the DM policies plan between publication of the June 2012 SA Report and the publication of the DM policies Plan for Regulation 19 consultation in August 2012. However, appraisal of all these changes is included in the June 2014 SA report addendum see examination stage below.</p>
<p>Submission to Secretary of State: April 2013 (‘Regulation 22 stage’)</p>	<p>An updated January 2013 SA report was prepared by LUC to accompany the plan submitted under Regulation 22 (submitted to the Inspector as document SD21 for the examination in public). This SA is available at: http://www.norwich.gov.uk/Planning/Documents/SD21.pdf</p> <p>This report fully reflected the policies in the Regulation 22 plan.</p>

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

	<p>However the Inspector subsequently decided to examine the Regulation 19 (Pre-submission) plan rather than the submission plan and its June 2012 SA Report as a consequence. As described earlier, the 'Final SA Report' now comprises both the Regulation 19 (June 2012 SA Report) as well as the SA Addendum produced in June 2014 and the two reports should be read in conjunction.</p>
<p>Examination stage: Proposed Main modifications June to August 2014</p>	<p>The June 2014 SA addendum supplemented the June 2012 SA report and should be read alongside it. The addendum is available at: http://www.norwich.gov.uk/Planning/Documents/SAAddendumNorwichDMPoliciesJune2014.pdf></p> <p>It appraised firstly the sustainability effects of changes made to the <i>DM policies plan</i> between publication of the June 2012 SA Report and the publication of the <i>DM policies Plan</i> for Regulation 19 consultation in August 2012.</p> <p>Secondly, it appraised and set out the sustainability effects of the Inspector's proposed main modifications to the pre-submission regulation 19 version of the <i>DM policies plan</i>. These modifications were also considered cumulatively with the effects of the Regulation 19 <i>DM policies plan</i>. The Inspector's report² states that "<i>SA has been carried out appropriately and is adequate</i>".</p>
<p>Adoption: December 2014, following receipt of the Inspector's report Sept. 2014.</p>	<p>Production of this Environmental adoption statement (EAS) in accordance with the SEA Directive.</p>

² Report on the Examination into the Norwich Development Management Policies Plan, C J Anstey, October 2014

- 4.4 As referred to in table 2, the SA process has informed plan making. In the early stages of plan making, the baseline evidence from the *SA scoping report* prepared by Norwich City Council assisted in the drafting of early policies and reasonable alternatives. Most importantly in terms of the SA, it informed the sustainability objectives set out in table 1 above against which the policies in the *DM policies plan* were appraised.
- 4.5 The *December 2010 Sustainability appraisal report* prepared by LUC to accompany the regulation 25 *DM policies plan* assessed how ‘clusters’ of policies perform against the sustainability objectives established on the *SA scoping report* and made recommendations for how policies could be amended to enhance their sustainability effects. This analysis, alongside other relevant information, was taken into account in the choice of policy approaches and their detailed wording for the subsequent Regulation 19 plan.
- 4.6 The report further concluded that the draft policies in the plan would have significant positive effects on the majority of the SA objectives. However, it also concluded that the plan could have negative effects on traffic, water quality, environmental amenity and climate change mitigation, with negative effects on air quality and carbon emissions being significant.
- 4.7 Accordingly, it recommended that the plan should be amended to take further account of water quality, to mitigate potential negative environmental effects of airport growth and to further promote electric car use, car free housing and car clubs.
- 4.8 The ‘*Schedule of key policy changes to the DM Policies Plan between the 2011 draft (Regulation 25) version and the pre-publication (Regulation 19)*’ is available at:
<http://www.norwich.gov.uk/Planning/Documents/DMPPolicyChanges.pdf> This document identifies some draft policies amended as a result of SA

recommendations in the *December 2010 SA report*. DM2 on amenity was amended to provide a clarification of wording and DM3 was amended to provide reference to the use of climate change resistant plant species in landscaped areas. Policy DM27 for the airport included changes to policy wording to ensure any proposals meet sustainable development criteria and priorities, along with significant redrafting of supplementary text to provide a better balance between environmental and economic considerations relating to airport growth. Minor amendments to the policy and text relating to car free housing were made. Amendments were not made in relation to electric cars and car clubs as it was concluded that policies provided adequate coverage, including parking standards requiring electric car charging points.

- 4.9 The *June 2012 SA report* concluded that most of the policies would have positive impacts on the sustainability objectives.
- 4.10 It also concluded that relatively few policy themes would have negative 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, were assessed to be mitigated by policies such as DM1 (Achieving and delivering sustainable development), DM6 (Natural environmental assets) and DM9 (the historic environment and heritage assets).
- 4.11 The only significant negative residual effect identified for an individual policy theme was the effect of DM27 for the 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 (ALC) zones 1-3 within the airport boundary which could be lost to development.

- 4.12 The report's recommendations included proposed changes to some DM policies to mitigate the negative effects and to strengthen sustainability effects generally.
- 4.13 A table setting out these recommendations, and the council's responses to them, is attached in Appendix 2. Following the decision of cabinet on 11th July 2012, the council incorporated the recommended changes into its final pre-submission plan.
- 4.14 The *June 2012 SA report* was not updated to reflect any of the changes made to the pre-submission *DM policies plan* prior to consultation. All these changes were subsequently appraised in the *June 2014 SA Addendum* (in chapter 2). This SA was consulted upon at the same time as the main modifications consultation.
- 4.15 The SA concluded that these changes generally did not significantly alter policy requirements and were therefore not capable of significant sustainability effects.
- 4.16 The Addendum also appraised the main modifications to the plan (chapter 3) which were consulted on between June and August 2014, and additional (minor) modifications which were publicised at the same. It concluded that minor sustainability effects of the main modifications do not merit alteration of the conclusions of the June 2012 SA Report.
- 4.17 There were no comments made by consultees regarding the SA of the modifications. The representations received to the main modifications to the plan themselves are referenced in paragraph 5.6 of this report.
- 4.18 The Inspector's report for the *DM policies plan* was received in September 2014. It found the plan sound, subject to a number of main modifications. As part of the public examination process, the Inspector specifically considered whether

the SA for the *DM policies plan* had been carried out appropriately. The Inspector concluded that the SA has been carried out appropriately and is adequate.

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

- 5.1 The SEA consultation bodies (i.e. Natural England, English Heritage and the Environment Agency) were first requested to identify the appropriate scope of the report. The consultation bodies and other stakeholders were then consulted on the *SA scoping report* in April/May 2010.
- 5.2 A schedule of responses to the SA scoping report was presented as table 3.2 on pages 11 to 14 of the *March 2013 submission SA report*, available at: <http://www.norwich.gov.uk/Planning/Documents/SD21.pdf> and in appendix 1 of this report. This detailed how comments on the SA have been considered and taken into account within the SA or the plan making process as appropriate and is summarised below.
- 5.3 Comments were made by five organisations: Norfolk Landscape Archaeology, Norfolk County Council, English Heritage, Natural England, and the Environment Agency. A summary of and response to a letter subsequently received from the Environment Agency (EA) in March 2011 requesting that the SA should contain further explanation of aspects of flood risk policy in Norwich is also included in the table.
- 5.4 No comments were received on the SA reports consulted on at the draft plan stage (Regulation 25) or at the Regulation 19 (pre-submission) stage.
- 5.5 The final stage of consultation on the *DM policies plan* was the Inspector's main modifications consultation following the public examination hearing, which took place between June and August 2014. No representations were received in relation to the SA of the plan.
- 5.6 Seventeen representations were made on the DM policies plan itself. They included number of objections by Broadland District Council, mainly on points of detail, support from Anglian Water to modifications to flood risk policies and

support from Norwich City Council for the Inspector's modification to policy DM14 for Gypsies and travellers. These are available to view on the council's website at:

<http://www.norwich.gov.uk/Planning/PlanningPolicy/Documents/4MainModificationsResponseSummaryTables.pdf> .

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

- 6.1 A large number of ‘reasonable alternative’ policy approaches were assessed throughout the plan making process, with drafts of the *DM policies plan* including alternatives at the end of each policy section. These alternatives were appraised through SA.
- 6.2 Detailed assessment of alternatives considered for each policy and the council’s reasons for not preferring each alternative over the proposed policy is provided in appendix 3. This table, which also contains LUC’s sustainability commentary on these reasonable alternatives, is taken from appendix 4 of the *June 2012 SA report*. Following the end of the public examination hearings, the inspector proposed a set of main modifications which were consulted upon between June and August 2014, alongside the June 2014 SA Addendum. No alternatives were identified in respect of these main modifications.
- 6.3 In relation to ‘reasonable alternatives’, the Inspector stated *“It is clear from the submitted plan and the supporting evidence that the Council considered reasonable alternatives before finalising the policies in the DM policies plan. Sustainability appraisal informed the process throughout and the public and stakeholders were given the opportunity to comment through several rounds of consultation. Consequently I conclude that the Council has adopted a thorough and systematic approach to policy formulation and that reasonable alternatives to policies have been considered.”*

7. How the environmental and sustainability effects will be monitored

- 7.1 The SEA Directive requires that *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”* (regulation 17) and that the environmental report should provide information on a *“description of the measures envisaged concerning monitoring”* (Schedule 2). Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, which should help decision making.
- 7.2 The government’s latest guidance on SA³ states that details of the proposals for monitoring the significant effects of implementing the adopted local plan should be included in the sustainability appraisal report, or the post-adoption statement (this document). It is not necessary to monitor everything. Instead monitoring should focus on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before damage is done), and on significant effects where there is uncertainty where monitoring would enable preventative or mitigation measures to be taken.
- 7.3 The *June 2012 SA Report* sets out recommendations for monitoring the significant social, economic and environmental effects of implementing the *DM policies plan*. The report recommends, in paragraphs 52 to 54 of the non-technical summary, that monitoring of sustainability effects for the *DM policies plan* should be undertaken for those objectives for which significant sustainability effects have been identified: where they may give rise to irreversible damage; where there is uncertainty, and where it would help to ensure positive outcomes.

³ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

- 7.4 Monitoring will be done through Norwich City Council's *Annual monitoring report (AMR)* so that it is integrated with monitoring the progress of the whole local plan. In addition to the framework set out in the *JCS*, the *DM policies plan* has a monitoring framework (appendix 9 of the plan) which sets out the SA objectives being monitored for each policy. Appendix 4 of this document sets out indicators in the AMR for measuring the significant sustainability effects of the *DM policies plan* identified in table 6.2 in the *June 2012 SA report*. All of the significant effects of the plan identified were positive – no negative effects were identified.
- 7.5 The monitoring framework commits Norwich City Council to seeking new evidence, implementing focussed changes to the plan or commencing work towards implementing a new plan if any significant issues with implementation of the policies become evident through monitoring within 2 years of adoption of this plan. This meets the requirements of the SEA Directive set out in paragraph 7.1 to undertake appropriate remedial action at an early stage if unforeseen adverse effects emerge.

Appendix 1 - Summary of consultation responses at each stage of Sustainability Appraisal

(extract from January 2013 SA report, table 3.2, pages 11 to 14)

Comment on April 2010 SA Scoping Report	SA/DPD response
<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>Norfolk County 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</p>

	Environment Record at an early stage in the application process.
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	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.
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 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.	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, 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.
Natural England – The following recommendations were made:	SA objective ENV6 is to adapt to and mitigate against the impacts of climate

<p>the increased stress of climate change impacting water availability should be addressed;</p> <p>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>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>
<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 moderate flood risk, particularly those large areas of the city centre in Zone 2.</p> <p>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</p>

	<p>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. 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 <i>Site allocations plan</i>.</p> <p>.</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.</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</p>

<p><i>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>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 SA Report for the Norwich DM Policies DPD 14 January 2013 Comment on SA SA/DPD response 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. 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>
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Appendix 2 - Norwich City Council's responses to June 2012 SA Report recommendations

(endorsed by Sustainable Development Panel, 27 June 2012 and reported to Cabinet July 11th 2012)

SUSTAINABILITY APPRAISAL RECOMMENDATIONS AND CITY COUNCIL RESPONSE

DM Policy (Reg. 19 stage)	SA recommendation (Reg. 19 stage)	Norwich City Council response to recommendation	Norwich City Council recommended policy change
COMMUNITIES			
Community Facilities (DM22)	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.	ACCEPTED: Although both policies DM1 (delivering sustainable development) and Policy DM28 (sustainable travel) require development to reduce car dependency, an explicit requirement in the policy clause on schools development would reinforce this.	Recommended to amend Policy DM22 clause a) to read "Proposals for new or replacement schools and other educational facilities, extensions to existing schools and changes of use for school or other educational and training purposes will be accepted and permitted where: a) they would not undermine the objectives for sustainable development set out in policy DM1; in particular by increasing the need to travel by private car"
NORWICH AIRPORT			
Norwich Airport (DM27)	It is recommended that the Norwich Airport Masterplan, once complete, is subject to	NOTED: However it is expected that the Airport Masterplan would be prepared by the airport operating company.	No change recommended to policy DM27. Recommended that a reference be added in the

	Sustainability Appraisal/Strategic Environmental Assessment.	Although it would be necessary to ensure that sustainability considerations were fully taken into account in order for the city council to endorse the masterplan, a privately prepared planning and management framework for a commercial airport is not a development plan document and would therefore not be subject to the requirements for formal sustainability appraisal.	supporting text clarifying the council's expectations for sustainability issues to be addressed in the masterplan; delegated approval to be given to officers to finalise wording prior to publication.
Norwich Airport (DM27)	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 and the Environment Agency.	NOTED: It is acknowledged that watercourses to the north of the airport in the vicinity of Horsham St Faith drain into the Bure and there may be potential for indirect impacts from aviation-related development in that area on protected habitats in the Broads. However it is considered that Joint Core Strategy policies 1 and 3 provide sufficient safeguards by requiring development to "minimise water use and protect groundwater sources" (Policy 1) and to "ensure that water quality is protected or improved, with no significant detriment to areas of environmental importance" (Policy 3).	No change recommended to policy DM27.
PLANNING OBLIGATIONS			

Planning Obligations (DM33)	<p>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.</p>	<p>NOT ACCEPTED. Although further detailed guidance on the scope and operation of planning obligations may be appropriate to bring forward through SPD, we consider it inappropriate to include an appendix seeking to set out definitively which matters must be dealt with by planning obligations. Appendix 7 of the Joint Core Strategy already sets out a broad overview of the types of strategic infrastructure that are necessary to deliver growth in the greater Norwich area (this will be funded through CIL, not planning obligations). The city council's list of qualifying infrastructure under Regulation 123 of the CIL regulations will also set out matters which still need be covered by planning obligations locally. Strategic infrastructure priorities (identified through a delivery plan) and the Regulation 123 list itself will be subject to at least annual review through publicly accountable member decisions informed by the investment priorities of the GNDP and any specific spending priorities identified by local communities. Inclusion of such material</p>	<p>No change recommended to policy DM33. No appendix proposed, since it would not add anything to what is already in the Joint Core Strategy and CIL provisions. Consider appropriate review and amplification of existing SPDs which make provision for local planning obligations to cover specific matters once CIL is adopted.</p>
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		in an appendix to this plan would be unsound in advance of the introduction of CIL and government decisions on CIL funding of affordable housing. Such an approach would also be highly inflexible (since it could not be amended over the intended 15 year plan period without reviewing the plan in its entirety).	
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Appendix 3 - The reason for choosing the plan as adopted, in the light of reasonable alternatives

(table taken from appendix 4 of *June 2012 SA report*)

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan 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

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
		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. 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.	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 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	This option would potentially secure more of the multiple benefits associated with green infrastructure provision, including improvements to

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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.	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 energy	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 national policy in the NPPF. No other alternatives were considered.	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 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	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

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	presumption in favour of sustainable development.	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 needs in the NPPF.	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 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	This option would provide a greater degree of protection for existing open space (positive effect on SOC2 and SOC7). However, it is important that

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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.	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 hazards	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 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	Sustainability of BAU policy framework is assessed in Section 5.

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	<p>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 - Communications 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 housing need.	Sustainability of BAU policy framework is assessed in Section 5.

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
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).

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
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	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

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	dwellings on top of existing commitments up to 2026.	accommodation, in turn resulting in an unacceptable amount of housing loss (negative effect on SOC4).
Economy		
DM16 - Employment and business development	One alternative approach is not to designate existing employment areas at all and to consider proposals for alternative uses on their merits. This approach 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.	Sustainability of BAU policy framework is assessed in Section 5.
	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.	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).
	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	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

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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.	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.
	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 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.	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 (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	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.

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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.	
	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 in certain circumstances, it also promotes small business development generally and protects small and medium sites and premises where there is demand.	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 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	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

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	be directly contrary to the JCS.	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 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	Sustainability of BAU policy framework is assessed in Section 5.

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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.	
	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 - Managing change in the primary and secondary retail areas and Large District Centres	One alternative option is to incorporate indicative percentage thresholds within 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.	The choice of whether to set out thresholds for the proportion of retail 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.
	A second alternative is to not to change the percentage thresholds, frontage zone	This option would not only be inflexible but also be

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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.	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).
	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.	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).
	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	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	Sustainability of BAU policy framework is assessed in Section 5 to provide a baseline for the assessment of

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
uses within district and local centres	applications within Norwich's district and local centres.	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		
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	Having more stringent criteria for the protection of community facilities would provide a higher degree of

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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.	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.

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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).	
	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.	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).
DM25 - Use and removal of restrictive conditions on retail warehousing and other retail premises	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.	Sustainability of BAU policy framework is assessed in Section 5.
	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 environments as it would effectively constrain new	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

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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.	and restrict sustained economic growth within the Norwich Policy Area. 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 the amount of land needed for expansion, taking account of the need for environmental protection. For the scale of growth to be	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

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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.	(positive effect on 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).
	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.

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	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 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.	Having less stringent criteria for off street parking may result in provision of a lower quality car parking (negative effect on ENV5, and SOC7), that does not effectively and efficiently meet need (negative effect on ENV9). It may also impact on economic

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
		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.

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
DM31 - Car parking and servicing	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 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.	Sustainability of BAU policy framework is assessed in Section 5.
	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.	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).
DM32 - Car free or low car housing	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	Sustainability of BAU policy framework is assessed in Section 5.

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	result in car free and low car housing being developed in inappropriate locations within the city. This may lead to on street parking problems.	
	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 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.	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 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	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,

Policy name and number	Reasonable alternative options and reason for not preferring each over the plan policy	LUC sustainability commentary
	supplementary planning guidance and technical advice notes.	SOC6, SOC7, SOC8, EC1, EC2, EC3 and EC4.).

Appendix 4 - Monitoring indicators

The following table sets out how the significant effects of the plan identified in the SA will be monitored through the Annual Monitoring Report for the Norwich Local Plan.

SA objectives for which potential significant effects have been identified	Indicators
<p>ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic</p>	<ul style="list-style-type: none"> Heritage at risk – Number of: <ol style="list-style-type: none"> listed buildings lost/demolished, and scheduled ancient monuments on the buildings at Risk Register. <p><i>Source: Norwich Local Plan: Annual monitoring report. Norwich City Council</i></p> <ul style="list-style-type: none"> Percentage of Conservation Areas with appraisals <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Growth Board.</i></p>
<p>SOC1: To reduce poverty and social exclusion</p>	<ul style="list-style-type: none"> Building for Life 12 percentage of developments scoring no reds on criteria 1, 2, 3, 8, 9 and 10 Employment rate of working age population 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 Growth Board.</i></p>
<p>SOC3: To improve education and skills</p>	<ul style="list-style-type: none"> Workforce qualifications - % of working age population with qualifications at NVQ Level 4 or above. School leaver qualifications - % of school leavers with 5 or more GCSEs at A*-C grades. <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Growth Board.</i></p>

SA objectives for which potential significant effects have been identified	Indicators
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 • Provision of Gypsy and Traveller pitches. <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Growth Board</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 • 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 <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Growth Board</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 (all affordable housing to achieve CfSH level 3). <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Growth Board</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 • Percentage of people crossing Norwich's inner ring road on foot or bike <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich</i></p>

SA objectives for which potential significant effects have been identified	Indicators
	<i>Growth Board</i>
EC1: To encourage sustained economic growth	<ul style="list-style-type: none"> • New business registration rate as a percentage of business stock • Percentage of completed town centre uses in identified centres <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: amount of office development in the DM19 priority area, elsewhere in the city centre and district/local centres and in defined employment areas • 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 Growth Board.</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 • Percentage of new and converted dwellings on Previously Developed Land <p><i>Source: JCS for Broadland, Norwich and South Norfolk: Annual Monitoring Report. Greater Norwich Growth Board.</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

SA objectives for which potential significant effects have been identified	Indicators
	<p>flood defence grounds or water quality</p> <ul style="list-style-type: none"> • Percentage of new and converted dwellings on Previously Developed Land • 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 Growth Board.</i></p>

In addition to monitoring the above, the monitoring framework for the *DM policies plan* through the Annual Monitoring Report covers issues specific to the DM policies plan and sets out which SA objectives each indicator addresses.