

## **GNLP authorities' Response to draft HRA (Dec 2020) recommendations for Reg 19 GNLP**

Recommendations, in italics, extracted from Non-Technical Summary.

- 1. Completion of the Water Cycle Study is necessary to be clearer about any impacts on European sites.*

Response - Agreed. The Water Cycle Study is close to completion. Indications from progress so far are that the proposed development is likely to be able to be accommodated within the capacity of existing or proposed water infrastructure, and if confirmed should therefore not have negative impacts on European sites in relation to the water cycle. The HRA will need to be reviewed, and revised if necessary, in the light of the final WCS.

- 2. It is recommended that additional supporting text is added to Policy 4. "Delivery of many of these transport improvements are outside the control of the Greater Norwich Local Plan. For example, the Norwich Western Link road and development of bus improvements are the responsibility of Norfolk County Council, and A140 and A47 improvements are the responsibility of Highways England. The GNLP Authorities will support the transport infrastructure improvements provided that their promoters and the relevant competent authority are able to demonstrate that they would not conflict with other policies of GNLP and where there would be no adverse effect on the integrity of a European site".*

Response - Although the principle of the recommendation is agreed with, the suggested text is not all necessary to provide adequate clarification as the issue of the Norwich Western Link is already explained in the Plan (see para 240). Therefore, a change has been made to the supporting text, based on the latter part of the suggested text, adding a new paragraph (245):

"The GNLP authorities will support the transport infrastructure improvements provided that their promoters and the relevant competent authority are able to demonstrate that they would not conflict with other policies of the plan and where there would be no adverse effect on the integrity of sites protected under the Habitats Regulations Directive" ..

- 3. To provide clarity, it is recommended that extra clarification is added to Policy 6, section 5 perhaps as supporting text 'Habitats Regulations Assessments will be required for small scale tourism accommodation within 1km of European sites. Tourism accommodation will be treated as residential development on the basis of 6 bed spaces being equivalent to one home, with respect to policy 3 for green infrastructure for the GIRAMS tariff payment. Habitats Regulations Assessment*

*will also be required for tourism, leisure, cultural and environmental activities which would result in greater use of European sites’.*

Response - Although the principle of the recommendation is agreed with, the suggested text is not all necessary to provide adequate clarification of the matter, as each local planning authority will apply the Habitat Regulations to any form of development that might have an impact on sites protected under the Habitats Regulations Directive as required. Therefore, a change has been made to revise the supporting text to Policy 6 (paragraph 299) to state:

“Tourism, and related developments, are an important part of the local economy and reflect the attractiveness of the environmental and cultural offer in the area. However, it is important that this attraction does not itself lead to damage of the very things that people come here for. In particular, consideration under the Habitat Regulations will be needed for such developments. The requirements set out under Policy 3 for new residential development will apply to tourist accommodation development; and a Habitat Regulations Assessment (HRA) will be required for significant tourism, leisure, cultural or environmental development which would impact on a Habitats Regulations protected site.”

- 4. The contingency allocation of 800 homes at might well be reliant on the Whitlingham Trowse Water Recycling Centre being upgraded before it is deliverable.*

The possibility of the contingency site has been incorporated within the Water Cycle Study and so will provide information on this matter. If, and when, the contingency site is proposed to be brought forward the issue will need to be reviewed.

- 5. It is concluded that subject to satisfactory resolution of the outstanding matters listed above, there would be no adverse affect upon the integrity of any European site.*

Agreed.