

Sustainability Appraisal (SA) of the Joint Core Strategy for Broadland, Norwich and South Norfolk

SA for the Broadland part of the Norwich Policy Area following
the High Court ruling of 24 February 2012



Non-technical summary

August 2012

Prepared for:
Greater Norwich
Development
Partnership (GNDP)

INTRODUCTION

The Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) was adopted in March 2011. A legal challenge to the adoption of the JCS was received in May 2011 from Stephen Heard, Chairman of Stop Norwich Urbanisation. High Court Judge Mr Justice Ouseley made his judgment in February 2012, followed by his final order in April 2012.

Mr. Justice Ouseley found that parts of the JCS concerning the distribution of housing and associated development¹ in the Broadland part of the Norwich policy area (NPA), including the North East Growth Triangle should be remitted for further consideration. This also required further Sustainability Appraisal (SA) work to be undertaken on these parts.

The plan-makers (the three local planning authorities, acting together as the Greater Norwich Development Partnership, GNDP) have considered the remitted parts of the JCS and the SA further, and are now able to publish the 'Proposed Submission Plan Content' for consultation. This SA Report is published for consultation alongside the Proposed Submission Plan Content. Any representations arising from the consultation will be taken into account by the local planning authorities before the decision is taken on whether to submit the proposed plan for public examination.

SCOPE OF THE SUSTAINABILITY APPRAISAL

Sustainability Appraisal is a process for considering the social, environmental and economic effects of a draft plan, and the reasonable alternatives to that approach. In doing so, it helps ensure that decisions are made that contribute to achieving sustainable development.

An important first step in the SA process is establishing its 'scope', i.e. those sustainability issues which should be a focus of the SA, and those that should not. In practice, scoping involves answering the following questions in turn:

- What's the sustainability 'context'?
- What's the sustainability 'baseline'?
- How would the sustainability baseline evolve without implementation of the plan?
- What are the key issues that should be the focus of the appraisal?

The scoping identified a list of sustainability 'objectives' that have been used as a methodological 'framework' for structuring the SA. These cover environmental, social and economic issues.

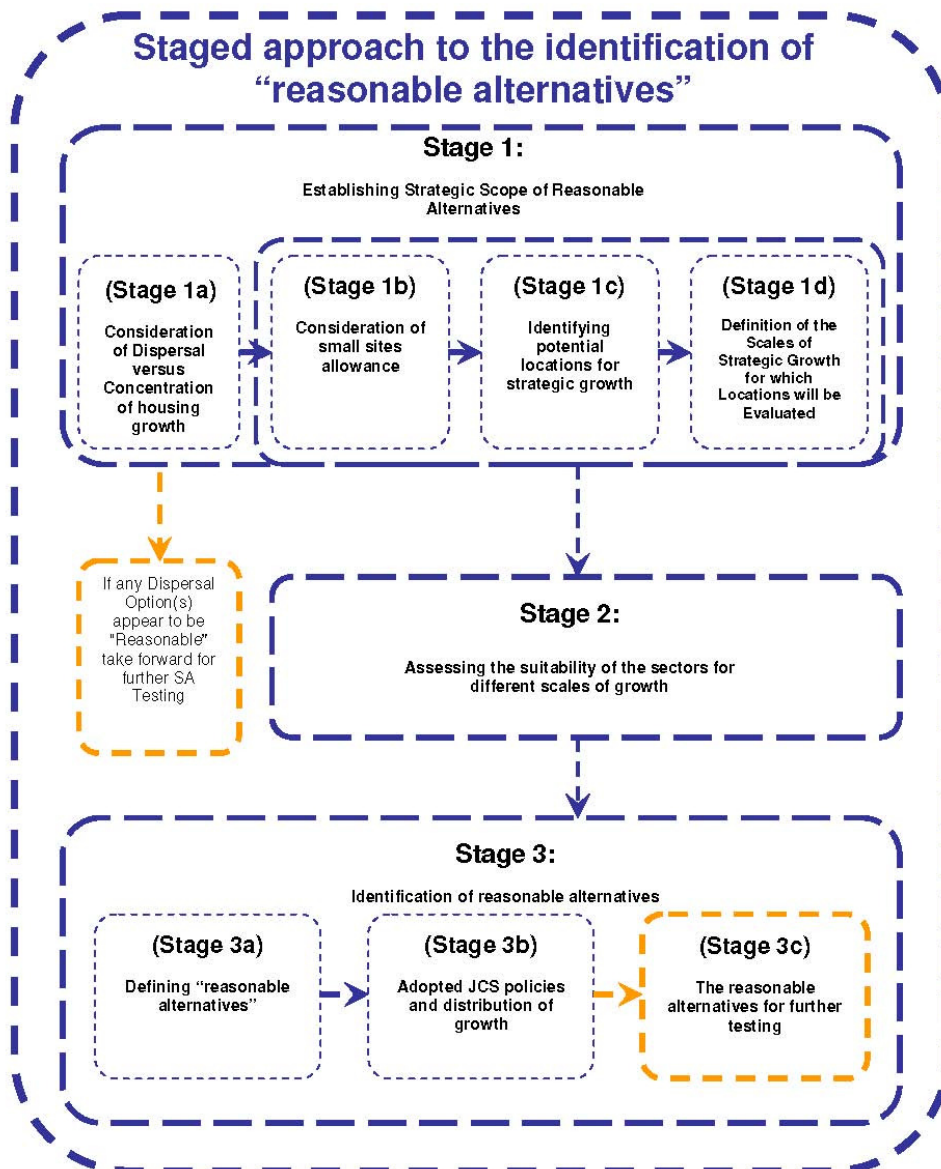
Sustainability objectives identified through scoping	
To reduce the effect of traffic on the environment.	To reduce poverty and social exclusion.
To improve the quality of the water environment.	To maintain and improve the health of the whole population and promote healthy lifestyles.
To improve environmental amenity, including air quality.	To improve education and skills.
To maintain and enhance biodiversity and geodiversity	To provide the opportunity to live in a decent, suitable and affordable home.
To maintain and enhance the quality of landscapes, townscapes and the historic environment.	To build community identity, improve social welfare, and reduce crime and anti-social activity.
To adapt to and mitigate against the impacts of climate change.	To offer more opportunities for rewarding and satisfying employment for all.
To avoid, reduce and manage flood risk.	To improve the quality of where people live.
To provide for sustainable use and sources of water supply.	To improve accessibility to essential services, facilities and jobs.

¹ A total of 9,000 dwellings and associated development, plus an additional 3000 homes outside of the plan period

To make the best use of resources, including land and energy and to minimise waste production.	To encourage sustained economic growth.
To make the best use of resources, including land and energy and to minimise waste production.	To encourage and accommodate both indigenous and inward investment.
To make the best use of resources, including land and energy and to minimise waste production.	To encourage efficient patterns of movement in support of economic growth
	To improve the social and environmental performance of the economy.

ALTERNATIVES CONSIDERED

It is a legislative requirement that every SA process includes an appraisal of ‘reasonable alternatives’ to the approach set out in the plan. In this instance there has been a need to appraise reasonable alternatives to the distribution of development identified within the remitted text of the JCS. The process of identifying reasonable alternatives was undertaken in three broad stages (as summarised in the figure below).



Stage One – Establishing the ‘strategic scope’ of reasonable alternatives

1a. *Dispersal versus concentration*

Consideration was given to the potential to concentrate all of the 9,000 homes in one single location as well as the potential to disperse the housing growth across the whole of the NPA. It was concluded that:

- concentrating 9,000 dwellings in a single location would not be reasonable within the plan period, because evidence indicates that maximum delivery in any one location would be limited to 7000;
- there is no scope for accommodating additional dispersed housing growth in South Norfolk, because all reasonable small scale sites will be utilised in meeting the adopted small sites target in South Norfolk; and
- there is no scope for accommodating additional housing growth in Norwich, because of the amount of sites that can be reasonably considered to be available.

Another outcome of this stage was the conclusion that any reasonable alternative should include some degree of dispersal through the provision of a “small sites allowance” of housing growth within the Broadland part of the NPA that is not be assigned to any specific location.

1b. *Small Sites Allowance*

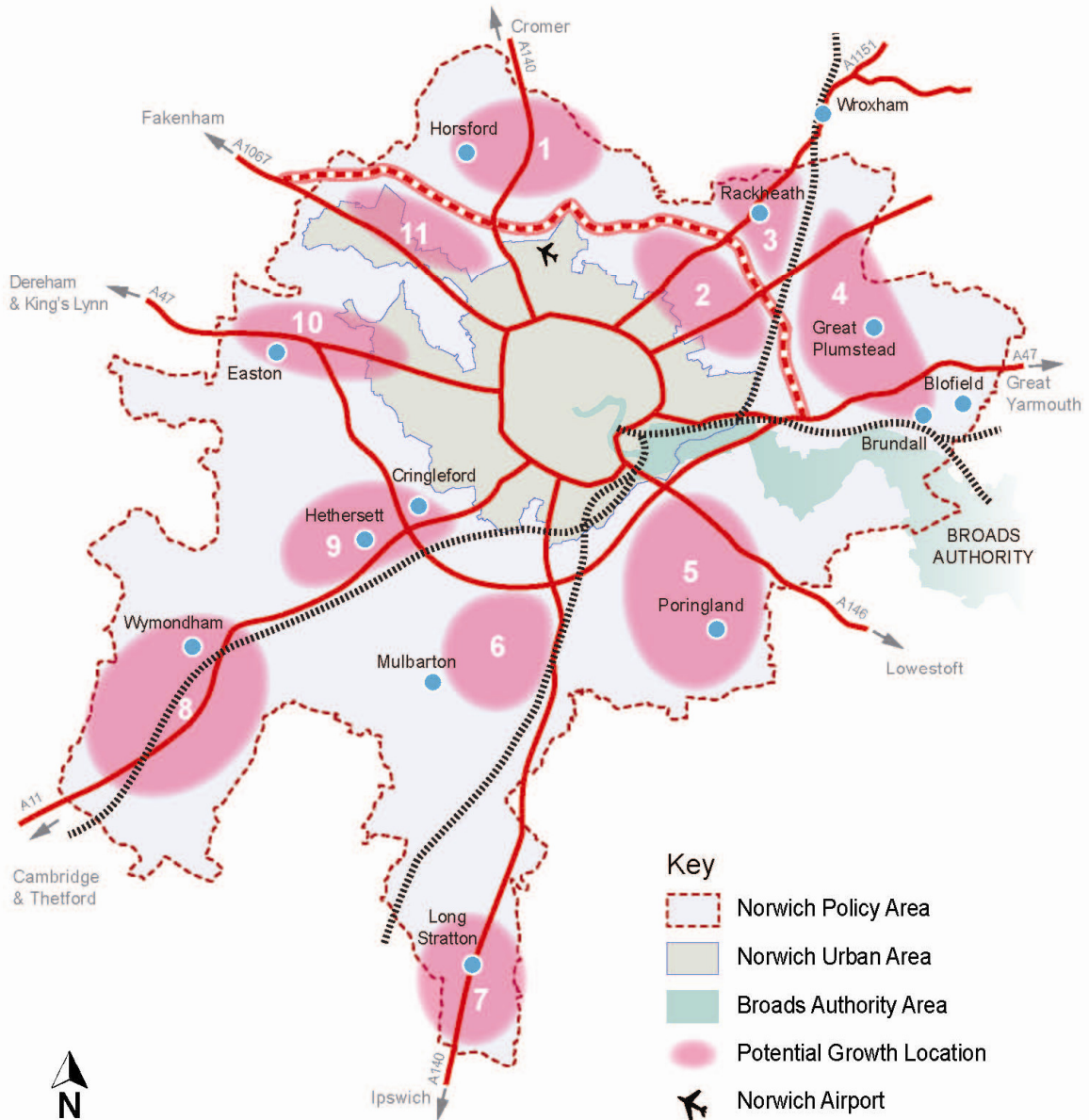
The next step involved considering what the appropriate number of homes to be delivered through a small sites allowance in the Broadland part of the NPA should be. Three alternative figures were analysed and it was concluded that a small sites allowance of 2,000 was appropriate as it struck the best balance between utilising available infrastructure capacity whilst providing flexibility for the delivery of housing.

The implication of determining that any reasonable alternative should include a ‘small scale sites allowance’ of 2,000 homes in the Broadland part of the NPA is that all reasonable alternatives should distribute 7,000 homes through a pattern of strategic scale growth.

1c. *Potential locations for strategic growth*

Eleven individual sectors were evaluated for their potential to accommodate strategic growth – see figure below.

Possible Areas for Strategic Growth in the Norwich Policy Area



Key

- Norwich Policy Area
- Norwich Urban Area
- Broads Authority Area
- Potential Growth Location
- Norwich Airport
- Northern Distributor Road (NDR)
- Main Roads
- Railways

- 1 North Sector (north of the Airport)
- 2 North East Sector (inside the NDR)
- 3 North East Sector (outside the NDR vicinity Rackheath)
- 4 East Sector (outside the NDR)
- 5 South East Sector (vicinity Poringland)
- 6 South Sector (between A11 and A140 outside of A47)
- 7 Long Stratton
- 8 Wymondham
- 9 South West Sector (between A11 and B1108)
- 10 West Sector (Easton & Costessey)
- 11 North West Sector (between A1067 and NDR)

NB. Broads Authority has prepared a separate Core Strategy.

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Some combinations of these sectors were considered where there was the potential for a clear and functional link between them, and where the combination of sectors might improve their potential as locations for major strategic growth. Seven combinations of sectors were regarded as being suitable for further evaluation. In total, 18 sectors or combinations of sectors were taken forward to be assessed for their suitability to accommodate strategic scale growth.

1d. Definitions of the scales of strategic growth

This step defined the reasonable scales for strategic growth against which the eighteen sectors and combinations of sectors should be assessed for their suitability. Three levels of strategic scale growth were defined: Small (1,000 to 1,500); Medium (1,500 to 3,000); and, Large (7000 to 10,000). These scales were defined principally on the basis of:

- the scale of development at which infrastructure limits are generally expected to be reached; and
- the level at which a sufficient quantity of development is achieved to deliver necessary facilities.

Stage Two: Assessing the suitability of the sectors for different scales of growth

This stage involved assessing the 18 sectors and combinations in terms of their suitability for accommodating small, medium and large-scale development.² A detailed evaluation of these identified that six individual sectors and one combination of sectors had the potential to be locations for strategic scale growth – see table below.³

Location	Identified scale of potential growth		
	Small 1,000 to 1,500	Medium 1,500 to 3,000	Large 7,000 to 10,000
North-East (Inside & Outside NDR)	x	x	✓
North East (Inside NDR)	✓	x	✓
South-West Sector	✓	✓	✓
West Sector	✓	x	x
Long Stratton	✓	✓ (limited to 1,800)	x
Wymondham	✓	✓ (limited to 2,200)	x
North-West Sector	✓	x	x

Stage Three: Identification of reasonable alternatives

Having identified the suitability of individual and combination locations to accommodate strategic-scale growth, the “reasonable alternatives” could then be defined.

As a starting point there was a need to recognise that the adopted elements of the JCS in South Norfolk identify some growth in the short listed locations, and it is beyond the scope of this work to consider alternatives that would lead to a reduction in these levels of growth. However, a reasonable alternative could

² It was only necessary to assess the combined locations for large scale growth.

³ A summary of these evaluations can be found in Tables 4.2 – 4.4 in the Main Report document. The full evaluations relating to this assessment of the locations for strategic scale growth can be found in Appendix L of the Technical Annex document.

involve additional growth at these locations. Taking the adopted JCS into account the following opportunities were found to exist:

Location	Opportunity
North-East (Inside & Outside NDR)	7,000
North East (Inside NDR)	1,500 or 7,000
South-West Sector	4,600 (plus adopted 2,400 making 7000 in total)
West Sector	500 (plus adopted 1,000 making 1500 in total)
North-West Sector	1,500

The table shows that to deliver 7,000 houses, all reasonable alternatives need to include one major growth location, with any remainder being picked up by small scale growth in other locations. As the only locations which have been identified as suitable for large scale growth are the North-East and South-West this gives a choice of:

- Growth focused on the North East; or
- Growth focused on South West

Analysis indicated that growth in the North East could be accommodated within the line of the Northern Distributor Road (NDR), or distributed across the combined sector of 'NE inside and outside NDR'. This gave two variations of growth focussed on the North East.

In regards to the South West, further consideration shows that it can only accommodate 4,600 of the 7,000 dwellings within the plan period, given that:

- The adopted JCS already identifies Cringleford and Hethersett (both within the SW) as needing to deliver a combined total of 2,200 dwellings, with an additional 200 proposed through South Norfolk's site allocations work; and
- Evidence (of delivery issues) suggests that a single sector cannot deliver more than 7,000 dwellings in the plan period.

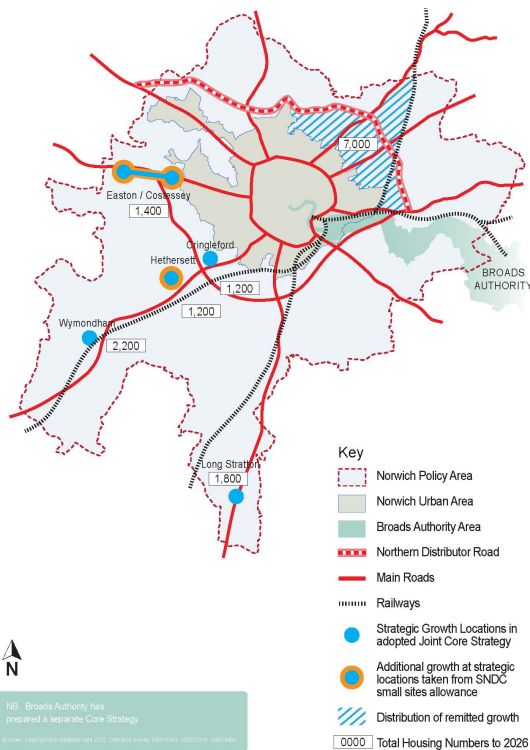
Furthermore, South Norfolk Council have proposed an additional allocation of 400 dwellings in the west, over and above the strategic requirement of 1,000, as part of their site allocations work. This means that a reasonable alternative that focuses growth on the SW Sector must also involve accommodating 2,400 homes in the Broadland part of the NPA.

The box below presents the reasonable alternatives that were identified, and subsequently subjected to SA. The alternatives are also presented diagrammatically on the following page.

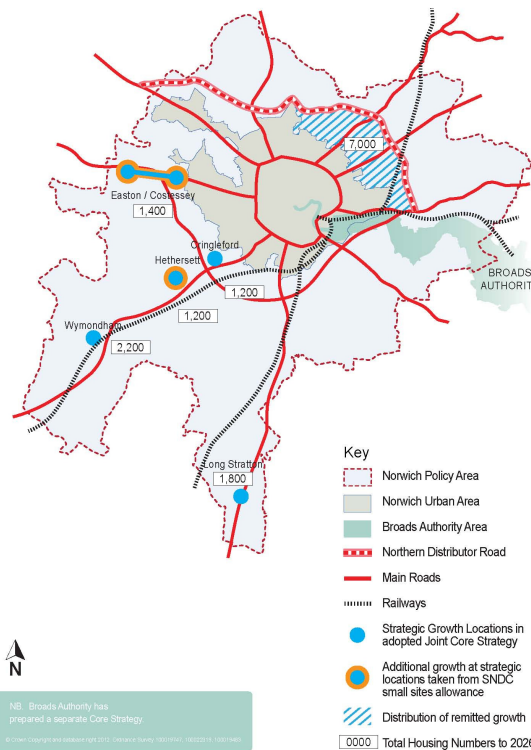
<p>Alternative One - Growth focused in North East (as in the remitted parts of the JCS):</p> <ul style="list-style-type: none"> • 7,000 homes in a combination of the North East Sectors inside and outside of the Northern Distributor Road (NDR), rising to 10,000 outside of the plan period. This alternative includes 25 hectares of employment land at Rackheath. <p>Alternative Two - Growth focused in North East inside the line of the NDR:</p> <ul style="list-style-type: none"> • 7,000 homes in the North East Sector inside of the NDR, with this rising to 10000 beyond the plan period. This includes 25 hectares of employment land at Broadland Business Park, or Norwich International Airport in addition to those in the adopted policies of the JCS. <p>Alternative Three - Growth focused in South West, with the balance in the Broadland part of the NPA:</p> <ul style="list-style-type: none"> • 4,600 homes in the South West Sector⁴. • 2,400 homes across the Broadland part of the Norwich Policy Area. Two small scale strategic locations, the North East Sector (inside the NDR) and the North West Sector, would provide at least 1000 dwellings each. • An additional 25 hectares of employment land in association with the large scale strategic housing development in the South West or at Norwich International Airport.

⁴ Making a total of 7,000 at this location in the plan period (potentially rising to 10,000 beyond) when combined with growth identified in the adopted JCS

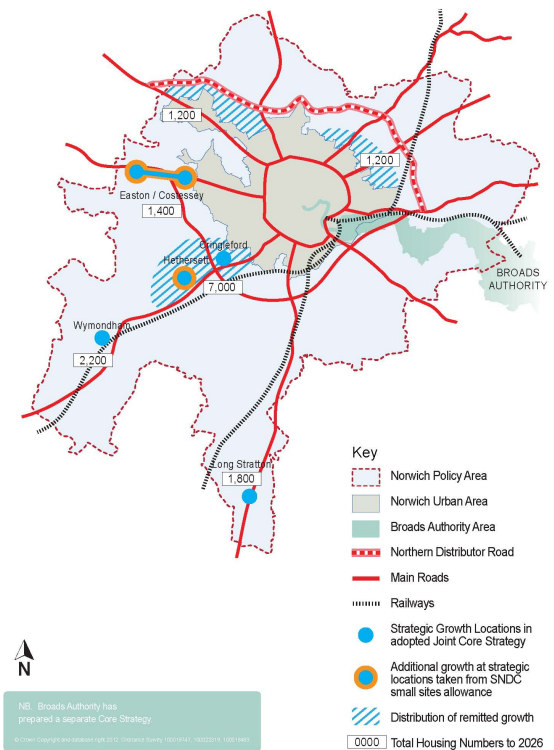
Housing Distribution Alternative 1



Housing Distribution Alternative 2



Housing Distribution Alternative 3



Please note that larger versions of these diagrams can be found within Chapter 4 of the main SA Report document.

APPRAISAL FINDINGS AND RECOMMENDATIONS

Appraisal of reasonable alternatives

This appraisal was undertaken in June and early July 2012 so that they could be presented at a series of Council meetings being held between 25th July and 2nd August 2012, to determine which of the reasonable alternatives (if any) should be 'preferred' and so taken forward as the basis for preparing the 'Proposed Submission Plan Content'.

The appraisal highlighted the potential for all of the reasonable alternatives to result in a range of 'significant effects', both positive and negative, but was not able to differentiate between the alternatives in these terms. However, the appraisal was able to highlight the relative performance of the reasonable alternatives in more general terms. The box below presents a summary.

In **environmental terms**, the three alternatives are fairly finely balanced. With regards to Alternative (1), development would occur in relatively close proximity to the Broads with potentially adverse implications; but at the same time there would be the potential to design-in green infrastructure in such a way that the Mousehold Heath to Broads Green Infrastructure Priority Link is enhanced. Furthermore, the Habitats Regulations Assessment (HRA) expresses confidence that suitable mitigation can be put in place in the form of an undeveloped 'buffer zone' to ensure that (1) would not result in significant effects on the Broads. Alternative (2) is similar in many respects to (1) but would necessitate a more intense form of development given the smaller site footprint. The intense nature of the development would make developing effective green infrastructure more of a challenge and so could lead to adverse impacts on wildlife, landscape and historic environment features. The benefit of (2) relative to (1) is that development would not extend so close to the Broads. Alternative (3) is less likely to impact on areas of biodiversity importance, but would probably mean that some opportunities to enhance the Mousehold Heath to Broads Green Infrastructure Link are foregone. Alternative (3) would also encroach on the Norwich Southern Bypass Landscape Protection Zone.

With respect to transport and its effects, Alternatives (1) and (2) are considered more sustainable since they would be likely to support public transport improvements in the form of high quality bus rapid transit (BRT) in the north eastern part of the urban area with commensurate benefits in terms of air quality, greenhouse gas emissions (responsible for climate change) amenity and health. While the SW sector would be served by a similar level of BRT under alternative (3), the strategic scale growth in the NE and NW would not be served by high quality BRT. Alternative (3) therefore performs relatively poorly in transport terms compared with Alternatives (1) and (2). There is little to differentiate (1) and (2), although (1) is likely to mean that a greater percentage of new residents live close to a BRT route.

In **social terms**, development in the NE under Alternatives (1) and (2) has the capacity to support regeneration in Norwich since development would facilitate the development of high quality BRT that would serve the Heartsease Estate, one of the most deprived parts of Norwich. This would facilitate better access for people living on the Estate to employment opportunities and other services provided in the City Centre (as well as in the growth area). Development in the NE would therefore allow poorer parts of Norwich to share in some of the benefits of new development. Although much needed new housing would be provided under all three alternatives, it is important to note that Alternatives (2) and (3) could lead to challenges in delivering this at the rate required to combat housing need. Alternative (1) is therefore judged to perform best in social terms.

In **economic terms**, all alternatives are considered likely to support the economic well-being of the area and all would support the provision of employment opportunities alongside new housing. Development in the NE under Alternatives (1) and (2) would be more likely to result in employment opportunities close to an existing area of relative deprivation (see above) and could therefore have regeneration benefits. Although development in the SW would be well related to major employment locations, the NE is better located and development in the NW under Alternative (3) is not well-related to major employment locations. Alternatives (1) and (2) are therefore considered to perform better than Alternative (3).

Appraisal of the Proposed Submission Plan Content

At the Council meetings it was determined that reasonable alternative one was preferred. This decision was informed by the appraisal of reasonable alternatives, although it is important to emphasise that SA is only one source of evidence for decision-making. Notwithstanding this, alternative one was supported through the SA.

Having resolved that alternative one was the most appropriate option, the next step was for the GNDDP to prepare the Proposed Submission Plan Content, and for this to be subject to SA. These SA findings are presented within this report for the benefit of those who might wish to make representations on the Proposed Submission Plan Content.

The appraisal highlights the potential for the Proposed Submission Plan Content to result in a number of significant positive and negative effects on the environment.

Negative effects are predicted for a range of environmental objectives, including those which relate to: reducing the effect of traffic on the environment; maintaining / enhancing biodiversity, landscapes and the historic environment; and making the best use of land. However, the appraisal also shows that various policy measures (put in place both through the adopted JCS and the Proposed Submission Content) will help to ensure that effects are mitigated as far as possible. In light of these potential significant negative effects, it is **recommended** that the plan-makers should:

- Ensure that the broad spatial approach to development ('a series of inter-related new villages or quarters') is such that the number of people with good access to high quality public transport services (in particular the Bus Rapid Transit (BRT) service) is maximised.
- Ensure that the choice of location for a district centre takes full account of the need to minimise car use / encourage alternatives to the car.
- Ensure that mechanisms are put in place to ensure that a strategic approach is taken to green infrastructure planning at the scale of the North East Growth Triangle.
- Ensure that early guidance is provided on appropriate densities for development within the North East Growth Triangle.
- Explore the benefit of addressing surface water flooding through an overarching policy within the JCS.

In relation to one environmental objective – '*adapt to and mitigate against the impacts of climate change*' – the appraisal found that the Proposed Submission Plan Content will result in a significant positive effect. With a view to maximising the benefits under this objective it is recommended that:

- Reference to Rackheath being a 'low carbon development' is removed, whilst the reference to Rackheath as a zero carbon development is retained.

In terms of socio-economic objectives, the appraisal highlights the likelihood of a range of significant positive effects. These reflect both: inherent opportunities associated with large scale development focused on the North East Growth Triangle; and the effect that the policies within the Proposed Submission Plan Content will have on ensuring these opportunities are capitalised on. For example, the Proposed Submission Plan Content requires that: '*The Growth Triangle will include a) new pre-school provision and up to six new primary schools plus a new secondary school with an initial phase to open as early as possible. To facilitate early provision the early phases of development will concentrate on family housing*'.

MONITORING

This appraisal has highlighted the potential for the Plan to give rise to a range of significant effects, both positive and negative, as well a number of uncertain effects. In line with legislation, the significant environmental effects of implementing a plan should be monitored.

Recommendations have been made to ensure that negative effects are avoided or mitigated insofar as possible, but at this stage it is possible to get a broad idea of what the likely effects of the plan will be. As such, there is a need to consider how these might be monitored.

The adopted JCS is currently monitored through an Annual Monitoring Report. Where significant effects have been identified during this appraisal, gaps in monitoring coverage of the AMR are highlighted and suggested indicators have been put forward. These suggestions will be considered by the Councils prior to Plan adoption and the AMR may be modified as appropriate.

WHAT HAPPENS NEXT?

Following consultation the GNDP may choose to make amendments to the Proposed Submission Plan Content. Should any of these be considered significant, then further SA work may be undertaken and an updated SA Report (or addendum to this report) prepared prior to independent examination.

Subsequent to independent examination the intention is for the 'Plan' to be formally adopted. At this point an 'SA Statement' will be published that summarises how environmental and sustainability considerations have been reflected in the plan together with the findings of the public consultation.