

GNLPAuthorities' Response to Sustainability Appraisal Residual Effects from the Reg 19 GNLPA

(Residual effects extracted from Non-Technical Summary)

This document sets out the GNLPAuthorities' response to the likely positive and adverse sustainability impacts arising from the proposed draft Greater Norwich Local Plan (Reg 19 Proposed Submission) as identified in the draft Sustainability Appraisal (Dec 2020).

1. Table N.5: Likely positive sustainability impacts of the GNLPA

Residual positive effects

1 Housing provision

The proposed development of 49,492 dwellings across the Plan area would be expected to make a significant and positive contribution towards meeting the identified local housing need. Policies within the GNLPA would be expected to ensure that residential developments meet the needs of the local community, including affordable housing.

Agreed. Though the figure of 49492 dwellings is the total provision for homes that is set out in the Plan and includes a significant "buffer" above the identified requirement for homes. The actual requirement to meet the minimum identified needs over the plan period, is 40,541 dwellings. The additional amount or "buffer" is, in effect, a safety-net to ensure that all needs are met.

2 Employment opportunities

The proposed development of 33,000 new employment opportunities through development allocations within the GNLPA, would be expected to make a significant and positive contribution to the employment needs of residents and to the local economy.

Agreed.

3 Multi-Functional Green Infrastructure Network

The GNLPA aims to ensure that development proposals incorporate multi-functional green infrastructure where possible and result in 10% biodiversity net gain. Although the proposed development would be expected to result in the loss of greenfield land to some extent, GNLPA policies help to ensure that there are improvements to and the increased provision of the multi-functional green infrastructure networks across the Plan area.

Agreed.

4 Physical and Mental Health

The increased provision of open space and multi-functional green infrastructure within Greater Norwich would be expected to help facilitate healthy and active lifestyles, increasing access to space for physical exercise as well as areas with mental wellbeing benefits.

Agreed.

5 Community Cohesion

The site allocations and policies within the GNLP would be likely to increase the provision of community facilities within the Plan area. This would be expected to help facilitate vibrant and interactive communities, and lead to a greater sense of place within settlements.

Agreed.

2. Table N.6: Likely residual adverse sustainability impacts of the GNLP

Residual adverse effects

1 Reduction in air quality

Due to the volume of development proposed, an increase in traffic flows and subsequent reduction of air quality would be expected to have residual adverse effects on human health. In addition, many new residents could potentially be located within 200m of a main road. Cumulatively, this would be expected to result in a reduction of local air quality.

It is reasonable to expect that an increase in the amount of development will give rise to an increase in traffic flows in a specific locality. However, the strategy for future development is for this to be focussed in the more sustainable locations where residential development can be located in relatively close proximity to everyday services and employment etc. This gives the potential for non-motor vehicle modes of travel, such as walking and cycling. Also, the strategy has had regard to the provision of public transport, to give the opportunity for longer journeys to be made by non-private motor vehicle where possible. It should also be remembered that the future residential growth is to provide homes for a population that largely already exists, whether in the local area or further afield, and so increases in traffic generation caused by people moving into an area has a consequent reduction in those areas that they have moved from. So, what might be a specific impact on air-quality in one location needs to be weighed against the overall situation. The

objective through the Plan is to have development that is located and designed to minimise the disbenefits arising from it. In terms of traffic and air quality impacts this should be assisted by the national initiatives to reduce carbon emissions, including the move towards low carbon vehicles.

2 Increased pollutant emissions, including greenhouse gases

An increase in pollutants including greenhouse gases would be expected following the development proposed within the GNLP. The introduction of 110,367 residents would be expected to increase traffic volumes and energy demand, which would be expected to result in an increase of pollutant emissions.

The increase in the number of residents arising from the development is over-stated as a large proportion of the need for new homes arises from the existing population. Nevertheless, it is reasonable to expect that an increase in the amount of development will give rise to an increase in pollutant emissions. However, the strategy for future development is for the growth to be focussed in the more sustainable locations where residential development can be located in relatively close proximity to everyday services and employment etc. This gives the potential for non-motor vehicle modes of travel, such as walking and cycling. Also, the strategy has had regard to the provision of public transport, to give the opportunity for longer journeys to be made by non-private motor vehicle where possible. It should also be remembered that the future residential growth is to provide homes for a population that largely already exists, whether in the local area or further afield, and so increases in traffic generation caused by people moving into an area has a consequent reduction in those areas that they have moved from. So, what might be a specific impact on air-quality in one location needs to be weighed against the overall situation. The objective through the Plan is to have development that is located and designed to minimise the disbenefits arising from it. In terms of traffic and air quality impacts this should be assisted by the national initiatives to reduce carbon emissions, including the move towards low carbon vehicles. As well as seeking to limit emissions through its overall strategy on the location of development, specific policies will also assist; in particular, the various requirements set out in Policy 2 Sustainable Communities.

3 Increased greenhouse gas emissions

The proposed development of 49,492 dwellings within the GNLP would be expected to increase carbon emissions in the Plan area by 565,079 tonnes (based on 2018 estimates). This increase would be expected to exacerbate the impacts of climate change within Greater Norwich.

See comments under 2.

4 Fragmentation of the ecological network

The GNLP would be expected to result in the loss of approximately 1,019ha of previously undeveloped land. This loss of land would be expected to include habitats and ecological links between designated biodiversity assets ultimately affecting the integrity of the wider ecological network.

In order to provide for the identified need for homes and other development it is necessary to use currently undeveloped land. However, the selection of development sites has sought to avoid important habitats, including links between designated biodiversity assets, and development is required to have regard to biodiversity. In particular, Policy 3 requires development proposals to conserve and enhance the natural environment, for there to be the provision of natural features, and for the creation of new or enhanced green infrastructure networks, to give an overall net biodiversity gain. Consequently, the proposed developments can have an overall contribution to the wider ecological network rather than detracting from it.

5 Reduced access to healthcare facilities

A total of 105 site allocations are located over 5km to an NHS hospital. Residents in some of the rural settlements of Broadland and South Norfolk would be expected to have limited access to emergency healthcare, which could potentially have detrimental impacts on human health.

Broadland and South Norfolk are largely rural districts and therefore a large number of residents live some distance from an NHS hospital. They still have the same level of access to emergency healthcare, other than the time taken to get there is affected by the distance to travel. In considering the location of development, this occasional need to access an NHS hospital has to be balanced against other more frequent access needs for example to other health services such as GP surgeries, and the wider range of services such as education, recreation, retail etc and access to employment. The Plan's locational strategy undertakes this balance and gives priority to the needs for accessing those services etc that are required on a more frequent basis.

6 Increased risk of urbanisation of the open countryside and coalescence

A total of 84 allocated sites are located on previously developed land in the open countryside of Greater Norwich. The proposed development within the GNLP in these locations would be expected to increase the risk of urbanisation of the countryside and coalescence.

(nb Assume this should refer to previously "undeveloped" land).

By virtue of development taking place, sites that are currently undeveloped and in the countryside would change from countryside to areas with built development on them. However, the selection of development sites has sought to avoid sensitive locations, such as open countryside and locations where coalescence might occur,

with new sites being adjacent to existing developed areas. Also, the policies seek to limit the impacts on the adjacent countryside, for example through the siting and design of development, provision of landscaping and green infrastructure etc. Hence, any risk of urbanisation is minimised.

7 Loss of tranquillity

The proposed development of 49,492 dwellings across Greater Norwich, with a number of developments located within rural Broadland and South Norfolk, would be likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.

The selection of development sites has sought to avoid sensitive locations, such as tranquil countryside locations, with new sites being adjacent to existing developed areas and focussed on the larger settlements. Also, Policy 2 requires development to minimise pollution, which would include noise and light pollution. Therefore, any loss of rural tranquillity should be limited.

8 Reduced access to facilities and services

The majority of new residents would be located in areas with good access to services and facilities, including convenience stores and bus services. Nevertheless, large areas of Broadland and South Norfolk have limited access to rail services.

The strategy for locating development has had regard to the provision of public transport, including rail, and significant levels of development are located to take advantage of this. However, by its nature, rail can only provide access to a limited number of locations. There are two rail lines in Broadland, and two in South Norfolk, with Norwich being the hub for these. These provide valuable services for all residents, though for those located some distance from a station accessing them would generally entail travel by motor vehicle, typical of rural areas.

9 Increased household waste generation

The proposed development within the GNLP would be expected to increase household waste generation within the Plan area by approximately 31.5%. Although GNLP Policy 2 seeks to support sustainable waste management, there is little scope to reduce the quantity of waste generated per household.

It is agreed that the Plan cannot itself reduce the amount of waste generated per household. However, the increase in household waste generation may not be as high as suggested. The level of waste generated in a household largely reflects the number of people in a household. A large part of the need for homes arises from the existing population and the general trend for a reduction in household sizes. Also, it is expected that some people will move into the Greater Norwich area from outside it. Therefore, the additional waste generated in the new homes provided through the

Plan, should be compensated to a degree by reductions elsewhere arising from this movement away from other areas and reduction in household size.

10 Loss of soil resources, including BMV land

Approximately 1,019ha of development allocated within the GNLP is located on previously undeveloped land. This would be expected to result in the permanent and irreversible loss of ecologically, and potentially agriculturally, important soil resources.

Although in theory developed land could later be converted back to farmland or wildlife habitat it is unlikely, at least in the timescale of the Plan. The selection of development sites has sought to avoid sensitive locations, including important habitats and better quality agricultural land, and brownfield sites have been utilised where feasible. Policy 2 requires development to make efficient use of land, and so minimising the loss of undeveloped land, and requires (together with Policy 3) the provision of green infrastructure and other open spaces, and in most circumstances homes will have gardens. Therefore, although buildings may use up land area, it does not mean that all the “soil resource” is lost within a development area; much is given over to gardens, green infrastructure etc, that provides a use for the soil resource that is not agriculture, but is still valuable.

11 Impact on soil ecosystem services

Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, filtering air, carbon storage and providing the basis for vegetation to flourish. The scale of development proposed within the GNLP would be expected to increase pressure on essential ecosystem services.

The strategy for development has sought to avoid sensitive locations and limit impacts on the environment, including in relation to the soil resource as discussed under point 12. Also, Policy 2 sets out specific requirements including in relation to green infrastructure provision, making efficient use of land, minimising pollution, ground conditions, efficient water management, avoiding and minimising flood-risk, sustainable drainage etc. Gardens and open spaces within developments will remain part of the wider soil resource and ecosystem. Therefore, whilst increased development (and people) may put pressure on soil ecosystems, the Plan helps to limit this and avoid significant impacts.

12 Reduction of water quality and ecosystem services

A total of 84 allocated sites are located on previously undeveloped land. the proposed development at these sites could potentially result in the contamination of nearby surface waterbodies or groundwater. The proposed development within the GNLP could also reduce the ability of the aquatic ecosystem to effectively filter

water, provide the basis for vegetation to flourish, have benefits in regard to mental and physical wellbeing, and support biodiversity.

The strategy for development has sought to avoid sensitive locations and limit impacts on the environment, including in relation to waterbodies and groundwater. Also, Policy 2 sets out specific requirements for development including in relation to green infrastructure provision, making efficient use of land, minimising pollution, ground conditions, efficient water management, avoiding and minimising flood-risk, sustainable drainage etc. In addition, a Water Cycle Study has been undertaken that considers the water resource and water supply and disposal, including capacities to accommodate development. Therefore, whilst increased development (and people) may put pressure on the water system, the Plan helps to limit this and avoid significant impacts.

13 Increased demand for water

The introduction of 110,367 new residents would be expected to result in increased pressure on the local water resource.

The increase in the number of residents arising from the development is over-stated as a large proportion of the need for new homes arises from the existing population. Nevertheless, it is reasonable to expect that an increase in the amount of development will give rise to an increased pressure on the local water resource. However, the strategy for the location of development has had regard to the availability of water supply (and disposal). A Water Cycle Study has been undertaken that considers the water resource and water supply and disposal, including capacities to accommodate development. Also, Policy 2 sets out specific requirements for development including in relation to minimising pollution, ground conditions, efficient water management, avoiding and minimising flood-risk, sustainable drainage etc. Therefore, whilst increased development (and people) may put pressure on the water resource, the Plan helps to limit this and avoid significant impacts.

CONCLUSION

The Sustainability Appraisal identifies likely positive and adverse sustainability impacts, related to social, environmental and economic considerations. This reflects the nature of development planning which has to address and plan for these often conflicting issues. The pros and cons of proposed development, and the policies to address it, are objectively considered. As such, the Sustainability Appraisal is a useful tool to help in producing the Plan and guiding decision-making on it.

As a principle, the Plan addresses identified impacts and seeks to minimise them while obtaining and expanding on the beneficial effects from development needs that must be addressed through the Plan. In doing this the objective is to “balance” the

conflicting issues, and so achieve an appropriate solution to plan for the area. The Sustainability Appraisal process has helped the Plan to achieve this.