

Greater Norwich Development Partnership: Pre-Submission Joint Core Strategy
Sustainability Appraisal Report



Revision Schedule

SA of the Greater Norwich Development Partnership Pre-Submission Joint Core Strategy September 2009

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Non-Technical Summary

Introduction

The Greater Norwich Joint Core Strategy (JCS) is currently being prepared by the Greater Norwich Development Partnership (GNDP) on behalf of Norwich City Council, Broadland District Council and South Norfolk District Council.¹ Scott Wilson is commissioned by the GNDP as independent consultants to undertake a Sustainability Appraisal (SA) of the JCS. The SA seeks to identify the economic, social and environmental impacts of the emerging JCS and suggest ways to avoid or minimise negative impacts and maximise positive impacts.

The JCS is now nearing completion and the point when it will be submitted to Government for approval. The latest version of the JCS is known as the pre-submission version. This SA Report sets out SA findings relating to the Pre-Submission JCS. This SA Report has been taken into account by the GNDP as they have finalised the Pre-Submission JCS. It is also aimed at a wider audience so that it can be read alongside the Pre-Submission JCS and so help consultees to make more informed responses. In these ways it can be seen that the SA seeks to ensure that the plan-making process is suitably scrutinised. Following the consultation, the GNDP will look to openly and transparently finalise the JCS taking account of consultation responses as well as the findings of the SA. It is also important to note that this is not the first stage of SA, but rather SA was also used as a tool to challenge the plan-making process at earlier stages of plan production.²

The SA has essentially involved testing the performance of the plan against a series of 21 aspirational sustainability objectives.

It is also important to note that the 21 SA objectives were developed following a consideration of local sustainability issues at the SA 'scoping stage'. A range of evidence was considered as part of the Scoping Stage, including evidence from a review of those Policies, Plans, Programmes, Strategies and Initiatives (PPPSIs), produced at all scales from the national down to the local, which set the 'sustainability context' for the JCS. The scoping stage was primarily undertaken in 2007, and resulted in the publication of a Scoping Report. However, further scoping has also been undertaken to inform this latest iteration of the SA, reflecting the fact that a range of new evidence has come to light since 2007 that changes our understanding of the sustainability context.

The **Table** below sets out the objectives identified for the SA of the JCS. These objectives should ensure that the assessment is focused on only those effects that are most likely to be significant. To further focus the scope of the assessment a number of additional decision-making criteria in the form of questions / prompts were also developed at the scoping stage.

¹ Norwich City Council, Broadland District Council and South Norfolk District Council are each developing their own individual Local Development Framework, but have chosen to develop and adopt a *joint* Core Strategy (the JCS).

² In particular, SA findings were made available alongside the Issues and Options and Regulation 25 Consultation Versions of the JCS.

SA objectives and sub-objectives

Environmental objectives:	
ENV 1 To reduce the effect of traffic on the environment.	<p>Will it reduce traffic volumes, ease the flow of traffic and reduce congestion?</p> <p>Will it increase the proportion of journeys using modes other than the car?</p> <p>Will it reduce the effect of HGV traffic on people and the environment?</p> <p>Will it encourage more benign modes of travel?</p> <p>Will new development be located such to reduce the need for people to travel?</p>
ENV 2 To improve the quality of the water environment.	<p>Will it improve the quality of the water environment (streams, rivers, lakes etc)?</p> <p>Will it help to support wetland habitats and species?</p>
ENV 3 To improve environmental amenity, including air quality.	<p>Will it improve air quality?</p> <p>Will it reduce the emission of atmospheric pollutants?</p>
ENV 4 To maintain and enhance biodiversity and geodiversity.	<p>Will it conserve / enhance natural or semi-natural habitats, and promote habitat connections?</p> <p>Is it likely to have a significant effect on sites designated for international, national or local importance?</p> <p>Will it conserve / enhance species diversity, and in particular avoid harm to protected species?</p>
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	<p>Will it protect and enhance the quality of landscapes, townscapes and countryside character, including the character of the Broads and its setting where relevant?</p> <p>Will it maintain and enhance the distinctiveness of the landscapes/townscapes and heritage?</p> <p>Will it reduce the amount of derelict, underused land?</p> <p>Will it protect and enhance features of historical, archaeological and cultural value?</p>
ENV 6 To adapt to and mitigate against the impacts of climate change.	<p>Will it reduce emissions of greenhouse gases by reducing energy consumption?</p> <p>Will it lead to an increased proportion of energy needs being met from renewable sources?</p> <p>Will it increase the capacity of the area to withstand the effects of climate change?</p> <p>Will it ensure that the risks to lives, land and property are minimised?</p>
ENV 7 To avoid, reduce and manage flood risk.	<p>Will it minimise the risk of flooding to people and property?</p> <p>Can it incorporate new designs to adapt to possible flood risk?</p> <p>Will it promote the use of sustainable drainage systems to reduce run</p>

	off?
ENV 8 To provide for sustainable use and sources of water supply.	<p>Will it conserve groundwater resources?</p> <p>Will it minimise water consumption?</p>
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	<p>Will it minimise consumption of materials and resources?</p> <p>Will it promote the use of land in sustainable locations that has been previously developed?</p> <p>Will it use land efficiently?</p> <p>Will it minimise the loss of "greenfield" land?</p> <p>Will it avoid the loss of good quality agricultural land and preserve soil resources?</p> <p>Will it minimise energy consumption and promote energy efficiency?</p> <p>Will it promote the use of renewable energy sources?</p> <p>Will it lead to less waste being produced?</p> <p>Will it lead to less waste being disposed, by promoting more recycling and composting?</p> <p>Will it increase waste recovery for other means eg. Energy generation?</p>
Social objectives:	
SOC 1 To reduce poverty and social exclusion.	<p>Will it reduce poverty and social exclusion in those areas most affected?</p> <p>Will it help to reduce deprivation levels?</p> <p>Will it help meet the needs of residents most effectively?</p>
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	<p>Will it improve access to high quality health facilities?</p> <p>Will it encourage healthy lifestyles?</p> <p>Will it provide adequate health infrastructure for existing and new communities?</p> <p>Will the links between poorer health and deprivation be addressed?</p> <p>Will links to the countryside be maintained and enhanced?</p>
SOC 3 To improve education and skills.	<p>Will it improve qualifications and skills for both young people and amongst the workforce?</p> <p>Will it help to retain key workers and provide more skilled workers from school leavers?</p> <p>Will adequate education infrastructure be provided for existing and new communities?</p> <p>Will it promote lifelong learning and skills training?</p> <p>Will links between lower levels of education and deprivation be addressed?</p>

<p>SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.</p>	<p>Will it increase the range of types, sizes and affordability of housing for all social groups?</p> <p>Will it reduce the housing need and ensure that housing provision addresses the needs of all?</p> <p>Will it provide the most appropriate solutions to address the housing requirements needed for creating sustainable communities?</p> <p>Will it make best use of existing housing stock?</p>
<p>SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.</p>	<p>Will it encourage engagement in community activities?</p> <p>Will it contribute to the achievement of a mixed and balanced community?</p> <p>Will it reduce actual levels of crime?</p> <p>Will it reduce the fear of crime?</p>
<p>SOC 6 To offer more opportunities for rewarding and satisfying employment for all.</p>	<p>Will it reduce unemployment overall?</p> <p>Will it help to improve earnings?</p>
<p>SOC 7 To improve the quality of where people live.</p>	<p>Will it improve the quality of dwellings?</p> <p>Will it improve the quality of local open space?</p> <p>Will it improve the satisfaction of people with their neighbourhoods?</p>
<p>SOC 8 To improve accessibility to essential services, facilities and jobs.</p>	<p>Will it improve accessibility to key local services and facilities (including health, education, leisure, open space, the countryside and community facilities)?</p> <p>Will it improve accessibility for all whilst reducing dependency on the private car?</p> <p>Will it improve access to jobs and services for all?</p>
<p>Economic objectives:</p>	
<p>EC 1 To encourage sustained economic growth.</p>	<p>Will it assist in strengthening the local economy?</p> <p>Will it improve business development and enhance competitiveness?</p> <p>Will it reduce vulnerability to economic shocks?</p> <p>Will it promote growth in key sectors?</p> <p>Will it increase vitality & viability of town centres and improve economic diversity?</p>
<p>EC 2 To encourage and accommodate both indigenous and inward investment.</p>	<p>Will it encourage indigenous businesses?</p> <p>Will it encourage inward investment?</p> <p>Will it make land and property available for business?</p> <p>Will it improve economic performance across the Greater Norwich area?</p> <p>Will it support / encourage rural diversification?</p> <p>Will it support / encourage small city businesses?</p>

<p>EC 3 To encourage efficient patterns of movement in support of economic growth.</p>	<p>Will it improve provision of local jobs? Will it improve accessibility to work, particularly by public transport, walking and cycling? Will it reduce journey times between key employment areas and key transport interchanges? Will it improve efficiency and sustainability of freight distribution? Will it support provision of key communications infrastructure?</p>
<p>EC 4 To improve the social and environmental performance of the economy.</p>	<p>Will it reduce the impact on the environment from businesses? Will it reduce the impact on residents from businesses? Will it attract new investment and skilled workers to the area? Will it maintain existing business and employment provision? Will it provide employment in the best locations to serve urban and rural residents?</p>

The SA objectives have been used to appraise the sustainability of the draft policies set out the in the Pre-Submission Joint Core Strategy. The policies are listed in the table below, and described in full in the Pre-Submission JCS Document.

Full list of preferred options / draft policies from the Pre-Submission JCS

Vision and objectives
The spatial vision
Spatial planning objectives:
Area wide policies
Policy 1 - Promoting sustainability and addressing climate change
Policy 2 - Promoting good design
Policy 3 - Energy, water and ICT
Policy 4 - Culture, leisure and entertainment
Policy 5 - Supporting communities
Policy 6 - The economy
Policy 7 - Housing delivery
Policy 8 - Access and transportation
Policies for places
Policy 9 - Strategy for growth in the Norwich Policy Area (NPA)
Policy 10 - Norwich City Centre
Policy 11 - The remainder of the Norwich urban area, including the fringe parishes
Policy 12 - Locations for major new or expanded communities in the Norwich Policy Area
Policy 13 - Main Towns
Policy 14 - Key Service Centres
Policy 15 - Service Villages
Policy 16 - Other Villages
Policy 17 - Smaller rural communities and the countryside
Policy 18 - The Broads
Policy 19 - The hierarchy of centres

A brief summary of appraisal findings is set out below. The appraisal was a qualitative exercise based on the professional judgement of Scott Wilson. However, where possible, judgements were made taking into account evidence gathered at the scoping stage as well as other evidence that has come to light more recently. It was also possible to take account of comments that were made as part of the Regulation 25 Public Consultation (Spring 2009) regarding previous Sustainability Appraisal findings.

Summary of appraisal findings

The Joint Core Strategy (JCS) essentially sets out a spatial strategy and a range of thematic policies to guide how the strategy is implemented. The spatial strategy and thematic policies have been developed with the aim of achieving an aspirational vision and set of objectives. The vision and objectives were themselves developed by the GNDP specifically for the purpose of the JCS, and so have been subject to SA. The appraisal found them to be appropriate and robust, predicting that they should go some way towards ensuring that the JCS capitalises on the opportunities that present themselves in Greater Norwich.

The JCS aims to implement the housing targets for the area set by the East of England Plan and a key task is to develop a spatial strategy for distributing this development. The proposed spatial strategy has been given particular attention through the SA as a result of the potential for significant sustainability effects and the likelihood of trade-offs having to be made between sustainability objectives. The proposed housing growth strategy essentially consists of:

1. Development within the existing built-up area of Norwich;
2. A new large-scale urban extension to the North East of Norwich;
3. Major expansion of a number of existing communities in South Norfolk; and
4. Lesser expansion of other communities

The first element of the strategy involves accommodating a considerable amount of development within the existing urban area of Norwich. This has been found to have a range of sustainability benefits, including making good use of previously developed land, reducing car dependency, supporting the continued prosperity of the City Centre as a whole; and supporting the regeneration of some specific areas that have been identified as being less prosperous.

The second element of the spatial strategy involves a major urban extension to the North-East of the City, based around two or three centres either side of the proposed Northern Distributor Road (NDR). This has also been highlighted as likely to have broadly positive sustainability effects. This is particularly the case as growth here should afford plenty of opportunities for accessing Norwich and major employment locations by sustainable modes of transport. Also, the scale / concentrated nature of the growth proposed here should mean that it should be possible to achieve a high degree of self-containment (e.g. employment, services and facilities will come forward as part of the development, and thus will be accessible to residents by walking or cycling). The SA does highlight that growth in such close proximity to the NDR may encourage car-based trips, but this potential negative effect is uncertain. The SA recommends that, when considering the case for the NDR, it should be possible to assume minimal use of this road by residents of the Growth Area.

The third element of the strategy has some of the most important implications in terms of sustainability effects and trade-offs. Many of the effects relate to the fact that there is little or no potential for an urban extension to the south similar to that which is promoted to the north (because of environmental constraints, in particular the floodplain of the River Yare), and so a much more dispersed approach to growth is promoted. Dispersing growth results in a number of sustainability considerations such as the potential effects on the receiving settlements (e.g. the character, distinctiveness and quality of the local environment); and the increased difficulty of achieving a degree of self-containment and providing attractive public transport options that encourage people to use their cars less. Another issue stemming directly from the dispersed nature of the growth relates to secondary school provision. There are a range of options that might meet educational requirements, but there is no single agreed plan at present. The current proposal is that options will be kept under review as part of the implementation plan of the Joint Core Strategy.

For the majority of these major growth locations the SA has not predicted significant negative effects that cannot be adequately mitigated through careful planning. Indeed, it is the case that many of the supporting policies within the JCS (discussed further below) should go some way to avoiding or mitigating potential negative effects and capitalising on specific opportunities. For example, policies recognise that both Long Stratton and Wymondham are historic settlements that sit within a sensitive landscape setting, and set out how negative effects can be avoided and the potential positive effects of growth realised.

Some of the most significant positive effects associated with the spatial strategy promoted for South Norfolk relate to the fact that much of the growth is concentrated in areas where there is good potential for encouraging sustainable patterns of travel by public transport to Norwich City Centre and the major employment locations (although not the same potential that exists with the urban extension to the North East). In particular, the SA notes that growth is focused along the A11 corridor (Wymondham, Hethersett and Cringleford) and at Costessey/Easton to the West, both of which are areas where there should be the potential to connect to Norwich via a 'bus rapid transit' service³ (although it is difficult to be completely certain about deliverability / financial viability at this stage).

However, one of the major growth locations – Long Stratton – does stand out as being less suited to encouraging more sustainable patterns of travel. This relates to the fact that Long Stratton is geographically isolated from Norwich and major employment locations in comparison to the other major growth locations; and to the fact that there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars. This is undoubtedly a significant negative effect of the spatial strategy, and probably the key issue that has been highlighted through this SA. However, it is important to bear in mind that the scale of growth promoted at Long Stratton (1,800 homes out of 14,200 that are promoted at major growth locations outside Norwich) is not such that these negative effects place in question the overall sustainability of the JCS in terms of achieving sustainable patterns of travel (and addressing climate change mitigation).

Furthermore, it is important to point out that, although there are some negative effects associated with growth at Long Stratton, there is the potential for significant positive effects. In particular, growth at Long Stratton is (in all likelihood) the only route in the short to medium term to securing funding for a bypass of the town. A bypass is strongly desired in order to reduce through-traffic and so bring about environmental improvements. The evidence does point to existing problems of environmental quality in the centre of Long Stratton, particularly in terms of air quality, and so there is some certainty that a bypass could lead to significant benefits. However, it is more difficult to say whether the 'local level' benefits associated with growth at Long Stratton outweigh the more 'strategic' disbenefits (as the GNDP consider to be the case). Irrespective of the answer to this question, there must be focused efforts to mitigate negative effects. The plan does set out the intention of delivering new services, facilities and employment opportunities in Long Stratton, ancillary to the housing growth, but a recommendation of the SA is that there is justification for going further, perhaps developing a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton.

In terms of the fourth element of the growth strategy, the SA has generally predicted positive effects. This conclusion relates to the broad implications of the settlement hierarchy that is proposed through the JCS (it has not been possible to consider each settlement individually in a similar fashion to the major growth locations). The hierarchical approach that is promoted should generally ensure that the amount of growth targeted to a settlement is directly dependent upon the size of the existing settlement, and, more specifically, the availability of local services, facilities and employment opportunities. This is a sensible approach that should help to reduce car dependency. However, it is noted that some smaller settlements

³ A bus rapid transport service is essentially one that gives a considerable degree of priority to buses, rather than to cars, leading to attractive frequencies, reliability and journey times.

(key service centres) may be required to deliver more houses than would ideally be the case taking into account access to local services, facilities and employment opportunities.

In terms of many of the other Policies that seek to guide *how* development should come forward, the SA is able to conclude that they generally represent a range of sensible proposals that will address many of the sustainability constraints and opportunities presented by the spatial strategy. These Policies have been developed taking account of a range of evidence base studies. There is a considerable emphasis on implementing the Green Infrastructure Strategy, and the findings of the Energy Study have largely fed through into Policy. The 'housing delivery' Policy is also carefully thought out, with considerable justification given regarding the approach that will be taken to delivering affordable housing. Reference to background evidence helps to increase the robustness of the policy-making process and demonstrate that Policies have been developed to address the issues that are specific to the Greater Norwich Area. Another example is the 'Economy' Area Wide Policy, which has a focus on developing the tourism, leisure, environmental and cultural industries. This is supported by a Policy that is devoted to capitalising on Norwich's regional role as a centre for 'culture, leisure and entertainment'. There is also a major focus on developing the 'knowledge economy', including through promoting a number of strategic employment locations (which are all well located, with good access to the major growth areas).

As a final point, it is important to note that, at the time of preparing this SA, the GNDDP were still awaiting the publication of a study into Infrastructure Need & Funding. This will be a crucial part of the evidence base (that will be taken into account by the GNDDP and can also inform SA). Another important evidence base study that was still unfinished at the time of preparing this SA was the Water Cycle Study Stage 2b.

1 Introduction

1.1.1 The Greater Norwich Joint Core Strategy (JCS) is currently being prepared by the Greater Norwich Development Partnership (GNDP) on behalf of Norwich City Council, Broadland District Council and South Norfolk District Council.⁴ Scott Wilson is commissioned by the GNDP as independent consultants to undertake a Sustainability Appraisal (SA) of the JCS. The SA seeks to identify the economic, social and environmental impacts of the emerging JCS and suggest ways to avoid or minimise negative impacts and maximise positive ones.

1.1.2 The JCS is now nearing completion and the point when it will be submitted to Government for approval. The latest version of the JCS prepared by the GNDP is known as the Pre-Submission JCS. This SA Report sets out SA findings relating to the Pre-Submission JCS and also describes how previous SA findings have been taken into account as part of JCS development.

1.2 Sustainability Appraisal and Strategic Environmental Assessment

1.2.1 Under the Planning and Compulsory Purchase Act (PCPA) (2004), all Development Plan Documents (DPDs) produced by local authorities as part of their Local Development Framework (LDF) must undergo a process of Sustainability Appraisal (SA). The Core Strategy is the key DPD, which sits at the centre of the LDF (the LDF can be thought of as a 'portfolio' of individual documents), and so is subject to SA.

1.2.2 SA involves the identification and evaluation of the DPD's impacts on economic, social and environmental objectives – i.e. its compatibility with the three dimensions of sustainable development. The SA process incorporates the requirements of a European law requiring certain plans and programmes to undergo a formal Strategic Environmental Assessment (SEA).

1.2.3 SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including DPDs.

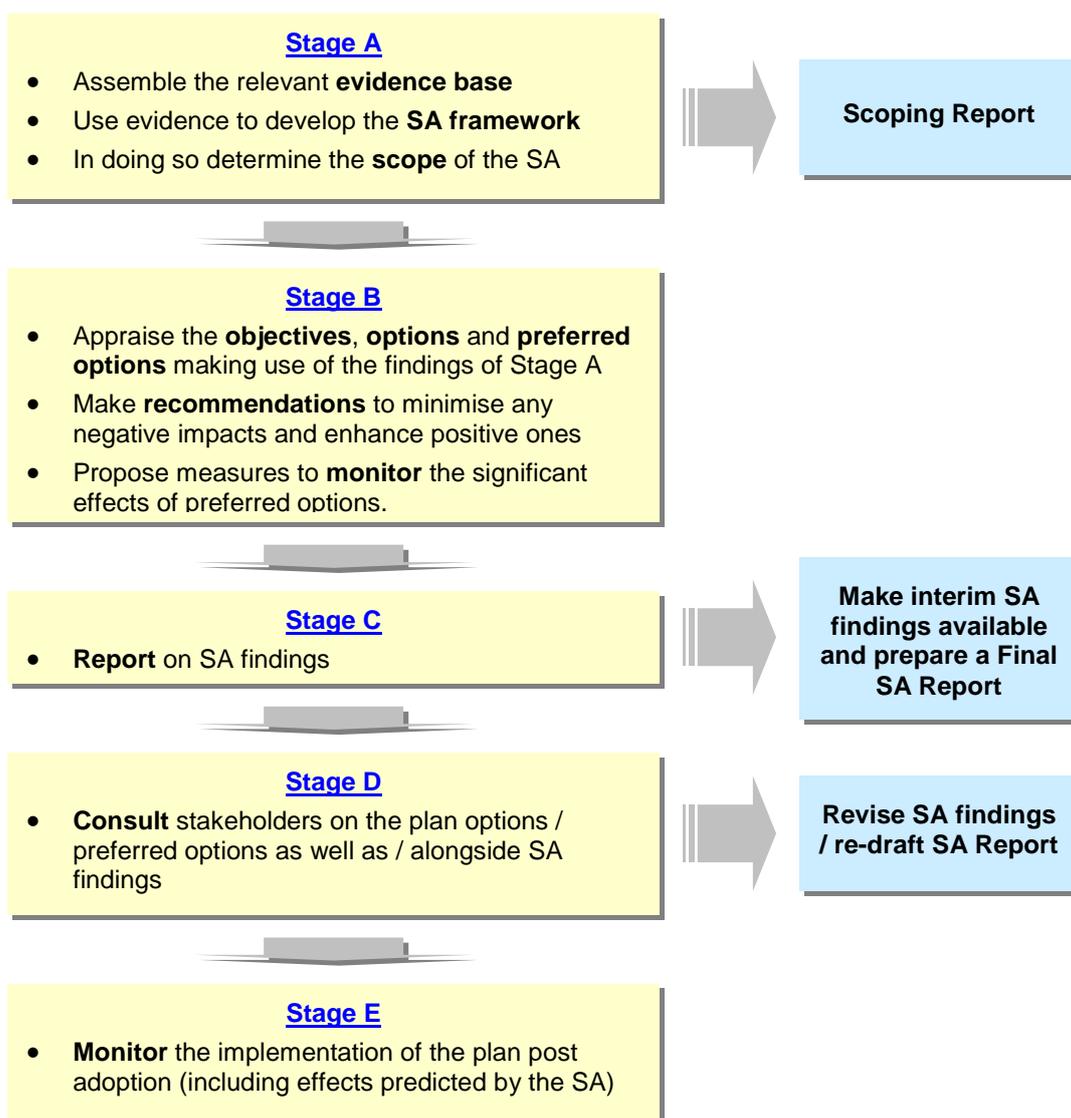
1.2.4 SA and SEA are therefore both statutory requirements. The Government's approach to this dual requirement is to incorporate the requirements of the SEA Directive into the SA process. The SA, which considers all three pillars of sustainability, therefore incorporates the requirements of the SEA Directive, but does not have any bias towards giving consideration to environmental issues. To this end, the Government published guidance on undertaking SA of spatial plans ('the Guidance') in November 2005. The combined SA / SEA process is referred to in the Guidance and in this document as 'Sustainability Appraisal (SA)'.

⁴ Norwich City Council, Broadland District Council and South Norfolk District Council are each developing their own individual Local Development Framework, but have chosen to develop and adopt a *joint* Core Strategy (the JCS).

1.3 The SA process

1.3.1 The Guidance advocates a five-stage approach to undertaking SA (see **Figure 1.1**).

Figure 1.1: The five stage approach to SA



1.3.2 Stages A and B are key stages of the SA process. The purpose of **Stage A** – the scoping stage - is to gather evidence and set the scope for the forthcoming assessment stage (Stage B). The outcomes of Stage A are set out in a Scoping Report (published in 2007 and available on the GNDP’s website).⁵ Section 2 of this Report summarises the findings of the Scoping Report. This Report also seeks to update the Scoping Report by reviewing new evidence that has come to light more recently, in order to identify further implications for the scope of the SA.

⁵ See http://www.gndp.org.uk/documents/content/SA_SCOPING_REPORT_ADOPTED_DEC_2007.pdf (accessed 06/09)

- 1.3.3 Stages B and C have been an iterative process. Options⁶ for the JCS were first developed in 2007 by the GNDP and set out in a consultation document in order to gather views on which should be selected to go forward as the 'preferred options'. An SA was undertaken of the options (**Stage B**) and a brochure was produced to summarise key findings (**Stage C**).
- 1.3.4 Following the consultation the GNDP set out their preferred options in another document for consultation in Winter 2008 - known as the Regulation 25 Technical Consultation. The aim of the Technical Consultation was also to consult on a new set of options that had been developed for one specific issue –the strategic spatial strategy.
- 1.3.5 The Technical Consultation was followed in Spring 09 by a second consultation on preferred options, this time also including the GNDPs preferred strategic spatial strategy. This consultation was known as the Regulation 25 Public Consultation. Options and preferred options consulted on at the Regulation 25 Stage were subject to SA (**Stage B**) and findings were made available on the Council's website (**Stage C**).
- 1.3.6 The GNDP has *now* taken account of all representations made during the Regulation 25 Technical and Public Consultations, as well as the findings of the SA, and as a result has been able to produce a draft version of plan – known as the Pre-Submission JCS – for consultation. The preferred options / draft policies set out in the Pre-Submission JCS have once again been appraised (**Stage B**) and the findings are set out in this SA Report (**Stage C**).
- 1.3.7 *In the future* the Council may wish to alter the JCS further, in order to reflect the consultation on the Pre-Submission JCS as well as the recommendations of the SA. If the changes made are likely to have significant sustainability implications then they will be subject to further SA (**Stage B**) and a further SA Report will be produced (**Stage C**). Stage C will be complete when an up to date SA Report (known as the Final SA Report) is submitted to Government alongside the JCS.

⁶ Options are alternative ways of meeting the plan objectives

Meeting the requirements of the SEA Directive

1.3.8 The SEA Directive sets out a legal process that must be followed. In light of this, this report clearly sets out the relevant requirements of the SEA Directive and explains how these have been satisfied (or will be satisfied).

Signposting

For ease of access, where the SEA Directive or Regulations require a specific task to be completed, or information to be present, there will be signpost boxes, similar to this, that highlight which aspects of the Directive and Regulations have been met by that section

1.3.9 **Table 1.1** below indicates where specific requirements of the SEA Directive can be found within this SA Report and the other supporting documents.

Table 1.1: SEA Directive requirements checklist

Environmental Report requirements ⁷	Section of this report
an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Chapter 1 and 2
the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Scoping Report (2007) Chapter 2
the environmental characteristics of areas likely to be significantly affected;	Scoping Report (2007) Chapter 2
any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Scoping Report (2007) Chapter 2
the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Scoping Report (2007) Chapter 2
the likely significant effects ⁸ on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Chapter 5 and Annex III
the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 5 and Annex III
an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 5
a description of the measures envisaged concerning monitoring in accordance with Article 10;	Chapter 5
a non-technical summary of the information provided under the above headings.	Included

⁷ As listed in Annex I of the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment).

⁸ These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

1.3.10 The rest of this SA Report is structured as follows:

- Chapter 2 - Sets out a summary of Stage A of the SA Process, including implications of recent evidence that has come to light.
- Chapter 3 - Deals with the assessment of the plan objectives (Stage B1) and describes how the preferred options included in the Pre-Submission JCS have been arrived at (Stage B2)
- Chapter 4 - Describes the appraisal methodology
- Chapter 5 – Summarises the findings of the SA and puts forward recommendations (Stages B3 – B5). It also considers cumulative effects and makes recommendations for monitoring the significant effects that have been highlighted by the SA (Stage B6)
- Chapter 6 - Sets out the next steps in the SA / plan-making process.
- Annexes - Set out the detailed appraisal findings

2 Stage A Findings

2.1 Introduction

- 2.1.1 Stage A of the SA process involved gathering evidence regarding the sustainability baseline and sustainability context that is of relevance to the JCS. This evidence was gathered with the aim of informing the assessment stage (SA Stage B). In particular, the evidence was used to develop a set of sustainability objectives against which the sustainability effects of the JCS can be assessed. Together, the objectives can be considered to be the 'framework' for the appraisal.
- 2.1.2 The framework and evidence base for the SA of the LDF are documented in a Scoping Report, which was published in 2007. Since this time our understanding of the sustainability context and baseline has improved considerably, primarily as a result of the publication of a number of new studies. Therefore, set out below is a summary of our current best understanding of the sustainability context, sustainability baseline and key sustainability issues, which draws on both the Scoping Report and new evidence that has come to light. Also set out below is the SA framework, which was first set out in the Scoping Report and agreed upon through a process of consultation, and so has not been altered in light of new evidence.

2.2 Update of the sustainability context (A1) and baseline (A2)

- 2.2.1 SA Stages A1 and A2 were undertaken in 2007 and the findings published in the 2007 SA Scoping Report. However, a range of new evidence has come to light since 2007, which means that there may be some benefit to updating Stages A1 and A2. This Section first introduces the two stages, before then considering implications from a number of evidence base studies.⁹

Introduction to updating Stage A1

- 2.2.2 **Stage A1** of the scoping process involves establishing an understanding of the sustainability context in which the JCS is being prepared, i.e. the implications of key policies, plans, programmes, strategies and initiatives that are relevant to the JCS, with a focus on the opportunities and challenges they present. Establishing the sustainability context helps to identify key sustainability issues (see SA Stage A3 below).
- 2.2.3 The 2007 Scoping Report reviewed a long list of context documents – see **Annex I**. However, since the publication of the Scoping Report a number of key documents have been published that add to our understanding of the sustainability context. Key findings from these studies are set out in this Section:

⁹ With the exception of the Indices of Multiple Deprivation and information regarding eco-towns, all of the evidence reviewed as part of this baseline update is sourced from documents available on the GNDP website @ <http://www.gndp.org.uk/documents/?pageid=99> (accessed 08/09)

2.2.4 The requirement to undertake a context review arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:
"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes"
and
"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"

(Annex 1(a) and (e))

Introduction to updating Stage A2

2.2.5 **Stage A2** involves collecting information about the current baseline conditions, and the likely future baseline conditions under a business as usual scenario. Baseline information helps to identify key sustainability issues (see SA Stage A3 below), and can also be used at the assessment stage as a basis for predicting and evaluating effects. Furthermore, reviewing baseline information is important for identifying appropriate monitoring indicators.

2.2.6 The SEA Directive's requirements in relation to baseline information are:

The 'Environmental Report' required under the SEA Directive should include:
"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme"
and
"the environmental characteristics of areas likely to be significantly affected"

(Annex 1(b) and (c))

2.2.7 The 2007 Scoping Report provides a very useful 'characterisation' of baseline conditions in the Greater Norwich area. This information remains relevant and so should be referred to by those seeking to gain a better understanding of the area. However, several of the recent evidence base studies that have been published since the publication of the Scoping Report (i.e. the same studies that are reviewed above as part of the context review) also shed further light on baseline conditions.

2.2.8 Presented below is evidence relating to both the sustainability context and baseline.

Sustainable Energy Study

2.2.9 The Sustainable Energy Study assesses the capacity for supplying new development with low carbon energy. The total technical potential for renewable energy within the Greater Norwich Development Partnership (GNDP) area has been estimated to be 7.7 Million MWh or 129% of the area's current energy consumption. Local biomass and wind resources have been identified as the lowest cost solutions to achieving Zero Carbon developments.

2.2.10 The Study proposes to set differing carbon standards for different parts of development sites, with stricter onsite targets for higher density areas. The fact that 70% of new development within the GNDP area will consist of large scale developments should mean that that low to zero carbon standards are more achievable, as the developments should be suitable for communal energy systems.

- 2.2.11 According to the study, anticipated additional cost for developers is another issue that will have to be considered when prescribing zero carbon standards. The additional costs will largely depend on whether the current Government definition of low/ zero carbon is followed, or whether the proposed new definition which allows offsite measures to be eligible is adopted by the council. 'Off site' renewables should be additional to any commercial renewable energy developments that would occur anyway within the districts.
- 2.2.12 The Sustainable Energy Study presents key recommendations for progressing low carbon development, including energy and heat mapping, to indicate the low carbon energy systems that developments of particular scales, density and mix, are expected to incorporate. The development of a local Carbon Investment Fund is recommended, to provide the upfront capital needed for financing large scale low carbon infrastructure such as CHP and district heating networks that can supply phased developments. An ESCO or special purpose vehicle led by a public sector organisation may help in taking forward low carbon projects that are not being implemented by the market place due to financial or technological risks.

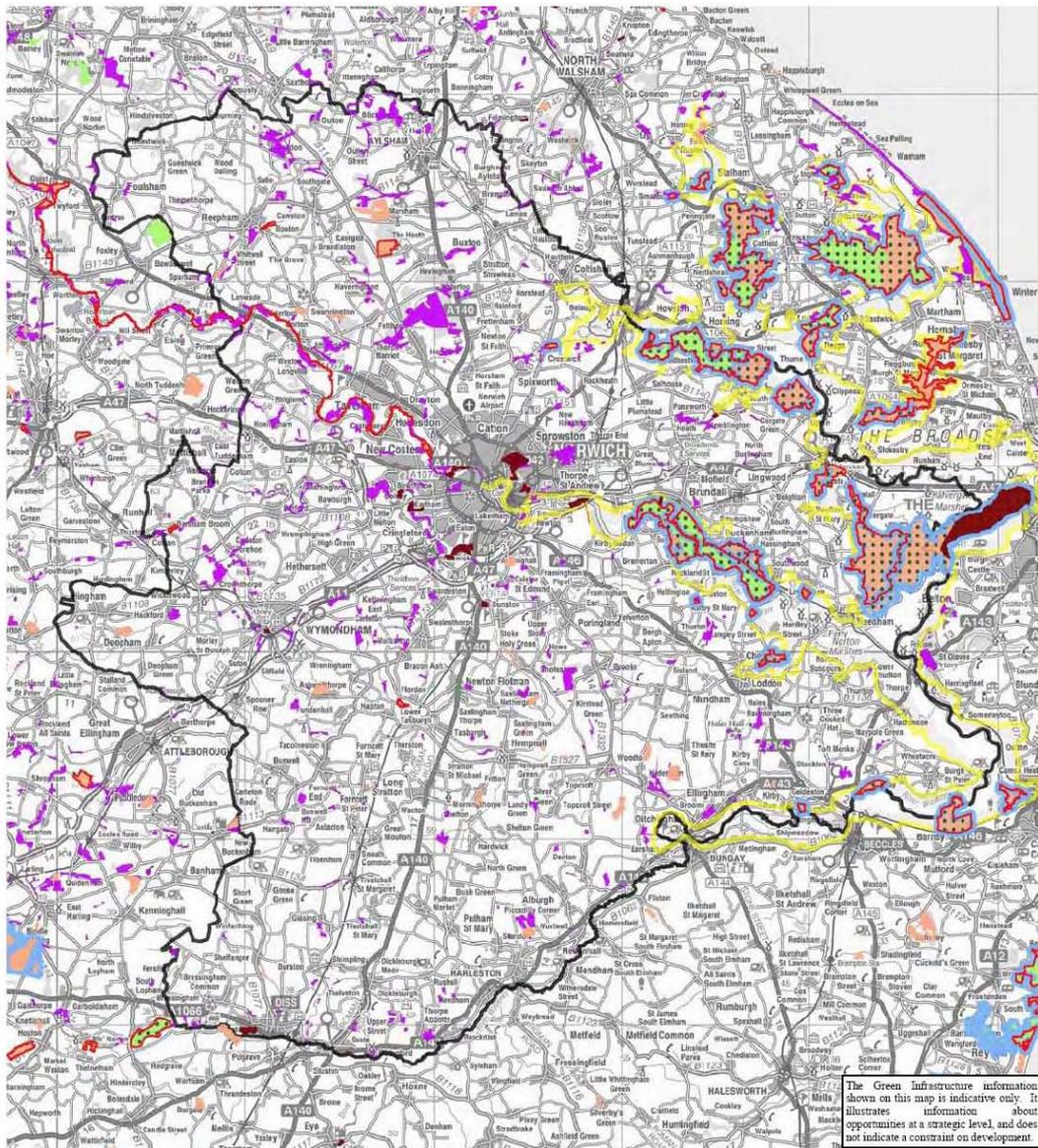
The Strategic Flood Risk Assessment (SFRA)

- 2.2.13 The 'Partnership of Norfolk District Councils' SFRA was published in January 2008. It examines strategic flood risk across the three authorities covered by the JCS in addition to North Norfolk DC and the Broads Authority. The document states that fluvial flooding affects the upstream areas of some catchments. In Norwich the main threat is from extreme rainfall events in the Wensum or Yare catchments. However, unless there are extreme meteorological conditions, risk is likely to be relatively low because floods will be slow to rise. The SFRA notes that groundwater and surface water flooding can be significant issues (particularly surface water flooding in urban areas), but because of lack of data and predictability, these issues are best addressed in more localised site-specific Flood Risk Assessments (FRAs).
- 2.2.14 The SFRA highlights the importance of water from further **development to the north east of Norwich** draining northwards to the Bure catchment, rather than southwards towards the River Wensum and Norwich. It is thought that this should be achievable, but that further investigation is needed. It will also be important to consider the impact on settlements downstream on the River Bure, some of which are already at risk from flooding.
- 2.2.15 Flooding from the Broads river systems caused by tidal surges is the most important cause of flooding in the **Broadland District Council area**, and there may be the potential for significant damage and loss. However, there is a low to moderate "danger to people" hazard because of the slow onset, and because of the effectiveness of the Environment Agency Flood Warning system. Flooding from the Broads river systems is also the most important cause of flooding in the **South Norfolk area**, and the hazard level is also described as low to moderate. Fluvial flooding associated with upstream areas of individual catchments within both districts is not normally "flashy" and these floods, excepting unusual meteorological conditions, are less onerous.
- 2.2.16 In the context of the evolving proposals for the Greater Norwich Policy area and development proposals for north east Norwich, the SuDS mapping indicates that the potential for SuDS is generally much better in areas to the **north and east of Norwich** than it is to the **south of Norwich**.

The Greater Norwich Green Infrastructure Strategy

2.2.17 **Figure 2.1**, which is taken from the Green Infrastructure Study, shows the location of important biodiversity assets in the Greater Norwich Area.

Figure 2.1: Designated nature conservation sites

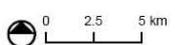


KEY

Local Nature Reserves (LNR)	Special Protection Area (SPA)	County Wildlife Sites (CWS)
Ramsar Site	National Nature Reserve (NNR)	Broads Authority Area
Special Areas of Conservation (SAC)	Site of Special Scientific Interest (SSSI)	Study Area

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Figure 4.9
Designated Nature
Conservation Sites



2.2.18 A consideration of this baseline highlights the following issues:

- In terms of designated sites, there is a large woodland County Wildlife Site to the north of Thorpe St. Andrew and there are other smaller woodland CWSs within the Growth Triangle.
- There are a number of small CWSs in the vicinity of Wymondham, including a cluster of relatively large woodland patches to the north-west of the town.
- To the west of Norwich, there are extensive areas designated as CWS associated with the floodplains of the Rivers Wensum and (to a lesser extent) Tud (in the vicinity of Costessey), and associated with the Floodplain of the River Yare (in the vicinity of Cringleford). It is also important to note that the River Wensum is designated as an SAC.
- Much of the growth triangle to the north east of Norwich is associated with an 'area of opportunity' for heathland habitat, where there is a need to focus on habitat creation and enhancement as well as improving linkages between existing patches. However, the core patches of existing heathland are located some way away, to the north west of Norwich.
- The area to the west of Costessey, to the south and west of Hethersett, and surrounding Wymondham is associated with an extensive 'area of opportunity' for woodland habitat, where there is a need to focus on habitat creation and enhancement as well as improving linkages between existing patches.

2.2.19 In terms of the **future baseline** under a business as usual scenario, it is important to consider that climate change will lead to increased stress on species populations, and that effects could potentially be intensified by changes to non-planning related land management activities. This makes it all the more important that a green infrastructure network is put in place that supports ecosystem function and promotes resilience to environmental change. The other issue that is likely to worsen in the future under a climate change scenario is flooding. This has implications for green infrastructure, as it is important that areas are not developed that may have an 'opportunity value' when left as open space because they may be able to play a role in terms of flood prevention in the future.

2.2.20 The Strategy identifies a number of sustainability issues specific to the Greater Norwich area that green infrastructure can help to address, including:

- Environmental character and local distinctiveness
 - the need for landscape and urban character and heritage to be retained, reflected and enhanced through the location and design of new development;
 - the importance of riverscapes to the overall character of the Greater Norwich Area generally, and in particular Norwich;
 - a lack of brownfield development sites, which will place pressure on greenfield land around the fringes of Norwich;
 - the need to protect the setting of Norwich, and the importance of maintaining views, gateways and approaches to and from the urban area;
 - changing patterns of urban and rural 'tranquillity'; and
 - the need to support diversification and indigenous growth of rural economies.
- Biodiversity and the natural environment

- there is a need to consider the impact of growth on catchments and water supplies;
- significant areas in Greater Norwich are at risk of flooding, including previously developed areas in the City;
- the wealth of high quality agricultural land which needs protecting, as the loss of high quality soil resources would be irreversible;
- the potential to develop an environmentally sustainable economy through development of sectors such as renewable energy and eco-tourism;
- climate change threatens the long-term future of some habitats and species, and their capacity to withstand these changes needs to be improved;
- the importance of the river valleys and the Broads for nature conservation;
- opportunities for targeted biodiversity enhancements on agricultural land;
- the generally poor status of SSSI designated sites, particularly in Norwich;
- Greenspaces and access networks
 - the imperative to redress identified deficiencies in provision of open space across the Greater Norwich Area in terms of quantity and quality;
 - integration of green spaces and green corridors into development, linked to walking and cycling networks;
 - the need to reduce poor air quality impacting on human health in urban areas;
 - the need to provide access to a good range of cultural and leisure facilities, including improved access to the countryside and local green spaces;
 - the need for facilities for local play and interaction to help build strong communities;
 - the need to improve access to jobs, services and facilities by walking, cycling and public transport and reduce the need to travel by private car.

2.2.21 The strategy is designed to meet the requirements of the draft East of England Plan to develop green infrastructure networks. Policy ENV1 requires such networks to be multifunctional, be capable of meeting a range of social, environmental and economic needs, and operate at all spatial scales from urban areas to the wider countryside, and include connections between urban and rural settlements and between settlements and the countryside.

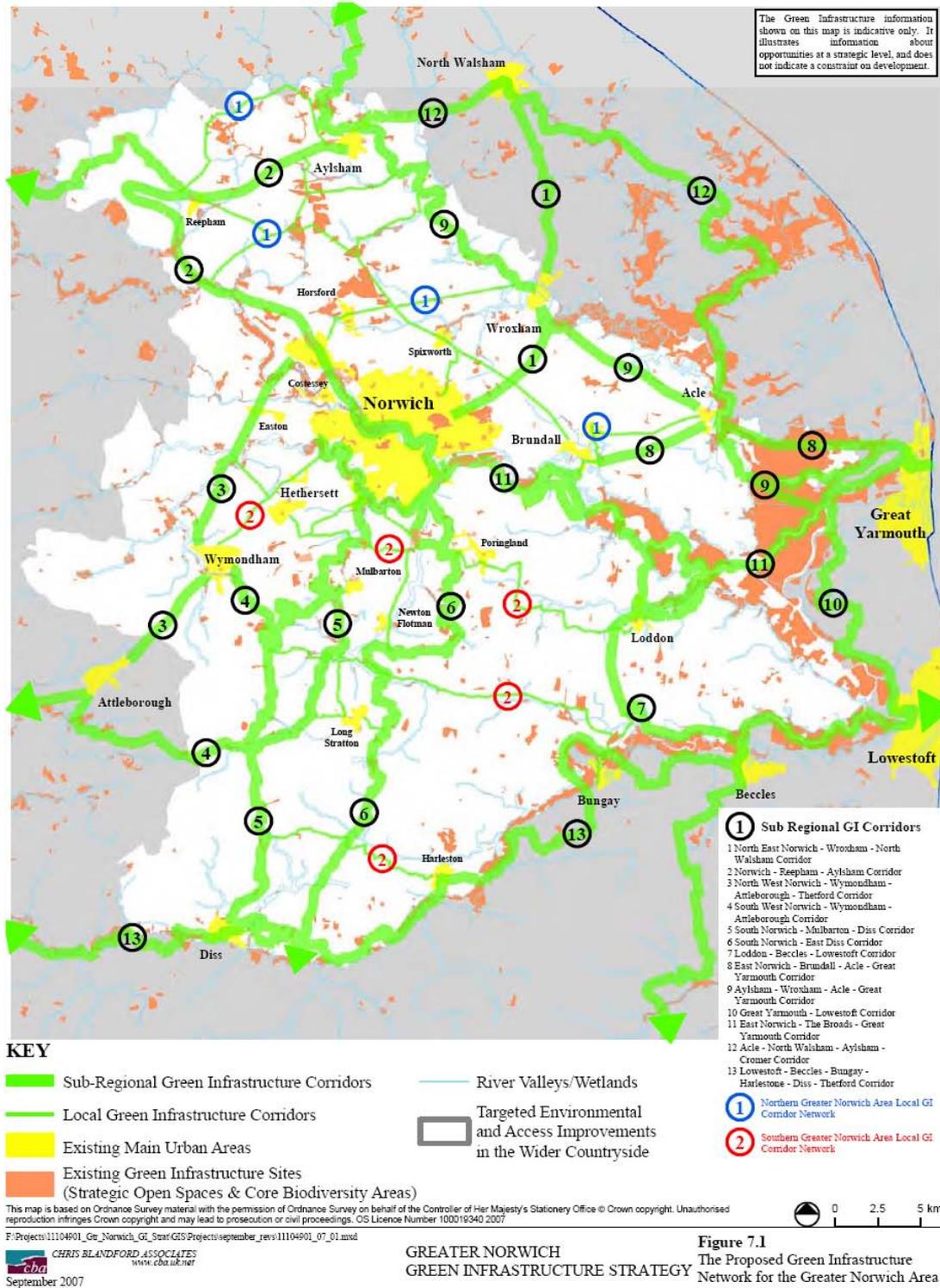
2.2.22 The proposed criteria for selection of multi-functional green infrastructure projects are:¹⁰

- 1) Contribution to delivery of the green infrastructure network (**Figure 2.2**)
 - Does the proposed project lie within or immediately adjacent to a Sub-Regional Green Infrastructure Corridor?
 - Does the proposed project lie within or immediately adjacent to a Local Green Infrastructure Corridor?
- 2) Contribution to delivery of the sustainable movement network (**Figures 2.3/2.4**)

¹⁰ These criteria might also be employed to determine the impact of a development proposal that would preclude the opportunity to develop a green infrastructure project at that location.

- Would the proposed project deliver a significant element of the Primary Movement Network?
- Would the proposed project deliver a significant element of the Secondary Movement Network?
- 3) Contribution to delivery of the ecological network (**Figures 2.5/2.6**)
 - Would the proposed project contribute to safeguarding the Ecological Network's Core Areas of high wildlife value?
 - Would the proposed project deliver a significant element of the Ecological Network's Habitat Enhancement and Creation Areas?
 - Would the proposed project deliver a significant element of the Ecological Network's Wetland Habitat Enhancement and Creation Areas?
 - Would the proposed project deliver a significant element of the Ecological Network's Corridors?
- 4) Contribution to delivery of the green infrastructure core principles
 - Would the proposed project help safeguard and protect valuable green infrastructure resources?
 - Would the proposed project help integrate green infrastructure into development schemes and existing developments?
 - Would the proposed project help secure new and enhanced green infrastructure before development proceeds where there is a clear need for provision?
 - Would the proposed project help enhance green infrastructure where of low quality, in decline or requires investment to realise its potential to meet future demands?

Figure 2.2: Sub-regional and local green infrastructure corridors¹¹



¹¹ Refer to the Green Infrastructure Strategy Document for maps of the two other components of the strategy – the Norwich Urban Green Grid and locations of green infrastructure elements in the wider countryside,

Figure 2.3: The proposed sustainable movement network – Greater Norwich Area

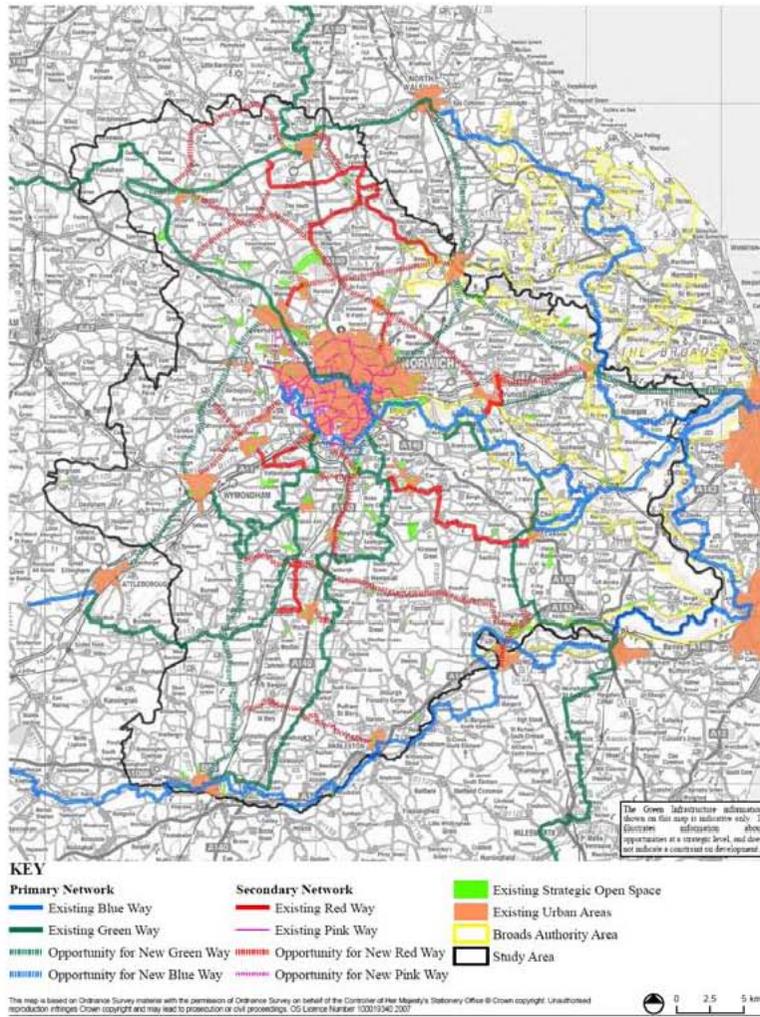


Figure 2.4: The proposed sustainable movement network – Norwich Urban Area

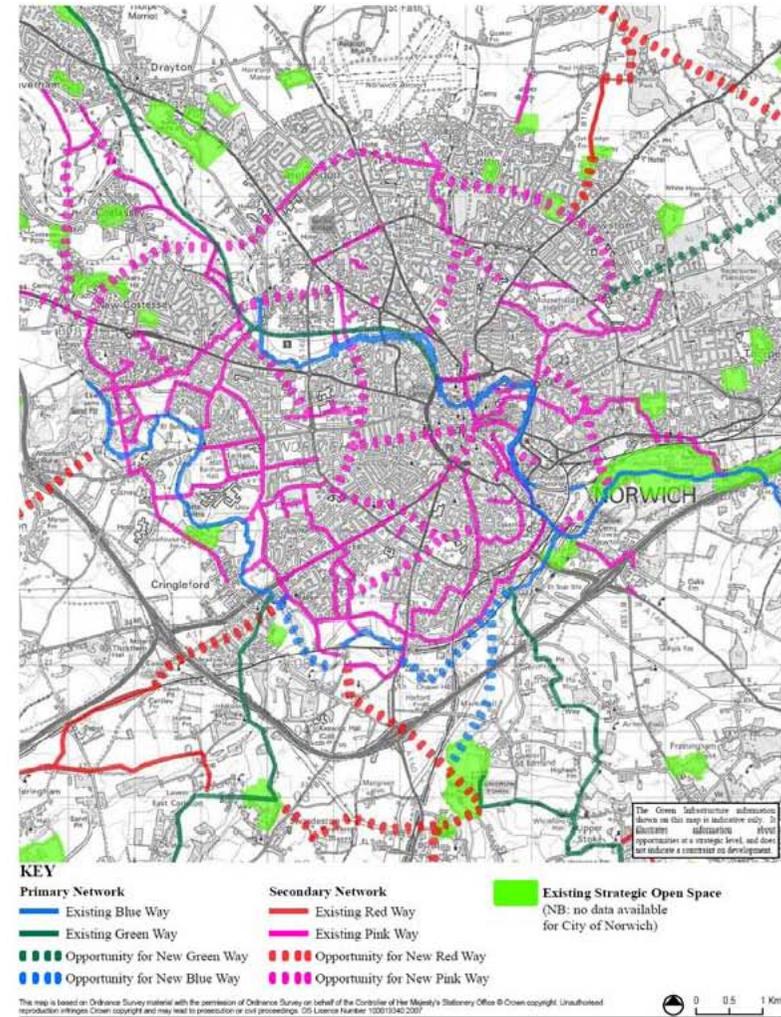


Figure 2.5: The proposed ecological network – Greater Norwich area

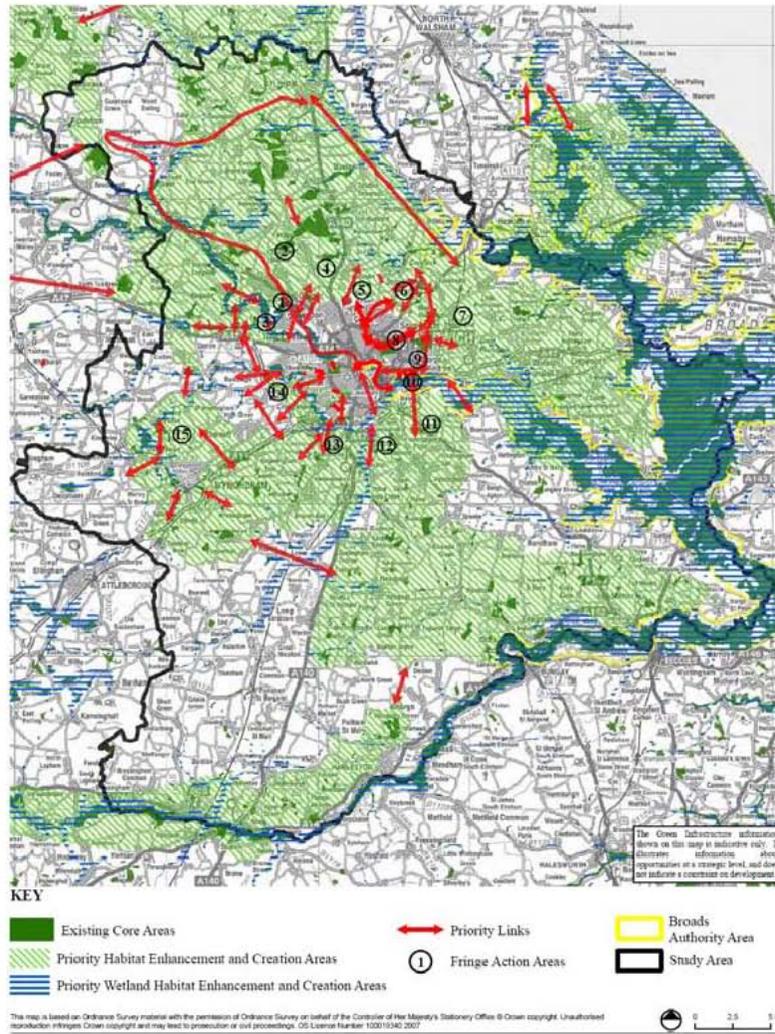
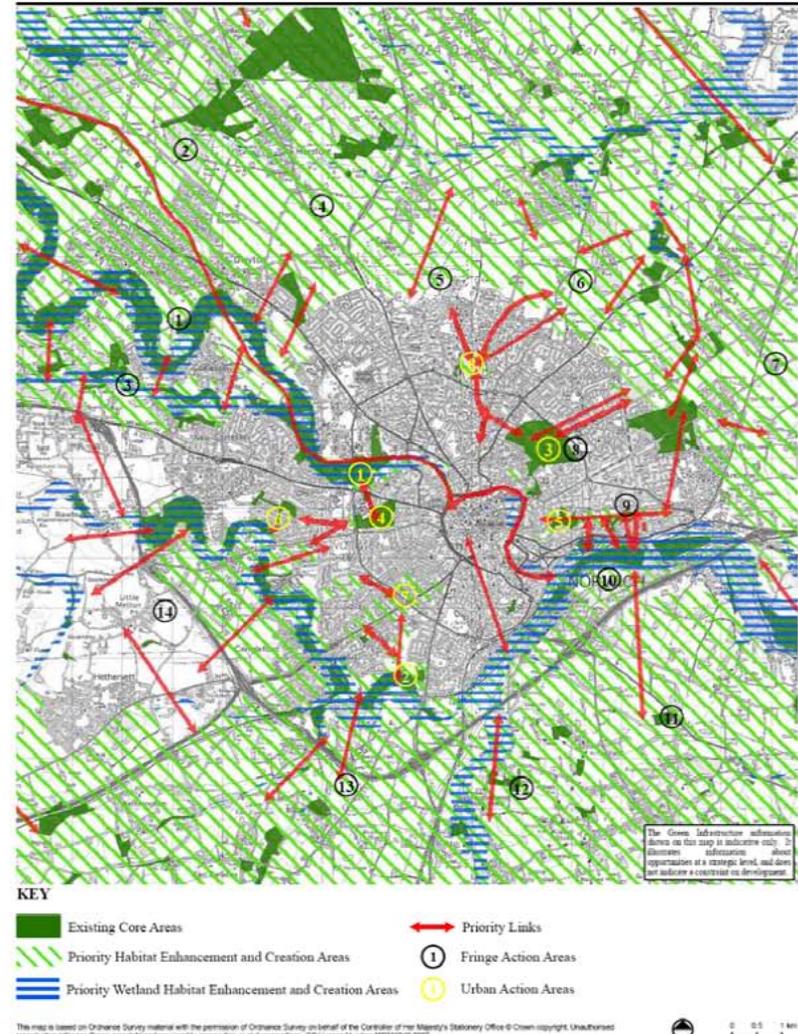


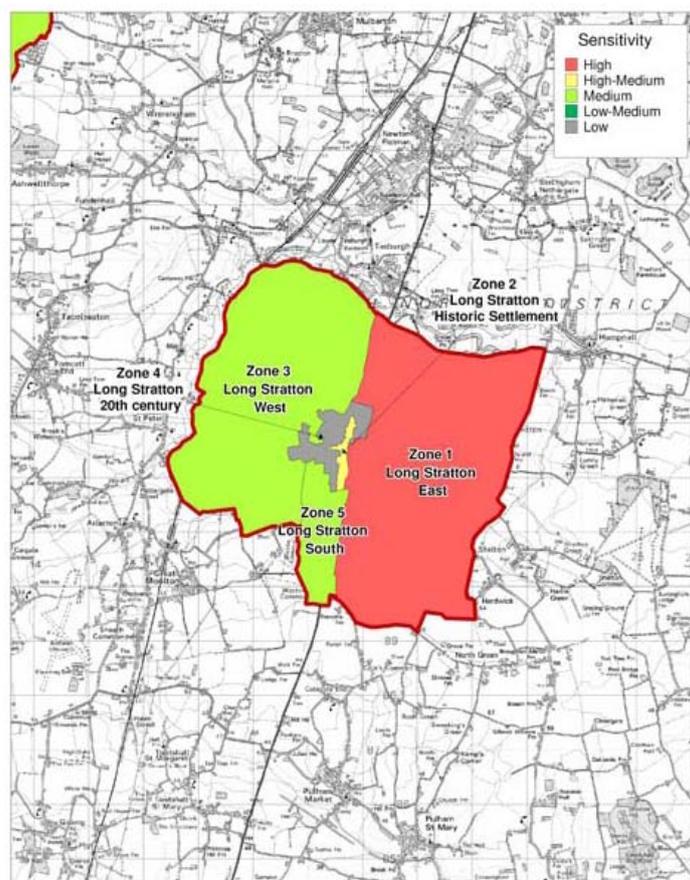
Figure 2.6: The proposed ecological network – Norwich urban area



Historic Characterisation and Sensitivity Assessment

2.2.23 This study looked at the sensitivity of each of the major growth locations in turn, in order to consider the existing historic character and sensitivity to growth.

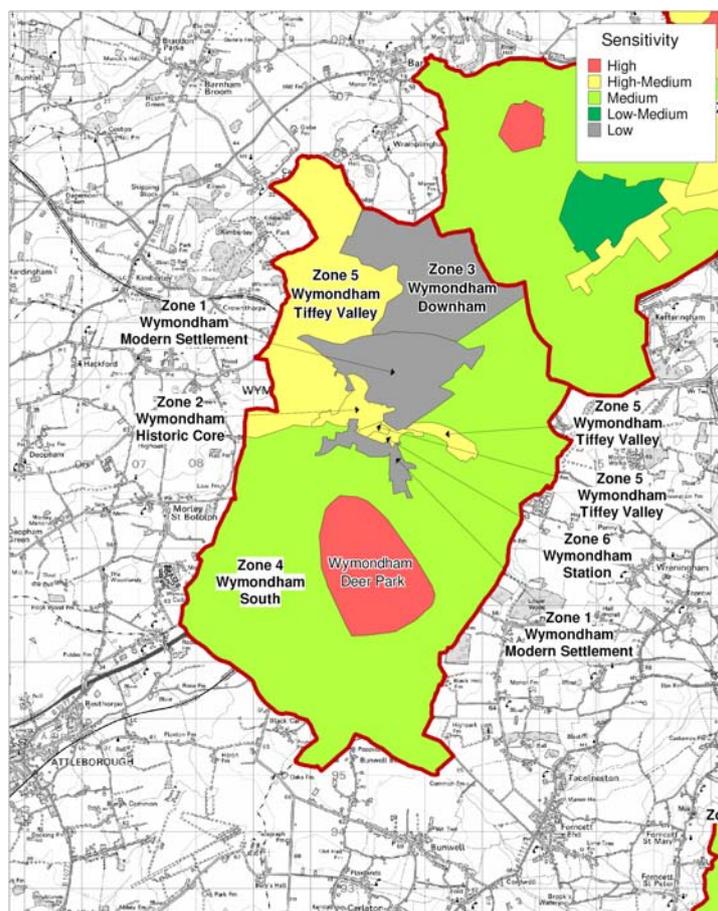
Figure 2.7: Historic sensitivity around Long Stratton



2.2.24 Long Stratton has historically had a role as a focal market town within the dispersed pattern of farmsteads, hall/church complexes, and common-edge 'hamlets' within which it sits. Surrounding settlements were all linked by tracks, which survive as footpaths, tracks, lanes and roads in the current landscape, but within this particular area the Roman Pye Road (A140) is a significant feature, visible in the landscape, and the reason for Long Stratton's location and linear shape. In modern times, increased traffic on the road has brought an erosion of character through dirt, noise and preventing easy passage from one side to the other.

2.2.25 The area to the east of Long-Stratton is identified as sensitive (see **Figure 2.7**) as a result of containing a high number of features of typical 'Ancient Countryside'. It is noted that there is the potential for impacts associated with the proposed Long Stratton bypass. The zone to the west of Long-Stratton also reflects the dispersed settlement pattern of 'Ancient' Countryside', although it differs from the east side of Long Stratton in having lost all its greens which provided the context for the 16th/17th century farmhouses that survive.

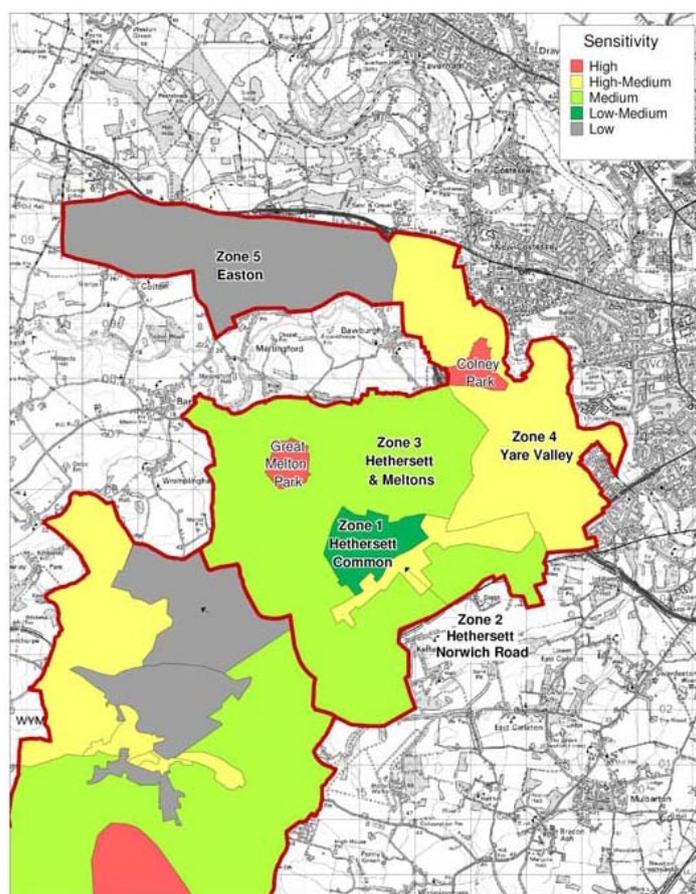
Figure 2.8: Historic sensitivity around Wymondham



- 2.2.26 Like Long-Stratton, Wymondham is a historic focal settlement set within an Ancient Countryside of dispersed and isolated smaller settlements. The parish of Wymondham is remarkably large, and is thought to be the rare survival of an intact Anglo-Saxon royal or aristocratic estate which, unlike other estates, was never divided up into more numerous smaller units which later became the basis of the parish system. It is also suggested that the parish was the site of a minster, common in the early days of Christianity, but usually fragmented during the Saxon period. It is not fully understood why these changes never occurred in Wymondham. There is an absence of church/hall settlements within the parish which is a variant on the ‘Ancient Countryside’ settlement type.
- 2.2.27 In the 10th century the route between Viking-established Norwich and Thetford passing through Wymondham increased in importance, bringing with it extra trade and prosperity. During the late 11th and 12th centuries the area was further transformed through the ownership of the d’Aubigny family, who founded the Priory (which became an Abbey later), created two deer parks, and built a castle.
- 2.2.28 The town retains a strongly cohesive historic core, with a high number of historic buildings from the 15th century-19th century. The road network and footprint of the town reflects the development of the medieval settlement pattern, and the visual relationship with the important Abbey site remains strong.

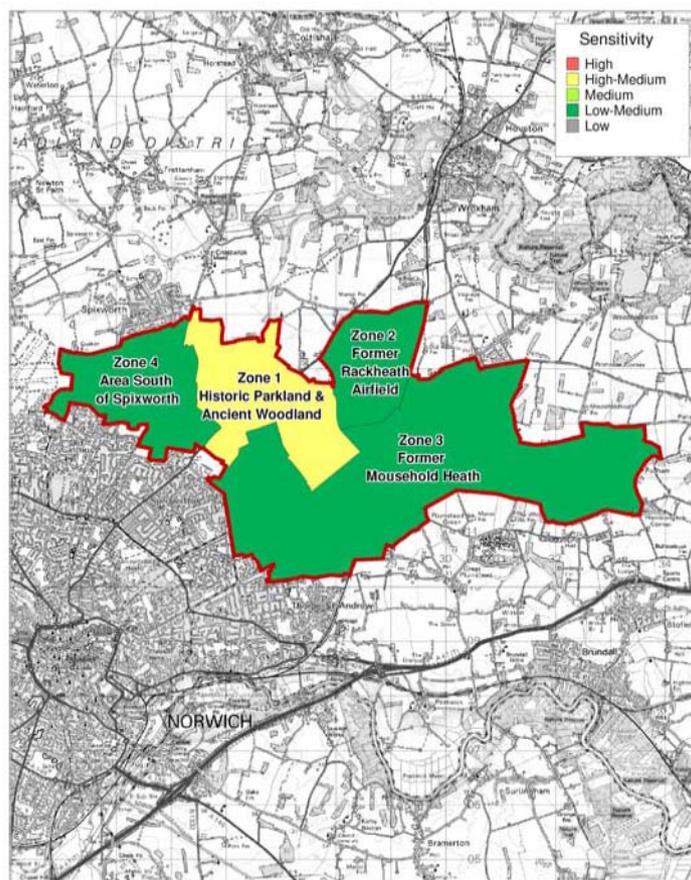
- 2.2.29 However, the town's relationship to the 1950s by-pass (which to an extent encapsulated the settlement's historic southern boundary), means that most vehicular access to the historic core is through a fairly 'thin' modern development area. The north-eastern boundary merges into an extensive area of 20th century housing development, which is largely self-contained, with no main approaches through it to the town. It therefore has little direct impact on the historic core in a visual sense, although it has, of course, destroyed the rural setting of the town in this direction.
- 2.2.30 The historic significance of Wymondham might be seen to be largely a factor of the highly cohesive and well-preserved medieval settlement pattern with postmedieval buildings. Robustness is affected by erosion of the setting of the historic core, but ameliorated by the levels of protection and generally good condition of the zone.

Figure 2.9: Historic sensitivity around Hethersett / Easton



- 2.2.31 The land between Hethersett and Easton marks a transition between the urban influence of Norwich and its suburbs, and the rural hinterland. South-west of the city a number of landscaped parks and associated halls show that this was a favoured area for the city's wealthy and influential to build convenient country residences. Settlement in the study area has been influenced by two major routes – the old London Road to the south, and the Swaffham Road to the north. Running broadly west-east through this area, the River Yare produces another settlement pattern of hamlets which developed around river crossings, with associated buildings such as bridges and mills, and pastoral river meadows.

Figure 2.10: Historic sensitivity around North East Norwich



- 2.2.32 The study area lies to the north east of Norwich, in an area of mainly light, sandy land, subdivided by the various roads radiating out from the city.
- 2.2.33 To the north of Norwich the formerly rural landscape of isolated farms and small parks is subject to various modern influences: the Norwich International airport; modern Spixworth settlement area; the northern suburbs and urban amenity uses.
- 2.2.34 East of the B1150 North Walsham Road, the landscape changes and is largely defined by a group of historic parklands (Beeston St Andrew, Rackheath, Sprowston and Sprowston Lodge) and woodland. The plantation belts of the parks, along with an area of ancient woodland fragments around Dobbs Beck/The Springs where the boundaries of Beeston St Andrew, Rackheath and Sprowston converge, contribute to the generally well-wooded appearance of the area.
- 2.2.35 To the east of Rackheath Park, a level plateau of arable farmland, bounded by roads and railway, was requisitioned in 1943 to become an airfield of the USAAF. Today, most of the airfield infrastructure has been removed, although the line of the main runway survives, highlighted by one of the narrow plantation belts that criss-cross the area.
- 2.2.36 The area to the south of the former airfield and parks was formerly part of the vast Mousehold Heath, some 6000 acres of heathland that extended eastwards to Woodbastwick until it was subject to a series of parliamentary enclosures in the early nineteenth century. This area is

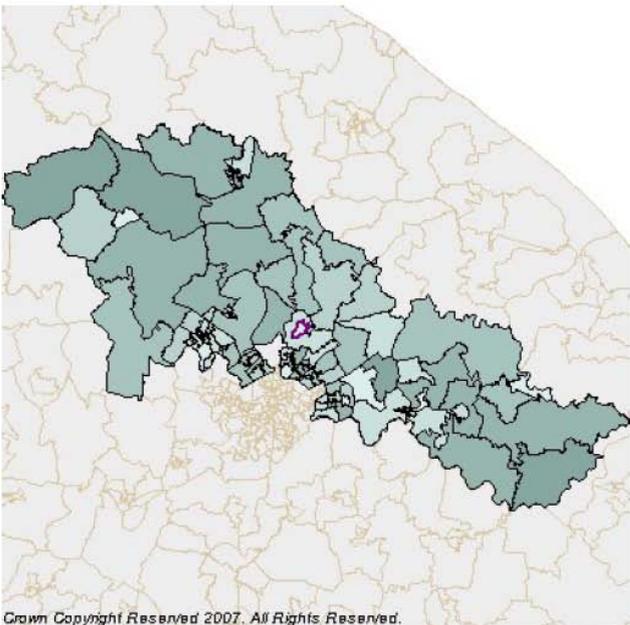
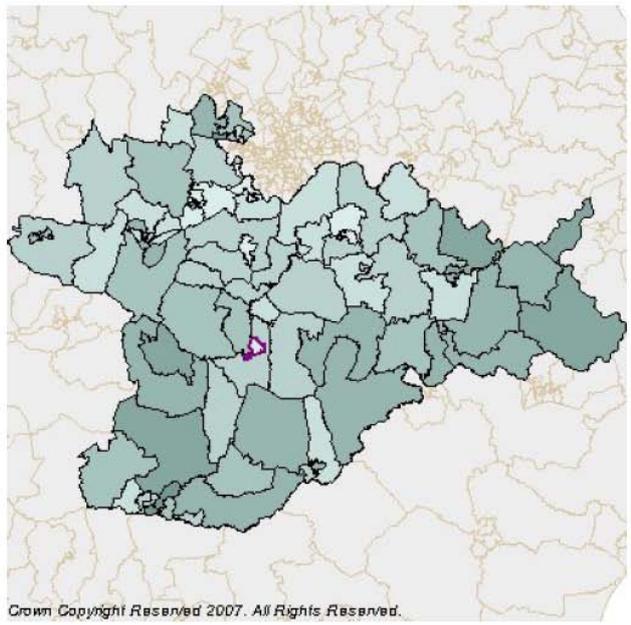
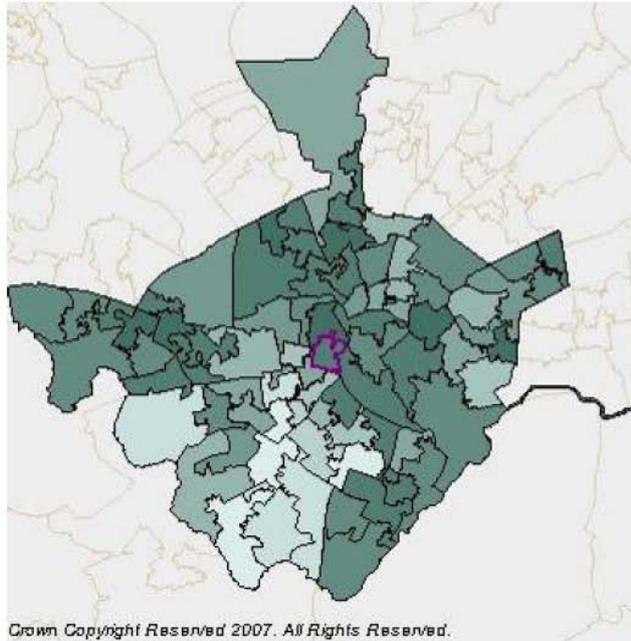
now in mixed use and the light lands are frequently cultivated. Closer to Norwich are a number of blocks of nineteenth-century mixed coniferous and broadleaf plantation and there are areas of interwar (and later) housing development at Thorpe End and New Rackheath. The former heathland is reflected in minor place-names and traces of characteristically heathland vegetation (e.g. gorse and bracken) can be found throughout the area, notably along the roadside verges.

2007 Indices of Multiple Deprivation

- 2.2.37 Since publication of the Scoping Report new data has become available that allows deprivation to be mapped spatially using figures from 2007 (previously data was only available from 2004). From **Figure 2.11** it is possible to see trends in deprivation across the three districts.
- 2.2.38 It is immediately apparent that deprivation in Norwich is significantly worse than in Broadland or South Norfolk districts. Within Norwich it is most notable that the south / south west sector (in the direction of Cringleford) is the least deprived (with some areas roughly on a par with Broadland and South Norfolk). There is no sector within Norwich that stands out as the most deprived, although it is noted that the western sector (which includes Easton / Costessey) is relatively deprived.
- 2.2.39 In South Norfolk, the most deprived ward is on the western edge of Norwich, and the next three most deprived wards are in or around Diss. Other than this, it is notable that a number of rural areas perform quite poorly in terms of deprivation. However, rural deprivation appears to be more widespread in Broadland District. Sparsely populated areas can be identified in Figure 2.11 by the large size of the map unit.¹² It can be seen that 3 of the 4 most deprived areas in Broadland are relatively rural. The most deprived urban area in Broadland is the south western sector of Aylesham, but other than this it can be seen that most of the urban areas that experience a degree of relative deprivation in comparison to other parts of the District are clustered to the north and north east of Norwich.

¹² The data is mapped by Super Output Area

Figure 2.11: Multiple deprivation across the three authorities



Water Cycle Study

- 2.2.40 Water resources are not considered to be the major constraint on development within this area. Anglian Water Services have stated that there are sufficient water resources to meet the growth demands until 2031. It is recommended that any of the large-scale developments (>5,000 houses in Norwich Policy Area and >1,000 houses elsewhere) are subject to further detailed water resource/supply investigations.
- 2.2.41 In terms of wastewater STWs within the Study Area range from having no spare capacity to considerable capacity, with Whitlingham STW having the most opportunity to receive additional flows. Development to the north east of Norwich would most likely discharge to Whitlingham. The capacity of the receiving watercourse will be crucial to determining where new discharge consents can be considered, or where existing ones will need to be upgraded. It is assumed that the water quality of any increase in discharge can be discounted through design engineering.
- 2.2.42 In terms of water quality, phosphate and nitrate loading into the river systems provides the biggest impact to environmental designated sites within the Study Area. The cumulative impacts of individual development should also be considered.
- 2.2.43 The study also notes that flood risk is most relevant on some brownfield sites in Norwich and in the area in the vicinity of the Wensum and Tud to the West of Norwich, where development is proposed at Eaton / Costessey.
- 2.2.44 The Water Cycle Study also identifies the following baseline issues:
- There are groundwater vulnerability issues associated with growth triangle to the north east of Norwich as well as Costessey and Easton. There is a degree of groundwater vulnerability associated with Long Stratton and Wymondham.
 - There is poor SuDS suitability associated with growth triangle to the north east of Norwich, Cringleford, Hethersett, Costessey, Easton and Long Stratton
 - The area in the vicinity of Costessey and Easton falls within a Source Protection Zone.
 - The Water Cycle Study highlights the potential for some water resource and water quality issues to worsen in the future as climate change leads to more frequent drought conditions.

N.B. Stage 2b of the Water Cycle Study is still to be reported. Publication of this report may add considerably to our understanding of the sustainability context and baseline.

Infrastructure Need and Funding Study 2007 (03/02/2009)

- 2.2.45 Understanding the size and characteristic of the future population is fundamental to understanding the likely future demand for:
- Social Infrastructure, including education, health and community facilities;
 - Transport Infrastructure;
 - Economic Infrastructure;
 - Utilities Infrastructure.

- 2.2.46 All infrastructure will require some form of improvement or upgrading during the growth period and utilities providers should consider growth post 2021. Location of development closer to utilities infrastructure will require less investment (financial and time resources).
- 2.2.47 It will also be important to consider medium and long term constraints at employment sites. It is noted that several key designated employment sites need assistance in providing infrastructure.

It is important to note that a 2009 Infrastructure Need and Funding Study is being prepared, but has not yet been finalised. Publication of this report may add considerably to our understanding of the sustainability context in terms of what may and may not be achievable.

Greater Norwich Retail and Town Centres Study

- 2.2.48 This study looks at the role of the city centre as a major regional centre, as well as the roles of the smaller market towns and district centres in the greater Norwich area. The study looks at the impact of predicted population increases in the region, as well as projected increases in household expenditure and changes in retail and leisure provision.
- 2.2.49 In terms of implications for the growth in and around Norwich:
- Norwich City Centre should be promoted as a retail, cultural, leisure and education centre;
 - development and investment should be directed first to existing town centres, in order to enhance their vitality and viability, but there is an important role for smaller market towns and village centres;
 - development should be consistent with the scale, size and function of the centre concerned; and
 - it is suggested that mixed-use retail and leisure developments at town centre or edge-of-centre locations can be effective in supporting regeneration.
- 2.2.50 The study describes Norwich City Centre as has a strong regional role and a relatively strong and attractive retail offer. There is a need to maintain this competitive position by continued investment in the retail centre, including the historic environment and tourist attraction of the centre.
- 2.2.51 In terms of Market towns in the rural areas in Broadland:
- Acle, Aylsham and Reepham provide essential local convenience shops. Aylsham has a wider range of provision than the others.
 - It is essential that these centres maintain and enhance their retail offer to meet the day-to-day needs of local residents as well as serving a wider tourist and visitor market.
- 2.2.52 In terms of Market towns in the rural areas in South Norfolk:
- Diss, Wymondham and Harleston are all attractive well maintained town centres and are on a larger scale than their Broadland equivalents.
 - Diss is the largest market town centre with good food provision but could be improved with more non-food shopping and opportunities for restaurants and bars.

- Wymondham has an under-provision of food shops but is important as a centre for banks and local services, which should be maintained.

Employment Growth and Sites and Premises Study

2.2.53 There are plans for 35,000 additional jobs in the greater Norwich area. This means that careful consideration and planning for future employment is needed. This document looks at the potential for, and impact of, employment growth within the greater Norwich economy up to 2026. It also includes a review of employment sites and premises which assesses existing and potential land supply.

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

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

2.2.55 In terms of existing land and premises provision:

- there is a need to afford strong protection to ring road sites and newer larger allocations;
- the City Centre still contains significant long term capacity;
- Norwich Research Park has great potential and is suggested as a priority; and

- there is a case for developing a new north city employment hub - realising the economic potential of the airport and the proposed northern distributor road.

Public Transport Study

- 2.2.56 Previous work has concluded that a distribution of housing growth based on a smaller number of larger development sites would be the preferred option from a public transport perspective in order to provide strong market opportunities for high frequency bus services and greater scope for truly Public Transport-Orientated Developments.
- 2.2.57 The preferred option for the distribution of housing growth within South Norfolk District proposes the dispersal of growth across a greater number of smaller sites. Appraisal of this option has shown that none of the growth areas proposed under this option are of sufficient size to individually support a 'turn up and go' bus service in 2021. Potential locations for smaller developments which would facilitate incremental improvements to good existing bus links to Norwich include Mulbarton and Poringland.
- 2.2.58 There is a further concern with developments of less than 2,000 homes at Long Stratton, and Easton/Costessey. At Long Stratton it is recommended that public transport is delivered through the extension and enhancement of existing bus services. At Easton it is highlighted that there are other planned and committed developments on the Dereham Road corridor, and that a Bus Rapid Transit service has been proposed for this corridor as part of the current work to refresh NATS.
- 2.2.59 However, the proposal for a total of 4,400 additional houses on the A11 corridor (Wymondham, Hetherset and Cringleford) is at the borderline of providing a potential market sufficient in size to support the development of a Bus Rapid Transit service. Increasing the total housing allocation for to 5,000 would provide greater comfort regarding the market potential for BRT on this corridor.

Housing Market Assessment

- 2.2.60 The Housing Market Assessment sets out a detailed picture of housing supply and demand. Of particular relevance to the Core Strategy is the provision of an appropriate housing mix of market housing, private rented and affordable housing.
- 2.2.61 Affordability in the market is a problem. This is reflected in the large number of people who apply to the council housing registers in the sub-region. There is evidence of a particular lack of affordability in the first time buyer market. To find a property within their budget first time buyers may need to choose cheaper locations or smaller homes. Single people and couples are the largest groups on the sub-region's housing registers, as in addition to being priced out the market they often struggle to afford rents.
- 2.2.62 The study identifies that there are three main sources of affordable housing supply:
- Housing delivered through the National Affordable Housing Programme (NAHP) and from other grant funding.
 - Housing delivered as a condition of planning permission for developments of new housing.
 - Affordable housing on rural exception sites for Broadland and South Norfolk districts.

- 2.2.63 Providing affordable family housing is difficult. In Norwich the council are likely to offer a flat and not a house to a small family. Most of these families would prefer, and in some cases, expect a house.

Eco-towns

- 2.2.64 The Final Eco-towns PPS¹³ was published in July 2009, and at the same time Rackheath was identified as one of the four shortlisted locations with the potential to meet the eco-towns objectives and set standards. The PPS sets out a range of interesting context regarding what the Government sees as a suitably ambitious to the development of sustainable new communities, but perhaps of greater relevance here are the Government's findings that relate specifically to Rackheath.

- 2.2.65 The Sustainability Appraisal summary published in November 2008 for consultation assessed this location as follows:

- Key strengths of location
 - Close to existing operational railway with station access.
 - Proximity to Norwich and the location within the Norwich Priority Growth Area.
 - The location is being considered in the Core Strategy by the Greater Norwich Development Partnership.
- Key weaknesses of location
 - The location is split into two sites extending either side of the proposed Northern Distributor Road (NDR).¹⁴
 - The great majority of the site has not been previously developed.

- 2.2.66 Following review of the consultation responses, and any additional evidence, the SA addendum published today alongside the PPS has summarised the key sustainability issues as follows:

- The availability of water resources is a key issue; the Environment Agency notes that there is no water available at low flows in any local catchments and that the catchment from which the Rackheath site draws is over-abstracted
- Impacts on water quality from development at Rackheath are also a key issue
- A Water Cycle Study covering Rackheath should be undertaken
- Further investigation of impacts on European wildlife sites from development at Rackheath are crucial.

¹³ CLG (2009) The eco-towns Planning Policy Statement: A Supplement to PPS1. Available [online] @ <http://www.communities.gov.uk/publications/planningandbuilding/pps-ecotowns> (accessed 08/09)

¹⁴ It is important to note that this conclusion is not technically correct, as the area proposed for the eco-town is in fact entirely to the north of the proposed route of the NDR. However, having said this, it could still be considered a weakness of the location that the NDR will split the eco-town and the other area proposed for growth to the south of the NDR.

2.2.67 Government has considered the issues raised in the Sustainability Appraisal, Habitats Regulation Assessment, supporting studies and updates and the issues identified in the summary of consultation responses under the following headings:¹⁵

(i) Scope for the location to exemplify high sustainability gains (in terms of PPS standards) in relation to its context and surrounding area.	There is strong potential to achieve wider environmental innovation in this location, given the close proximity to Norwich, integration with local development and the presence of local centres of expertise on these issues. However, there are also significant environmental constraints which must be addressed.
(ii) Whether infrastructure proposals for the location, such as transport, are sufficiently developed to be able to achieve sustainability standards of the type set in the PPS.	Good rail access with the potential for improvement is a strength. Issues remain to be resolved on how best to provide road and sustainable transport. The local authority view is that road access should be part of the proposed NDR, which is an RFA regional priority. A further significant issue is the need to tackle the extreme water stress of the area, to develop new and detailed proposals on water supply and to manage water discharges to avoid unacceptable pressure on the Broads SPA. These do not appear to be strategic barriers to successful delivery of a scheme in this location, but require significant further work. Further work on green infrastructure and on management measures to address impacts on biodiversity will also be required.
(iii) Whether the infrastructure proposed for the location is likely to be deliverable, taking account of affordability and public sector constraints.	The proposed NDR has yet to receive DfT major scheme approval, although consideration of the scheme is well advanced, but alternative means of improving road access to Rackheath are also achievable. Apart from the NDR and the need for innovative new water supply and additional waste water measures, the infrastructure delivery issues for this location are likely to be relatively straightforward and capable of resolution.
(iv) Is the location likely to work well in terms of economic and employment links and impacts on neighbouring settlements.	The location is well placed in relation to employment areas nearby and links well to neighbouring settlements and is strongly supported by the Great Norwich Development Partnership.
(v) Would taking forward and deliverability of an eco-town in this location fit well with current or emerging policies on planning and wider growth and regeneration issues.	As the consultation responses indicate deliverability prospects are strong, given the support for this direction of growth in the work supporting the Greater Norwich joint Local Development Framework (LDF) and growth point delivery plan. It also benefits from positive community work by the local authority and the active involvement in public engagement of the Climate Change unit at UEA.

¹⁵ CLG (2009). Ecotowns location decision statement. Available [online] at <http://www.communities.gov.uk/publications/planningandbuilding/ecotownslocationdecision> (accessed 09/09)

2.3 A3 – Sustainability Issues

2.3.1 Stage A3 involves drawing on the evidence gathered in Stages A1 and A2 to identify those sustainability issues that are most pressing and so should be a focus of the assessment. The sustainability issues identified form the basis for developing the SA framework (Stage A4) and can themselves provide useful source evidence to inform the judgement of effects against the SA framework at the assessment stage.

2.3.2 The requirement to identify sustainability issues arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:
"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive']"

(Annex 1(d))

2.3.3 The following is a brief summary of the sustainability issues that were identified by (and expanded upon further within) the 2007 Scoping Report:

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

2.4 A4 – Developing the SA Framework

- 2.4.1 SA is fundamentally based on an objectives-led approach whereby the potential impacts of a plan are gauged in relation to a series of aspirational objectives for sustainable development. In other words, the objectives provide a methodological yardstick against which to assess the effects of the plan.
- 2.4.2 The SA objectives were developed primarily by drawing on the sustainability issues identified at Stage A3, but also taking account of other evidence gathered at Stages A1 and A2. **Table 2.1** below sets out the SA Objectives identified for the SA of the JCS. These objectives should ensure that the assessment is focused on only those effects that are most likely to be significant. To further focus the scope of the assessment a number of additional decision-making criteria in the form of questions / prompts have been developed from the scoping evidence – see Table 2.1.

Table 2.1: SA objectives and sub-objectives

Environmental objectives:	
ENV 1 To reduce the effect of traffic on the environment.	<p>Will it reduce traffic volumes, ease the flow of traffic and reduce congestion?</p> <p>Will it increase the proportion of journeys using modes other than the car?</p> <p>Will it reduce the effect of HGV traffic on people and the environment?</p> <p>Will it encourage more benign modes of travel?</p> <p>Will new development be located such to reduce the need for people to travel?</p>
ENV 2 To improve the quality of the water environment.	<p>Will it improve the quality of the water environment (streams, rivers, lakes etc)?</p> <p>Will it help to support wetland habitats and species?</p>
ENV 3 To improve environmental amenity, including air quality.	<p>Will it improve air quality?</p> <p>Will it reduce the emission of atmospheric pollutants?</p>
ENV 4 To maintain and enhance biodiversity and geodiversity.	<p>Will it conserve / enhance natural or semi-natural habitats, and promote habitat connections?</p> <p>Is it likely to have a significant effect on sites designated for international, national or local importance?</p> <p>Will it conserve / enhance species diversity, and in particular avoid harm to protected species?</p>
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	<p>Will it protect and enhance the quality of landscapes, townscapes and countryside character, including the character of the Broads and its setting where relevant?</p> <p>Will it maintain and enhance the distinctiveness of the landscapes/townscapes and heritage?</p>

	<p>Will it reduce the amount of derelict, underused land?</p> <p>Will it protect and enhance features of historical, archaeological and cultural value?</p>
ENV 6 To adapt to and mitigate against the impacts of climate change.	<p>Will it reduce emissions of greenhouse gases by reducing energy consumption?</p> <p>Will it lead to an increased proportion of energy needs being met from renewable sources?</p> <p>Will it increase the capacity of the area to withstand the effects of climate change?</p> <p>Will it ensure that the risks to lives, land and property are minimised?</p>
ENV 7 To avoid, reduce and manage flood risk.	<p>Will it minimise the risk of flooding to people and property?</p> <p>Can it incorporate new designs to adapt to possible flood risk?</p> <p>Will it promote the use of sustainable drainage systems to reduce run off?</p>
ENV 8 To provide for sustainable use and sources of water supply.	<p>Will it conserve groundwater resources?</p> <p>Will it minimise water consumption?</p>
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	<p>Will it minimise consumption of materials and resources?</p> <p>Will it promote the use of land in sustainable locations that has been previously developed?</p> <p>Will it use land efficiently?</p> <p>Will it minimise the loss of "greenfield" land?</p> <p>Will it avoid the loss of good quality agricultural land and preserve soil resources?</p> <p>Will it minimise energy consumption and promote energy efficiency?</p> <p>Will it promote the use of renewable energy sources?</p> <p>Will it lead to less waste being produced?</p> <p>Will it lead to less waste being disposed, by promoting more recycling and composting?</p> <p>Will it increase waste recovery for other means eg. Energy generation?</p>
Social objectives:	
SOC 1 To reduce poverty and social exclusion.	<p>Will it reduce poverty and social exclusion in those areas most affected?</p> <p>Will it help to reduce deprivation levels?</p> <p>Will it help meet the needs of residents most effectively?</p>
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	<p>Will it improve access to high quality health facilities?</p> <p>Will it encourage healthy lifestyles?</p>

	<p>Will it provide adequate health infrastructure for existing and new communities?</p> <p>Will the links between poorer health and deprivation be addressed?</p> <p>Will links to the countryside be maintained and enhanced?</p>
SOC 3 To improve education and skills.	<p>Will it improve qualifications and skills for both young people and amongst the workforce?</p> <p>Will it help to retain key workers and provide more skilled workers from school leavers?</p> <p>Will adequate education infrastructure be provided for existing and new communities?</p> <p>Will it promote lifelong learning and skills training?</p> <p>Will links between lower levels of education and deprivation be addressed?</p>
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	<p>Will it increase the range of types, sizes and affordability of housing for all social groups?</p> <p>Will it reduce the housing need and ensure that housing provision addresses the needs of all?</p> <p>Will it provide the most appropriate solutions to address the housing requirements needed for creating sustainable communities?</p> <p>Will it make best use of existing housing stock?</p>
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	<p>Will it encourage engagement in community activities?</p> <p>Will it contribute to the achievement of a mixed and balanced community?</p> <p>Will it reduce actual levels of crime?</p> <p>Will it reduce the fear of crime?</p>
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	<p>Will it reduce unemployment overall?</p> <p>Will it help to improve earnings?</p>
SOC 7 To improve the quality of where people live.	<p>Will it improve the quality of dwellings?</p> <p>Will it improve the quality of local open space?</p> <p>Will it improve the satisfaction of people with their neighbourhoods?</p>
SOC 8 To improve accessibility to essential services, facilities and jobs.	<p>Will it improve accessibility to key local services and facilities (including health, education, leisure, open space, the countryside and community facilities)?</p> <p>Will it improve accessibility for all whilst reducing dependency on the private car?</p> <p>Will it improve access to jobs and services for all?</p>

Economic objectives:	
EC 1 To encourage sustained economic growth.	<p>Will it assist in strengthening the local economy?</p> <p>Will it improve business development and enhance competitiveness?</p> <p>Will it reduce vulnerability to economic shocks?</p> <p>Will it promote growth in key sectors?</p> <p>Will it increase vitality & viability of town centres and improve economic diversity?</p>
EC 2 To encourage and accommodate both indigenous and inward investment.	<p>Will it encourage indigenous businesses?</p> <p>Will it encourage inward investment?</p> <p>Will it make land and property available for business?</p> <p>Will it improve economic performance across the Greater Norwich area?</p> <p>Will it support / encourage rural diversification?</p> <p>Will it support / encourage small city businesses?</p>
EC 3 To encourage efficient patterns of movement in support of economic growth.	<p>Will it improve provision of local jobs?</p> <p>Will it improve accessibility to work, particularly by public transport, walking and cycling?</p> <p>Will it reduce journey times between key employment areas and key transport interchanges?</p> <p>Will it improve efficiency and sustainability of freight distribution?</p> <p>Will it support provision of key communications infrastructure?</p>
EC 4 To improve the social and environmental performance of the economy.	<p>Will it reduce the impact on the environment from businesses?</p> <p>Will it reduce the impact on residents from businesses?</p> <p>Will it attract new investment and skilled workers to the area?</p> <p>Will it maintain existing business and employment provision?</p> <p>Will it provide employment in the best locations to serve urban and rural residents?</p>

3 Stages B1 and B2

3.1 Introduction

3.1.1 The second stage of SA is known as Stage B. The guidance sets out a six stage approach to completing Stage B:

- B1 - Testing the DPD objectives against the SA framework
- B2 - Developing the DPD options – carried out by the Council
- B3 - Predicting the effects of the draft DPD
- B4 - Evaluating the effects of the draft DPD
- B5 - Considering ways of mitigating adverse effects and maximising beneficial effects
- B6 - Proposing measures to monitor the significant effects of implementing the DPD

3.2 Testing the DPD Objectives (B1)

3.2.1 The guidance requires that the JCS objectives undergo an assessment against the SA framework (see box below). Furthermore, the JCS vision has been appraised and the findings are discussed below.

“It is important for the objectives of the DPD to be in accordance with sustainability principles. The objectives should be tested for compatibility with the SA objectives.”

Section 3.3.4

Assessment of the draft vision

3.2.2 The draft vision has been assessed against the SA framework. The full findings can be found in **Annex III**, and are summarised in **Table 3.1** below.

Table 3.1: Assessment of the draft vision – summary findings

Overall environmental effects
The Vision should lead to benefits in terms of all environmental objectives, with the exception of ENV7 and ENV9, where the effects are predicted as uncertain.
Overall social effects
The Vision should lead to benefits in terms of all social objectives
Overall economic effects
The Vision should lead to benefits in terms of all economic objectives
Overall summary of effects
This Vision identifies a long list of priorities, many of which are ambitious and forward-thinking in terms of sustainability objectives. It is useful that this detailed list of priorities is set out clearly for public scrutiny and comment.

Recommendations:

- Refer to the important issue of avoiding and mitigating flood risk
- The Vision states that development must ‘minimise the use of global resources’, but does not refer specifically to the importance of utilising brownfield land / protecting greenfield land or the need to support the development of good waste management practices.

Assessment of the draft objectives

3.2.3 The draft objectives were assessed against the SA framework. The full findings can be found in Annex III, and are summarised in **Table 3.2** below.

Table 3.2: Assessment of the draft objectives – summary findings

<p>Overall environmental effects</p> <p>The Joint Core Strategy objectives perform well in terms of all environmental objectives, with the exception of ENV2 (water quality) and ENV3 (environmental quality including air quality) which effects are predicted to be uncertain as these issues are not specifically referred to by any objective.</p>
<p>Overall social effects</p> <p>The Joint Core Strategy objectives perform well in terms of all social objectives</p>
<p>Overall economic effects</p> <p>The Joint Core Strategy objectives perform well in terms of all economic objectives</p>
<p>Overall summary of effects</p> <p>Many of these objectives are ambitious and forward-thinking in terms of sustainability objectives. It is helpful that issues such as the promotion of sustainable patterns of travel and transport, which are relatively complex and cross-cutting and so dealt with by a number of Policies throughout the rest of the Joint Core Strategy, are addressed within the objectives in a clear and concise way.</p>
<p>Recommendations:</p> <ul style="list-style-type: none"> • Rather than ‘desirable for reasons of sustainability’ it is suggested that it may be clearer to state ‘necessary in order to fulfill broader objectives’, or, alternatively, to refer to ‘exceptions to the general rule’ • Ensure that at some point in the JCS it is clearly stated how the objective to ‘minimise domestic and commercial waste by encouraging waste reduction, reuse, recycling, composting and safe energy recovery’ will be achieved.

3.3 Developing the Options (B2)

3.3.1 The appraisal of options (alternative approaches to delivering the plan objectives) is a requirement of the 'SEA Directive.

Under the SEA Directive, "*Where an environmental assessment is required... an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and **reasonable alternatives** taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated*" (our emphasis)

Article 5(1)

Furthermore, the Directive requires that the following information is included in this Report:
"an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information"

Annex I(h)

3.3.2 The Pre-Submission JCS sets out the GNDPs current preferred approach in a series of draft policies. These policies represent the GNDPs preferred options, which have been selected and refined following consultation on alternative options that has occurred in the past. In particular, options were published and consulted during the 'Issues and Options' consultation in 2007. All options presented in the Issues and Options consultation document were also subjected to SA to establish the relative merits of options in sustainability terms and inform the identification of preferred options. The findings of the Issues and Options SA were summarised in a brochure, which is available to download from the GNDP website.

3.3.3 Following the Issues and Options Consultation the GNDP were able to identify many of their preferred options. However, it transpired that there was a need to consult further on options for the spatial approach to growth. Identification of a spatial approach to growth is the single most important decision to be made by the JCS, and the decision with the most wide ranging and potentially significant sustainability implications. The section below gives further detail as to how the preferred approach was developed.

Options for the spatial approach to growth

3.3.4 The issues and options consultation document put forward three options relating to the overall approach to growth in the Norwich Policy Area:

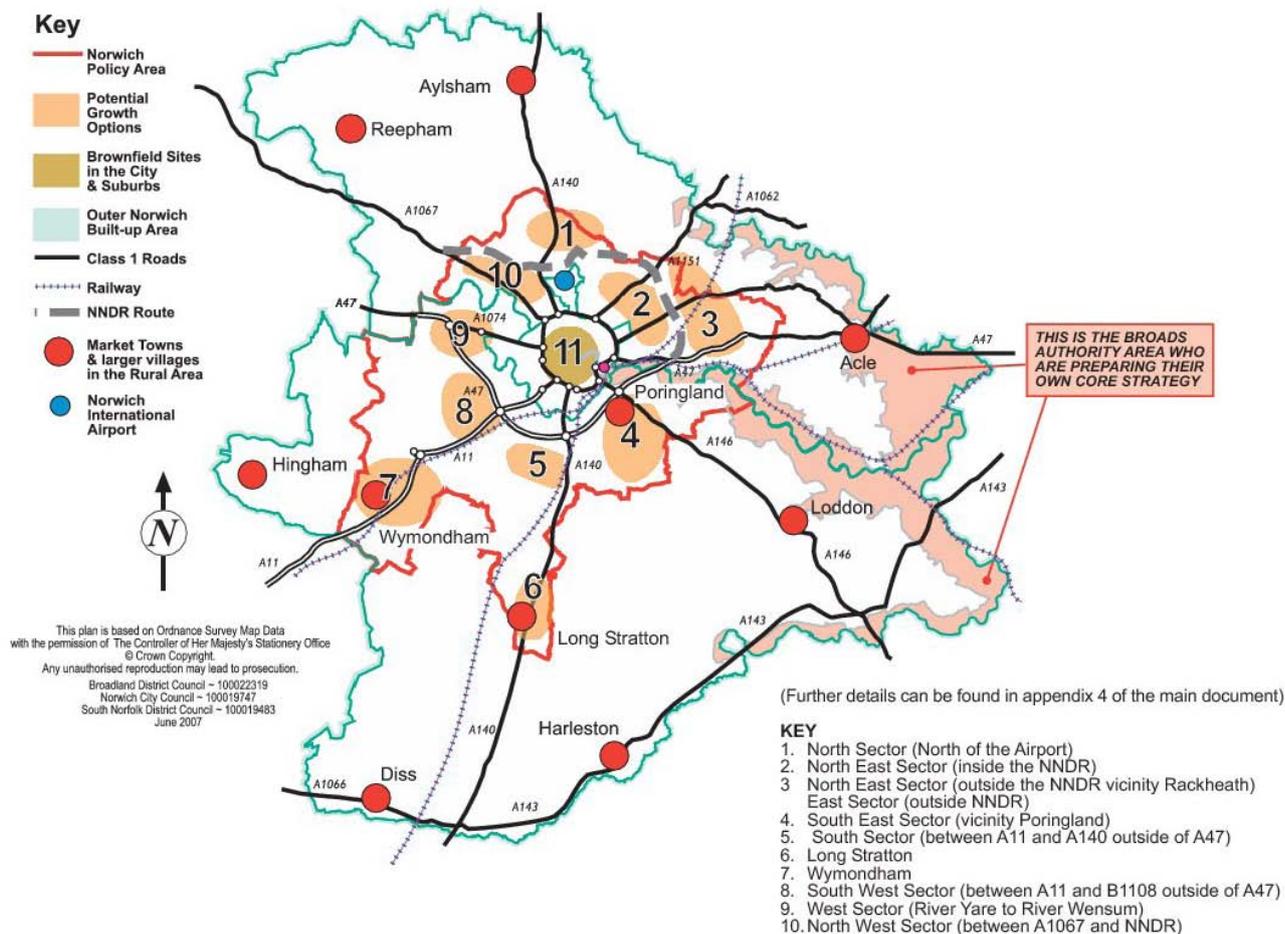
- Dispersing the growth across a large number of small scale sites on the edge of the urban area and in surrounding villages
- A medium concentration on sites similar to some of the larger estates constructed in recent years (1500 - 3000 units)
- Larger scale urban extensions and new settlements in the range 5000 -10000 dwellings.

3.3.5 More specifically, however, it identified a number of potential locations for growth (see **Figure 3.1**) and put forward five different options for meeting the overall housing target at these locations:

1. Concentration on the north east and south west of Norwich and at Wymondham

2. As (1) plus a fourth location for large scale growth
3. As (1) plus two or more locations for medium scale growth
4. A different combination of major growth options
5. A more dispersed pattern of growth (perhaps an average of 1,500 dwellings in 10 locations)

Figure 3.1: Potential growth locations identified at the issues and options stage



3.3.6 After taking on-board the Issues and Options Consultation responses the GNDP felt that there was a need to consult further on options for the spatial approach to growth. Therefore, as part of the Regulation 25 Technical Consultation three more specific options were put forward – see **Table 3.3**. Each represented a different spatial approach to delivering 24,000 new dwellings in the Norwich Policy Area.

Table 3.3: Options for major growth locations identified at the Regulation 25 Technical Consultation Stage

Location	Number of dwellings under Option 1	Number of dwellings under Option 2	Number of dwellings under Option 3
Norwich	4,000	4,000	4,
Broadland	2,000	2,000	3,000
South Norfolk	2,000	2,000	2,000
Sprowston and Rackheath area	6,000	6,000	6,000
Hethersett and Little Melton area	4,000	4,000	No significant development
Mangreen, Swardeston, Mulbarton, and Swainsthorpe area	No significant development	No significant development	4,500
Wymondham	4,000	2,000	2,000
Costessey and Easton area	2,000	2,000	1,000
Long Stratton	No development	2,000	1,500

3.3.7 **Tables 3.4 – 3.6** describe the relative merits of each of the options, as identified through the Sustainability Appraisal. These SA findings were published on the GNDP website at the time of the Regulation 25 Consultation.

Table 3.4: Sustainability implications of Option 1

Effects in terms of environmental objectives	This option maximises opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure closer on the approaches Norwich. This is an advantage in relation to option 2, and significantly more than option 3. Growth to the north east would benefit from choice and flexibility about how to manage bus and car traffic. A focus for some of the major growth on the A11 corridor in this option could have potential significant impacts on European sites if the effects are not fully mitigated but the overall strategy also provides for significant enhancement to habitats a green infrastructure. Some improvement to the policy wording needs to be more explicit, ensuring these positive aspects are recognised. The combined locations included as part of the policy give very positive scores, although the primary use of greenfield land is a disadvantage in absolute terms for all options, as is the potential impact on local landscapes where large scale growth is being promoted. Potential bus rapid transit indicated is a benefit to large parts of the existing area.
Effects in terms of social objectives	Social aspects score very positively, although the main focus will be on new residents in the areas indicated. Will ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new services and infrastructure. Requires community engagement in designing the new communities in a 'masterplanning' exercise to ensure effective delivery.
Effects in terms of economic objectives	The policy scores very positively. It performs a little better than option 2, and better than option 3 in promoting growth that is well-located in relation to, and supports key strategic employment locations and associated sectors.
Overall summary	<p>Policy generally performs very well against sustainability criteria. Some improvement to policy wording required to make the implicit explicit. Implementation of sustainable transport infrastructure and services will be key, as this is one of the main requirements for growth set out in the regional spatial strategy. There is a need to investigate:</p> <ul style="list-style-type: none"> • strengthening consideration of landscape impacts • and potential for innovative use of the railway.

Table 3.5: Sustainability implications of Option 2

<p>Effects in terms of environmental objectives</p>	<p>This option redistributes some growth in south Norfolk and makes less use of the opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure closer on the approaches Norwich. This is a disadvantage in relation to option 1 but better than option 3. Growth to the north east would benefit from choice and flexibility about how to manage bus and car traffic. A reduced focus for some of the major growth on the A11 corridor in this option could have marginally less potential for significant impacts on European sites if the effects are not fully mitigated. This strategy overall also provides for significant enhancement to habitats a green infrastructure. Some improvement to the policy wording needs to be more explicit, ensuring these positive aspects are recognised. The combined locations included as part of the policy give very positive scores, although the primary use of greenfield land is a disadvantage in absolute terms for all options, as is the potential impact on local landscapes where large scale growth is being promoted. Potential bus rapid transit indicated is a benefit to large parts of the existing area.</p> <p>The growth in Long Stratton has the potential to be less sustainable because of the potential to increase travel distances to other centres and to Norwich where most people work. The distance from Norwich for buses along an unimproved A140 corridor give less opportunity than option 1 to mitigate car journeys and make bus use more attractive.</p> <p>The scale of growth in Long Stratton is a small proportion of the overall requirement across the plan area and while locally significant particularly on the regionally important A140 corridor, in itself this does not significantly affect the sustainability of this option. In Long Stratton there will be local environmental improvements from a bypass.</p>
<p>Effects in terms of social objectives</p>	<p>Social aspects score very positively, although the main focus will be on new residents in the areas indicated. Will ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new services and infrastructure.</p> <p>Requires community engagement in designing the new communities in a 'masterplanning' exercise to ensure effective delivery. Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.</p>
<p>Effects in terms of economic objectives</p>	<p>The policy scores very positively. It performs a little worse than option 1, but, better than option 3 in promoting growth that is well-located in relation to, and supports key strategic employment locations and associated sectors.</p> <p>The Long Stratton Bypass will improve strategic access along the A140 and may give a local boost to Long Stratton.</p>
<p>Overall summary</p>	<p>Policy generally performs well. Growth in long Stratton not ideally located for strategic employment sites and is over 10 miles from Norwich city centre. The need to fund a bypass may divert investment from other areas and infrastructure needs although it will improve strategic access. Education solutions for high schools in Long Stratton and Wymondham are compromised. Uncertainty over the funding of a Long Stratton bypass could have consequent impacts on provision of and access to other social infrastructure also negatively impact in this way.</p>

	<p>Implementation of sustainable transport infrastructure and services will be key, as this is one of the main requirements for growth set out in the regional spatial strategy. There is a need to investigate:</p> <ul style="list-style-type: none"> • strengthening consideration of landscape impacts • potential for innovative use of the railway.
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Table 3.6: Sustainability implications of Option 3

<p>Effects in terms of environmental objectives</p>	<p>Overall beneficial, but may not easily achieve the high quality public transport system necessary to limit CO₂ emissions and manage travel demand from the planned scale of growth.</p> <p>This option would redistribute growth in South Norfolk more than option 2 and, apart from growth at Wymondham, would not use the opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure closer on the approaches Norwich. This is a disadvantage in relation to options 1 and 2. Growth to the north east would benefit from choice and flexibility about how to manage bus and car traffic. A much reduced focus for some of the major growth on the A11 corridor in this option may avoid potential for significant impacts on European sites. This strategy overall also provides for significant enhancement to habitats and green infrastructure.</p> <p>Some improvement to the policy wording needs to be more explicit, ensuring these positive aspects are recognised. The combined locations included as part of the policy give very positive scores, although the primary use of greenfield land is a disadvantage in absolute terms for all options, as is the potential impact on local landscapes where large scale growth is being promoted. Potential bus rapid transit indicated is a benefit to large parts of the existing area.</p> <p>The growth in Long Stratton has the potential to be less sustainable because of the potential to increase travel distances to other centres and to Norwich where most people work. The distance from Norwich for buses along an unimproved A140 corridor give less opportunity than option 1 to mitigate car journeys and make bus use more attractive.</p> <p>The scale of growth in Long Stratton is a small proportion of the overall requirement across the plan area and while locally significant particularly on the regionally important A140 corridor, in itself this does not significantly affect the sustainability of this option. In Long Stratton there will be local environmental improvements from a bypass.</p>
<p>Effects in terms of social objectives</p>	<p>Overall beneficial, but some development not accessible to larger centres and services. Dispersed transport and education infrastructure costly and will impact on the ability to provide other essential infrastructure and affordable housing.</p> <p>Social aspects score very positively, although the main focus will be on new residents in the areas indicated. Will ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new</p>

	<p>services and infrastructure. Requires community engagement in designing the new communities in a 'masterplanning' exercise to ensure effective delivery.</p> <p>Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.</p>
<p>Effects in terms of economic objectives</p>	<p>Uncertainty over the timing and impact of promoting a further strategic employment site.</p> <p>The policy scores very positively. It performs worse than options 1 and 2 in promoting growth that is well-located in relation to, and supports key strategic employment locations and associated sectors.</p> <p>The long Stratton Bypass will improve strategic access along the A140 and may give a local boost to Long Stratton.</p>
<p>Overall summary</p>	<p>Generally positive impacts. Score held down by the ability to provide high quality public transport, the costs of infrastructure and the consequent impacts on provision of and access to other social infrastructure. Uncertainty over the funding of a Long Stratton bypass could also negatively impact in this way.</p> <p>Implementation of sustainable transport infrastructure and services will be key, as this is one of the main requirements for growth set out in the regional spatial strategy. There is a need to investigate:</p> <ul style="list-style-type: none"> • strengthening consideration of landscape impacts • potential for innovative use of the railway. • environmental consequences of implementing public transport priority and the scale of enhancements on A140 in the city.

The preferred spatial approach to growth

3.3.8 Following the Regulation 25 Technical Consultation the GNDP were able to identify their preferred option (see **Figure 3.2**). This preferred option was published for consultation by the GNDP alongside all other preferred options (e.g. the Policy for Norwich City Centre and the area wide policies) as part of the Regulation 25 Public Consultation. The preferred spatial approach to growth can be seen diagrammatically below, with further detail provided in **Table 3.7**.

Figure 3.2: The preferred spatial approach to growth

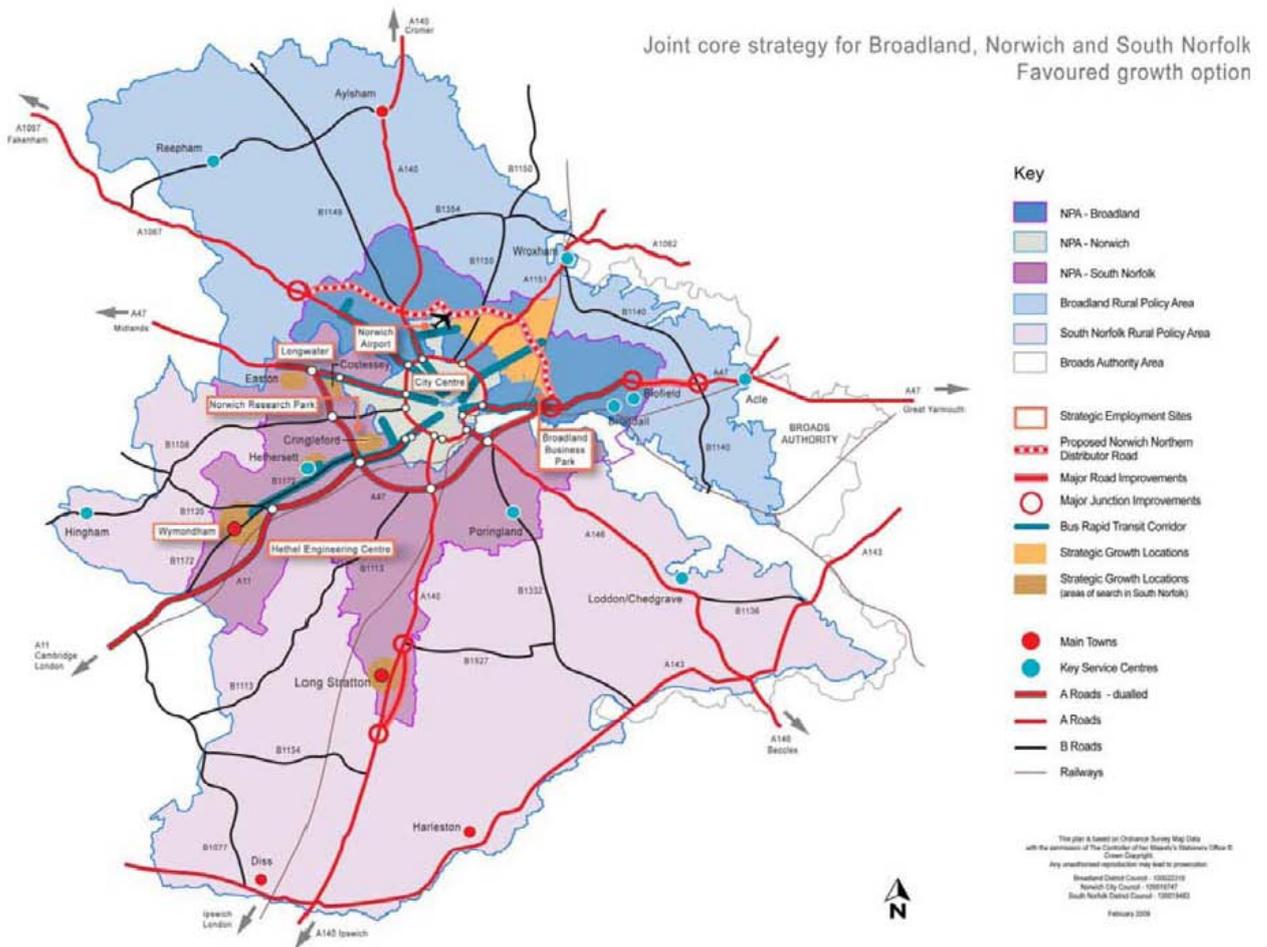


Table 3.7: Preferred spatial approach to growth

Location	Number of dwellings
Norwich	3,000
Broadland smaller sites in the NPA and possible additions to named growth locations	2,000
South Norfolk smaller sites in the NPA and possible additions to named growth locations	1,800
Old Catton, Sprowston, Rackheath & Thorpe St Andrew growth triangle	7,000
South West: Hethersett	1,000
Cringleford	1,200
Wymondham	2,200
Easton / Costessey	1,000
Long Stratton	1,800
Total	21,000

The full list of preferred options

- 3.3.9 The spatial approach to growth described in Table 3.7 has not been altered between the Regulation 25 Public Consultation Stage and the current stage that we are at – consultation on the Pre-Submission Version of the Core Strategy. However, a number of other Policies have changed substantially. Changes have been made to reflect comments made during the Regulation 25 Consultations, the findings of the Sustainability Appraisal and also the new evidence that has been brought to light by studies commissioned by the GNDP. Set out below is the full list of the GNDPs preferred policy options, which are set out as draft Policies in the Pre-Submission Joint Core Strategy and will be consulted upon as part of the Regulation 27 Consultation.
- 3.3.10 It is important to note that, although the preferred spatial approach to growth has not altered since it was subjected to SA at the Regulation 25 Public Consultation stage, it has been reappraised as part of this current SA in light of the further clarity that now exists regarding its implementation (i.e. it will be implemented in line with the full range of other policies).

Table 3.8: Full list of preferred options / draft policies from the Pre-Submission JCS

Vision and objectives
The spatial vision
Spatial planning objectives:
Area wide policies
Policy 1 - Promoting sustainability and addressing climate change
Policy 2 - Promoting good design
Policy 3 - Energy, water and ICT
Policy 4 - Culture, leisure and entertainment
Policy 5 - Supporting Communities
Policy 6 - The economy
Policy 7 - Housing delivery
Policy 8 - Access and transportation
Policies for places
Policy 9 - Strategy for growth in the Norwich Policy Area (NPA)
Policy 10 - Norwich City Centre
Policy 11 - The remainder of the Norwich urban area, including the fringe parishes
Policy 12 - Locations for major new or expanded communities in the Norwich Policy Area
Policy 13 - Main Towns
Policy 14 - Key Service Centres
Policy 15 - Service Villages
Policy 16 - Other Villages
Policy 17 - Smaller rural communities and the countryside
Policy 18 - The Broads
Policy 19 - The hierarchy of centres

4 Appraisal Methodology

4.1.1 This Chapter describes the approach that has been taken to appraising the draft policies set out in the Pre-Submission Core Strategy. This is a requirement of the SEA Directive.

The Directive requires that the following information is included in this Report:
“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”

Annex I(h)

SA methodology

4.1.2 The appraisal has been carried out using the SA framework that was developed and documented in the Scoping Report. The SA framework is provided in Section 2.5 and consists of 21 objectives against which all of the draft policies have been appraised. The appraisal also made use of the prompts that have been identified for each of objective to guide the appraisal towards a consideration of the most likely significant effects.

4.1.3 The appraisal was a qualitative exercise based on the professional judgement of Scott Wilson. However, where possible judgements were made taking into account evidence gathered at the scoping stage as well as other evidence that has come to light more recently (as summarised in Chapter 2).

4.1.4 This appraisal has also been able to draw on the appraisal findings from the SA work that was undertaken in-house by the GNDP at the Issues and Options and Regulation 25 stages of JCS development. For example, it has been possible to draw on the previous appraisal of the Growth Strategy, which has essentially not been altered since it was last appraised¹⁶. Furthermore, it has been possible to take account of the consultation responses that were made relating to the findings of the Sustainability Appraisal as part of the Regulation 25 consultation. Key responses that were made relating specifically to the findings of the Sustainability Appraisal are summarised in **Box 4.1**.

Box 4.1: Summarised consultation responses relating specifically to the findings of the SA

The Leeder Family [8390]

- Question the assumption made that a by-pass in Long-Stratton would draw funds away from other infrastructure. They also put forward evidence that suggests good potential for people to access Norwich from Long Stratton using public transport and suggest that there is a tendency to work locally.

The Norfolk Biodiversity Partnership [8382]

- Suggest that geodiversity must be given greater consideration under SA objective ENV4.

The Wymondham Consortium of Landowners

- Highlight that Wymondham rail station allows the town excellent connections with Norwich, Thetford

¹⁶ It is important to point out that, despite the fact that the Growth Strategy has already been appraised at the Regulation 25 Stage, there is still a necessity for it to be re-appraised in light of the added detail regarding its likely implementation that is set out in the Area Wide Policies as well as Policy 12, which identifies measures that must be delivered alongside growth at each major growth location.

and Cambridge

- They highlight the potential for the 'Wymondham South' site to perform well in terms of a number of SA objectives. In particular, they point out that there is an extensive area of previously developed land and low grade farmland.

The Hethersett Consortium [8353]

- Highlight that the preferred approach of dispersing growth to South Norfolk settlements results in a less sustainable outcome than focusing growth at key locations in South Norfolk, including Hethersett. In particular, delivering levels of growth greater than 1000 dwellings would lead to the greatest opportunities to deliver public transport services.

Kier Land [8254]

- Highlight that a range of important stakeholders, including Norfolk County Council and Anglian Water, believe that there are no significant constraints to growth at Aylsesham. Reasons are put forward as to why Aylsesham should receive a greater level of growth than Acle, mainly relating to increased access to services, facilities and employment.

4.1.5 When the appraisal highlighted that a policy had the potential to result in a significant effect in terms of one of the SA objectives (SA Stage B3), the significance of that effect was evaluated (SA Stage B4) and given a 'significance score' according to the criteria set out in **Table 4.1**. In addition to the significance scores, further judgements have been made regarding significance and uncertainty in the form of a commentary, which allows more refined judgements to be made.

4.1.6 When determining the likely significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. For example, the following can all determine whether effects may be significant:

- Probability, duration, frequency and reversibility of effects;
- Magnitude and spatial extent of the effects;
- Cumulative nature of effects; and
- Sensitivity or vulnerability of the likely effect receptors

Table 4.1: Scoring Criteria

Scoring symbol	Meaning
+	Positive effect
-	Negative effect
+/-	Mixed effects
0	Neutral effect
?	Uncertain effects
N/A	Not applicable

4.1.7 The appraisals have been documented using a proforma. As well as space for the significance score and commentary, the proforma also:

- clearly identifies the timescales of effects, i.e.
 - short- term – 0 -5 years
 - medium-term – 5 – 20 years
 - long- term – 20+ years
- includes space for recommendations to be made to improve the option/preferred option (including, where necessary, measures to mitigate negative effects).
- Includes space for a summary of the most significant effects associated with that particular policy, including a consideration of whether the Policy necessitates trade-offs to be made between different objectives (e.g. a Policy may perform well in terms of an economic objective, but poorly in terms of an environmental objective)

4.1.8 **Table 4.2** shows an example of the proforma used for the assessment. The completed proformas are provided in the Appendices to this report.

Policy XXX				
SA Objective	Short-term	Medium-term	Long-term	Comments / Justification and recommendations
Env1				
Env2				
Etc.				
Soc1				
Soc2				
Etc.				
Ecv1				
Ec2				
Etc.				
Summary				
Overall environmental effects				
Overall social effects				
Overall economic effects				
Overall summary of effects				
Recommendations				

The nature of SA recommendations

- 4.1.9 As well as simply setting out to identify positive and negative effects with respect to individual objectives, a key aim of the SA is to highlight instances where the plan results in tensions between objectives (for example, there can often be tensions between environmental and economic objectives) and where implementation of the plan may mean that one objective must be 'traded-off' against another. Where the SA has identified the potential for negative effects or tensions between objectives recommendations have been made that might improve sustainability performance. These recommendations are designed to 'challenge' the plan-makers and increase the transparency of the plan-making process. The Greater Norwich Development Partnership is incorporating as many of them as it can, but if a recommendation is not accepted it does not imply the JCS is "unsound" without the change. The GNDP is having to balance a range of interests, and take into account a range of evidence (of which the SA is only one element) as it determines the most appropriate approach to growth in Greater Norwich.

Difficulties encountered

- 4.1.10 The key difficulty encountered related to the need to predict and evaluate effects even where there was uncertainty regarding how these strategic policies will be implemented on the ground, or where there were gaps in the evidence base. In these situations there is a need to state clearly that there is a degree of uncertainty, and make recommendations regarding how effects can be considered in the future at the earlier possible stage (for example through other LDF documents or at the project planning stage).

Who has undertaken this SA?

- 4.1.11 The Vision, Objectives and Policies set out in the Pre-Submission Joint Core Strategy have been appraised by independent SA specialists at Scott Wilson. The appraisal has made use of the 2007 SA Scoping Report, which was produced in house by the GNDP; as well as more recent evidence, which has been compiled and analysed by Scott Wilson (this evidence is summarised in Section 2). Previous stages of the SA were under undertaken entirely in-house by the GNDP, but with Scott Wilson acting as a critical friend.

5 Outcomes of the Appraisal (Stages B3 – B6)

5.1 Introduction

- 5.1.1 This chapter sets out the findings from the appraisal of the draft policies set out in the Pre-Submission JCS.

The SEA Directive requires the environmental assessment to identify, describe and evaluate “*the likely significant effects on the environment of a plan or programme*” Annex II of the SEA Directive provides criteria which help determine the likely significance of an effect.

Article 5 & Annex II

The Guidance states that the “*purpose of this task is to predict the social, environmental and economic effects of the options being considered in the DPD process*”. Also, the Guidance states that “*having identified and described the likely effects of the DPD, an evaluation of their significance needs to be made*”.

Sections 3.3.11 and 3.3.15

- 5.1.2 This chapter also sets out the mitigation measures identified during the appraisal. The mitigation of significant effects is a key requirement of the SEA Directive:

The SEA Directive requires that this report includes “*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme*”

Annex 1(g)

- 5.1.3 Many of the mitigation measures proposed are in the form of general recommendations or points for consideration, rather than measures designed to counter specific impacts. The recommendations are designed to ‘challenge’ the plan-makers and increase the transparency of the plan-making process. Following the consultation on the Submission Core Strategy the Council will make justified responses to these recommendations, also taking account of any comments made by stakeholders during the consultation. The Council’s responses can then be considered at the following stage of the plan-making process - the Examination in Public. This is an important way by which SA can help to increase the transparency of the plan-making process.

- 5.1.4 The Greater Norwich Development Partnership is incorporating as many of them as it can, but if a recommendation is not accepted it does not imply the JCS is “unsound” without the change. The GNDP is having to balance a range of interests, and take into account a range of evidence (of which the SA is only one element) as it determines the most appropriate approach to growth in Greater Norwich.

- 5.1.5 Furthermore, this chapter sets out:

- a consideration of the cumulative effects of implementing the policies set out in the Pre-Submission JCS;
- an overall summary of the SA findings; and
- proposals for monitoring.

5.2 Appraisal findings

Table 5.1: Policy 1 - Promoting sustainability and addressing climate change

<p>Overall environmental effects</p> <p>This Policy performs well in terms of all environmental objectives, with the exception of ENV5 (landscapes, townscapes and the historic environment) where it is questioned whether a stronger statement should be made.</p>
<p>Overall social effects</p> <p>This Policy performs well in terms of most social objectives. In particular, this Policy performs well in terms of promoting good health and community cohesion. In terms of a number of social objectives this Policy will have no significant effects.</p>
<p>Overall economic effects</p> <p>It is thought that promoting sustainability and a robust and accessible green infrastructure is an important aspect of promoting Norwich as an attractive location to live, invest and 'do business'. Thus, positive effects have been identified in terms of objective EC1, whilst it is not thought that there will be significant effects in terms of other objectives.</p>
<p>Overall summary of effects</p> <p>This Policy performs strongly in terms of a number of environmental objectives.</p> <p>This Policy plays a key role in terms of setting a clear message regarding the importance of promoting and enabling sustainable patterns of transport and travel within new developments and the Greater Norwich Area more generally. However, because this is a cross-cutting objective, it is also addressed through a number of other Policies.</p> <p>This Policy will also play a key role in terms of ensuring the built development supports efforts to mitigate climate change, and does not impact upon environmental assets.</p> <p>'Environmental assets' are helpfully defined in the supporting text as comprising biodiversity, built heritage, ancient monuments and archaeology, geodiversity, and landscape character; as well as more general aspects such as the countryside and rural character, and the setting of Norwich, towns and villages, and the Broads. It is felt that this Policy should go some way towards ensuring protection of biodiversity assets, as well as promoting the aims of the Green Infrastructure Strategy. However, in terms of protecting 'landscape character' and heritage assets it is felt that this Policy could go further.</p> <p>In terms of climate change mitigation, this Policy has been developed taking account of a recent Energy Study that looked at opportunities in the Sub-Region. These requirements are not overly ambitious, but are stricter than the requirements set by Central Government.</p> <p>This Policy sets out requirements relating to water quality, flood risk and recycling that will all lead to positive effects, but suggestions are made regarding how the Policy wording might be strengthened.</p> <p>It is thought that implementation of this Policy will have a range of beneficial secondary socio-economic effects.</p>
<p>Recommendations:</p> <ul style="list-style-type: none"> • 'Low impact' modes of travel might be considered to be slightly ambiguous. For example, a train line, guided bus route or even a bus route can have 'impacts' in some respects. • The statement in the supporting text that: "<i>In appropriate urban locations car-free development will be promoted</i>" should be included in the main policy wording. • Broaden the Policy to include a commitment to protecting the water environment more generally

(perhaps also stating the particular importance of avoiding water quality impacts to the Natura 2000 network in order to avoid breaches to EU Law).

- Reword to 'seek to ensure ecosystem function and resilience to environmental change'. Alternatively, this statement could be removed from its current position and placed later in the Policy under the banner of 'protecting environmental assets'.
- It is thought that this Policy might be more appropriately titled "Addressing climate change and protecting environmental assets". The only topic that is addressed by this Policy that does not entirely fit well with this title is the issue of recycling and the use of 'sustainable' building materials. It is thought that these issues are of less significance at this strategic level of planning, but could still be 'tagged-on' to this Policy. Alternatively, these issues could be addressed through the 'Promoting good design' Policy.
- Refer to 'conflicts with biodiversity objectives', rather than 'conflicts with biodiversity'
- Rather than focusing solely on protecting internationally important biodiversity, there could be some benefit to promoting a more balanced approach to protecting biodiversity in-line with the principles set out in the GI Strategy, but perhaps also stating that certain actions will be particularly important where HRA has identified that they are necessary to protect internationally important biodiversity.
- Refer to maintenance or enhancement of the 'local biodiversity baseline', rather than the 'status quo'.
- Consider making a stronger and more proactive statement regarding the maintenance and enhancement of heritage features and wider historic character. This Policy, with its emphasis on environmental assets, should perhaps set the high level principles that are implemented through other Area Wide Policies as well as Policies for Places.
- Rather than 'adapted to weather extremes', it may be more appropriate to refer to 'adapted to a changing climate and more extreme weather'
- There may be some benefit to expanding on this statement regarding flood-risk, including through relating flood-risk to the implementation of SuDS.
- There could be some benefit to adding further detail regarding the approach that is expected in terms of recycling. For example, it might be stated that: 'all developments must design-in facilities for the segregation and storage of waste both for private use within dwellings and for communal use, with the aim of maximising the efficiency and effectiveness of recycling'.

Table 5.2: Policy 2 - Promoting good design

Overall environmental effects

This Policy performs well in terms of the majority of environmental objectives. Effects are highlighted as questionable for two objectives as a result of the Policy being silent on two specific issues, namely the need to design in Sustainable Drainage Systems and the need to design in recycling facilities. This Policy performs particularly well in terms of ENV5 (landscapes, townscapes and the historic environment).

Overall social effects

This Policy performs well in terms of a number of social objectives. Although not addressed explicitly by the Policy, it is thought that there will be a range of social benefits as a result of creating an attractive urban realm and designing new developments to have a strong 'sense of place'. In terms of other social objectives it is less likely that this Policy will result in direct significant effects.

Overall economic effects

It is thought that promotion of good design can play a role in supporting the economic objectives that have been identified for Greater Norwich. As highlighted through the supporting text of the Policy: “*The quality of the local environment plays a crucial role in the economic success of the area.*”

Overall summary of effects

This Policy supports the aims of Policy 1 regarding promoting sustainable transport, by requiring the design of development to take account of established principles, i.e. ‘highway design principles that do not prioritise the movement function of streets at the expense of quality of place’ and principles of ‘public transport oriented design’.

Perhaps the strongest benefits of this Policy relate to objective ENV5 (landscapes, townscapes and the historic environment) as this Policy sets out clearly that development must take account of existing landscape and historic character and townscape. It is thought that this Policy should go some way towards ensuring that new developments are ‘distinctive’, with a strong ‘sense of place’. This can lead to benefits in terms of social cohesion and community inclusiveness. The background text identifies the importance of ‘making places better for people’ and also highlights that “*The quality of the local environment plays a crucial role in the economic success of the area.*” It is thought particularly beneficial that the Policy makes a number of specific requirements of developers in terms of certain standards and principles that must be adhered to (including CABE’s ‘Building for Life’ standard).

Recommendations

- There could be some benefit to highlighting the importance of good design seeking to ensure environmental quality in terms of air pollution and noise / soundscapes in particular (these two elements of environmental quality can be brought into particular focus where development seeks to incorporate on-site low/zero carbon energy generation).
- Consider removing the emphasis on protecting international important biodiversity through good design, or highlighting that this will only need to be a priority in some respects (i.e. water quality) or in some instances (i.e. where there a development is in close proximity to an internationally designated site).
- A number of principles are mentioned. It is thought that each is likely to be suitably proactive, but that clarity could be increased by further discussion in the background text (e.g. ‘the rural/urban transition’ and ‘gateways’). In the background text there is a need to define what is meant by ‘the principles of urban design’.
- It may be helpful for the Policy to be structured differently, so that design principles for new development (e.g. sustainable transport, designing out crime, designing a public realm and open space that supports community cohesion and inclusion) are promoted before then stating the importance of protecting and integrating existing environmental assets.
- There could be some benefit to highlighting the relationship between good location, good masterplanning and good design in terms of achieving the objectives and principles set out in the Policy.
- Consider removing the point regarding landscaping, so that this does not detract from issues of greater strategic importance.
- Consider giving further guidance regarding public art (so that, for example, there is a consistent approach / theme where this might be beneficial) or committing to examining this further through the LDF.
- It may be more appropriate to refer to ‘traditional and locally sourced materials’, rather than ‘sustainable

- and traditional materials’.
- Consider requiring good design to *demonstrate how that have taken account of principles* of designing out crime.
 - Consider promoting innovative approaches to waste storage and segregation as an integral part of the urban realm.

Table 5.3: Policy 3 – Energy, water and ICT

Overall environmental effects

This Policy will result in significant benefits in terms of ENV3 (quality of the water environment) and ENV6 (climate change mitigation). It is also highlighted that promoting access to high speed broadband will have benefits in terms of reducing the need to travel.

Overall social effects

This Policy can be seen to have indirect social benefits as access to broadband can help to alleviate issues of social exclusion.

Overall economic effects

This Policy can be seen to have indirect economic benefits as access to high-speed broadband will be an important factor in terms of attracting investment.

Overall summary of effects

This Policy addresses three specific issues that are seen as particular priorities, namely the need to ensure that new developments draw their energy from renewable and low carbon sources; the need to ensure that development is supported by sufficient waste water treatment capacity (and thus avoids water pollution); and a requirement to ensure access to ‘fast broadband’ within new developments.

In terms of energy requirements, the Policy wording and the background text go into considerable detail regarding the most appropriate way to achieve low and zero carbon development, taking account of the findings of the Energy Study. There is a major emphasis on ensuring that measures are in place that will allow successful implementation, including establishment of a Carbon Infrastructure Fund and the establishment of Energy Service Companies (preferably with community ownership). This is considered to be important and appropriate strategic guidance.

In terms of water quality, this Policy recognises that there are particular ways in which development (and development in certain locations) can impact upon, and be constrained by, the water environment. It sets stringent requirements which (in conjunction with Policy 1) should protect the water environment. The Policy takes account of the findings of the Water Cycle Study.

It is considered appropriate that the Core Strategy should give strategic guidance regarding access to broadband as this can lead to wide-ranging socio-economic benefits, and also can be seen to support efforts to reduce the need to travel.

Recommendations

- Provide some further justification as to why there is not a preference for on-site renewable / low carbon energy generation (including CHP and district heating networks).

Table 5.4: Policy 4 - Communities and culture

<p>Overall environmental effects</p> <p>This Policy is not associated with significant environmental effects, although it is noted that this Policy can support Policy 2 (Promoting good design) in terms of creating high quality 'places'.</p>
<p>Overall social effects</p> <p>A Policy relating to culture, leisure and entertainment can play an important role in terms of building community identity.</p>
<p>Overall economic effects</p> <p>Capitalising on existing strengths, and promoting targeted new cultural, leisure and entertainment facilities and schemes will undoubtedly play an important role in enhancing Norwich's image as a good place to live, invest and 'do business'.</p>
<p>Overall summary of effects</p> <p>A Policy relating to culture, leisure and entertainment can play an important role in terms of ensuring a strong 'sense of place' and building community identity. It is helpful that the Policy and background text sets out some existing 'cultural assets and leisure facilities' that are valued and sets specific priorities for the area. Added detail such as this should help to ensure that the Policy is interpreted from a perspective of seeking to maintain and enhance the local sustainability baseline. It is also recognised that capitalising on existing strengths, and promoting targeted new cultural, leisure and entertainment facilities and schemes will play an important role in terms of enhancing Norwich's image as a good place to live, invest and 'do business'.</p>
<p>Recommendations</p> <ul style="list-style-type: none"> • The Policy could benefit from making a connection to the implementation of the GI Strategy. • Substitute the term 'cultural life' for 'cultural offer'.

Table 5.5: Policy 5 – Supporting communities

<p>Overall environmental effects</p> <p>This Policy seeks to ensure that services and facilities are locally accessible. Thus, this Policy supports Policies 1, 2 and 8 as well as the Policies for Places in terms of the achievement of objective ENV1 (sustainable transport).</p>
<p>Overall social effects</p> <p>Addressing health, education, crime and community cohesion as part of new development will have wide-ranging positive social effects.</p>
<p>Overall economic effects</p> <p>This Policy will not directly result in any significant effects in terms of economic objectives.</p>
<p>Overall summary of effects</p> <p>This Policy has wide ranging social benefits as a result of seeking to ensure accessibility to essential services and facilities as well as seeking to promote good health and community cohesion through other mechanisms. It is useful that the Policy refers to particular priorities, including reference to promoting Norwich as a 'learning city'. Added detail such as this should help to ensure that the Policy is interpreted from a perspective of seeking to maintain and enhance the local sustainability baseline.</p>

<p>Recommendations</p> <ul style="list-style-type: none"> • It is thought that the word ‘holistic’ should be used with caution, as the achievement of sustainable communities involves more than just the delivery of accessible services and facilities (which would appear to be the focus of this Policy). • Rather than “<i>the quality of life and well being of communities</i>”, it may be better to refer to “<i>quality of life and the well being of communities</i>” • The general approach to supporting communities might be communicated more clearly by firstly setting out that there will be a proactive approach to improving health / preventing illness (linked to other policy); and then identifying that there is also a need to support communities through ensuring good access to facilities such as healthcare and retirement homes (which are usefully identified as a priority). • It is thought that designing in opportunities for social interaction is more likely to result in benefits in terms of community cohesion than in terms of health.
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Table 5.6: Policy 6 - The economy

<p>Overall environmental effects</p> <p>This Policy will not directly result in any significant effects in terms of environmental objectives.</p>
<p>Overall social effects</p> <p>The Policy includes a good degree of specificity regarding local priorities for achieving skills and education objectives. It is not thought that there will be significant effects in terms of other social objectives.</p>
<p>Overall economic effects</p> <p>This Policy seeks to guide the economic growth that will be seen in the Greater Norwich area over coming years, with an emphasis on ensuring sustainable growth.</p>
<p>Overall summary of effects</p> <p>This Policy plays a key role in terms of facilitating and regulating economic growth. There is an emphasis on ensuring a focus on developing the knowledge economy and tourism and ensuring that the economy does not grow in a way that is detrimental to the environment or small businesses. The Policy promotes a range of specific measures including promoting a ‘cultural cluster’ and a ‘food and farming hub’.</p>
<p>Recommendations</p> <ul style="list-style-type: none"> • The reference to a ‘food and farming hub’ may require some further background explanation. • Consider the relationship between farmers markets and a ‘food and farming hub’ • It is thought that the point regarding “<i>promoting the development of appropriate new and expanded businesses</i>” requires further explanation.

Table 5.7: Policy 7 - Housing delivery

<p>Overall environmental effects</p> <p>This Policy will not directly result in any significant effects in terms of environmental objectives.</p>
<p>Overall social effects</p> <p>Meeting housing need, particularly acute housing need, will be an important factor in terms of achieving social objectives.</p>
<p>Overall economic effects</p> <p>This Policy sets requirements on developers to deliver housing at below market prices (affordable housing), which can have the effect of discouraging investment from housing developers. However, the Policy also builds in a degree of flexibility to take account of issues of financial viability.</p>
<p>Overall summary of effects</p> <p>This Policy sets out an approach to meeting housing need in the area that appears to be carefully thought-out and based on robust use of evidence. In particular, transparency is greatly increased as a result of considerable detail being provided in the background text.</p> <p>With regard to delivery of affordable housing, the headline standard that affordable housing must be provided on development sites of 5 or more dwellings (or 0.2 hectare or more) is a stringent approach. The supporting text gives a reasoned justification for the approach taken.</p> <p>With regard to setting requirements on developers to deliver affordable housing there has been an increasing realisation over the past year or so that Policies should also take into account issues of financial viability so as not to discourage investment from housing developers. This Policy does so by building in a degree of flexibility with regard to affordable housing requirements that are made of developers. The Policy goes into some detail on the issue (both in the Policy and background text), which should ensure that there are no 'loopholes' that might be exploited by developers who would seek to avoid providing affordable housing.</p> <p>With regard to Gypsies and Travellers, this Policy sets out the number of pitches that should be allocated to each district. It is notable that South Norfolk District is allocated significantly more pitches than the other two Districts. Norwich is also allocated a relatively large number of pitches for its size. It is thought that this spatial distribution is likely to make some sense from a perspective of meeting the locational needs of the Gypsy and Traveller as Broadland can be considered to be the most isolated of the three authorities (i.e. it is more difficult to access other parts of the country).</p> <p>It is considered very beneficial that the Policy states that "<i>Some sites are expected to be provided in association with large scale strategic housing growth</i>". It is suggested that this could be strengthened, however, by a commitment to ensuring that 'a significant proportion of new pitches' will come forward along-side new development, or that 'all new developments must consider the potential for Gypsy and Traveller pitch provision'. This approach would be in-line with the approach being taken elsewhere in the Country (e.g. South Cambridgeshire District). However, it is recognised that timing must be a key consideration (i.e. need must be met as a priority, and so it may not be possible to wait for new developments to come forward.</p>
<p>Recommendations</p> <ul style="list-style-type: none"> • There is a need to set out the evidence base that has been used to determine Gypsy and Traveller and Travelling show people allocations. • Consider making a stronger commitment regarding bringing forward Gypsy and Traveller sites alongside major housing developments. • It may be important to note that 'Generally sites will not have more than 10 to 12 pitches in order to

meet the preferences of the Gypsy and Traveller community for smaller sites’.

- Consider strengthening the commitment relating to bringing forward Gypsy and Traveller sites alongside major housing developments.

Table 5.8: Policy 8 - Access and transport

Overall environmental effects

It is thought that, despite the fact that this strategy for access and transport does include the promotion of new road infrastructure, the overriding effect will be to support wider efforts to reduce car dependency and promote more sustainable travel patterns within Greater Norwich. There is also an emphasis on measures to reduce the environmental effects of congestion. It is identified that infrastructure improvements are promoted that do have the potential to result in environmental impacts. However, there is little certainty regarding such impacts at this stage.

Overall social effects

Promotion of good transport links and good accessibility to services and facilities will have wide ranging social benefits. Furthermore, this Policy (along with a range of other Policies) seeks to ensure that development comes forward in close proximity to services.

Overall economic effects

Improved strategic access is likely to have wide-ranging benefits in terms of supporting sustainable growth in the Sub-Region.

Overall summary of effects

This Policy, together with several other Area Wide Policies, should help to ensure that there is a focus on minimising dependency on the private car and promoting more sustainable patterns of travel amongst residents of new developments. Ideally, it would be possible to deliver this message in one Policy, rather than through a number of different Area Wide Policies. However, it is recognised that this is difficult as it is a cross-cutting objective that does involve planning for ‘sustainability’, ‘good design’, ‘accessible services’, and other topics.

The Policy recognises that it is difficult or impossible for the Joint Core Strategy to address private car dependency in rural areas. However, helpfully the Policy recognises the important role that park-and-ride can play in reducing negative effects on Norwich City Centre. The Policy also promotes other measures that should help to address rural car dependency, including innovative approaches to public transport and a focus on public transport to key service centres. Achievement of these aims should be supported by the Settlement Hierarchy and the Policies for Places that implement it, as the Settlement Hierarchy has an important role to play in ensuring that growth is directed to those areas where there is the greatest potential to encourage sustainable travel patterns.

The Policy and background text identify a number of strategic priorities. Although it is the case that their delivery is in many instances dependent on decisions to be made by outside agencies such as Network Rail and the Highways Agency, it is helpful to describe them here in the Core Strategy, so that a true picture can evolve of future growth in the Sub-Region.

Recommendations

- One key area of concern relates to whether the NDR, which is promoted through this Policy, would preclude sustainable patterns of travel and transport associated with the North East Growth Triangle. It will be of great importance to ensure that the NDR does not have this effect. It will be important to design in ambitious measures that encourage residents to meet more of their needs locally by sustainable modes of travel, and that also allow ease of access to Norwich by rapid public transport. When considering the necessity for the NDR it should be possible to assume minimal use of this road by residents of the Growth Area.

- Rural car dependency will remain a sustainability problem into the future. It will be important that means of monitoring and addressing rural car dependency must be a continued focus going forward.
- Infrastructure improvements that are promoted include two new stretches of road and two major road-widening projects. Although the Policy and background text provide justification for these projects, there could also be some benefit to stating any potential negative effects that must be a focus of mitigatory measures at the project level.

Table 5.9: Policy 9 - Strategy for growth in the Norwich Policy Area (NPA)

<p>Overall environmental effects</p> <p>Mixed effects are predicted in terms of objective ENV1 (sustainable transport), ENV6 (climate change) and ENV9 (as a result of the likelihood of both greenfield and brownfield development).</p> <p>Negative effects are predicted in terms of ENV8, in order to highlight the fact that growth in a water stressed part of the country will lead to further pressure being placed on water resources.</p> <p>Positive effects are predicted in terms of other environmental objectives.</p>
<p>Overall social effects</p> <p>Mixed effects are predicted in terms of a number of social objectives related to the fact that, although the scale of growth at the North East Growth Area is of a scale where the delivery of community infrastructure can be guaranteed, the more dispersed nature of growth promoted in South Norfolk leaves a number of questions-marks. Some benefits may not be realised in the short-term as services and facilities may have a considerable lead-in time.</p>
<p>Overall economic effects</p> <p>This spatial growth strategy performs strongly in terms of economic objectives, although it is noted that in Long-Stratton housing growth may be promoted in an area that does not have access to a strategic employment location.</p>
<p>Overall summary of effects</p> <p>One of the key implications of this Policy relates to the potential for this spatial strategy to support sustainable patterns of transport and travel. Growth will clearly have implications for the amount of travel and traffic in the Sub-Region. It is clear that some aspects of the spatial approach promoted through this Policy have been developed with the objective of allowing more sustainable patterns of travel at the forefront. However, the effects of some aspects of the strategy in terms of this objective are more questionable.</p> <p>There is a need to understand the specific proposals for sustainable access and transport before a judgement can be made regarding the overall performance of the growth strategy in terms of this objective. At this stage, however a question is raised as to whether the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North East Norwich only) and the isolated nature of Long-Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport. Long-Stratton is remote from Norwich and it will not be possible to provide a Bus Rapid Transit Service (discussed further under Policy 12). Furthermore, it does not appear that Long-Stratton is well linked to a strategic employment location (Hethel is located about 6 miles away). This issue relating to Long Stratton has been highlighted through previous iterations of the Sustainability Appraisal (and so can be seen to have been considered as part of previous consultations). Having pointed out the limitations of Long Stratton, however, it is important to point out that for a village of its size there is a good range of existing services, facilities and employment opportunities, and that that this range will see ancillary growth as part of the housing-led growth strategy.</p> <p>The appraisal has also highlighted that there is potential for the quantum of development proposed by this Policy to result in negative effects in terms of some environmental objectives, but at this stage there is little</p>

evidence to suggest that this particular spatial growth strategy will lead to significant effects that cannot be mitigated. In terms of biodiversity effects it is thought that implementation of the Green Infrastructure Strategy should ensure that negative effects are mitigated, and there should, in fact, be some benefit to promoting access to nature and the countryside as well as promoting a more proactive approach to conservation. The appraisal has highlighted that one environmental effect that cannot be fully mitigated is the impact of increased abstraction on water resources (although impacts are partially mitigated by requiring water efficiency measures in all new buildings).

In terms of effects on social objectives it is thought that the quantum of growth will lead to broad benefits. However, some effects are predicted to be mixed as the smaller growth locations in South Norfolk will struggle to bring forward the same level of local services and facilities that can be brought forward at the North East Growth Area.

There is little to suggest that there will be significant effects on existing communities that cannot be addressed and mitigated. There will be some potential to target development in Norwich at areas that are in need of regeneration (i.e. there are existing issues of deprivation). However, this spatial strategy is primarily focused on maximising opportunities for sustainable growth, rather than regeneration.

It is also important to point out that developing new communities in these locations with an emphasis on sustainable movement patterns and implementation of the Green Infrastructure Strategy should mean that walking, cycling and outdoor recreation are encouraged, which will have benefits in terms of the health of the population.

In terms of economic effects, this Policy promotes strategic employment growth at a number of locations that have been chosen for their potential to support growth in key sectors (in line with Policy 6), as well as being well connected to Norwich, major growth locations and the wider region. It is thought that the growth and supporting infrastructure promoted through this Policy should, on the whole, help to support a shift towards a knowledge based, yet diverse economy for the Sub-Region. This will be an important factor in terms of solidifying the image of Norwich as being forward thinking and supportive of a sustainable form of growth.

Recommendations

N/a

Table 5.10: Policy 10 - Norwich City Centre

Overall environmental effects

This Policy generally performs well in terms of environmental objectives. In particular, this Policy emphasises the importance of a high quality environment in the City Centre, and should support wider efforts to bring about sustainable patterns of transport and travel. It is noted that this Policy does not refer specifically to flood risk, despite this being a significant issue in parts of the City Centre.

Overall social effects

This Policy performs well in terms of social objectives. It provides a high level strategy that will have the effect of guiding the nature of development in the City Centre. The strategy essentially involves focusing on office, retail, leisure, culture and tourism led development, rather than housing led development, but it is thought that this is an appropriate approach which will have wider-ranging social benefits. This Policy identifies four areas that will be the focus of planned regeneration schemes.

Overall economic effects

This Policy performs well in terms of economic objectives. The Policy works from the assumption that focusing major retail, leisure, office, culture and tourism related development in the City Centre will boost what has been termed 'agglomeration' benefits. It is thought that this is likely to be the case, i.e. that these land-uses will support and reinforce one another, making Norwich an attractive location to 'do business'.

Overall summary of effects

This Policy takes account of the existing situation in the City Centre to identify the best strategy for future development. The emphasis of the Policy is on ensuring that the City Centre will consolidate and build upon its position as the main focus in the Sub-Region for office development, retail, leisure, culture and tourism. Housing development takes something of a back-seat - 'reinforcing' the vibrancy of the city centre. This is most closely in-line with the 'commercial and cultural led development' option considered for the City Centre at the Issues and Options stage of Joint Core Strategy development. The Policy and supporting text provides considerable detail regarding how this vision will be achieved. There is a discussion of the demand for major tourist and visitor facilities, and also a discussion of a particular role for the evening / night-time economy.

The Policy works from the assumption that focusing major retail, leisure, office, culture and tourism related development in the City Centre will boost what has been termed 'agglomeration' benefits. It is thought that this is likely to be the case, i.e. that these land-uses will support and reinforce one another, making Norwich an attractive location to 'do business'. It might be suggested that, because there is no other City in Norfolk or perhaps even the wider Region, can offer this combination of factors to attract business (Cambridge has a considerable offer, but one that differs considerably), that developing the City Centre in this way will have wider, regional scale benefits. This can be seen as a strong justification for resisting a housing-led approach to development in the City Centre.

Although city-centre development will not be 'housing-led', a considerable number of houses are allocated nonetheless. The Policy gives considerable detail as to where and how this housing allocation will be delivered. It is notable that housing densities will generally be high, but family housing will also be provided to achieve a social mix.

The Policy recognises the importance of development within the City Centre supporting wider efforts to promote sustainable travel and transport patterns, and also the importance of taking into account environmental assets. The Policy promotes an approach which enhances the historic city, including its built and environmental assets and its distinctive "contemporary medieval" character through innovative, sustainable design. The Policy also identifies the importance of development in the City Centre being supported by improvements to open spaces and green linkages.

Recommendations

- It is notable that the 'early evening' economy is promoted across the City Centre, but 'late night activities' focussed in identified areas only. It will be important that these terms are clearly defined and that this Policy feeds through into action on the ground.

Table 5.11: Policy 11 - The remainder of the Norwich urban area, including the fringe parishes

Overall environmental effects

This Policy performs well in terms of a number of environmental objectives. In particular ENV1 (sustainable transport and travel), ENV3 (environmental amenity including air quality), ENV4 (biodiversity) and ENV5 (landscapes, townscapes and the historic environment). In terms of a number of other objectives this Policy can be seen to have no significant effects.

Overall social effects

This Policy performs well in terms of a number of social objectives, particularly SOC8 (local services and facilities and enhance local and district centres) and SOC7 (satisfaction of people with their neighbourhoods).

Overall economic effects

This Policy may have some economic benefits as the urban edge and fringe parishes will play an important

role in terms of the overall image of Norwich as a good place to live, invest and do business.

Overall summary of effects

This Policy sets out priorities for the remainder of the Norwich urban area and the fringe parishes. One of specific commitments of the Policy that is likely to directly lead to actions on the ground is the commitment to focus on environmental and townscape improvements to 'gateways'. It is thought that a Policy focusing on these areas is appropriate as it is thought that the urban edge and fringe parishes will play an important role in terms of the overall image of Norwich as a good place to live, invest and do business. Thus the improvements that will come as a direct result of this Policy can be seen to be beneficial in terms of wider objectives for sustainable growth in Norwich.

This Policy describes two key ways by which "*Public transport serving the suburbs and fringe parishes will be significantly enhanced*". It also highlights that high density development will be appropriate in some locations, which can be beneficial in terms of encouraging more sustainable patterns of travel and transport. Linked to the issue of promoting a sustainable transport network, the Policy identifies that the urban fringe is a key area for the implementation of green infrastructure, and sets out a number of strategic priorities. The Policy identifies the impact of traffic on residential areas as a key issue and sets out a number of ways by which this will be tackled, including through construction of the Norwich Northern Distributor Road.

Recommendations

- A key aim is to "*identify and regenerate "tired" suburbs and promote neighbourhood based renewal*". It is noted that this is not expanded upon further, and so it will be important that this aim leads to action on the ground through other LDF documents.
- Another commitment is to "*improve townscape and retain the best of local character*". It is thought that this should be expanded upon, bearing in mind that this would be achieved anyway through area wide Policy 2.
- The Policy identifies a number of priority areas for regeneration, and identifies particular priorities within them. The Policy highlights the need for 'co-ordination and community based approaches', and so it will be important that this is implemented through other LDF documents.

Table 5.12: Policy 12 - Locations for major new or expanded communities in the Norwich Policy Area

Overall environmental effects

The detail set out in this Policy should help to ensure that potential negative environmental effects of development are avoided or mitigated, and should also help to make the most of a range of opportunities. For each of the major growth locations the Policy identifies what must be put in place in order to achieve sustainable patterns of travel and transport. However, effects in terms of objective ENV1 (To reduce the effect of traffic on the environment.) are predicted to be mixed because it is thought that some growth locations perform better than others.

Overall social effects

It is thought that the detail set out in this Policy should help to ensure that social benefits associated with growth at these locations are maximised. However, effects are predicted to be mixed for SOC3 and SOC8 (access to services and facilities) because it is noted that uncertainties remain regarding meeting the need for local secondary school capacity. Similarly, effects are predicted to be mixed for SOC4 (housing) and SOC6 (employment) because it is thought that some growth locations perform better than others.

Overall economic effects

The success of these major growth locations is important in terms of supporting sustainable economic

growth in Greater Norwich. Thus, it is thought that the detail set out in this Policy should indirectly lead to economic benefits.

Overall summary of effects

Although some of the implications of the spatial approach to growth have already been considered as part of the appraisal of Policy 9, this Policy allows sustainability implications to be considered with a greater degree of certainty (as this Policy describes *how* growth will come forward, and not just *where*).

One of the key roles of this Policy is to identify what must be put in place in order to achieve sustainable patterns of travel and transport. For the North East Growth Triangle a number of ambitious proposals appear to be agreed and settled upon in principle, and it seems that it will be possible to achieve a major shift away from car dependency for residents here. However, this will require much on-going work and commitment. If suitably ambitious measures are implemented then it may be wrong to assume that access to a major orbital road – the proposed NDR – ‘on the door-step’ of the development will lead to on-going car dependency.

At Wymondham the Policy describes a number of schemes that will allow many people to reduce their car dependency, but there remains considerable uncertainty regarding the potential for a Bus Rapid Transit Service into Norwich. Without this commuting by car will be more prevalent.

At Hethersett and Cringleford proposals revolve around enhanced cycle routes to a number of key destinations as well as enhanced bus services. Both of these are likely to be measures that can encourage many people out of their cars (bearing in mind that proximity to Norwich will make the bus a more attractive option). There is an even greater deal of uncertainty regarding the potential for a Bus Rapid Transit Service into Norwich from Cringleford and Hethersett, as it could be that a service would only be viable if, travelling from Wymondham, it stopped at one or the other.

Similarly, at Easton/Costessey there is a commitment to deliver enhanced bus routes and cycle routes to a number of key destinations. It also appears that the Policy commits to delivery of a Bus Rapid Transit Service. This will have the effect of development at this location potentially being able to match that at the North East Growth Triangle in terms of promoting sustainable transport patterns. However, it is important to note that the viability of this service is dependent upon other development coming forward along the Dereham Road corridor, which is beyond the control of the Core Strategy (i.e. as not part of the major growth location there could be less impetus behind it and thus less certainty).

At Long-Stratton there are serious question-marks relating to the potential for sustainable transport due to the isolation from higher order centres and major employment locations. This Policy does little to allay any fears. There is a specific commitment to bus priority at the A140/A47 junction, which is to be welcomed, but also a more general reference to creating an ‘enhanced route’. Long-Stratton is about 12 miles from Norwich, and so there is a need for more specific commitments as to how this will be made a journey that encourages people out of their cars. There is also scant reference to access to major employment locations from Long Stratton. The supporting text acknowledges that “*While Long Stratton is not as well related to employment or high quality public transport this is outweighed by the availability of a good range of local services and the significant local benefits of a development-led bypass.*”

For each of the locations, the Policy sets out to identify strategic priorities that take account of the constraints and opportunities provided by the local landscape, heritage and biodiversity baseline. For each of the major growth locations, with the exception of Cringleford, the Policy takes account of local priorities and promotes a bespoke approach for delivering the aims of the Green Infrastructure Strategy and protecting and enhancing environmental assets more generally. This is thought to be a well considered and proactive approach that can feed through into more detailed plan-making. For a number of major growth locations the Policy also takes account of local landscape constraints and opportunities. For example, the Policy recognises the importance of the ancient landscape to the east of Long Stratton, and north of Wymondham creating a “Ketts Country” pastoral landscape of grass, wood, hedgerow and wetland habitat.

In Wymondham, it is important to note that the Policy promotes ‘expansion of the town centre’. This must be considered as having considerable potential to impact on the existing character of the town, with effects perhaps being on a par with the impact of the development itself. However, the Policy does promote

retaining and enhancing the distinctive character of the existing historic centre.

In terms of the social effects of this Policy, it is not thought that any of these major growth locations have the specific aim to support regeneration of neighbouring or nearby deprived communities. Similarly, the Policy does not highlight specific existing communities that have the potential to be impacted by these major developments. However, it does make a commitment to *“achieve a high level of self containment while integrating well with neighbouring communities”*.

The Policy highlights the need to deliver healthy, sustainable communities with locally distinctive design and high quality green infrastructure. It is likely that each of the new developments can achieve these ambitions and lead to the development of strong and inclusive communities where residents feel a strong sense of place. In particular, it is important to note that designing in opportunities for walking and cycling, as well as planning for green infrastructure, will have health related benefits.

It is also noted that this Policy reaffirms the commitment made through Policy 7 to *“provide for a wide range of housing need including giving serious consideration to the provision of sites for gypsies and travellers”*.

Another issue that is considered for each location is access to services and facilities. For the North East Growth Triangle it is thought that there will be sufficient opportunity to meet needs. It is particularly helpful that the Policy promotes a new secondary school ‘with an initial phase to open as early as possible’, and states that *“To facilitate early provision the early phases of development will concentrate on family housing.”*

For the other major growth locations subtly different approaches to ensuring adequate local services and facilities are promoted. For example, a specific commitment is made for Easton/Costessey - *“Significant growth at Easton will need to provide an enhanced village centre”* – but an approach that offers less certainty in terms of suitable access (including by walking and cycling) is promoted for Cringleford – *“expansion of the existing services nearby”*. Provision of education facilities has been a key sustainability consideration throughout the development of this growth strategy. This Policy highlights that some uncertainties remain for Wynmondham, Hetherset, Cringleford and Easton/Costessey.

Recommendations

- There is a need to develop a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton
- This Policy promotes on site or nearby renewable energy generation, for example large scale wind turbines and biomass fuelled Combined Heat Power and Cooling (CHPC). It will be important that this supports the guidance given in Policy 3, taking account of the fact that ambitious schemes may be more difficult to deliver at the smaller growth locations.
- Resolve uncertainties surrounding meeting the need for additional secondary school capacity as a result of new development. This should take account of the benefits of allowing children to attend a school that is local to where they live.

Table 5.13: Policy 13 - Main Towns

Overall environmental effects

These towns have been identified as suitable for a considerable amount of development taking account of a range of environmental constraints. There may still be potential for impacts, but at this stage there is little evidence to suggest that effects cannot be adequately avoided or mitigated. Having said this, it is particularly important to note the potential for impacts in terms of objective ENV5 (landscapes, townscapes and the historic environment) as these are all market towns with a recognisable historic character, and it is likely that each is also closely associated with a particular landscape setting.

Furthermore, these towns have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes,

and so in this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport).

Overall social effects

This Policy performs well in terms of most social objectives. In particular, ensuring good access to services and facilities as well as employment opportunities can be seen to be beneficial in terms of a range of social objectives. This Policy has also been predicted to perform well in terms of SOC1 because these towns are service centres that serve an extensive rural hinterland, and so it can be seen that investment at these towns can help to ensure access to services and help to address rural deprivation.

The only social objective for which effects have been predicted to be more questionable is SOC5 (building community identity). The scale of development is significantly less than that which is promoted at the major growth locations. Nonetheless, there may be some potential for impacts to local character and the distinctiveness of these settlements as market towns.

Overall economic effects

It is not clear that this Policy will directly lead to any economic effects of strategic significance, although it is noted that growth at these towns may play a role in terms of supporting local economic activity in these more rural areas.

Overall summary of effects

These towns have been identified as suitable for a considerable amount of development primarily taking account of access to services, facilities, employment and public transport. However, at the same time, all three towns are relatively isolated from Norwich and the major employment locations, and so promoting a level of growth significantly below that which is promoted for the major growth locations can be seen to be beneficial in terms of promoting sustainable patterns of travel and transport as well as ensuring good access.

In terms of environmental constraints, there may be potential for development on this scale to lead to impacts, but at this stage there is little evidence to suggest that effects cannot be adequately avoided or mitigated. Having said this, it is particularly important to note the potential for impacts in terms of objective ENV5 (landscapes, townscapes and the historic environment) as these are all market towns with a recognisable historic character, and it is likely that each is also closely associated with a particular landscape setting. Diss, in particular, is an attractive town with a strong historic character, and so from this perspective it can also be seen as beneficial to restrain growth. Harleston is a smaller town than Aylesham or Diss, and so it is questionable whether it should be considered for the same level of growth as these two towns without further justification.

In terms of promoting energy efficiency and use of renewable / low-carbon energy in new development, this Policy does not add further to the requirement of Policy 3. Policy 3 requires that developments of this scale connect to dedicated off-site renewable sources to meet all energy needs; or, where this is not feasible, ensure best use is made of local energy generated on site from renewable and low carbon decentralised energy sources and contribute to the carbon offset fund.

In terms of the socio-economic effects, there is little to suggest that these locations have been identified for development at this scale so that they can address existing local deprivational issues. However, these towns are service centres that serve an extensive rural hinterland, and so it can be seen that investment at these towns can help to ensure access to services and help to address rural deprivation.

Recommendations

N/a

Table 5.14: Policy 14 - Key Service centres

<p>Overall environmental effects</p> <p>These towns have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes, and so in this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport).</p> <p>These villages have also been identified as suitable for development at this scale taking account of a range of environmental constraints. There may still be potential for impacts, but at this stage there is little evidence to suggest that effects cannot be adequately avoided or mitigated. Having said this, it is particularly important to note the potential for impacts in terms of objective ENV5 (landscapes, townscapes and the historic environment) given the rural nature of the landscapes in which these settlements sit.</p>
<p>Overall social effects</p> <p>Accessibility to essential services, facilities (including schools) and employment has been a key consideration when defining key service centres. Furthermore, there may be some benefits in terms of addressing issues of rural deprivation. In terms of other social objectives, it is thought that development on this scale is unlikely to have wide ranging effects of strategic significance.</p>
<p>Overall economic effects</p> <p>There may be some benefits in terms of addressing issues of rural deprivation and supporting rural enterprise, but the significance of effects is uncertain.</p>
<p>Overall summary of effects</p> <p>These villages have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes, and so in this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport).</p> <p>These villages have also been identified as suitable for development at this scale taking account of a range of environmental constraints. There may still be potential for impacts, but at this stage there is little evidence to suggest that effects cannot be adequately avoided or mitigated. Having said this, it is particularly important to note the potential for impacts in terms of objective ENV5 (landscapes, townscapes and the historic environment) given the rural nature of the landscapes in which these settlements sit. It will be important that consideration is given to avoiding sensitive landscapes and avoiding impacts to historic character, particularly in village centres.</p> <p>In terms of the socio-economic effects of development at this scale in these locations, there is little to suggest that there will be significant effects. However, these villages are service centres that serve a rural hinterland, and so it can be seen that investment at these villages can help to ensure access to services and help to address issues of rural deprivation.</p>
<p>Recommendations</p> <p>N/a</p>

Table 5.15: Policy 15 - Service Villages

<p>Overall environmental effects</p> <p>Limiting development at these locations can be seen to be beneficial in terms of ENV1 (sustainable transport) as there will still be a considerable need for residents in the villages to rely on the private car to access employment and higher order services and facilities. In terms of other environmental objectives it is not thought that development on this scale will lead to significant effects.</p>
<p>Overall social effects</p> <p>Identification of these settlements as suitable for development at this scale has taken account of access to</p>

<p>local services and facilities, including a primary school. Furthermore, although the scale of development proposed is small, it will still have the potential to meet acute housing need and thus help to address issues of rural deprivation.</p>
<p>Overall economic effects</p> <p>The Policy highlights that service villages should encourage small scale local employment opportunities and enhanced local services to also provide for the diversification of the local economy (including agriculture and tourism).</p>
<p>Overall summary of effects</p> <p>These villages have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes, and so in this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport). In terms other environmental objectives it is not thought that development on this scale will lead to significant effects.</p> <p>In terms of social objectives, identification of these settlements as suitable for development at this scale has taken account of access to local services and facilities, including a primary school. Furthermore, although the scale of development proposed is small, it will still have the potential to meet acute housing need and thus help to address issues of rural deprivation. The Policy highlights that service villages should encourage small scale local employment opportunities and enhanced local services to also provide for the diversification of the local economy (including agriculture and tourism).</p>
<p>Recommendations</p> <p>N/a</p>

Table 5.16: Policy 16 - Other villages

<p>Overall environmental effects</p> <p>Limiting development at these locations can be seen to be beneficial in terms of ENV1 (sustainable transport) as residents in these villages will rely on the private car to access services, facilities and employment. In terms other environmental objectives it is not thought that development on this scale will lead to significant effects.</p>
<p>Overall social effects</p> <p>These villages have been identified as unsuitable for significant development because they have few or no services and facilities. Limiting development here is therefore beneficial from a perspective of ensuring good access to services and facilities.</p> <p>This Policy identifies that there may be a need for housing to meet identified local needs.</p>
<p>Overall economic effects</p> <p>It is not thought that development on this scale will lead to significant effects in terms of economic objectives.</p>
<p>Overall summary of effects</p> <p>These villages have been identified as suitable for only very limited, primarily infill development in recognition of the need to use the private car to access services and facilities. In this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport). In terms other environmental objectives it is not thought that development on this scale will lead to significant effects.</p> <p>In terms of social effects, limiting development at these locations can be seen to be beneficial from a perspective of ensuring good access to services and facilities. Furthermore, this Policy identifies that there may be a need for housing to meet identified local needs.</p>

<p>Recommendations</p> <p>N/a</p>
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Table 5.17: Policy 17 - Smaller rural communities and the countryside

<p>Overall environmental effects</p> <p>These villages have been identified as unsuitable for significant development because they have few or no services and facilities. Limiting development here is therefore beneficial from a perspective of reducing car dependency.</p> <p>In terms of other environmental objectives it is not thought that development on this scale will lead to significant effects.</p>
<p>Overall social effects</p> <p>It is thought that, in terms of the majority of objectives, development on this scale will not lead to significant effects. However, the Policy does identify that there may be a need for housing to meet identified local needs, which could help to address issues of rural deprivation.</p>
<p>Overall economic effects</p> <p>It is thought that, in terms of economic objectives, development on this scale will not lead to significant effects.</p>
<p>Overall summary of effects</p> <p>These villages have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes. In this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport). In terms other environmental objectives it is not thought that development on this scale will lead to significant effects.</p> <p>In terms of social objectives, identification of these settlements as suitable for development at this scale has taken account of access to local services and facilities, including a primary school. Furthermore, although the scale of development proposed is small, it will still have the potential to meet acute housing need and thus help to address issues of rural deprivation. The Policy identifies that there may be a need for housing to meet identified local needs.</p>
<p>Recommendations</p> <p>N/a</p>

Table 5.18: Policy 18 - The Broads

<p>Overall environmental effects</p> <p>This Policy performs well in terms of those environmental objectives that relate to the protection of 'environmental assets'. In terms of other environmental objectives there will be no significant effects.</p>
<p>Overall social effects</p> <p>This Policy has limited implications for social objectives, but it is noted that this Policy does seek to promote traditional rural enterprise and the distinctive character of the Broads landscape.</p>
<p>Overall economic effects</p> <p>This Policy seeks to support rural enterprises associated with the Broads.</p>
<p>Overall summary of effects</p>

This Policy seeks to draw attention to particular priorities within the Broads area. In particular, this Policy promotes the importance of 'environmental quality' and protection of the 'setting' of the Broads. Thus it is thought that this Policy may have benefits in terms of biodiversity, water quality and landscape related objectives.

This Policy also seeks to support rural enterprises associated with the Broads, which may help to secure local employment and so perhaps help to address issues or rural deprivation. However, it is important to note that issues of rural deprivation may not be as severe in the Broads area as they are in other deeply rural areas in Norfolk as a result of the thriving tourist industry. It is also worth noting that support for traditional industries that might otherwise suffer from problems of economic viability can also be seen to have biodiversity and landscape benefits, as it is these industries that have shaped the landscape that we value today.

This Policy, along with a number of other references to the Broads in other Area Wide Policies and Policies for Places, should help to ensure that the Joint Core Strategy does not lead to significant effects on areas designated under the EU Habitats Directive as being internationally important for biodiversity. However, this requires further testing, which is the role of the Habitats Regulations Assessment – a separate assessment process that, like Sustainability Appraisal, is being undertaken in parallel to the development of the Joint Core Strategy.

Recommendations: N/a

Table 5.19: Policy 19 - The hierarchy of centres

Overall environmental effects

This Policy is predicted to have positive effects in terms of a number of environmental objectives, and no significant effect in terms of others.

Overall social effects

This Policy is predicted to have positive effects in terms of some social objectives, and no significant effect in terms of others.

Overall economic effects

This Policy is predicted to have positive effects in terms of some environmental objectives, and no significant effect in terms of others.

Overall summary of effects

This Policy seeks to ensure that development of new retailing, services, offices and other town centre uses only occurs in appropriate centres. More development will be allowed in the largest centres. This approach can be seen to be beneficial from a perspective of promoting sustainable patterns of transport and travel, as there will be the centres that can most easily be accessed by walking, cycling and public transport. The other key environmental benefit relates to protecting the townscape and historic character associated with many town and village centres. It can be seen that this Policy has beneficial effects in terms of this objective as a result of promoting the greatest amount of development to the larger centres, which are likely to be less vulnerable.

This Policy can also be seen to be supportive of socio-economic objectives as it seeks to maintain the vibrancy of centres by ensuring that they receive an appropriate amount of new development. This should help to ensure access to a good range of services, maintain strong and cohesive communities and lead to local economic benefits as a result of creating opportunities for small businesses to start-up and expand.

Recommendations

N/a

Table 5.20: Policy 20 - Implementation and monitoring

<p>Overall environmental effects</p> <p>This Policy should perform well in terms of most environmental objectives, although there is one objective – ENV5 (landscapes, townscapes and the historic environment) – where it is thought less likely that there will be significant effects.</p>
<p>Overall social effects</p> <p>This Policy should perform well in terms of most social objectives, although there is one objective – SOC6 (employment) – where it is thought less likely that there will be significant effects.</p>
<p>Overall economic effects</p> <p>This Policy performs well in terms of economic objectives in general, although it is not thought likely that there will be significant effects in terms of all objectives.</p>
<p>Overall summary of effects</p> <p>This Policy sets out the detailed mechanisms for ensuring that funding is available to deliver and maintain the infrastructure that will be necessary to support development. In some respects the choice of what mechanism is employed has little bearing on sustainability objectives, as long as the infrastructure comes forward as required. However, it is thought that there are elements of the approach promoted that will help to ensure that infrastructure comes forward in a way that is supportive of sustainability objectives. In particular, it is seen as beneficial that the approach promoted is not rigid and one dimensional, but rather operates at a number of levels and includes a degree of flexibility. This is thought to be supportive of delivering the full, diverse range of infrastructure that will be required to meet sustainability objectives. For example, the Policy recognises the need to pursue central funding streams that will enable major infrastructure to be delivered, as well as collecting funds through the CIL and planning obligations for local level community infrastructure. The diverse nature of infrastructure that will be pursued is reflected in the examples that are included in the Policy.</p> <p>Securing the delivery of infrastructure will be important to ensure the achievement of a range of socio-economic and economic objectives, but can also lead to a financial burden on developers, which might then discourage investment in Greater Norwich. It is thought that the Policy should go some way to addressing any potential problems in this respect. The background text, in particular, adds considerable detail regarding the mechanisms that will be employed to collect funds from developers. There is an emphasis on fairness and seeking to avoid causing problems of financial viability.</p>
<p>Recommendations</p> <p>N/a</p>

5.3 Cumulative effects

- 5.3.1 This appraisal has taken account of the potential for the JCS policies to act together, in a synergistic fashion. However, it is also important to consider whether there will be other, non-planning related factors that might have a significant effect on sustainability objectives as a result of acting cumulatively with the Joint Core Strategy.
- 5.3.2 Firstly, it is important to note that the JCS has been developed to come forward alongside a number of major infrastructure projects, the delivery of which is the responsibility of external agencies. There is some suggestion that the Northern Distributor road may encourage continued car dependency, although it is important to note that this is an orbital route, and so it may still be possible to make direct public transport routes into the City a more attractive option than the car. In addition to road infrastructure, there may be some improvement of the train network. However, it is not thought that this will have a major effect in terms of reducing car dependency amongst residents of Greater Norwich (Wymondham to Norwich is the most important route in this respect).
- 5.3.3 In terms of environmental effects it is of primary importance to note that water quality impacts, (a significant issue in the Greater Norwich Area), can result from the cumulative effects of planning related matters as well as agricultural activity. It will be important that a catchment scale approach is taken to ensuring that environmental capacity is not breached. The other key environmental issue that is influenced by factors outside of the JCS remit is biodiversity, simply because so much conservation work is undertaken by large land-owners such as the RSPB, Wildlife Trusts and National Trust. There is a need to work closely with these external agencies to maximise benefits.
- 5.3.4 Finally, it is worth noting here that it is now likely that Rackheath will be developed as an eco-town, in compliance with the Eco-towns PPS. This will mean that this can be a flag-ship development. It is interesting to note that Rackheath is the only one of the shortlisted potential eco-town locations that is coming forward as part of a wider growth strategy for a conurbation. This suggests that it will be important to ensure that the eco-town aims and objectives integrate well with the wider aims and objectives of the JCS, in order to maximise benefits.

5.4 Summary of the SA

- 5.4.1 The Joint Core Strategy (JCS) essentially sets out a spatial strategy and a range of thematic policies to guide how the strategy is implemented. The spatial strategy and thematic policies have been developed with the aim of achieving an aspirational vision and set of objectives. The vision and objectives were themselves developed by the GNDP specifically for the purpose of the JCS, and so have been subject to SA. The appraisal found them to be appropriate and robust, predicting that they should go some way towards ensuring that the JCS capitalises on the opportunities that present themselves in Greater Norwich.
- 5.4.2 The JCS aims to implement the housing targets for the area set by the East of England Plan and a key task is to develop a spatial strategy for distributing this development. The proposed spatial strategy has been given particular attention through the SA as a result of the potential for significant sustainability effects and the likelihood of trade-offs having to be made between sustainability objectives. The proposed housing growth strategy essentially consists of:
1. Development within the existing built-up area of Norwich;
 2. A new large-scale urban extension to the North East of Norwich;
 3. Major expansion of a number of existing communities in South Norfolk; and
 4. Lesser expansion of other communities
- 5.4.3 The first element of the strategy involves accommodating a considerable amount of development within the existing urban area of Norwich. This has been found to have a range of sustainability benefits, including making good use of previously developed land, reducing car dependency, supporting the continued prosperity of the City Centre as a whole; and supporting the regeneration of some specific areas that have been identified as being less prosperous.
- 5.4.4 The second element of the spatial strategy involves a major urban extension to the North-East of the City, based around two or three centres either side of the proposed Northern Distributor Road (NDR). This has also been highlighted as likely to have broadly positive sustainability effects. This is particularly the case as growth here should afford plenty of opportunities for accessing Norwich and major employment locations by sustainable modes of transport. Also, the scale / concentrated nature of the growth proposed here should mean that it should be possible to achieve a high degree of self-containment (e.g. employment, services and facilities will come forward as part of the development, and thus will be accessible to residents by walking or cycling). The SA does highlight that growth in such close proximity to the NDR may encourage car-based trips, but this potential negative effect is uncertain. The SA recommends that, when considering the case for the NDR, it should be possible to assume minimal use of this road by residents of the Growth Area.
- 5.4.5 The third element of the strategy has some of the most important implications in terms of sustainability effects and trade-offs. Many of the effects relate to the fact that there is little or no potential for an urban extension to the south similar to that which is promoted to the north (because of environmental constraints, in particular the floodplain of the River Yare), and so a much more dispersed approach to growth is promoted. Dispersing growth results in a number of sustainability considerations such as the potential effects on the receiving settlements (e.g. the character, distinctiveness and quality of the local environment); and the increased difficulty of achieving a degree of self-containment and providing attractive public transport options that

encourage people to use their cars less. Another issue stemming directly from the dispersed nature of the growth relates to secondary school provision. There are a range of options that might meet educational requirements, but there is no single agreed plan at present. The current proposal is that options will be kept under review as part of the implementation plan of the Joint Core Strategy.

- 5.4.6 For the majority of these major growth locations the SA has not predicted significant negative effects that cannot be adequately mitigated through careful planning. Indeed, it is the case that many of the supporting policies within the JCS (discussed further below) should go some way to avoiding or mitigating potential negative effects and capitalising on specific opportunities. For example, policies recognise that both Long Stratton and Wymondham are historic settlements that sit within a sensitive landscape setting, and set out how negative effects can be avoided and the potential positive effects of growth realised.
- 5.4.7 Some of the most significant positive effects associated with the spatial strategy promoted for South Norfolk relate to the fact that much of the growth is concentrated in areas where there is good potential for encouraging sustainable patterns of travel by public transport to Norwich City Centre and the major employment locations (although not the same potential that exists with the urban extension to the North East). In particular, the SA notes that growth is focused along the A11 corridor (Wymondham, Hethersett and Cringleford) and at Costessey/Easton to the West, both of which are areas where there should be the potential to connect to Norwich via a 'bus rapid transit' service¹⁷ (although it is difficult to be completely certain about deliverability / financial viability at this stage).
- 5.4.8 However, one of the major growth locations – Long Stratton – does stand out as being less suited to encouraging more sustainable patterns of travel. This relates to the fact that Long Stratton is geographically isolated from Norwich and major employment locations in comparison to the other major growth locations; and to the fact that there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars. This is undoubtedly a significant negative effect of the spatial strategy, and probably the key issue that has been highlighted through this SA. However, it is important to bear in mind that the scale of growth promoted at Long Stratton (1,800 homes out of 14,200 that are promoted at major growth locations outside Norwich) is not such that these negative effects place in question the overall sustainability of the JCS in terms of achieving sustainable patterns of travel (and addressing climate change mitigation).
- 5.4.9 Furthermore, it is important to point out that, although there are some negative effects associated with growth at Long Stratton, there is the potential for significant positive effects. In particular, growth at Long Stratton is (in all likelihood) the only route in the short to medium term to securing funding for a bypass of the town. A bypass is strongly desired in order to reduce through-traffic and so bring about environmental improvements. The evidence does point to existing problems of environmental quality in the centre of Long Stratton, particularly in terms of air quality, and so there is some certainty that a bypass could lead to significant benefits. However, it is more difficult to say whether the 'local level' benefits associated with growth at Long Stratton outweigh the more 'strategic' disbenefits (as the GNDP consider to be the case). Irrespective of the answer to this question, there must be focused efforts to mitigate negative effects. The plan does set out the intention of delivering new services, facilities and employment opportunities in Long Stratton, ancillary to the housing growth, but a

¹⁷ A bus rapid transport service is essentially one that gives a considerable degree of priority to buses, rather than to cars, leading to attractive frequencies, reliability and journey times.

recommendation of the SA is that there is justification for going further, perhaps developing a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton.

- 5.4.10 In terms of the fourth element of the growth strategy, the SA has generally predicted positive effects. This conclusion relates to the broad implications of the settlement hierarchy that is proposed through the JCS (it has not been possible to consider each settlement individually in a similar fashion to the major growth locations). The hierarchical approach that is promoted should generally ensure that the amount of growth targeted to a settlement is directly dependent upon the size of the existing settlement, and, more specifically, the availability of local services, facilities and employment opportunities. This is a sensible approach that should help to reduce car dependency. However, it is noted that some smaller settlements (key service centres) may be required to deliver more houses than would ideally be the case taking into account access to local services, facilities and employment opportunities.
- 5.4.11 In terms of many of the other Policies that seek to guide *how* development should come forward, the SA is able to conclude that they generally represent a range of sensible proposals that will address many of the sustainability constraints and opportunities presented by the spatial strategy. These Policies have been developed taking account of a range of evidence base studies. There is a considerable emphasis on implementing the Green Infrastructure Strategy, and the findings of the Energy Study have largely fed through into Policy. The 'housing delivery' Policy is also carefully thought out, with considerable justification given regarding the approach that will be taken to delivering affordable housing. Reference to background evidence helps to increase the robustness of the policy-making process and demonstrate that Policies have been developed to address the issues that are specific to the Greater Norwich Area. Another example is the 'Economy' Area Wide Policy, which has a focus on developing the tourism, leisure, environmental and cultural industries. This is supported by a Policy that is devoted to capitalising on Norwich's regional role as a centre for 'culture, leisure and entertainment'. There is also a major focus on developing the 'knowledge economy', including through promoting a number of strategic employment locations (which are all well located, with good access to the major growth areas).
- 5.4.12 As a final point, it is important to note that, at the time of preparing this SA, the GNDP were still awaiting the publication of a study into Infrastructure Need & Funding. This will be a crucial part of the evidence base (that will be taken into account by the GNDP and can also inform SA). Another important evidence base study that was still unfinished at the time of preparing this SA was the Water Cycle Study Stage 2b.

5.5 Monitoring

5.5.1 **Table 5.21** makes suggestions for monitoring some of the likely significant effects of implementing the JCS. It will be up to the Council to consider the practicalities of monitoring and what might be achievable.

5.5.2 Monitoring significant effects is a key requirement of the SEA Directive:

The SEA Directive states that “member States shall monitor the significant environmental effects of the implementation of plans and programmes”.

Article 10

“Monitoring allows the actual significant effects of implementation of the SPD to be tested against those predicted in the SA”

Section 4.3.21, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, DCLG, 2005

Table 5.21: Monitoring suggestions

Likely significant effect / sustainability issue	Monitoring suggestion
Further strain on water resources as a result of increased abstraction	Work in partnership with the Environment Agency and other partners to monitor ground water levels and flows of water, and also seek to monitor the effects of water stress on the local environment
Inability to lead to a major shift away from car dependency in some of the major growth locations	Monitor use of public transport as well as walking and cycling as a means to access services, facilities and employment.
Continued high levels of rural car dependency	Monitor use of public transport as well as walking and cycling as a means to access services, facilities and employment.
The potential for impacts on landscape, townscape and historic character associated with growth at the main towns and service centres.	Build on the findings of the historic character and sensitivity study to monitor and avoid impacts.

6 Next Steps

6.1 Consultation

- 6.1.1 To enable the community and other stakeholders to continue to contribute to the LDF, there is now a period of formal consultation on the Pre-Submission JCS. This SA Report will go for consultation alongside the Plan, so that it might facilitate more informed responses. It is also important that there is an opportunity for questions to be raised regarding any of the judgements made within this SA, and further evidence put forward that may help to consider sustainability effects.
- 6.1.2 Following consultation, the JCS will be submitted to the Government for approval. The approval process involves a public examination held by a Planning Inspector. The Inspector has the power to approve the Document, with or without alteration, or reject it. The Inspector will be able to refer to the GNDP's responses the recommendations set out in this SA Report, which will be made following this current consultation.

6.2 SEA Statement

- 6.2.1 Once a plan or programme has been adopted, the SEA Directive requires those responsible for preparing it – in this case the GNDP - to provide the public and the Consultation Bodies with information on how environmental considerations and consultation responses are reflected in the plan or programme and how its implementation will be monitored in the future. The Directive states that:

Plan or programme proponents should ensure that, when a plan or programme is adopted, the Environmental Consultation Bodies and the public are informed and the following items are made available to those so informed:

- (a) the plan or programme as adopted;*
- (b) a statement summarising how environmental considerations have been integrated into the plan or programme...[including] the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and*
- (c) the measures decided concerning monitoring [of the plan]*

Annex 9(1)

- 6.2.2 In light of this requirement, the GNDP should prepare an SEA / SA Statement setting out the above information (reporting on how sustainability considerations have been taken into account rather than environmental considerations only).

Annex I – Context Documents Reviewed in the 2007 Scoping Report

Implications for the SA of the JCS were drawn from the following national level documents:

- Securing the Future - the UK Sustainable Development Strategy 2005
- Sustainable Communities Plan: Building for the future
- Air Quality Strategy for England etc (Jan 2000 and February 2003 addendum)
- Airports White Paper, DfT (2003)
- Planning (Control of Major Accident Hazards) Regulations (implements obligations under
- Seveso II Directive Council Directive 96/82/EC)
- Rural White Paper: Our Countryside (2000)
- Rural Strategy 2004
- Urban White Paper- Our Towns and Cities: The Future (2000)
- Energy White Paper: Our Energy Future – creating a low carbon economy (2003)
- Energy Review 2006
- Saving Lives: Our Healthier Nation White Paper (1999)
- UK Climate Change Programme – first published Jan. 1994, produced annually (latest version March 2006).

Furthermore, the full range of Central Government Planning Policy Statements was reviewed.

At the regional level, the following context documents were reviewed:

- A Sustainable Development Framework for the East of England (EERA, 2001)
- Woodland for Life - Regional Woodland strategy for the East of England (2003)
- Sustainable Futures: The Integrated Regional strategy for the East of England (2005)
- Living with Climate Change in the East of England, EERA and Sustainable Development
- Round Table for the East of England
- Sustainable Communities in the East of England (2003)
- Sustainable Tourism Strategy for the East of England (2004)
- Water resources for the future: a strategy for the Anglian Region
- Norfolk, Suffolk and Cambridgeshire Strategic Health Authority Health Strategy 2005 – 2010

Local level documents that were reviewed included:

- Local Transport Plan for Norfolk 2006 – 2011 (inc. Transport Strategy to 2021)

- Shaping the Future - an economic strategy for Norfolk and Waveney, and a social cohesion strategy for Norfolk
- Norfolk Biodiversity Action Plan 2004
- Norfolk Ambition
- Gypsies and Travellers Strategy for Norfolk (2005-2008)
- Broadland Rivers Catchment Flood Management Plan (Draft – June 2006)
- Broadland Rivers Catchment Abstraction Management Strategy
- The Broads Plan 2004
- The Broads Core Strategy (2007)
- Greater Norwich Housing Strategy (2005 – 2010)
- Joint Municipal Waste Strategy for Norfolk (2006-2020)
- Learning Disability Employment Plan for Norfolk (2006)
- Broadland Community Plan
- Broadland Culture and Leisure Strategy
- Broadland Economic Development and Tourism Strategy (2004)
- Broadland Crime and Disorder and Drugs Misuse Strategy (2005)
- South Norfolk Local Agenda 21 Strategy
- South Norfolk Economic Development Strategy (2004)
- South Norfolk Empty Homes Strategy (2003)
- South Norfolk Tourism Strategy (2004)
- South Norfolk Corporate Equality Plan (2003)
- South Norfolk Crime Reduction Strategy (2003)
- South Norfolk Alliance Sustainable Community Strategy (2004)
- Towards Stronger Communities: South Norfolk's Strategy for Community Cohesion (2006)
- South Norfolk Cycling Strategy (2005)
- South Norfolk Corporate Environment Strategy
- South Norfolk Leisure/Culture & Countryside Strategy (2006 - 2016)
- South Norfolk Council's Strategy for Health and Well-Being (2006 – 2016)
- Norwich: City Destination Strategy (2004)
- Norwich's Environment Strategy 2003 - 2008
- Norwich City Council Economic Strategy 2003 – 2008
- Norwich Community Safety Strategy and Audit Report 2005 - 2008
- Norwich Homelessness Strategy

- Norwich Sustainable Community Strategy 2007 -2020 (draft)
- Norwich Area Transport Strategy
- Norwich River Valleys Strategy

Annex II – SEA Checklist

Quality assurance is an important element of the appraisal exercise. It helps to ensure that the requirements of the SEA Directive are met, and show how effectively the appraisal has integrated sustainability considerations into the plan-making process.

Guidance checklist	Chapter	Carried out by
<ul style="list-style-type: none"> The plan's purpose and objectives are made clear. 	1 & 3	Scott Wilson
<ul style="list-style-type: none"> Sustainability issues, including international and EC objectives, are considered in developing objectives and targets. 	Chapter 2 and the Scoping Report	Scott Wilson and the GNDP
<ul style="list-style-type: none"> SA objectives are clearly set out and linked to indicators and targets where appropriate. 	Chapter 2 and the Scoping Report	Scott Wilson and the GNDP
<ul style="list-style-type: none"> Links with other related plans, programmes and policies are identified and explained. 	Chapter 2 and the Scoping Report	Scott Wilson and the GNDP
<ul style="list-style-type: none"> Conflicts that exist between SA objectives, between SA and plan objectives, and between SA and other plan objectives are identified and described. 	Chapter 2 and the Scoping Report	Scott Wilson and the GNDP
<ul style="list-style-type: none"> The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the SA Report. 	See Chapter 6. Also, see description of process in Chapters 1 & 2	GNDP
<ul style="list-style-type: none"> The appraisal focuses on significant issues. 	An outcome of the scoping process. Also, see SA methodology in Chapter 4	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit. 	Chapter 4	Scott Wilson
<ul style="list-style-type: none"> Reasons are given for eliminating issues from further consideration. 	Scoping Report. Also, see discussion of effects in appraisal matrices.	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Realistic alternatives are considered for key issues, and the reasons for choosing them are documented. 	Section 3.2	GNDP
<ul style="list-style-type: none"> Alternatives include 'do nothing' and/or 'business as usual' scenarios wherever relevant 	Section 3.2	GNDP

<ul style="list-style-type: none"> The sustainability effects (both adverse and beneficial) of each alternative are identified and compared 	Chapter 5	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained. 	Chapter 5	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Reasons are given for selection or elimination of alternatives. 	See Section 3.2	GNDP
<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and their likely evolution without the plan are described. 	Scoping Report and Chapter 2	Scott Wilson and the GNDP
<ul style="list-style-type: none"> Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable. 	Chapter 2	Scott Wilson
<ul style="list-style-type: none"> Difficulties such as deficiencies in information or methods are explained. 	Chapter 4	Scott Wilson
<ul style="list-style-type: none"> Likely significant social, environmental and economic effects are identified, including in issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant. 	Chapter 5	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed. 	Chapter 5	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Likely secondary, cumulative and synergistic effects are identified where practicable. 	Chapter 5	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Inter-relationships between effects are considered where practicable. 	Chapter 5	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Where relevant, the prediction and evaluation of effects makes use of accepted standards, regulations, and thresholds. 	Chapter 5	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Methods used to evaluate the effects are described. 	Chapter 4	Scott Wilson
<ul style="list-style-type: none"> Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan are 	Chapter 5	Scott Wilson and the GNDP (through past

indicated.		appraisals)
<ul style="list-style-type: none"> Issues to be taken into account in development consents are identified. 	Chapter 5	Scott Wilson and the GNDP (through past appraisals)
<ul style="list-style-type: none"> Is clear and concise in its layout and presentation. 	All	Scot Wilson
<ul style="list-style-type: none"> Uses simple, clear language and avoids or explains technical terms. 	All	Scot Wilson
<ul style="list-style-type: none"> Uses maps and other illustrations where appropriate. 	Chapter 2 and Scoping Report	Scott Wilson and the GNDP
<ul style="list-style-type: none"> Explains the methodology used. 	Chapter 4	Scott Wilson
<ul style="list-style-type: none"> Explains who was consulted and what methods of consultation were used. 	Chapter 1 and Section 3.2	Scott Wilson
<ul style="list-style-type: none"> Identifies sources of information, including expert judgement and matters of opinion. 	Chapter 4	Scott Wilson
<ul style="list-style-type: none"> Contains a non-technical summary. 	See NTS	Scott Wilson
Consultation		
<ul style="list-style-type: none"> The SA is consulted on as an integral part of the plan-making process. 		GNDP
<ul style="list-style-type: none"> The consultation bodies, other consultees and the public are consulted in ways which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and SA Report. 		GNDP
<ul style="list-style-type: none"> The SA Report and the opinions of those consulted are taken into account in finalising and adopting the plan. 		GNDP
<ul style="list-style-type: none"> An explanation is given of how they have been taken into account. 	SEA Statement (forthcoming)	GNDP and Scott Wilson
<ul style="list-style-type: none"> Reasons are given for choices in the adopted plan, in the light of other reasonable options considered. 	SEA Statement (forthcoming)	GNDP and Scott Wilson
<ul style="list-style-type: none"> Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SA. 	Chapter 5	Scott Wilson
<ul style="list-style-type: none"> Monitoring is used, where appropriate, during implementation of the plan to make good deficiencies in baseline information in the SA. 	See LDF Annual Monitoring Report	GNDP

<ul style="list-style-type: none">Monitoring enables unforeseen adverse effects to be identified at an early stage (These effects may include predictions which prove to be incorrect.)	See LDF Annual Monitoring Report	GNDP
<ul style="list-style-type: none">Proposals are made for action in response to significant adverse effects.	See LDF Annual Monitoring Report	GNDP

Annex III – Appraisal Matrices

The Spatial Vision				
SA Objective	Short-term	Medium-term	Long-term	Comments / Justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	<ul style="list-style-type: none"> Access to and across the area will be improved with the completion of the Norwich Northern Distributor Road and the Long Stratton bypass. <p>(This will reduce traffic flow through town and village centres.)</p> <ul style="list-style-type: none"> The NDR will have enabled significantly enhanced public transport, cycling and walking networks. Sustainable transport options will include a network of safe and convenient pedestrian and cycle links and public transport services to provide easy access between residential areas, the city centre, business parks, local services and further afield, reducing the need for car use. A Bus Rapid Transit network will serve key destinations.
ENV 2 To improve the quality of the water environment.	+	+	+	<ul style="list-style-type: none"> People will use less water, and the quality of water resources and the aquatic environment will be maintained or improved
ENV 3 To improve environmental amenity, including air quality.	+	+	+	<ul style="list-style-type: none"> Long Stratton residents will also benefit from the enhanced quality of life resulting from a bypass
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	<ul style="list-style-type: none"> A network of green links will connect existing open space and wildlife habitats across urban areas and the countryside, and link to neighbouring areas outside the JCS including the Broads
ENV 5 To maintain	+	+	+	<ul style="list-style-type: none"> As a contemporary medieval city Norwich will treasure and promote its rich historic, cultural and architectural

and enhance the quality of landscapes, townscapes and the historic environment.				<p>heritage, encouraging new buildings built to an exceptional design quality, and its parks, wildlife sites, woodland and heathland.</p> <ul style="list-style-type: none"> The rural area will retain its distinctive Norfolk character and will continue to be working and tranquil, recognising the Broads, and other locally and nationally important habitats The four main towns of Aylsham, Diss, Harleston and Wymondham will retain attractive historical centres.
ENV 6 To adapt to and mitigate against the impacts of climate change.	+	+	+	<ul style="list-style-type: none"> Inspired by the exemplar eco-community at Rackheath, zero carbon development will be the standard to be achieved through advances and innovation in the design, construction and management of sustainable communities and new buildings
ENV 7 To avoid, reduce and manage flood risk.	?	?	?	<ul style="list-style-type: none"> The Vision refers to the need to adapt to climate change Recommendation: Refer to the important issue of avoiding and mitigating flood risk
ENV 8 To provide for sustainable use and sources of water supply.	+	+	+	<ul style="list-style-type: none"> People will use less water, and the quality of water resources and the aquatic environment will be maintained or improved
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	?	?	?	<ul style="list-style-type: none"> Recommendation: The Vision states that development must 'minimise the use of global resources', but does not refer specifically to the importance of utilising brownfield land / protecting greenfield land or the need to support the development of good waste management practices.
SOC 1 To reduce poverty and social exclusion.	+	+	+	<ul style="list-style-type: none"> Regeneration, development and growth will create sustainable places and revitalise areas of deprivation
SOC 2 To maintain and improve the health of the whole population and	+	+	+	<ul style="list-style-type: none"> People will enjoy healthy, safe and fulfilling lifestyles, have equitable access to high standards of health and social care and make informed choices about their own health.

promote healthy lifestyles.				
SOC 3 To improve education and skills.	+	+	+	<ul style="list-style-type: none"> There will be excellent opportunities for lifelong learning and personal development and people will have high expectations for their own educational achievement to meet their needs, to contribute to the life of their communities, and to the economy
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	+	+	+	<ul style="list-style-type: none"> Everyone will have access to suitable housing
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	<ul style="list-style-type: none"> The area will be renowned for its culture, creativity and spirituality, with high quality cultural and leisure opportunities that improve people's well-being.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+	+	+	<ul style="list-style-type: none"> See comments under EC1
SOC 7 To improve the quality of where people live.	+	+	+	<ul style="list-style-type: none"> There will be excellent public open space, sport and recreational facilities and community centres.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	<ul style="list-style-type: none"> A vibrant network of accessible district and local centres will provide for day to day needs. The main towns, key service centres and service villages will be focal points for communities to have better access to quality jobs, healthcare, education facilities and shops.
EC 1 To encourage sustained	+	+	+	<ul style="list-style-type: none"> Business investment in the area will support and create a sustainable, diverse, thriving economy accessible and appropriate to the needs of all the community and where the social and environmental performance of

economic growth.				<p>the economy is improved.</p> <ul style="list-style-type: none"> Investment at strategic and other employment locations will help create a stronger economy (including at Norwich city centre; Norwich Research Park, Hethel Engineering Centre, Thorpe St Andrew, Longwater, Wymondham and around Norwich International Airport). Growing the local economies in main towns and key service centres will help revitalise the rural economy The expanded urban area of Norwich will be a greener city, in appearance and environmental performance. It will be a stronger social, economic and cultural centre with a focus for jobs, shopping, leisure and other activities. Norwich city centre will build on its importance for key economic sectors including financial and general insurance services, retailing and creative and media industries. It will continue to be a UK “top-10” retail centre. Norwich will continue to be the cultural capital of East Anglia and local people and visitors will have access to theatres, art galleries, museums and buildings of architectural and historical interest. The cultural economy will stimulate regeneration, increase tourism and encourage an active and cohesive community. The four main towns of Aylsham, Diss, Harleston and Wymondham will enjoy greater economic prosperity with new opportunities for business.
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	<ul style="list-style-type: none"> See comments under EC1
EC 3 To encourage efficient patterns of movement in support of economic growth.	+	+	+	<ul style="list-style-type: none"> See comments under ENV1
EC 4 To improve the social and environmental performance of the	+	+	+	<ul style="list-style-type: none"> See comments under EC1

economy.				
Summary				
Overall environmental effects				
The Vision should lead to benefits in terms of all environmental objectives, with the exception of ENV7 and ENV9, where the effects are predicted as uncertain.				
Overall social effects				
The Vision should lead to benefits in terms of all social objectives				
Overall economic effects				
The Vision should lead to benefits in terms of all economic objectives				
Overall summary of effects				
This Vision identifies a long list of priorities, many of which are ambitious and forward-thinking in terms of sustainability objectives. It is useful that this detailed list of priorities is set out clearly for public scrutiny and comment.				
Recommendations:				
<ul style="list-style-type: none"> • Refer to the important issue of avoiding and mitigating flood risk • The Vision states that development must 'minimise the use of global resources', but does not refer specifically to the importance of utilising brownfield land / protecting greenfield land or the need to support the development of good waste management practices. 				

The Joint Core Strategy Objectives				
SA Objective	Short-term	Medium-term	Long-term	Comments / Justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	<ul style="list-style-type: none"> Objective 6 - To allocate enough land for housing and affordable housing, in the most sustainable settlements – states that people will have alternatives to using cars and new housing, employment and services will be planned so they are grouped together wherever possible. The settlement hierarchy defines the towns and villages with a good range of jobs, services and facilities. Appropriate densities will make sure land is used efficiently and the need for accessible and affordable housing will also be met. Objective 11 - To enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact – states that the location and design of development will reduce the need to travel especially by private car. Greater use of sustainable modes of transport will be encouraged by better public transport, footways and cycle networks, and by co-location of housing with services, jobs, shops, schools and recreational facilities. A Bus Rapid Transit system and general enhancement to bus infrastructure will be introduced on key routes in the Norwich area. Furthermore, more than 90% of the area is rural and rural isolation can be reduced by encouraging newer communication and information technologies.
ENV 2 To improve the quality of the water environment.	?	?	?	<ul style="list-style-type: none"> None of the objective refer to water quality or the water environment.
ENV 3 To improve environmental amenity, including air quality.	?	?	?	<ul style="list-style-type: none"> None of the objectives refer specifically to the need to improve environmental quality.
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	<ul style="list-style-type: none"> Objective 3 - To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value – highlights that biodiversity and locally distinctive landscapes will be protected and enhanced.
ENV 5 To maintain	+	+	+	<ul style="list-style-type: none"> Objective 2 - To positively protect and enhance the individual character and culture of the area – states that

and enhance the quality of landscapes, townscapes and the historic environment.				<p>more visitors will be encouraged to the area by protecting the very qualities that make the area attractive. Gateways between the wider Norwich area and the Broads, the Brecks and the coast will be enhanced in a way that does not harm their special character.</p> <ul style="list-style-type: none"> Objective 3 - To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value – highlights that biodiversity and locally distinctive landscapes will be protected and enhanced.
ENV 6 To adapt to and mitigate against the impacts of climate change.	+	+	+	<ul style="list-style-type: none"> Objective 1 - To minimise the contributors to climate change and address its impact - promotes a strong approach to climate change mitigation and adaptation.
ENV 7 To avoid, reduce and manage flood risk.	+	+	+	<ul style="list-style-type: none"> Objective 1 - To minimise the contributors to climate change and address its impact - states that new development will generally be guided away from areas with a high probability of flooding, and where new development in such areas is desirable for reasons of sustainability, flood protection will be maintained and enhanced. Recommendation: Rather than 'desirable for reasons of sustainability' it is suggested that it may be clearer to state 'necessary in order to fulfill broader objectives', or, alternatively, to refer to 'exceptions to the general rule'
ENV 8 To provide for sustainable use and sources of water supply.	+	+	+	<ul style="list-style-type: none"> Objective 1 - To minimise the contributors to climate change and address its impact - states that water efficiency will be a priority in both new and existing development.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	+	+	+	<ul style="list-style-type: none"> Objective 1 - To minimise the contributors to climate change and address its impact - states that domestic and commercial waste will be minimised by encouraging waste reduction, reuse, recycling, composting and safe energy recovery. Recommendation: Ensure that at some point in the JCS it is clearly stated how the objective to 'minimise domestic and commercial waste by encouraging waste reduction, reuse, recycling, composting and safe energy recovery' will be achieved. Objective 3 - To protect, manage and enhance the natural, built and historic environment, including key

				landscapes, natural resources and areas of natural habitat or nature conservation value – highlights that the use of previously developed land will be prioritised to minimise the loss of agricultural land and the countryside.
SOC 1 To reduce poverty and social exclusion.	+	+	+	<ul style="list-style-type: none"> Objective 2 - To positively protect and enhance the individual character and culture of the area – highlights that promoting culture will help to develop the economy, stimulate further regeneration, increase sustainable tourism and promote community involvement. It goes on to state that adequate public open space, sport and recreational facilities, community centres and access to the countryside is needed locally to make sure everyone can take part in community activities. Objective 5 - To promote regeneration and reduce deprivation – states that there is a need to regenerate communities, local economies, underused brownfield land and neighbourhoods by creating safe, healthy, prosperous, sustainable and inclusive communities. It states that development and growth will be used to bring benefits to local people, especially those in deprived communities.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	+	+	+	<ul style="list-style-type: none"> Objective 9 - To encourage the development of healthy and active lifestyles – highlights the importance of accessibility to open space, the countryside, sports and recreational facilities. People will also be offered the best opportunities to make healthy travel choices as part of their daily lives. By working with NHS Norfolk and Norfolk County Council, medical and social facilities will be properly planned for new developments, which will be accessible to all.
SOC 3 To improve education and skills.	+	+	+	<ul style="list-style-type: none"> Objective 10 - To allow people to develop to their full potential by providing educational facilities to support the needs of a growing population states that there is a need to improve, expand and develop new education provision to serve an increasing population and higher educational aspirations. It is essential to provide an environment and the facilities to improve the skills of the workforce to support the developing economy of the area.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	+	+	+	<ul style="list-style-type: none"> Objective 6 - To allocate enough land for housing and affordable housing, in the most sustainable settlements – states that the amount and type of new housing will be provided in line with the targets set by the East of England Plan and to meet the needs identified by the Greater Norwich Sub Regional Housing Assessments.
SOC 5 To build community identity, improve social	+	+	+	<ul style="list-style-type: none"> Objective 2 - To positively protect and enhance the individual character and culture of the area – highlights that promoting culture will help to develop the economy, stimulate further regeneration, increase sustainable

welfare, and reduce crime and anti-social activity.				tourism and promote community involvement. It goes on to state that adequate public open space, sport and recreational facilities, community centres and access to the countryside is needed locally to make sure everyone can take part in community activities.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+	+	+	<ul style="list-style-type: none"> Objective 4 - To promote economic growth and diversity and provide a wide range of jobs – states that existing employment sites will be safeguarded and enough land for employment development will be allocated to meet the needs of inward investment, new businesses and existing businesses wishing to expand or relocate. It also states that mixed-use development, live/work units and diversification schemes will be encouraged to reduce the need for local people to commute long distances to work.
SOC 7 To improve the quality of where people live.	+	+	+	<ul style="list-style-type: none"> Objective 2 - To positively protect and enhance the individual character and culture of the area – states that adequate public open space, sport and recreational facilities, community centres and access to the countryside is needed locally to make sure everyone can take part in community activities. Objective 8 - To be a place where people feel safe in their communities promotes community safety, a stronger sense of belonging and pride in peoples' surroundings, to reduce crime and the fear of crime.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	<ul style="list-style-type: none"> Objective 7 - To make sure people have ready access to services – states that Norwich city centre will continue to provide a wide range of services accessible to a very wide area. The diversity, vitality and accessibility of the city centre will be maintained and enhanced. Investment will be encouraged in district and local centres to enhance accessibility, vitality and viability. The surrounding market towns and service centres will continue to play a key service role. Innovative approaches will be taken to support rural service provision. Wherever new homes or jobs are to be developed, existing supporting services must either already be adequate or should be provided at the right stage of a new development. This will ensure existing and future residents and workers will have access to the services they need.
EC 1 To encourage sustained economic growth.	+	+	+	<ul style="list-style-type: none"> Objective 2 - To positively protect and enhance the individual character and culture of the area – highlights that promoting culture will help to develop the economy, stimulate further regeneration, increase sustainable tourism and promote community involvement. Objective 4 - To promote economic growth and diversity and provide a wide range of jobs – states that existing employment sites will be safeguarded and enough land for employment development will be allocated to meet the needs of inward investment, new businesses and existing businesses wishing to expand or relocate. It also highlights that Norwich city centre will continue to exert a powerful economic influence over the wider area. Its growth will be further encouraged. Supporting economic growth in the

				market towns and revitalising the rural economy are also priorities.
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	<ul style="list-style-type: none"> See discussion under EC1.
EC 3 To encourage efficient patterns of movement in support of economic growth.	+	+	+	<ul style="list-style-type: none"> See discussion under EC1 and ENV1.
EC 4 To improve the social and environmental performance of the economy.	+	+	+	<ul style="list-style-type: none"> Objective 4 - To promote economic growth and diversity and provide a wide range of jobs – states that existing employment sites will be safeguarded and enough land for employment development will be allocated to meet the needs of inward investment, new businesses and existing businesses wishing to expand or relocate. It also states that mixed-use development, live/work units and diversification schemes will be encouraged to reduce the need for local people to commute long distances to work.
Summary				
Overall environmental effects				
The Joint Core Strategy objectives perform well in terms of all environmental objectives, with the exception of ENV2 (water quality) and ENV3 (environmental quality including air quality) which effects are predicted to be uncertain as these issues are not specifically referred to by any objective.				
Overall social effects				
The Joint Core Strategy objectives perform well in terms of all social objectives				
Overall economic effects				
The Joint Core Strategy objectives perform well in terms of all economic objectives				
Overall summary of effects				
Many of these objectives are ambitious and forward-thinking in terms of sustainability objectives. It is helpful that issues such as the promotion of sustainable patterns of travel and transport, which are relatively complex and cross-cutting and so dealt with by a number of Policies throughout the rest of the Joint Core				

Strategy, are addressed within the objectives in a clear and concise way.

Recommendations:

- Rather than 'desirable for reasons of sustainability' it is suggested that it may be clearer to state 'necessary in order to fulfill broader objectives', or, alternatively, to refer to 'exceptions to the general rule'
- Ensure that at some point in the JCS it is clearly stated how the objective to 'minimise domestic and commercial waste by encouraging waste reduction, reuse, recycling, composting and safe energy recovery' will be achieved.

Policy 1 – Promoting sustainability and addressing climate change				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	<p>This Policy, along with others in the JCS, promotes minimising the need to travel and giving priority to 'low impact' modes of travel. Other key Policies that play a key role in terms of this objective include Policies 2, 5 and 8 as well as the Policies for Places.</p> <p>Recommendation: 'Low impact' modes of travel might be considered to be slightly ambiguous. For example, a train line, guided bus route or even a bus route can have 'impacts' in some respects.</p> <p>The Policy makes a strong commitment to "<i>make the most efficient appropriate use of land, with the density of development varying according to the characteristics of the area, with the highest densities in centres and on public transport routes.</i>"</p> <p>Recommendation: The statement in the supporting text that: "<i>In appropriate urban locations car-free development will be promoted</i>" should be included in the main policy wording.</p> <p>It is also important to note that this Policy plays a key role in terms of implementing the Green Infrastructure Strategy, a key aim of which is to increase the attractiveness of walking and cycling as a mode of transport.</p>
ENV 2 To improve the quality of the water environment.	+	+	+	<p>The Policy makes a commitment to incorporate sustainable drainage within new development. This should help to protect water quality. The Policy does not go as far as saying that <i>all</i> new development must incorporate Sustainable Drainage Systems (SuDS). However, Policy 12 does make a commitment to incorporate SuDS within the major locations for growth.</p> <p>There is an emphasis on avoiding water quality impacts on SACs and SPAs.</p> <p>Recommendation: Broaden the Policy to include a commitment to protecting the water environment more generally (perhaps also stating the particular importance of avoiding water quality impacts to the Natura 2000 network in order to avoid breaches to EU Law).</p>
ENV 3 To improve environmental amenity, including air quality.	+	+	+	<p>This Policy, along with others in the JCS, promotes minimising the need to travel and giving priority to 'low impact' modes of travel. It is assumed that use of the term 'low impact' implies that the aim is to improve environmental quality as well as reduce greenhouse gas emissions.</p>
ENV 4 To maintain	+	+	+	<p>As part of the discussion on adapting to climate change, the Policy sets out that development must 'improve the</p>

<p>and enhance biodiversity and geodiversity.</p>			<p>resilience of ecosystems to adapt to the effects of climate change’.</p> <p>Recommendation: Reword this to ‘seek to ensure ecosystem function and resilience to environmental change’. Alternatively, this statement could be removed from here and discussed later in the Policy under the banner of protecting environmental assets.</p> <p>This Policy has a significant emphasis on ‘protecting environmental assets’, which are helpfully defined in the supporting text as comprising biodiversity, built heritage, ancient monuments and archaeology, geodiversity, and landscape character; as well as more general aspects such as the countryside and rural character, and the setting of Norwich, towns and villages, and the Broads. The text also highlights that assets of local importance, such as County Wildlife Sites are valuable in their own right, and in combination provide a significant resource.</p> <p>Recommendation: It is thought that this Policy might be more appropriately titled “Addressing climate change and protecting environmental assets”. The only topic that is addressed by this Policy that does not entirely fit well with this title is the issue of recycling and the use of materials as part of building. It is thought that these issues are of less significance at this strategic level of planning, but could still be ‘tagged-on’ to this Policy. Alternatively, these issues could be addressed through the ‘Promoting good design’ Policy.</p> <p>The Policy wording should successfully help to ensure that the principles set out in the GI Strategy are implemented. However, a number of other policies are also important in terms of realising the aims and objectives of the GI Strategy, including Policies 2, 4 and 5 as well as the Policies for Places.</p> <p>The Policy sets out that a priority is to promote access and understanding to biodiversity, except in exceptional circumstances. This is an important statement to make at the strategic level, as it can inform strategy and project planning at a more local level.</p> <p>Recommendation: Refer to ‘conflicts with biodiversity objectives’, rather than ‘conflicts with biodiversity’</p> <p>It is notable that the Policy recognises some specific ways in which development in the Sub-Region could impact on internationally important biodiversity, but not biodiversity assets of national or local importance. It is recognised that this may be because it is only for internationally designated sites is a body of evidence available regarding potential impacts (as a result of the HRA process).</p> <p>It is appropriate that this Policy recognises the importance of ensuring sufficient strategic green space to avoid and mitigate recreational pressures on international sites.</p> <p>Recommendation: Rather than focusing solely on protecting internationally import there could be some benefit to promoting a more balanced approach to protecting biodiversity in-line with the principles set out in the GI Strategy, but also stating that certain actions will be particularly important where HRA has identified that they are necessary to protect internationally important biodiversity.</p> <p>The Policy recognises the important ‘buffering and linking’ role of locally important assets. This is an important point in terms of this objective.</p>
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				<p>Recommendation: Refer to 'maintenance or enhancement of the 'local biodiversity baseline', rather than the 'status quo'.</p> <p>It is thought that the second bullet point - <i>contribute to providing green infrastructure compatible with the Green Infrastructure Strategy. This will include areas of open space, wildlife resources and links between them as an integral part of the development, and connecting and contributing to the wider green infrastructure network</i> - helpfully distils some of the key messages from the GI strategy that should be taken into account by developers.</p> <p>The Policy makes a strong commitment by ensuring that development “<i>help[s] to make provision for the long-term maintenance of the green infrastructure network.</i>”</p> <p>It is not clear what benefit there is to the point made regarding protecting minerals resources.</p>
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	?	?	?	<p>It is not thought that the statement “<i>The built environment and public realm will be conserved and enhanced through the protection of buildings and structures which contribute to their surroundings, the encouragement of high-quality maintenance and repair and the enhancement of public spaces</i>” will result in a comprehensive and proactive approach being taken to the protection heritage features and wider historic character.</p> <p>Recommendation: Consider making a stronger and more proactive statement regarding the maintenance and enhancement of heritage features and wider historic character. This Policy should set the high level principles that are implemented through other Area Wide Policies as well as Policies for Places.</p> <p>The Policy promotes high density development as a sustainable approach in some instances, but also goes on to state that “<i>consideration of density will also need to take account of local characteristics and other design criteria including the need for open space.</i>”</p> <p>The background text identifies landscape character as an important aspect of the Sub-Region’s environmental assets, but this does not feed through well into the Policy.</p>
ENV 6 To adapt to and mitigate against the impacts of climate change.	+	+	+	<p>This Policy promotes an ambitious approach to climate change mitigation.</p> <p>In particular, it stipulates that all new housing development must reach Code for Sustainable Homes level 4 for water and energy and level 6 by 2015. This should ensure the incorporation of energy efficiency measures, and the promote renewable energy. These requirements are not overly ambitious, but are stricter than the requirements set by Central Government (i.e. that all new housing must meet CfSH Level 4 by 2013 and CfSH Level 6 by 2016).</p> <p>Non residential developments that require an Energy Performance Certificate must meet BREEAM excellent standards and BREEAM Outstanding from 2015. Higher energy efficiency achieves a greater number of credits under the BREEAM Assessment process, therefore this Policy encourages energy efficiency and minimises consumption through adopting these BREEAM standards. Also, since the BREEAM schemes award credits for buildings and developments which can supply their energy demands from renewable sources, this Policy</p>

				<p>encourages the provision of renewable energy.</p> <p>In terms of climate change adaptation this Policy makes reference to ensuring that development is ‘adapted to weather extremes’.</p> <p>Recommendation: Rather than ‘adapted to weather extremes’, it may be more appropriate to refer to ‘adapted to a changing climate and more extreme weather’</p>
ENV 7 To avoid, reduce and manage flood risk.	+	+	+	<p>This Policy commits to locating development so as to minimise flood risk, and to mitigate any such risk through design.</p> <p>Recommendation: There may be some benefit to expanding on this statement regarding flood-risk, including through relating flood-risk to the implementation of SuDS.</p>
ENV 8 To provide for sustainable use and sources of water supply.	+	+	+	<p>In terms of minimising unsustainable abstraction, the Policy states a commitment that “<i>all new housing development must reach Code for Sustainable Homes level 4 for water and energy on adoption of this plan and level 6 by 2015.</i>”</p> <p>This is a somewhat ambitious approach, although it is important to note that some authorities in other water stressed parts of the country are requiring all new development to meet Level 5 of the Code for Sustainable Homes for water.</p>
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	+	+	+	<p>Energy related issues are considered under ENV6</p> <p>In terms of efficient use of resources more generally this Policy seeks to ensure that developments ‘provide for recycling of materials’.</p> <p>Recommendation: There could be some benefit to adding further detail regarding the approach that is expected. For example ‘all developments must design-in facilities for the segregation and storage of waste both for private use within dwellings and for communal use, with the aim of maximising the efficiency and effectiveness of recycling’</p> <p>It is notable that, whilst this Policy promotes CHP from biomass there is no mention of the potential for energy from waste.</p> <p>This Policy also promotes the use of locally sourced materials wherever possible. This supports Policy 2.</p>
SOC 1 To reduce poverty and social exclusion.	+	+	+	<p>A key aim of the Green Infrastructure Strategy, which this Policy seeks to implement, is to increase accessibility to green space and open space, which can have wide ranging social benefits, including relating to health as residents are encouraged to walk, cycle and undertake outdoor activities; and also in terms of community cohesion and inclusiveness as Green Infrastructure can create attractive environments where people from different communities and backgrounds can come together.</p>

SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	+	+	+	See discussion under SOC1.
SOC 3 To improve education and skills.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	See discussion under SOC1 It is also important to add that the proactive approach to green infrastructure promoted through the GI Strategy seeks to protect and enhance the role of existing environmental assets, including specific landscape character areas and heritage features, and so can be seen to help maintain and enhance sense of place and local distinctiveness.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+	+	+	Implementing the GI Strategy will result in significant employment opportunities at a range of skill levels (but mainly lower skilled).
SOC 7 To improve the quality of where people live.	+	+	+	See discussion under SOC1
SOC 8 To improve accessibility to essential services, facilities and jobs.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

EC 1 To encourage sustained economic growth.	+	+	+	Norwich has the opportunity to capitalise on its image as a forward thinking and 'green' city, and that in doing so increase its attractiveness as a location to live, invest and 'do business'. Thus, it can be seen that this Policy plays an important role in terms of this objective.
EC 2 To encourage and accommodate both indigenous and inward investment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 4 To improve the social and environmental performance of the economy.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

Summary

Overall environmental effects

This Policy performs well in terms of all environmental objectives, with the exception of ENV5 (landscapes, townscapes and the historic environment) where it is questioned whether a stronger statement should be made.

Overall social effects

This Policy performs well in terms of most social objectives. In particular, this Policy performs well in terms of promoting good health and community cohesion. In terms of a number of social objectives this Policy will have no significant effects.

Overall economic effects

It is thought that promoting sustainability and a robust and accessible green infrastructure is an important aspect of promoting Norwich as an attractive location to live, invest and 'do business'. Thus, positive effects have been identified in terms of objective EC1, whilst it is not thought that there will be

significant effects in terms of other objectives.

Overall summary of effects

This Policy performs strongly in terms of a number of environmental objectives.

This Policy plays a key role in terms of setting a clear message regarding the importance of promoting and enabling sustainable patterns of transport and travel within new developments and the Greater Norwich Area more generally. However, because this is a cross-cutting objective, it is also addressed through a number of other Policies.

This Policy will also play a key role in terms of ensuring the built development supports efforts to mitigate climate change, and does not impact upon environmental assets.

'Environmental assets' are helpfully defined in the supporting text as comprising biodiversity, built heritage, ancient monuments and archaeology, geodiversity, and landscape character; as well as more general aspects such as the countryside and rural character, and the setting of Norwich, towns and villages, and the Broads. It is felt that this Policy should go some way towards ensuring protection of biodiversity assets, as well as promoting the aims of the Green Infrastructure Strategy. However, in terms of protecting 'landscape character' and heritage assets it is felt that this Policy could go further.

In terms of climate change mitigation, this Policy has been developed taking account of a recent Energy Study that looked at opportunities in the Sub-Region. These requirements are not overly ambitious, but are stricter than the requirements set by Central Government.

This Policy sets out requirements relating to water quality, flood risk and recycling that will all lead to positive effects, but suggestions are made regarding how the Policy wording might be strengthened.

It is thought that implementation of this Policy will have a range of beneficial secondary socio-economic effects.

Recommendations:

- 'Low impact' modes of travel might be considered to be slightly ambiguous. For example, a train line, guided bus route or even a bus route can have 'impacts' in some respects.
- The statement in the supporting text that: "*In appropriate urban locations car-free development will be promoted*" should be included in the main policy wording.
- Broaden the Policy to include a commitment to protecting the water environment more generally (perhaps also stating the particular importance of avoiding water quality impacts to the Natura 2000 network in order to avoid breaches to EU Law).
- Reword to 'seek to ensure ecosystem function and resilience to environmental change'. Alternatively, this statement could be removed from its current position and placed later in the Policy under the banner of 'protecting environmental assets'.
- It is thought that this Policy might be more appropriately titled "Addressing climate change and protecting environmental assets". The only topic that is addressed by this Policy that does not entirely fit well with this title is the issue of recycling and the use of 'sustainable' building materials. It is thought that these issues are of less significance at this strategic level of planning, but could still be 'tagged-on' to this Policy. Alternatively, these issues could

be addressed through the 'Promoting good design' Policy.

- Refer to 'conflicts with biodiversity objectives', rather than 'conflicts with biodiversity'
- Rather than focusing solely on protecting internationally important biodiversity, there could be some benefit to promoting a more balanced approach to protecting biodiversity in-line with the principles set out in the GI Strategy, but perhaps also stating that certain actions will be particularly important where HRA has identified that they are necessary to protect internationally important biodiversity.
- Refer to maintenance or enhancement of the 'local biodiversity baseline', rather than the 'status quo'.
- Consider making a stronger and more proactive statement regarding the maintenance and enhancement of heritage features and wider historic character. This Policy, with its emphasis on environmental assets, should perhaps set the high level principles that are implemented through other Area Wide Policies as well as Policies for Places.
- Rather than 'adapted to weather extremes', it may be more appropriate to refer to 'adapted to a changing climate and more extreme weather'
- There may be some benefit to expanding on this statement regarding flood-risk, including through relating flood-risk to the implementation of SuDS.
- There could be some benefit to adding further detail regarding the approach that is expected in terms of recycling. For example, it might be stated that: 'all developments must design-in facilities for the segregation and storage of waste both for private use within dwellings and for communal use, with the aim of maximising the efficiency and effectiveness of recycling'.

Policy 2 - Promoting good design				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	<p>This Policy supports the aims of Policy 1 regarding promoting sustainable transport, by requiring the design of development to take account of established principles, i.e. 'highway design principles that do not prioritise the movement function of streets at the expense of quality of place'; and principles of 'public transport oriented design'.</p> <p>It is thought that requiring developers to demonstrate how they will adhere to certain principles is an appropriate approach. However, there could be some benefit to discussing 'principles' further in the background text in order to add clarity to readers who are non-experts.</p>
ENV 2 To improve the quality of the water environment.	?	?	?	<p>This Policy identifies "<i>The need to design development to avoid harmful impacts on key environmental assets and, in particular SACs, SPAs and Ramsar sites</i>"</p> <p>However, it is not clear what implications this has for designing in features such as SuDS, which will help to prevent water pollution runoff from development.</p>
ENV 3 To improve environmental amenity, including air quality.	+	+	+	<p>This Policy requires the design of development to take account of. 'highway design principles that do not prioritise the movement function of streets at the expense of quality of place'.</p> <p>It is thought that this is a strong statement, which should lead to benefits in terms of environmental quality.</p> <p>Recommendation: There could be some benefit to highlighting the importance of good design seeking to ensure environmental quality in terms of air pollution and noise / soundscapes in particular (these two elements of environmental quality can be brought into particular focus where development seeks to incorporate on-site low/zero carbon energy generation).</p>
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	<p>This Policy identifies "<i>The need to design development to avoid harmful impacts on key environmental assets and, in particular SACs, SPAs and Ramsar sites</i>"</p> <p>It is not clear that it is appropriate to emphasise the importance of protecting internationally important biodiversity sites through good design, at the expense of other assets that are perhaps more likely to be significantly impacted as a result of 'design decisions'.</p> <p>Recommendation: Consider removing the emphasis on protecting international important biodiversity through good design, or highlighting that this will only need to be a priority in some respects (i.e. water quality) or in</p>

				some instances (i.e. where there a development is in close proximity to an internationally designated site).
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	+	+	+	<p>Recommendation: A number of principles are mentioned. It is thought that each is likely to be suitably proactive, but that clarity could be increased by further discussion in the background text (e.g. ‘the rural/urban transition’ and ‘gateways’). In the background text there is a need to define what is meant by ‘the principles of urban design’.</p> <p>The Policy refers to ‘local distinctiveness’ and ‘sense of place’. This is considered to be suitably proactive terminology.</p> <p>It is thought that the first four bullet points should, taken together, lead to a suitably proactive approach to maintaining and enhancing the quality of landscapes, townscapes and the historic environment, and thus local distinctiveness and sense of place. It is thought particularly useful that the Policy refers to specific local priorities.</p> <p>Recommendation: It may be helpful for the Policy to be structured differently, so that design principles for new development (e.g. sustainable transport, designing out crime, designing a public realm and open space that supports community cohesion and inclusion) are promoted before then stating the importance of protecting and integrating existing environmental assets.</p> <p>Recommendation: There could be some benefit to highlighting the relationship between good location, good masterplanning and good design in terms of achieving the objectives and principles set out in the Policy.</p> <p>It is thought that the 3 specific requirements that are made of developments (according to their type and size) are suitably stringent and ambitious, and should help to achieve many of the principles that are listed in the Policy above.</p> <p>The Policy commits to using the Building for Life principles of good design, as defined by CABI. It is important to be clear and transparent about this. This is well established and well regarded standard, which has been adopted within the Eco-towns PPS (i.e. any eco-town must meet Building for Life standards). Another standard that is now sometimes being promoted as an alternative is ‘BREEAM Communities’.</p> <p>It is useful that the background text refers to the need for Design and Access Statements to take account of such things as Landscape Character Assessments and Conservation Area appraisals.</p> <p>It is noted that the background text highlights the important link between implementation and masterplanning/design.</p> <p>It is not clear that it is necessary to promote ‘landscaping’, as this is a means to an end rather than an end in itself (unlike the preceding four points).</p> <p>Recommendation: Consider removing the point regarding landscaping, so that this does not detract from issues of greater strategic importance.</p>

				<p>It is thought appropriate to give strategic direction regarding public art, but there could be benefits to giving further guidance</p> <p>Recommendation: Consider giving further guidance regarding public art (so that, for example, there is a consistent approach / theme where this might be beneficial) or committing to examining this further through the LDF.</p> <p>Recommendation: It may be more appropriate to refer to 'traditional and locally sourced materials', rather than 'sustainable and traditional materials'.</p>
ENV 6 To adapt to and mitigate against the impacts of climate change.	+	+	+	See discussion of sustainable transport and travel under ENV1
ENV 7 To avoid, reduce and manage flood risk.	?	?	?	This Policy does not identify designing out flood risk as a strategic priority.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy does not identify designing in water efficiency measures as a strategic priority.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	?	?	?	<p>This Policy does not identify designing in recycling facilities as a strategic priority.</p> <p>Recommendation: Consider promoting innovative approaches to waste storage and segregation as an integral part of the urban realm.</p>
SOC 1 To reduce poverty and social exclusion.	+	+	+	The supporting text highlights the importance of 'making places better for people', although this is not identified as a priority through the Policy itself.
SOC 2 To maintain and improve the health of the whole population and	+	+	+	The supporting text highlights the importance of 'making places better for people', although this is not identified as a priority through the Policy itself.

promote healthy lifestyles.				
SOC 3 To improve education and skills.	0	0	0	This Policy will not directly result in any significant effect in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	0	0	0	This Policy will not directly result in any significant effect in terms of this objective.
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	The Policy makes reference to designing out crime. Recommendation: Consider requiring good design to <i>demonstrate how that have taken account of principles of designing out crime</i>
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	This Policy will not directly result in any significant effect in terms of this objective.
SOC 7 To improve the quality of where people live.	+	+	+	The supporting text highlights the importance of 'making places better for people', although this is not identified as a priority through the Policy itself.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	The supporting text identifies that " <i>Masterplanning for large scale developments and areas of particular complexity, for example within the city centre must embrace the principles of urban design and also examine carefully the means by which development including infrastructure can be progressed logically and implementation in full can be ensured.</i> "
EC 1 To encourage sustained economic growth.	+	+	+	The supporting text highlights that " <i>The quality of the local environment plays a crucial role in the economic success of the area.</i> " However, this is not highlighted as a strategic priority through the Policy itself.

EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	The supporting text highlights that “ <i>The quality of the local environment plays a crucial role in the economic success of the area.</i> ” However, this is not highlighted as a strategic priority through the Policy itself.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effect in terms of this objective.
EC 4 To improve the social and environmental performance of the economy.	0	0	0	This Policy will not directly result in any significant effect in terms of this objective.

Summary

Overall environmental effects

This Policy performs well in terms of the majority of environmental objectives. Effects are highlighted as questionable for two objectives as a result of the Policy being silent on two specific issues, namely the need to design in Sustainable Drainage Systems and the need to design in recycling facilities. This Policy performs particularly well in terms of ENV5 (landscapes, townscapes and the historic environment).

Overall social effects

This Policy performs well in terms of a number of social objectives. Although not addressed explicitly by the Policy, it is thought that there will be a range of social benefits as a result of creating an attractive urban realm and deigning new developments to have a strong ‘sense of place’. In terms of other social objectives it is less likely that this Policy will result in direct significant effects.

Overall economic effects

It is thought that promotion of good design can play a role in supporting the economic objectives that have been identified for Greater Norwich. As highlighted through the supporting text of the Policy: “*The quality of the local environment plays a crucial role in the economic success of the area.*”

Overall summary of effects

This Policy supports the aims of Policy 1 regarding promoting sustainable transport, by requiring the design of development to take account of established principles, i.e. ‘highway design principles that do not prioritise the movement function of streets at the expense of quality of place’ and principles of ‘public

transport oriented design’.

Perhaps the strongest benefits of this Policy relate to objective ENV5 (landscapes, townscapes and the historic environment) as this Policy sets out clearly that development must take account of existing landscape and historic character and townscape. It is thought that this Policy should go some way towards ensuring that new developments are ‘distinctive’, with a strong ‘sense of place’. This can lead to benefits in terms of social cohesion and community inclusiveness. The background text identifies the importance of ‘making places better for people’ and also highlights that “*The quality of the local environment plays a crucial role in the economic success of the area.*” It is thought particularly beneficial that the Policy makes a number of specific requirements of developers in terms of certain standards and principles that must be adhered to (including CABI’s ‘Building for Life’ standard).

Recommendations

- There could be some benefit to highlighting the importance of good design seeking to ensure environmental quality in terms of air pollution and noise / soundscapes in particular (these two elements of environmental quality can be brought into particular focus where development seeks to incorporate on-site low/zero carbon energy generation).
- Consider removing the emphasis on protecting international important biodiversity through good design, or highlighting that this will only need to be a priority in some respects (i.e. water quality) or in some instances (i.e. where there a development is in close proximity to an internationally designated site).
- A number of principles are mentioned. It is thought that each is likely to be suitably proactive, but that clarity could be increased by further discussion in the background text (e.g. ‘the rural/urban transition’ and ‘gateways’). In the background text there is a need to define what is meant by ‘the principles of urban design’.
- It may be helpful for the Policy to be structured differently, so that design principles for new development (e.g. sustainable transport, designing out crime, designing a public realm and open space that supports community cohesion and inclusion) are promoted before then stating the importance of protecting and integrating existing environmental assets.
- There could be some benefit to highlighting the relationship between good location, good masterplanning and good design in terms of achieving the objectives and principles set out in the Policy.
- Consider removing the point regarding landscaping, so that this does not detract from issues of greater strategic importance.
- Consider giving further guidance regarding public art (so that, for example, there is a consistent approach / theme where this might be beneficial) or committing to examining this further through the LDF.
- It may be more appropriate to refer to ‘traditional and locally sourced materials’, rather than ‘sustainable and traditional materials’.
- Consider requiring good design to *demonstrate how that have taken account of principles* of designing out crime.
- Consider promoting innovative approaches to waste storage and segregation as an integral part of the urban realm.

Policy 3 - Energy, water and ICT				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	Access to high-speed broadband will have positive effects in terms of encouraging home-working and reducing car journeys to access services that can instead be accessed on-line.
ENV 2 To improve the quality of the water environment.	+	+	+	This Policy recognises that there are particular ways in which development (and development in certain locations) can impact on and be constrained by the water environment. It sets stringent requirements which (in conjunction with Policy 1) should protect the water environment. The Policy takes account of the findings of the Water Cycle Study.
ENV 3 To improve environmental amenity, including air quality.	+	+	+	Community based energy generation, particularly biomass fuelled CHP, can lead to local air quality effects. However, this Policy promotes ample scope for off-site energy generation. Furthermore, it is likely that, where there is local CHP energy generation, any effects can be avoided (through careful location) and/or mitigated.
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	See discussion under ENV2.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	0	0	0	Energy generation schemes can have implications for landscape and townscape character. However, it is likely that careful design (as promoted through Policy 2) can avoid and mitigate effects.
ENV 6 To adapt to and mitigate against the impacts	+	+	+	The Policy wording and the background text go into considerable detail regarding the most appropriate way to achieve low and zero carbon development, taking account of the findings of the Energy Study. There is a major emphasis on setting up the measures that will be required for successful implementation, including

of climate change.				<p>establishment of a Carbon infrastructure fund and Energy Service Companies (ESCOs), preferably with community ownership. This is considered to be important and appropriate strategic guidance.</p> <p>Recommendation: Provide some further justification as to why there is not a preference for on-site renewable / low carbon energy generation (including CHP and district heating networks).</p>
ENV 7 To avoid, reduce and manage flood risk.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	+	+	+	See discussion of energy under ENV6
SOC 1 To reduce poverty and social exclusion.	+	+	+	Access to broadband can help to alleviate issues of social exclusion. The requirement that all new development must demonstrate how it contributes to ICT objectives is thought to be a suitably stringent and proactive approach.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 3 To improve education and skills.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 4 To provide	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

the opportunity to live in a decent, suitable and affordable home.				
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 7 To improve the quality of where people live.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	Access to high-speed broadband provides a means of accessing services
EC 1 To encourage sustained economic growth.	+	+	+	Access to high-speed broadband will be an important factor in terms of attracting investment.
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	Access to high-speed broadband will be an important factor in terms of attracting investment.
EC 3 To encourage efficient patterns of	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

movement in support of economic growth.				
EC 4 To improve the social and environmental performance of the economy.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
Summary				
Overall environmental effects				
This Policy will result in significant benefits in terms of ENV3 (quality of the water environment) and ENV6 (climate change mitigation). It is also highlighted that promoting access to high speed broadband will have benefits in terms of reducing the need to travel.				
Overall social effects				
This Policy can be seen to have indirect social benefits as access to broadband can help to alleviate issues of social exclusion.				
Overall economic effects				
This Policy can be seen to have indirect economic benefits as access to high-speed broadband will be an important factor in terms of attracting investment.				
Overall summary of effects				
This Policy addresses three specific issues that are seen as particular priorities, namely the need to ensure that new developments draw their energy from renewable and low carbon sources; the need to ensure that development is supported by sufficient waste water treatment capacity (and thus avoids water pollution); and a requirement to ensure access to 'fast broadband' within new developments.				
In terms of energy requirements, the Policy wording and the background text go into considerable detail regarding the most appropriate way to achieve low and zero carbon development, taking account of the findings of the Energy Study. There is a major emphasis on ensuring that measures are in place that will allow successful implementation, including establishment of a Carbon Infrastructure Fund and the establishment of Energy Service Companies(preferably with community ownership). This is considered to be important and appropriate strategic guidance.				
In terms of water quality, this Policy recognises that there are particular ways in which development (and development in certain locations) can impact upon, and be constrained by, the water environment. It sets stringent requirements which (in conjunction with Policy 1) should protect the water environment. The Policy takes account of the findings of the Water Cycle Study.				
It is considered appropriate that the Core Strategy should give strategic guidance regarding access to broadband as this can lead to wide-ranging socio-economic benefits, and also can be seen to support efforts to reduce the need to travel.				

Recommendations

- Provide some further justification as to why there is not a preference for on-site renewable / low carbon energy generation (including CHP and district heating networks).

Policy 4 - Cultureleisure andentertainment				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 2 To improve the quality of the water environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	Recommendation: The Policy could benefit from making a connection to the implementation of the GI Strategy.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	0	0	0	This Policy states that “ <i>Cultural heritage will be enriched through use of innovative design and art in the public realm</i> ”. It is not clear how this acts to support the discussion of heritage and public art set out in Policy 2.
ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

ENV 7 To avoid, reduce and manage flood risk.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 3 To improve education and skills.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	It is helpful that the Policy and background text sets out some existing 'cultural assets and leisure facilities' that are valued and sets specific priorities for the area. Added detail such as this should help to ensure that the Policy is interpreted from a perspective of seeking to maintain and enhance the local sustainability baseline. Recommendation: Substitute 'cultural life' for 'cultural offer'.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+	+	+	Promotion of cultural, leisure and entertainment facilities will lead to a diverse range of employment opportunities
SOC 7 To improve the quality of where people live.	+	+	+	This Policy will have positive effects in terms of the quality of local open space and the satisfaction of people with their neighbourhoods.
SOC 8 To improve accessibility to essential services, facilities and jobs.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 1 To encourage sustained economic growth.	+	+	+	Capitalising on existing strengths, and promoting targeted new cultural, leisure and entertainment facilities and schemes will undoubtedly play an important role in enhancing Norwich's image as a good place to live, invest and 'do business'.
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	See discussion under EC1
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

EC 4 To improve the social and environmental performance of the economy.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
Summary				
<p>Overall environmental effects</p> <p>This Policy is not associated with significant environmental effects, although it is noted that this Policy can support Policy 2 (Promoting good design) in terms of creating high quality 'places'.</p>				
<p>Overall social effects</p> <p>A Policy relating to culture, leisure and entertainment can play an important role in terms of building community identity.</p>				
<p>Overall economic effects</p> <p>Capitalising on existing strengths, and promoting targeted new cultural, leisure and entertainment facilities and schemes will undoubtedly play an important role in enhancing Norwich's image as a good place to live, invest and 'do business'.</p>				
<p>Overall summary of effects</p> <p>A Policy relating to culture, leisure and entertainment can play an important role in terms of ensuring a strong 'sense of place' and building community identity. It is helpful that the Policy and background text sets out some existing 'cultural assets and leisure facilities' that are valued and sets specific priorities for the area. Added detail such as this should help to ensure that the Policy is interpreted from a perspective of seeking to maintain and enhance the local sustainability baseline. It is also recognised that capitalising on existing strengths, and promoting targeted new cultural, leisure and entertainment facilities and schemes will play an important role in terms of enhancing Norwich's image as a good place to live, invest and 'do business'.</p>				
<p>Recommendations</p> <ul style="list-style-type: none"> • The Policy could benefit from making a connection to the implementation of the GI Strategy. • Substitute the term 'cultural life' for 'cultural offer'. 				

Policy 5 – Supporting communities				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	This Policy seeks to ensure that services and facilities are locally accessible. Thus, this Policy supports Policies 1, 2 and 8 as well as the Policies for places will play a role in terms of the achievement of this objective.
ENV 2 To improve the quality of the water environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 7 To avoid, reduce and manage	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

flood risk.				
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	+	+	+	<p>Addressing health, education, crime and community cohesion as part of new development will have wide-ranging positive social effects.</p> <p>Recommendation: It is thought that the word 'holistic' should be used with caution, as the achievement of sustainable communities involves more than just the delivery of accessible services and facilities (which would appear to be the focus of this Policy).</p> <p>Recommendation: Rather than "<i>the quality of life and well being of communities</i>", it may be better to refer to "<i>quality of life and the well being of communities</i>"</p>
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	+	+	+	<p>This Policy has a focus on achieving good health through spatial planning, in particular through ensuring good access to health facilities.</p> <p>Recommendation: The general approach to supporting communities might be communicated more clearly, i.e. that there will be a proactive approach to improving health / preventing illness (linked to other policy); as well as delivering facilities such as healthcare and retirement homes (which are usefully identified as a priority)</p> <p>Recommendation: It is thought that designing in opportunities for social interaction is more likely to result in benefits in terms of community cohesion than in terms of health.</p>
SOC 3 To improve education and skills.	+	+	+	It is useful that the Policy refers to the need to promote Norwich as a 'learning city'. Added detail such as this should help to ensure that the Policy is interpreted from a perspective of seeking to maintain and enhance the local sustainability baseline.
SOC 4 To provide the opportunity to live	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

in a decent, suitable and affordable home.				
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	Addressing health, education, crime and community cohesion as part of new development will have an important role to play in terms of the achievement of this objective.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 7 To improve the quality of where people live.	+	+	+	Addressing health, education, crime and community cohesion as part of new development will have an important role to play in terms of the achievement of this objective.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	The background text includes a useful discussion of mechanisms for the delivery of community infrastructure.
EC 1 To encourage sustained economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 2 To encourage and accommodate both indigenous and inward investment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

EC 4 To improve the social and environmental performance of the economy.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
Summary				
<p>Overall environmental effects</p> <p>This Policy seeks to ensure that services and facilities are locally accessible. Thus, this Policy supports Policies 1, 2 and 8 as well as the Policies for Places in terms of the achievement of objective ENV1 (sustainable transport).</p>				
<p>Overall social effects</p> <p>Addressing health, education, crime and community cohesion as part of new development will have wide-ranging positive social effects.</p>				
<p>Overall economic effects</p> <p>This Policy will not directly result in any significant effects in terms of economic objectives.</p>				
<p>Overall summary of effects</p> <p>This Policy has wide ranging social benefits as a result of seeking to ensure accessibility to essential services and facilities as well as seeking to promote good health and community cohesion through other mechanisms. It is useful that the Policy refers to particular priorities, including reference to promoting Norwich as a 'learning city'. Added detail such as this should help to ensure that the Policy is interpreted from a perspective of seeking to maintain and enhance the local sustainability baseline.</p>				
<p>Recommendations</p> <ul style="list-style-type: none"> • It is thought that the word 'holistic' should be used with caution, as the achievement of sustainable communities involves more than just the delivery of accessible services and facilities (which would appear to be the focus of this Policy). • Rather than "<i>the quality of life and well being of communities</i>", it may be better to refer to "<i>quality of life and the well being of communities</i>" • The general approach to supporting communities might be communicated more clearly by firstly setting out that there will be a proactive approach to improving health / preventing illness (linked to other policy); and then identifying that there is also a need to support communities through ensuring good access to facilities such as healthcare and retirement homes (which are usefully identified as a priority). • It is thought that designing in opportunities for social interaction is more likely to result in benefits in terms of community cohesion than in terms of health. 				

Policy 6 - The economy				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 2 To improve the quality of the water environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

ENV 7 To avoid, reduce and manage flood risk.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 3 To improve education and skills.	+	+	+	The Policy includes a good degree of specificity regarding local priorities for achieving skills and education objectives.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 7 To improve the quality of where people live.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 8 To improve accessibility to essential services, facilities and jobs.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 1 To encourage sustained economic growth.	+	+	+	<p>This is a useful policy that could potentially be structured differently in order to aid interpretation. The context is that the economy has the potential to grow, and it should be made clear that the role of the Core Strategy has a key facilitatory and regulatory role to play in terms of ensuring that there is particular focus on the knowledge economy and tourism, as well as through such things as promoting connectivity, the environment and protecting small businesses.</p> <p>In terms of the proposals for promoting tourism, leisure, green and cultural industries, some relatively important points are made, including the commitment to a 'cultural cluster'</p>
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	<p>The commitments to support farmers markets and promote the development of a 'food and farming hub' are welcomed and likely to be a suitable approach given the sustainability context in surrounding rural parts of Norfolk.</p> <p>Recommendation: Consider the relationship between farmers markets a 'food and farming hub'</p> <p>Recommendation: The reference to a 'food and farming hub' may require some further background explanation.</p>

				Recommendation: It is thought that the point regarding “ <i>promoting the development of appropriate new and expanded businesses</i> ” requires further explanation.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 4 To improve the social and environmental performance of the economy.	+	+	+	This is a useful policy that could potentially be structured differently in a way that aids interpretation. The context is that the economy has the potential to grow, and it should be made clear that the role of the Core Strategy has a key facilitatory and regulatory role to play in terms of ensuring that there is particular focus on the knowledge economy and tourism, as well as through such things as promoting connectivity, the environment and protecting small businesses.
Summary				
Overall environmental effects				
This Policy will not directly result in any significant effects in terms of environmental objectives.				
Overall social effects				
The Policy includes a good degree of specificity regarding local priorities for achieving skills and education objectives. It is not thought that there will be significant effects in terms of other social objectives.				
Overall economic effects				
This Policy seeks to guide the economic growth that will be seen in the Greater Norwich area over coming years, with an emphasis on ensuring sustainable growth.				
Overall summary of effects				
This Policy plays a key role in terms of facilitating and regulating economic growth. There is an emphasis on ensuring a focus on developing the knowledge economy and tourism and ensuring that the economy does not grow in a way that is detrimental to the environment or small businesses. The Policy promotes a range of specific measures including promoting a ‘cultural cluster’ and a ‘food and farming hub’.				
Recommendations				
<ul style="list-style-type: none"> The reference to a ‘food and farming hub’ may require some further background explanation. 				

- Consider the relationship between farmers markets a 'food and farming hub'
- It is thought that the point regarding "*promoting the development of appropriate new and expanded businesses*" requires further explanation.

Policy 7 – Housing delivery				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 2 To improve the quality of the water environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

ENV 7 To avoid, reduce and manage flood risk.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	+	+	+	Meeting housing need, particularly acute housing need, will be an important factor in terms of achieving this objective.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	+	+	+	Meeting housing need, particularly acute housing need, will be an important factor in terms of achieving this objective.
SOC 3 To improve education and skills.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	+	+	+	This Policy sets out an approach to meeting housing need in the area that appears to be carefully thought-out and based on robust use of evidence. In particular, transparency is greatly increased as a result of considerable detail being provided in the background text. With regard to delivery of affordable housing, the headline standard that affordable housing must be provided on development sites of 5 or more dwellings (or 0.2 hectare or more) is a stringent approach. The supporting

				<p>text gives a reasoned justification for the approach taken.</p> <p>With regard to setting requirements on developers to deliver affordable housing there has been an increasing realisation over the past year or so that issues of financial viability must also be considered. There is a need for Policy to allow some degree of flexibility to account for issues of financial viability. This Policy does this, going into some detail on the issue (both in the Policy and background text), which should ensure that there are no 'loopholes' that might be exploited by developers who would seek to avoid providing affordable housing.</p> <p>With regard to Gypsies and Travellers, this Policy sets out the number of pitches that should be allocated to each district. It is notable that South Norfolk District is allocated significantly more pitches than the other two Districts. Norwich is also allocated a relatively large number of pitches for its size. It is thought that this spatial distribution is likely to make some sense from a perspective of meeting the locational needs of the Gypsy and Traveller, as Broadland can be considered to be the most isolated of the three authorities (i.e. it is more difficult to access other parts of the country).</p> <p>Recommendation: There is a need to set out the evidence base that has been used to determine Gypsy and Traveller and Travelling show people allocations.</p> <p>It is considered very beneficial that the Policy states that "<i>Some sites are expected to be provided in association with large scale strategic housing growth</i>". It is suggested that this could be strengthened, however, by a commitment to ensuring that 'a significant proportion of new pitches' will come forward alongside new development, or that 'all new developments must consider the potential for Gypsy and Traveller pitch provision'. This approach would be in-line with the approach being taken elsewhere, including South Cambridgeshire. However, it is recognised that timing must be a key consideration (i.e. need must be met as a priority, and so it may not be possible to wait for new developments to come forward).</p> <p>Recommendation: Consider making a stronger commitment regarding bringing forward Gypsy and Traveller sites alongside major housing developments.</p> <p>Recommendation: It may be important to note that 'Generally sites will not have more than 10 to 12 pitches in order to meet the preferences of the Gypsy and Traveller community for smaller sites'.</p>
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	This Policy will result in a good social mix within communities.
SOC 6 To offer more opportunities for rewarding and	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

satisfying employment for all.				
SOC 7 To improve the quality of where people live.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 8 To improve accessibility to essential services, facilities and jobs.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 1 To encourage sustained economic growth.	+	+	+	This Policy sets requirements on developers to deliver housing at below market prices (affordable housing), but also builds in a degree of flexibility to take account of issues of financial viability.
EC 2 To encourage and accommodate both indigenous and inward investment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 4 To improve the social and environmental performance of the economy.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
Summary				
Overall environmental effects				
This Policy will not directly result in any significant effects in terms of environmental objectives.				

Overall social effects

Meeting housing need, particularly acute housing need, will be an important factor in terms of achieving social objectives.

Overall economic effects

This Policy sets requirements on developers to deliver housing at below market prices (affordable housing), which can have the effect of discouraging investment from housing developers. However, the Policy also builds in a degree of flexibility to take account of issues of financial viability.

Overall summary of effects

This Policy sets out an approach to meeting housing need in the area that appears to be carefully thought-out and based on robust use of evidence. In particular, transparency is greatly increased as a result of considerable detail being provided in the background text.

With regard to delivery of affordable housing, the headline standard that affordable housing must be provided on development sites of 5 or more dwellings (or 0.2 hectare or more) is a stringent approach. The supporting text gives a reasoned justification for the approach taken.

With regard to setting requirements on developers to deliver affordable housing there has been an increasing realisation over the past year or so that Policies should also take into account issues of financial viability so as not to discourage investment from housing developers. This Policy does so by building in a degree of flexibility with regard to affordable housing requirements that are made of developers. The Policy goes into some detail on the issue (both in the Policy and background text), which should ensure that there are no 'loopholes' that might be exploited by developers who would seek to avoid providing affordable housing.

With regard to Gypsies and Travellers, this Policy sets out the number of pitches that should be allocated to each district. It is notable that South Norfolk District is allocated significantly more pitches than the other two Districts. Norwich is also allocated a relatively large number of pitches for its size. It is thought that this spatial distribution is likely to make some sense from a perspective of meeting the locational needs of the Gypsy and Traveller as Broadland can be considered to be the most isolated of the three authorities (i.e. it is more difficult to access other parts of the country).

It is considered very beneficial that the Policy states that "*Some sites are expected to be provided in association with large scale strategic housing growth*". It is suggested that this could be strengthened, however, by a commitment to ensuring that 'a significant proportion of new pitches' will come forward along-side new development, or that 'all new developments must consider the potential for Gypsy and Traveller pitch provision'. This approach would be in-line with the approach being taken elsewhere in the Country (e.g. South Cambridgeshire District). However, it is recognised that timing must be a key consideration (i.e. need must be met as a priority, and so it may not be possible to wait for new developments to come forward).

Recommendations

- There is a need to set out the evidence base that has been used to determine Gypsy and Traveller and Travelling show people allocations.
- Consider making a stronger commitment regarding bringing forward Gypsy and Traveller sites alongside major housing developments.
- It may be important to note that 'Generally sites will not have more than 10 to 12 pitches in order to meet the preferences of the Gypsy and Traveller community for smaller sites'.

- Consider strengthening the commitment relating to bringing forward Gypsy and Traveller sites alongside major housing developments.

Policy 8 - Access and transport				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	<p>This Policy, together with several other Area Wide Policies, should help to ensure that there is a focus on minimising dependency on the private car amongst residents of new developments. It might be helpful if this message was made clearer and in one place, however, it is recognised that this is difficult as it is a cross-cutting objective that does involve planning for 'sustainability', 'good design', 'accessible services', and other topics.</p> <p>Recommendation: One key area of concern relates to whether the NDR, which is promoted through this Policy, would discourage residents of the North East Growth Triangle from adopting lifestyles based largely around the use of public transport as well as walking and cycling. It will be of great importance to ensure that the NDR does not have this effect, and to achieve this by designing in ambitious measures that will encourage residents to meet more of their needs locally by sustainable modes of travel, and that also allow ease of access to Norwich by rapid public transport. It will be important that the NDR only comes forward if its necessity can still be demonstrated after taking into an assumption of low car dependency amongst residents of the Growth Area.</p> <p>The Policy recognises that it is difficult or impossible for the Core Strategy to address private car dependency in rural areas. However, helpfully the Policy recognises the important role that park-and-ride can play in reducing negative effects on Norwich City Centre.</p> <p>The Policy also promotes other measures that should help to address rural car dependency, including innovative approaches to public transport and a focus on public transport to key service centres. The settlement hierarchy and the policies for places that implement it have an important role to play in ensuring that growth is directed to those areas where there is the greatest potential to encourage sustainable transport patterns.</p> <p>Recommendation: Rural car dependency will remain a sustainability problem into the future. It will be important that means of monitoring and addressing rural car dependency must be a continued focus going forward.</p>
ENV 2 To improve the quality of the water environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

ENV 3 To improve environmental amenity, including air quality.	+	+	+	Promotion of sustainable transport patterns will have a key role to play in the achievement of this objective. Furthermore, this Policy promotes two major transport infrastructure projects, both of which are promoted as being able to create benefits in terms of environmental quality through removing traffic from local roads.
ENV 4 To maintain and enhance biodiversity and geodiversity.	?	?	?	Infrastructure improvements that are promoted include two new stretches of road and two major road-widening projects. These have the potential to result in environmental impacts. However, there is little certainty regarding such impacts at this stage.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	?	?	?	Infrastructure improvements that are promoted include two new stretches of road and two major road-widening projects. These have the potential to result in environmental impacts. However, there is little certainty regarding such impacts at this stage.
ENV 6 To adapt to and mitigate against the impacts of climate change.	+	+	+	Reducing transport related emissions are a key means by which the Core Strategy can help to mitigate climate change.
ENV 7 To avoid, reduce and manage flood risk.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

production.				
SOC 1 To reduce poverty and social exclusion.	+	+	+	Promotion of good transport links and good accessibility to services and facilities will have wide ranging social benefits.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	+	+	+	Promotion of good transport links and good accessibility to services and facilities will have wide ranging social benefits.
SOC 3 To improve education and skills.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 7 To improve the quality of where	+	+	+	Promotion of good transport links and good accessibility to services and facilities will have wide ranging social benefits.

people live.				
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	This Policy, along with a range of other Policies, seeks to ensure that development comes forward in close proximity to services.
EC 1 To encourage sustained economic growth.	+	+	+	<p>The background text identifies and clearly sets out the importance of improving strategic access. Improved strategic access is likely to have wide-ranging benefits in terms of supporting sustainable growth in the sub-region.</p> <p>The Policy and background text identify a number of strategic transport priorities. Although it is the case that their delivery is in many instances dependent on decisions to be made by outside agencies such as Network Rail and the Highways Agency, it is helpful to describe them here in the Core Strategy, so that a true picture can evolve of what growth in the Sub-Region will involve.</p> <p>Recommendation: Infrastructure improvements that are promoted include two new stretches of road and two major road-widening projects. Although the Policy and background text provide justification for these projects, there could also be some benefit to stating any potential negative effects that must be a focus of mitigatory measures.</p>
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	See discussion under SOC1.
EC 3 To encourage efficient patterns of movement in support of economic growth.	+	+	+	This Policy promotes “ <i>Continued investigation of and support for rail freight opportunities.</i> ”
EC 4 To improve the social and environmental performance of the economy.	+	+	+	This Policy seeks to ensure that economic growth can proceed without traffic and congestion worsening.

Summary

Overall environmental effects

It is thought that, despite the fact that this strategy for access and transport does include the promotion of new road infrastructure, the overriding effect will be to support wider efforts to reduce car dependency and promote more sustainable travel patterns within Greater Norwich. There is also an emphasis on measures to reduce the environmental effects of congestion. It is identified that infrastructure improvements are promoted that do have the potential to result in environmental impacts. However, there is little certainty regarding such impacts at this stage.

Overall social effects

Promotion of good transport links and good accessibility to services and facilities will have wide ranging social benefits. Furthermore, this Policy (along with a range of other Policies) seeks to ensure that development comes forward in close proximity to services.

Overall economic effects

Improved strategic access is likely to have wide-ranging benefits in terms of supporting sustainable growth in the Sub-Region.

Overall summary of effects

This Policy, together with several other Area Wide Policies, should help to ensure that there is a focus on minimising dependency on the private car and promoting more sustainable patterns of travel amongst residents of new developments. Ideally, it would be possible to deliver this message in one Policy, rather than through a number of different Area Wide Policies. However, it is recognised that this is difficult as it is a cross-cutting objective that does involve planning for 'sustainability', 'good design', 'accessible services', and other topics.

The Policy recognises that it is difficult or impossible for the Joint Core Strategy to address private car dependency in rural areas. However, helpfully the Policy recognises the important role that park-and-ride can play in reducing negative effects on Norwich City Centre. The Policy also promotes other measures that should help to address rural car dependency, including innovative approaches to public transport and a focus on public transport to key service centres. Achievement of these aims should be supported by the Settlement Hierarchy and the Policies for Places that implement it, as the Settlement Hierarchy has an important role to play in ensuring that growth is directed to those areas where there is the greatest potential to encourage sustainable travel patterns.

The Policy and background text identify a number of strategic priorities. Although it is the case that their delivery is in many instances dependent on decisions to be made by outside agencies such as Network Rail and the Highways Agency, it is helpful to describe them here in the Core Strategy, so that a true picture can evolve of future growth in the Sub-Region.

Recommendations

- One key area of concern relates to whether the NDR, which is promoted through this Policy, would preclude sustainable patterns of travel and transport associated with the North East Growth Triangle. It will be of great importance to ensure that the NDR does not have this effect. It is suggested that this highlights the importance of designing in ambitious measures that encourage residents to meet more of their needs locally by sustainable modes of travel, and that also allow ease of access to Norwich by rapid public transport. When considering the necessity for the NDR it

should be possible to assume minimal use of this road by residents of the Growth Area.

- Rural car dependency will remain a sustainability problem into the future. It will be important that means of monitoring and addressing rural car dependency must be a continued focus going forward.
- Infrastructure improvements that are promoted include two new stretches of road and two major road-widening projects. Although the Policy and background text provide justification for these projects, there could also be some benefit to stating any potential negative effects that must be a focus of mitigatory measures at the project level.

Policy 9 - Strategy for growth in the Norwich Policy Area (NPA)				
SA Objective	Short-term	Medium-term	Long-term	Comments / Justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+/-	+/-	+/-	<p>This Policy sets out major locations for employment growth as well as setting out the broad distribution of housing (other Policy goes into more detail regarding housing delivery) and the key strategic transport infrastructure that will be required to support growth (which is also addressed in greater detail through other Policy).</p> <p>Growth will clearly have implications for the amount of travel and traffic in the Sub-Region. It is clear that some aspects of the spatial approach promoted through this Policy have been developed with the objective of allowing more sustainable patterns of travel at the forefront. However, the effects of some aspects of the strategy in terms of this objective are more questionable.</p> <p>There is a need to understand the specific proposals for sustainable access and transport before a judgement can be made regarding the overall performance of the growth strategy in terms of this objective. At this stage, however, it is useful to highlight one major question-mark that has been highlighted through the Sustainability Appraisal of growth options and remains a sustainability issues associated with this preferred growth strategy.</p> <p>This question relates to whether the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North East Norwich only) and the isolated nature of Long-Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport.</p> <p>Long-Stratton is remote from Norwich and it will not be possible to provide a Bus Rapid Transit Service (discussed further under Policy 12). Furthermore, it does not appear that Long-Stratton is well linked to a strategic employment location (Hethel is located about 6 miles away).</p>
ENV 2 To improve the quality of the water environment.	+	+	+	<p>The quantum of development proposed by this Policy has the potential to impact the sensitive water environment of the surrounding area, including the Broads. In particular, water quality could be impacted if there was not adequate sewerage capacity. However, Policy 3 seeks to ensure that there is adequate sewerage capacity.</p> <p>There is no evidence to suggest that this particular spatial growth strategy will lead to significant effects in terms of this objective that cannot be mitigated.</p>

ENV 3 To improve environmental amenity, including air quality.	+	+	+	<p>If it is assumed that the new development proposed by this Policy will facilitate low levels of car dependency, then there is little to suggest that the quantum of development proposed here will lead to significant effects in terms of environmental quality, either for neighbouring existing communities or for existing communities along transport routes.</p> <p>Nonetheless, removing traffic from existing villages and suburbs is given as a key justification for the NDR, and thus it must be assumed that it necessary largely as a result of existing traffic levels.</p> <p>Finally, in Long-Stratton, environmental quality as a result of transport passing through the village has been identified as a problem, and this Policy seeks to address this through promoting development that will then be able to fund a by-pass.</p>
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	<p>It is thought that the Implementation of the Green Infrastructure Strategy (in-line with Policy 1) should mean that development can come forward in the proposed locations whilst adding to the value of the local biodiversity baseline, and also increasing access to, and understanding of, biodiversity.</p> <p>It is clear that the development strategy has taken account of one of the key spatial biodiversity constraints, namely the river valleys. In particular, in South Norfolk the urban edge is defined by the Yare valley, which was a factor that was taken into account as part of the decision to rule out a large scale urban extension.</p>
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	?	?	?	<p>There is potential for negative effects. However, Policy 1 seeks to ensure that development is not detrimental to the 'environmental assets' of the Sub-Region, which it takes to include landscapes, townscapes and the historic environment. Furthermore, Policy 2 seeks to also protect such assets through good design. If these Policies are fully implemented, there is little to suggest the potential for significant negative effects in terms of this objective.</p>
ENV 6 To adapt to and mitigate against the impacts of climate change.	+/-	+/-	+/-	<p>Effects of growth on climate change mitigation are primarily related to the degree to which growth leads to reduced dependency on the private car. A number of the Area Wide Policies should support the achievement of reduced car dependency in new settlements. The implications of the spatial growth strategy for transport patterns and climate change mitigation are also discussed under Policy 12.</p> <p>The other significant consideration in terms of climate change mitigation is the degree to which the growth strategy supports low and zero carbon development. Policies 1 and 3 set requirements in this respect and so will help to ensure growth meets this objective. However, it is noted that the growth strategy does promote significant growth at smaller sites in the South Norfolk part of the NPA, where it will be more of a challenge (financially) to deliver low and zero-carbon development.</p> <p>In terms of climate change adaptation, the key consideration relating to the growth strategy relates to</p>

				flood risk (see discussion under ENV7), but there is also the urban heat island affect to consider. It is thought that this has been given sufficient consideration through Policies 1 and 2, and also that growth in-line with the Green Infrastructure Strategy should help to avoid or mitigate problems.
ENV 7 To avoid, reduce and manage flood risk.	+	+	+	The spatial growth strategy has been determined in accordance with the need to avoid areas at risk from flooding, as identified by the Strategic Flood Risk Appraisal recently undertaken for the Sub-Region.
ENV 8 To provide for sustainable use and sources of water supply.	-	-	-	Despite the fact that Policy 1 seeks to ensure that water efficiency measures are designed into all new residential an non-residential development, it is thought that the quantum of growth promoted through this Policy will exacerbate the pressure on the already stretched water resources of the East of England.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	+/-	+/-	+/-	The strategy promotes an appropriate level of further growth in Norwich City Centre and the surrounding urban area, which will ensure that the brownfield resource is suitably utilised. However, much of the proposed growth will be on greenfield land. Effects will be mitigated through the emphasis on relatively high densities of development. N.B. Energy efficiency and renewable energy is discussed under ENV6.
SOC 1 To reduce poverty and social exclusion.	0	+	+	Growth should lead to positive effects in terms of this objective as a result of leading to the development of affordable housing and increasing access to jobs and services. Benefits could be maximised by focusing development in locations where it might stimulate the regeneration of deprived areas. However, this has not been a priority consideration in the development of this spatial growth strategy. Some positive affects are likely to be felt only in the medium to long-term, once development has lead to funding becoming available for community infrastructure that can benefit the existing population.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	+	+	It is likely that much of the future development promoted through this Policy will be in locations where there is ample opportunity to allow good access to open space, green space and the wider countryside, in-line with the Green Infrastructure strategy and Policy 1. This should bring benefits in terms of health. Furthermore, a number of Policies seek to ensure that developments are planned with walking and cycling in mind. The lead-in time to prepare for growth and the supporting physical and green infrastructure means it will be several years before full benefits are felt. Despite forward funding of initial green infrastructure projects, short term impacts are predicted to be neutral.

SOC 3 To improve education and skills.	?	?	?	The general approach to achieving education and skills objectives alongside growth is described in Policy 5. Furthermore Policy 12 sets out the means of achieving adequate access to secondary schools at each major growth location, which is a key sustainability consideration. It should be possible to meet secondary school demand in some locations, although one or two question marks remain in South Norfolk (where the scale of individual growth locations will allow for the development of new secondary schools in optimum locations).
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	+/-	+/-	+/-	There is a need for growth in the Sub-Region to meet housing needs. Policy 7 should help to ensure that the full range of housing need is met. One point to note is that the delivery of affordable homes in Long Stratton may be constrained because of diversion of funding to the bypass (although it is also important to note that Long Stratton makes up only about 8% of the total housing to be delivered in the NPA). However, this is somewhat uncertain.
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	In the South Norfolk part of the plan area this strategy is focused less on large-scale new development locations and more on a dispersed pattern of growth based on existing communities. This might offer the opportunity for new development to use (and support) existing community facilities and activities and enhance the facilities for everyone. However, the dispersed pattern of growth in South Norfolk gives rise to uncertainties about arrangements for delivering some community facilities like secondary schools. Policies 2 and 5 should help to ensure that new developments are planned and designed in such a way that puts in place the opportunities for strong, cohesive and inclusive communities to develop.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+/-	+/-	+/-	Most of the locations for growth promoted through this option will be well-related to strategic employment locations and/or well-connected with them and the city centre, but one point that is immediately apparent is that Long Stratton is less well related or connected with strategic employment locations. Having said this, there are two major employers located within Long Stratton, and there will be further ancillary employment development as part of the growth strategy. A central feature of the JCS is the development of the knowledge economy as well as increasing aspirations and opportunities for people with a wide range of skills. The balance of strategic employment locations promoted through this Policy reflects this aspiration.
SOC 7 To improve the quality of where people live.	?	?	?	There is little evidence to suggest that the strategic locations of growth promoted by this Policy will lead to significant effects in terms of this objective, other than promotion of a by-pass at Long-Stratton (which will address identified environmental quality issues in the village centre).
SOC 8 To improve accessibility to	0	+/-	/-+	Much of the growth promoted through this option will be at major growth locations, which are likely to have good access to services, facilities and jobs, either as part of the development, at nearby

essential services, facilities and jobs.				<p>employment sites, or at nearby higher order centres. This is discussed further under Policy 12 (which sets out specific proposals for each major growth location).</p> <p>One important thing to note here, however, is that the scale of individual locations for growth does vary substantially, and so there must be more uncertainty regarding the achievement of this objective at some of the smaller locations for growth.</p> <p>However, much of the smaller scale growth promoted by this option is focused along the A11, and, as such, it should be possible to access services and facilities in nearby higher order settlements and employment locations, including (probably) via a high quality public transport service.</p> <p>In the case of Long Stratton, however, its isolation from other centres is noticeable, as is the fact that the bus link is relatively poor and a challenge to improve; and also that developer contributions to community infrastructure may be swallowed-up by the need to fund the by-pass. Having said this, a good range of services, facilities and employment opportunities do exist in Long Stratton and this will be expanded as part of the growth strategy.</p>
EC 1 To encourage sustained economic growth.	+	+	+	This Policy promotes strategic employment growth at a number of locations that have been chosen for their potential to support growth in key sectors (in line with Policy 6), as well as being well connected to Norwich, major growth locations and the wider region.
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	The scale and diverse nature of proposed employment growth proposed through this Policy should help to support Policy 6 and secure both indigenous growth and inward investment.
EC 3 To encourage efficient patterns of movement in support of economic growth.	+/-	+/-	+/-	It is notable that considerably different approaches are promoted for Wymonham and Long-Stratton – the two more isolated major growth locations. Wymondham will benefit from a new 15 ha employment allocation as well as expansion of activity at nearby Hethel Engineering Centre. Local employment opportunities for Long-Stratton, on the other hand, are not addressed through this Policy (Hethel is about 6 miles from Long-Stratton).
EC 4 To improve the social and environmental performance of the economy.	+	+	+	It is thought that the growth and supporting infrastructure promoted through this Policy should, on the whole, help to support a shift towards a knowledge based, yet diverse economy for the Sub-Region. This will be an important factor in terms of solidifying an image of being forward thinking and supportive of a sustainable form of growth.

Summary

Overall environmental effects

Mixed effects are predicted in terms of objective ENV1 (sustainable transport), ENV6 (climate change) and ENV9 (as a result of the likelihood of both greenfield and brownfield development).

Negative effects are predicted in terms of ENV8, in order to highlight the fact that growth in a water stressed part of the country will lead to further pressure being placed on water resources.

Positive effects are predicted in terms of other environmental objectives.

Overall social effects

Mixed effects are predicted in terms of a number of social objectives related to the fact that, although the scale of growth at the North East Growth Area is of a scale where the delivery of community infrastructure can be guaranteed, the more dispersed nature of growth promoted in South Norfolk leaves a number of questions-marks. Some benefits may not be realised in the short-term as services and facilities may have a considerable lead-in time.

Overall economic effects

This spatial growth strategy performs strongly in terms of economic objectives, although it is noted that in Long-Stratton housing growth may be promoted in an area that does not have access to a strategic employment location.

Overall summary of effects

One of the key implications of this Policy relates to the potential for this spatial strategy to support sustainable patterns of transport and travel. Growth will clearly have implications for the amount of travel and traffic in the Sub-Region. It is clear that some aspects of the spatial approach promoted through this Policy have been developed with the objective of allowing more sustainable patterns of travel at the forefront. However, the effects of some aspects of the strategy in terms of this objective are more questionable.

There is a need to understand the specific proposals for sustainable access and transport before a judgement can be made regarding the overall performance of the growth strategy in terms of this objective. At this stage, however a question is raised as to whether the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North East Norwich only) and the isolated nature of Long-Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport. Long-Stratton is remote from Norwich and it will not be possible to provide a Bus Rapid Transit Service (discussed further under Policy 12). Furthermore, it does not appear that Long-Stratton is well linked to a strategic employment location (Hethel is located about 6 miles away). This issue relating to Long Stratton has been highlighted through previous iterations of the Sustainability Appraisal (and so can be seen to have been considered as part of previous consultations). Having pointed out the limitations of Long Stratton, however, it is important to point out that for a village of its size there is a good range of existing services, facilities and employment opportunities, and that that this range will see ancillary growth as part of the housing-led growth strategy.

The appraisal has also highlighted that there is potential for the quantum of development proposed by this Policy to result in negative effects in terms of some environmental objectives, but at this stage there is little evidence to suggest that this particular spatial growth strategy will lead to significant effects that cannot be mitigated. In terms of biodiversity effects it is thought that implementation of the Green Infrastructure Strategy should ensure that negative effects are mitigated, and there should, in fact, be some benefit to promoting access to nature and the countryside as well as promoting a

more proactive approach to conservation. The appraisal has highlighted that one environmental effect that cannot be fully mitigated is the impact of increased abstraction on water resources (although impacts are partially mitigated by requiring water efficiency measures in all new buildings).

In terms of effects on social objectives it is thought that the quantum of growth will lead to broad benefits. However, some effects are predicted to be mixed as the smaller growth locations in South Norfolk will struggle to bring forward the same level of local services and facilities that can be brought forward at the North East Growth Area.

There is little to suggest that there will be significant effects on existing communities that cannot be addressed and mitigated. There will be some potential to target development in Norwich at areas that are in need of regeneration (i.e. there are existing issues of deprivation). However, this spatial strategy is primarily focused on maximising opportunities for sustainable growth, rather than regeneration.

It is also important to point out that developing new communities in these locations with an emphasis on sustainable movement patterns and implementation of the Green Infrastructure Strategy should mean that walking, cycling and outdoor recreation are encouraged, which will have benefits in terms of the health of the population.

In terms of economic effects, this Policy promotes strategic employment growth at a number of locations that have been chosen for their potential to support growth in key sectors (in line with Policy 6), as well as being well connected to Norwich, major growth locations and the wider region. It is thought that the growth and supporting infrastructure promoted through this Policy should, on the whole, help to support a shift towards a knowledge based, yet diverse economy for the Sub-Region. This will be an important factor in terms of solidifying the image of Norwich as being forward thinking and supportive of a sustainable form of growth.

Policy 10 – Norwich City Centre				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	The Policy reinforces the message set out in a number of other Policies, that there must be an emphasis on development leading to increased opportunities for walking and cycling, linked to improved green infrastructure and improvements to the public realm. The Policy also emphasises the importance of sustainable transport access to and within the city centre in accordance with the Norwich Area Transportation Strategy, in particular the role as a gateway and hub of an enhanced public transport system.
ENV 2 To improve the quality of the water environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	+	+	+	There are some areas of poor air quality within Norwich. The emphasis of this Policy on ensuring that development is accompanied by improvements to sustainable transport as well as improvements to the public realm should help to address issues.
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	The Policy identifies the importance of development in the City Centre being supported by improvements to open spaces, green linkages and connections between open spaces, linking to the river corridor and the open countryside
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	+	+	+	The Policy promotes an approach which enhances the historic city, including its built and environmental assets and its distinctive “contemporary medieval” character through innovative, sustainable design.
ENV 6 To adapt to and mitigate	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

against the impacts of climate change.				
ENV 7 To avoid, reduce and manage flood risk.	?	?	?	There are areas at risk of flooding in the City Centre. It is thought that the findings of the Strategic Flood Risk Assessment have been taken into account when determining this strategy for the City Centre. However, this Policy does not make a specific reference to flood risk.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	+	+	+	This Policy identifies four areas that will be the focus of planned regeneration schemes. Within each area the Policy identifies strategic priorities.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 3 To improve education and skills.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and	+	+	+	Although city-centre development will not be 'housing-led', a considerable number of houses are allocated nonetheless. The Policy gives considerable detail as to where and how this housing allocation will be delivered. It is notable that housing densities will generally be high, but family housing will also be provided

affordable home.				to achieve a social mix.
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	<p>The emphasis of the Policy is on ensuring that the City Centre will consolidate and build upon its position as the main focus in the sub-region for office development, retail, leisure, culture and tourism. Housing development takes something of a back-seat - 'reinforcing' the vibrancy of the city centre. This is most closely in-line with the 'commercial and cultural led development' option considered for the City Centre at the Issues and Options stage of JCS development. The Policy and supporting text provides considerable detail regarding how this vision will be achieved. There is a discussion of the demand for major tourist and visitor facilities, and also a discussion of a particular role for the evening / night-time economy.</p> <p>Recommendation: It is notable that the 'early evening' economy is promoted across the City Centre, but 'late night activities' focussed in identified areas only. It will be important that these terms are clearly defined and that this Policy feeds through into action on the ground.</p>
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 7 To improve the quality of where people live.	+	+	+	The Policy identifies the importance of development in the City Centre being supported by improvements to the public realm and green infrastructure.
SOC 8 To improve accessibility to essential services, facilities and jobs.				This Policy will not directly result in any significant effects in terms of this objective.
EC 1 To encourage sustained economic growth.	+	+	+	The Policy works from the assumption that focusing major retail, leisure, office, culture and tourism related development in the City Centre will boost what has been termed 'agglomeration' benefits. It is thought that this is likely to be the case, i.e. that these land-uses will support and reinforce one another, making Norwich an attractive location to 'do business'. It might be suggested that, because no other City in Norfolk or perhaps even the wider Region, can offer this combination of factors to attract business (Cambridge has a considerable offer, but one that differs considerably), that developing the City Centre in this way will have wider benefits for the East of England as a whole. This can be seen as a strong justification for resisting a housing-led approach to development in the City Centre.
EC 2 To encourage	+	+	+	See discussion under EC1

and accommodate both indigenous and inward investment.				
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 4 To improve the social and environmental performance of the economy.	+	+	+	The strategy for the City Centre is conducive to achieving a shift towards a knowledge based economy for the Greater Norwich area.

Summary

Overall environmental effects

This Policy generally performs well in terms of environmental objectives. In particular, this Policy emphasises the importance of a high quality environment in the City Centre, and should support wider efforts to bring about sustainable patterns of transport and travel. It is noted that this Policy does not refer specifically to flood risk, despite this being a significant issue in parts of the City Centre.

Overall social effects

This Policy performs well in terms of social objectives. It provides a high level strategy that will have the effect of guiding the nature of development in the City Centre. The strategy essentially involves focusing on office, retail, leisure, culture and tourism led development, rather than housing led development, but it is thought that this is an appropriate approach which will have wider-ranging social benefits. This Policy identifies four areas that will be the focus of planned regeneration schemes.

Overall economic effects

This Policy performs well in terms of economic objectives. The Policy works from the assumption that focusing major retail, leisure, office, culture and tourism related development in the City Centre will boost what has been termed 'agglomeration' benefits. It is thought that this is likely to be the case, i.e. that these land-uses will support and reinforce one another, making Norwich an attractive location to 'do business'.

Overall summary of effects

This Policy takes account of the existing situation in the City Centre to identify the best strategy for future development. The emphasis of the Policy is on

ensuring that the City Centre will consolidate and build upon its position as the main focus in the Sub-Region for office development, retail, leisure, culture and tourism. Housing development takes something of a back-seat - 'reinforcing' the vibrancy of the city centre. This is most closely in-line with the 'commercial and cultural led development' option considered for the City Centre at the Issues and Options stage of Joint Core Strategy development. The Policy and supporting text provides considerable detail regarding how this vision will be achieved. There is a discussion of the demand for major tourist and visitor facilities, and also a discussion of a particular role for the evening / night-time economy.

The Policy works from the assumption that focusing major retail, leisure, office, culture and tourism related development in the City Centre will boost what has been termed 'agglomeration' benefits. It is thought that this is likely to be the case, i.e. that these land-uses will support and reinforce one another, making Norwich an attractive location to 'do business'. It might be suggested that, because there is no other City in Norfolk or perhaps even the wider Region, can offer this combination of factors to attract business (Cambridge has a considerable offer, but one that differs considerably), that developing the City Centre in this way will have wider, regional scale benefits. This can be seen as a strong justification for resisting a housing-led approach to development in the City Centre.

Although city-centre development will not be 'housing-led', a considerable number of houses are allocated nonetheless. The Policy gives considerable detail as to where and how this housing allocation will be delivered. It is notable that housing densities will generally be high, but family housing will also be provided to achieve a social mix.

The Policy recognises the importance of development within the City Centre supporting wider efforts to promote sustainable travel and transport patterns, and also the importance of taking into account environmental assets. The Policy promotes an approach which enhances the historic city, including its built and environmental assets and its distinctive "contemporary medieval" character through innovative, sustainable design. The Policy also identifies the importance of development in the City Centre being supported by improvements to open spaces and green linkages.

Recommendations

- It is notable that the 'early evening' economy is promoted across the City Centre, but 'late night activities' focussed in identified areas only. It will be important that these terms are clearly defined and that this Policy feeds through into action on the ground.

Policy 11 - The remainder of the Norwich urban area, including the fringe parishes				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	An important commitment relates to increasing densities for small and medium scale redevelopments, where a design and access statement demonstrates that an improvement to townscape will result, and particularly around district centres and on public transport routes. It is thought that this is an ambitious statement, which seeks to balance competing sustainability objectives, but will have the overriding effect of helping to support behavioural change relating to car dependency. This Policy describes two key ways by which <i>“Public transport serving the suburbs and fringe parishes will be significantly enhanced”</i>
ENV 2 To improve the quality of the water environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	+	+	+	The Policy identifies the impact of traffic on residential areas as a key issue and sets out a number of ways by which this will be tackled, including through construction of the Norwich Northern Distributor Road.
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	The Policy identifies that the urban fringe is a key area for the implementation of green infrastructure, and sets out a number of strategic priorities.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	+	+	+	The Policy seeks to <i>“to improve townscape and retain the best of local character”</i> in these areas.

ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	See discussion of transport effects under ENV1
ENV 7 To avoid, reduce and manage flood risk.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	+	+	+	Recommendation: The Policy identifies a number of priority areas for regeneration, and identifies particular priorities within them. The Policy highlights the need for 'co-ordination and community based approaches', and so it will be important that this is instigated through other LDF documents.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 3 To improve education and skills.	+	+	+	The Policy states that " <i>Norwich will be promoted as a "learning city" and the expansion of existing further and higher education opportunities will be encouraged.</i> " It is assumed that this point is of particular relevance to the urban edge and fringe parishes.
SOC 4 To provide	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

the opportunity to live in a decent, suitable and affordable home.				
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	See discussion under SOC7.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 7 To improve the quality of where people live.	+	+	+	<p>Recommendation: A key aim is to “<i>identify and regenerate “tired” suburbs and promote neighbourhood based renewal</i>”. It is noted that this is not expanded upon further, and so it will be important that this aim leads to action on the ground through other LDF documents.</p> <p>Recommendation: Another commitment is to “<i>improve townscape and retain the best of local character</i>”. It is thought that this should be expanded upon, bearing in mind that this would be achieved anyway through area wide Policy 2.</p> <p>One of specific commitments of the Policy that is likely to directly lead to actions on the ground is the commitment to focus on environmental and townscape improvements to ‘gateways’. It is thought that this is an appropriate way to support the aims of Policy 6 (i.e. relating to promoting a certain type of growth in the City Centre).</p>
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	The Policy commits to retaining and improving local services, and to protect and enhance local and district centres. The second part of this statement, in particular, is an important Policy statement.
EC 1 To encourage sustained economic growth.	+	+	+	The urban edge and fringe parishes will play an important role in terms of the overall image of Norwich as a good place to live, invest and do business. Thus the improvements that will come as a direct result of this Policy can be seen to be beneficial in terms of this objective.

EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	A commitment is made relating to maintaining a diverse local economic base in these areas, although without further explanation it is not clear how it will lead to significant benefits on the ground. However, there may be some benefits as a result of lending general support for Policy 6, and emphasising that these issues are key in urban edge / sub-urban areas.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 4 To improve the social and environmental performance of the economy.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
Summary				
Overall environmental effects				
This Policy performs well in terms of a number of environmental objectives. In particular ENV1 (sustainable transport and travel), ENV3 (environmental amenity including air quality), ENV4 (biodiversity) and ENV5 (landscapes, townscapes and the historic environment). In terms of a number of other objectives this Policy can be seen to have no significant effects.				
Overall social effects				
This Policy performs well in terms of a number of social objectives, particularly SOC8 (local services and facilities and enhance local and district centres) and SOC7 (satisfaction of people with their neighbourhoods).				
Overall economic effects				
This Policy may have some economic benefits as the urban edge and fringe parishes will play an important role in terms of the overall image of Norwich as a good place to live, invest and do business.				
Overall summary of effects				
This Policy sets out priorities for the remainder of the Norwich urban area and the fringe parishes. One of specific commitments of the Policy that is likely to directly lead to actions on the ground is the commitment to focus on environmental and townscape improvements to 'gateways'. It is thought that a Policy focusing on these areas is appropriate as it is thought that the urban edge and fringe parishes will play an important role in terms of the overall				

image of Norwich as a good place to live, invest and do business. Thus the improvements that will come as a direct result of this Policy can be seen to be beneficial in terms of wider objectives for sustainable growth in Norwich.

This Policy describes two key ways by which “*Public transport serving the suburbs and fringe parishes will be significantly enhanced*”. It also highlights that high density development will be appropriate in some locations, which can be beneficial in terms of encouraging more sustainable patterns of travel and transport. Linked to the issue of promoting a sustainable transport network, the Policy identifies that the urban fringe is a key area for the implementation of green infrastructure, and sets out a number of strategic priorities. The Policy identifies the impact of traffic on residential areas as a key issue and sets out a number of ways by which this will be tackled, including through construction of the Norwich Northern Distributor Road.

Recommendations

- A key aim is to “*identify and regenerate “tired” suburbs and promote neighbourhood based renewal*”. It is noted that this is not expanded upon further, and so it will be important that this aim leads to action on the ground through other LDF documents.
- Another commitment is to “*improve townscape and retain the best of local character*”. It is thought that this should be expanded upon, bearing in mind that this would be achieved anyway through area wide Policy 2.
- The Policy identifies a number of priority areas for regeneration, and identifies particular priorities within them. The Policy highlights the need for ‘co-ordination and community based approaches’, and so it will be important that this is implemented through other LDF documents.

Policy 12 - Locations for major new or expanded communities in the Norwich Policy Area				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+/-	+/-	+/-	<p>The Policy makes a commitment to ensuring that all major locations for growth will be designed around walking and cycling for local journeys and public transport for longer journeys.</p> <p>For each major growth location in turn, the Policy sets out how this will be achieved.</p> <p>For the North East Growth Triangle a number of ambitious proposals appear to be agreed and settled upon in principle, and it seems that it will be possible to achieve a major shift away from car dependency for residents here. However, this will require much on-going work and commitment. If suitably ambitious measures are implemented then it may be wrong to draw the conclusion that access to a major orbital road – the proposed NDR – ‘on the door-step’ of the development will lead to on-going car dependency.</p> <p>At Wymondham the Policy describes a number of schemes that will allow many people to reduce their car dependency, but there remains considerable uncertainty regarding the potential for a Bus Rapid Transit Service into Norwich. Without this commuting by car will be more prevalent.</p> <p>At Hethersett and Cringleford proposals revolve around enhanced cycle routes to a number of key destinations as well as enhanced bus services. Both of these are likely to be measures that can encourage many people out of their cars (bearing in mind that proximity to Norwich will make the bus a more attractive option). There is an even greater deal of uncertainty regarding the potential for a Bus Rapid Transit Service into Norwich from Cringleford and Hethersett, as it could be that a service would only be viable if, travelling from Wymondham, it stopped at one or the other.</p> <p>Similarly, at Easton/Costessey there is a commitment to deliver enhanced bus routes and cycle routes to a number of key destinations. It also appears that the Policy commits to delivery of a Bus Rapid Transit Service. This will have the effect of development at this location potentially being able to match that at the North East Growth Triangle in terms of promoting sustainable transport patterns. However, it is important to note that the viability of this service is dependent upon other development coming forward along the Dereham Road corridor, which is beyond the control of the Core Strategy (i.e. as not part of the major growth location there could be less impetus behind it and thus less certainty).</p> <p>At Long-Stratton there are serious question-marks relating to the potential for sustainable transport due to the isolation from higher order centres and major employment locations. This Policy does little to allay any fears. There is a specific commitment to bus priority at the A140/A47 junction, which is to be welcomed, but also a more general reference to creating an ‘enhanced route’. Long-Stratton is about 12 miles from Norwich, and so</p>

				<p>there is a need for more specific commitments as to how this will be made a journey that encourages people out of their cars. There is also scant reference to access to major employment locations from Long Stratton. The supporting text acknowledges that “<i>While Long Stratton is not as well related to employment or high quality public transport this is outweighed by the availability of a good range of local services and the significant local benefits of a development-led bypass.</i>”</p> <p>Recommendation: There is a need to develop a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton</p>
ENV 2 To improve the quality of the water environment.	+	+	+	The Policy makes a commitment to including Sustainable Drainage Systems (SuDS). This should support the reference to sustainable drainage in Policy 1.
ENV 3 To improve environmental amenity, including air quality.	?	?	?	The Policy makes a commitment to “ <i>on-site or nearby renewable energy generation, for example large scale wind turbines and biomass fuelled Combined Heat Power and Cooling (CHPC)</i> ”. It will be important to give early consideration to the impacts that biomass energy generation can have on local air quality.
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	For each of the major growth locations, with the exception of Cringleford, the Policy takes account of local priorities and promotes a bespoke approach for delivering the aims of the Green Infrastructure Strategy and protecting and enhancing environmental assets more generally. This is thought to be a well considered and proactive approach that can feed through into more detailed plan-making.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	+	+	+	<p>The Policy makes a commitment to achieving a high level of self containment whilst integrating well with neighbouring communities. Commitment to these two principles should ensure that the more general aims of area wide Policy 2 are achieved at the major growth locations.</p> <p>For a number of major growth locations the Policy takes account of local landscape constraints and opportunities. For example, the Policy recognises the importance of the ancient landscape to the East of Long Stratton, and north of Wymondham creating a “Ketts Country” pastoral landscape of grass, wood, hedgerow and wetland habitat.</p> <p>In Wymondham, it is important to note that the Policy promotes ‘expansion of the town centre’. This must be considered as having considerable potential to impact on the existing character of the town, with effects perhaps being on a par with the impact of the development itself. However, the Policy does promote retaining and enhancing the distinctive character of the existing historic centre.</p>
ENV 6 To adapt to and mitigate against the impacts	?	?	?	Recommendation: This Policy promotes on site or nearby renewable energy generation, for example large scale wind turbines and biomass fuelled Combined Heat Power and Cooling (CHPC). It will be important that this supports the guidance given in Policy 3, taking account of the fact that ambitious schemes may be more

of climate change.				difficult to deliver at the smaller growth locations.
ENV 7 To avoid, reduce and manage flood risk.	+	+	+	These growth locations have been determined taking into account the findings of the SFRA,
ENV 8 To provide for sustainable use and sources of water supply.	+	+	+	This Policy promotes the use of water saving technologies, and so can be seen to support Policy 1.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	+	+	+	See ENV6 for a discussion of energy. This Policy does not discuss recycling, although this addressed through other Policy.
SOC 1 To reduce poverty and social exclusion.	+	+	+	It is not thought that any of these major growth locations have the specific aim to support regeneration of neighbouring or nearby deprived communities. However, there should be the potential at each of these locations to create mixed and inclusive communities that prevent issues of social deprivation developing.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	+	+	+	In addition to the comments made under SOC1, it is important to note that designing in opportunities for walking and cycling as well as planning for green infrastructure will have health related benefits.
SOC 3 To improve education and skills.	+/-	+/-	+/-	For each of the growth locations there is a discussion regarding how the need for increased secondary school capacity can best be met. This is discussed further under SOC8.
SOC 4 To provide	+/-	+/-	+/-	These major growth locations will help to ensure that housing need in the Greater Norwich can be met. There

the opportunity to live in a decent, suitable and affordable home.				<p>can also be a high degree of certainty that these will be mixed communities that deliver the proportion of on-site affordable housing required by Policy 7.</p> <p>This Policy states the need to “provide for a wide range of housing need including giving serious consideration to the provision of sites for gypsies and travellers”</p> <p>One point to note is that the delivery of affordable homes in Long Stratton may be constrained because of diversion of funding to the bypass (although it is also important to note that Long Stratton makes up only about 8% of the total housing to be delivered in the NPA).</p>
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	<p>The Policy highlights the need to deliver healthy, sustainable communities with locally distinctive design and high quality green infrastructure. It is likely that each of the new developments can achieve these ambitions and develop as distinctive communities with a strong sense of place.</p> <p>Although the Policy does not highlight specific existing communities that have the potential to be impacted by these major developments, it does make a commitment to “achieve a high level of self containment while integrating well with neighbouring communities”.</p> <p>The Policy highlights that, for the North East Growth Triangle, permeability and community integration across the Norwich Northern Distributor Road will be crucial for the successful development of the area.</p>
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+/-	+/-	+/-	<p>Most of the locations for growth promoted through this option will be well-related to strategic employment locations and/or well-connected with them and the city centre, but one point that is immediately apparent is that Long Stratton is less well related or connected with strategic employment locations. However, for a village of its size, there is a good range of local employment opportunities (as well as services and facilities) within Long Stratton.</p> <p>This Policy promotes specific sustainable transport links.</p>
SOC 7 To improve the quality of where people live.	+	+	+	<p>The Policy highlights the need to deliver healthy, sustainable communities with locally distinctive design and high quality green infrastructure. It is likely that each of the new developments can achieve these ambitions and develop as distinctive communities with a strong sense of place.</p> <p>The developer[s] of major Strategic Growth Locations will be required to ensure there is an ongoing commitment to support community development throughout the period until the development is completed.</p>
SOC 8 To improve accessibility to essential services, facilities and jobs.	0	+/-	+/-	<p>The Policy makes a commitment to include new or expanded education provision addressing the needs of the 0-19 age range, local retail and other services, small scale employment opportunities and primary healthcare facilities.</p> <p>The delivery of services and facilities is considered for each of the major growth locations in turn.</p> <p>For the North East Growth Triangle it is thought that there will be sufficient opportunity to meet needs, given the</p>

				<p>scale of the development. It is particularly helpful that the Policy promotes a new secondary school 'with an initial phase to open as early as possible', and states that <i>"To facilitate early provision the early phases of development will concentrate on family housing."</i></p> <p>For the other major growth location subtly different approaches to ensuring adequate local services and facilities are promoted.</p> <p>For example, a specific commitment is made for Easton/Costessey - <i>"Significant growth at Easton will need to provide an enhanced village centre"</i> – but a an approach that offers less certainty in terms of suitable access (including by walking and cycling) is promoted for Cringleford – <i>"expansion of the existing services nearby"</i>.</p> <p>Provision of education facilities has been a key sustainability consideration throughout the development of this growth strategy. This Policy highlights that some uncertainties remain for Wynmondham, Hethersett, Cringleford and Easton/Costessey.</p> <p>Recommendation: Resolve uncertainties surrounding meeting the need for additional secondary school capacity as a result of new development. This should take account of the benefits of allowing children to attend a school that is local to where they live.</p>
EC 1 To encourage sustained economic growth.	+	+	+	Well designed, sustainable communities with good transport links to strategic employment locations and the City Centre will play an important role in terms of attracting skilled workers and investment.
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	See discussion under EC1.
EC 3 To encourage efficient patterns of movement in support of economic growth.	+	+	+	It is thought likely that, within these new communities incidences of commuting can, in many instances, be minimised and there should also be good potential for home working. Furthermore, Policy 6 should ensure that there is ample opportunity for small businesses to make use of premises made available locally.
EC 4 To improve the social and environmental performance of the economy.	+	+	+	Developing these new communities has the potential to support the transition to a high skilled, knowledge based economy.

Summary

Overall environmental effects

The detail set out in this Policy should help to ensure that potential negative environmental effects of development are avoided or mitigated, and should also help to make the most of a range of opportunities. For each of the major growth locations the Policy identifies what must be put in place in order to achieve sustainable patterns of travel and transport. However, effects in terms of objective ENV1 (To reduce the effect of traffic on the environment.) are predicted to be mixed because it is thought that some growth locations perform better than others.

Overall social effects

It is thought that the detail set out in this Policy should help to ensure that social benefits associated with growth at these locations are maximised. However, effects are predicted to be mixed for SOC3 and SOC8 (access to services and facilities) because it is noted that uncertainties remain regarding meeting the need for local secondary school capacity. Similarly, effects are predicted to be mixed for SOC4 (housing) and SOC6 (employment) because it is thought that some growth locations perform better than others.

Overall economic effects

The success of these major growth locations is important in terms of supporting sustainable economic growth in Greater Norwich. Thus, it is thought that the detail set out in this Policy should indirectly lead to economic benefits.

Overall summary of effects

Although some of the implications of the spatial approach to growth have already been considered as part of the appraisal of Policy 9, this Policy allows sustainability implications to be considered with a greater degree of certainty (as this Policy describes *how* growth will come forward, and not just *where*).

One of the key roles of this Policy is to identify what must be put in place in order to achieve sustainable patterns of travel and transport. For the North East Growth Triangle a number of ambitious proposals appear to be agreed and settled upon in principle, and it seems that it will be possible to achieve a major shift away from car dependency for residents here. However, this will require much on-going work and commitment. If suitably ambitious measures are implemented then it may be wrong to assume that access to a major orbital road – the proposed NDR – ‘on the door-step’ of the development will lead to on-going car dependency.

At Wymondham the Policy describes a number of schemes that will allow many people to reduce their car dependency, but there remains considerable uncertainty regarding the potential for a Bus Rapid Transit Service into Norwich. Without this commuting by car will be more prevalent.

At Hethersett and Cringleford proposals revolve around enhanced cycle routes to a number of key destinations as well as enhanced bus services. Both of these are likely to be measures that can encourage many people out of their cars (bearing in mind that proximity to Norwich will make the bus a more attractive option). There is an even greater deal of uncertainty regarding the potential for a Bus Rapid Transit Service into Norwich from Cringleford and Hethersett, as it could be that a service would only be viable if, travelling from Wymondham, it stopped at one or the other.

Similarly, at Easton/Costessey there is a commitment to deliver enhanced bus routes and cycle routes to a number of key destinations. It also appears that the Policy commits to delivery of a Bus Rapid Transit Service. This will have the effect of development at this location potentially being able to match that at the North East Growth Triangle in terms of promoting sustainable transport patterns. However, it is important to note that the viability of this service is

dependent upon other development coming forward along the Dereham Road corridor, which is beyond the control of the Core Strategy (i.e. as not part of the major growth location there could be less impetus behind it and thus less certainty).

At Long-Stratton there are serious question-marks relating to the potential for sustainable transport due to the isolation from higher order centres and major employment locations. This Policy does little to allay any fears. There is a specific commitment to bus priority at the A140/A47 junction, which is to be welcomed, but also a more general reference to creating an 'enhanced route'. Long-Stratton is about 12 miles from Norwich, and so there is a need for more specific commitments as to how this will be made a journey that encourages people out of their cars. There is also scant reference to access to major employment locations from Long Stratton. The supporting text acknowledges that "*While Long Stratton is not as well related to employment or high quality public transport this is outweighed by the availability of a good range of local services and the significant local benefits of a development-led bypass.*"

For each of the locations, the Policy sets out to identify strategic priorities that take account of the constraints and opportunities provided by the local landscape, heritage and biodiversity baseline. For each of the major growth locations, with the exception of Cringleford, the Policy takes account of local priorities and promotes a bespoke approach for delivering the aims of the Green Infrastructure Strategy and protecting and enhancing environmental assets more generally. This is thought to be a well considered and proactive approach that can feed through into more detailed plan-making. For a number of major growth locations the Policy also takes account of local landscape constraints and opportunities. For example, the Policy recognises the importance of the ancient landscape to the east of Long Stratton, and north of Wymondham creating a "Ketts Country" pastoral landscape of grass, wood, hedgerow and wetland habitat.

In Wymondham, it is important to note that the Policy promotes 'expansion of the town centre'. This must be considered as having considerable potential to impact on the existing character of the town, with effects perhaps being on a par with the impact of the development itself. However, the Policy does promote retaining and enhancing the distinctive character of the existing historic centre.

In terms of the social effects of this Policy, it is not thought that any of these major growth locations have the specific aim to support regeneration of neighbouring or nearby deprived communities. Similarly, the Policy does not highlight specific existing communities that have the potential to be impacted by these major developments. However, it does make a commitment to "*achieve a high level of self containment while integrating well with neighbouring communities*".

The Policy highlights the need to deliver healthy, sustainable communities with locally distinctive design and high quality green infrastructure. It is likely that each of the new developments can achieve these ambitions and lead to the development of strong and inclusive communities where residents feel a strong sense of place. In particular, it is important to note that designing in opportunities for walking and cycling, as well as planning for green infrastructure, will have health related benefits.

It is also noted that this Policy reaffirms the commitment made through Policy 7 to "*provide for a wide range of housing need including giving serious consideration to the provision of sites for gypsies and travellers*".

Another issue that is considered for each location is access to services and facilities. For the North East Growth Triangle it is thought that there will be sufficient opportunity to meet needs. It is particularly helpful that the Policy promotes a new secondary school 'with an initial phase to open as early as possible', and states that "*To facilitate early provision the early phases of development will concentrate on family housing.*"

For the other major growth locations subtly different approaches to ensuring adequate local services and facilities are promoted. For example, a specific commitment is made for Easton/Costessey - "*Significant growth at Easton will need to provide an enhanced village centre*" - but an approach that offers less certainty in terms of suitable access (including by walking and cycling) is promoted for Cringleford - "*expansion of the existing services nearby*". Provision of education facilities has been a key sustainability consideration throughout the development of this growth strategy. This Policy highlights that

some uncertainties remain for Wynmondham, Hethersett, Cringleford and Easton/Costessey.

Recommendations

- There is a need to develop a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton
- This Policy promotes on site or nearby renewable energy generation, for example large scale wind turbines and biomass fuelled Combined Heat Power and Cooling (CHPC). It will be important that this supports the guidance given in Policy 3, taking account of the fact that ambitious schemes may be more difficult to deliver at the smaller growth locations.
- Resolve uncertainties surrounding meeting the need for additional secondary school capacity as a result of new development. This should take account of the benefits of allowing children to attend a school that is local to where they live.

Policy 13 - Main Towns				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	All three main towns are relatively isolated from Norwich and associated major employment locations, and so restraining growth can be seen as beneficial in terms of this objective. However, one of the key reasons that has been taken into account when defining them as 'main towns' rather than 'key service centres' is public transport routes that they are served by and the availability of a good range of services and facilities to meet local needs.
ENV 2 To improve the quality of the water environment.	+	+	+	The Policy recognises that Aylsham, Diss and Harleston are located on rivers that flow directly into the Broads and so development must ensure that there is no significant detrimental effect on the Broadland SPA and Broads SAC. From this perspective it can also be seen as beneficial to restrain growth at these locations. It is identified that sewage treatment capacity is a constraint at Aylsham. Exceeding sewerage capacity would have implications for water quality.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	It is not thought that there are existing issues in terms of environmental quality at these locations.
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	There is little evidence to suggest that this level of housing growth would lead to unavoidable impacts in terms of this objective.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	?	?	?	All of these towns are market towns with a recognisable historic character, and it is likely that each is also closely associated with a particular landscape setting. Diss, in particular, is an attractive town with a strong historic character, and so from this perspective it can also be seen as beneficial to restrain growth. Harleston is a smaller town than Aylesham or Diss, and so it is questionable whether it should be considered for the same level of growth as these two towns without further justification.

ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	In terms of promoting energy efficiency and use of renewable / low-carbon energy in new development, this Policy does not add further to the requirements of Policies 1 and 3. In particular, Policy 3 requires that developments of this scale will: Connect to dedicated off-site renewable sources to meet all its energy needs; or, where this is not feasible, ensure best use is made of local energy generated on site from renewable and low carbon decentralised energy sources and contribute to the carbon offset fund.
ENV 7 To avoid, reduce and manage flood risk.	+	+	+	These locations have been identified as suitable for development of scale taking into account the findings of the Strategic Flood Risk Assessment.
ENV 8 To provide for sustainable use and sources of water supply.	+	+	+	It is not thought that development at this scale in these locations will lead to issues in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	+	+	+	Policy 1 identifies that development must “ <i>make the most efficient appropriate use of land, with the density of development varying according to the characteristics of the area, with the highest densities in centres and on public transport routes</i> ” It is likely that development at this scale in these locations will require loss of agricultural land.
SOC 1 To reduce poverty and social exclusion.	+	+	+	There is little to suggest that these locations have been identified for development at this scale so that they can address existing local deprivational issues. However, these towns are service centres that serve an extensive rural hinterland, and so it can be seen that investment at these towns can help to ensure access to services and help to address rural deprivation.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	It is not thought that development at this scale in these locations will lead to significant effects in terms of this objective.
SOC 3 To improve education and skills.	+	+	+	These locations have been identified for development at this scale following a consideration of local educational capacity.

SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	+	+	+	Development at this scale can help to meet local housing need, and should be able to deliver the full amount of on-site affordable housing envisioned through Policy 7.
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	?	?	?	These towns have been identified for development at this scale taking account of existing character. It will be important to ensure development does not contribute to any erosion of this character. Harleston is a smaller town than Aylesham or Diss, and so it is questionable whether it should be considered for the same level of growth as these two towns without further justification.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+	+	+	This Policy identifies that development at this scale must be accompanied by increased local employment opportunities. It is noted that employment growth at Diss will aim to meet the needs of the town and large rural catchment.
SOC 7 To improve the quality of where people live.	+	+	+	See discussion under SOC5.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	These towns have been identified for development at this scale taking account of availability of local services and facilities.
EC 1 To encourage sustained economic growth.	+	+	+	Growth at these towns can play an important role in terms of supporting local economic activity in these more rural areas.
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	See discussion under EC1.

EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	It is not thought that development at this scale in these locations will lead to issues in terms of this objective.
EC 4 To improve the social and environmental performance of the economy.	0	0	0	It is not thought that development at this scale in these locations will lead to issues in terms of this objective.
Summary				
<p>Overall environmental effects</p> <p>These towns have been identified as suitable for a considerable amount of development taking account of a range of environmental constraints. There may still be potential for impacts, but at this stage there is little evidence to suggest that effects cannot be adequately avoided or mitigated. Having said this, it is particularly important to note the potential for impacts in terms of objective ENV5 (landscapes, townscapes and the historic environment) as these are all market towns with a recognisable historic character, and it is likely that each is also closely associated with a particular landscape setting.</p> <p>Furthermore, these towns have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes, and so in this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport).</p>				
<p>Overall social effects</p> <p>This Policy performs well in terms of most social objectives. In particular, ensuring good access to services and facilities as well as employment opportunities can be seen to be beneficial in terms of a range of social objectives. This Policy has also been predicted to perform well in terms of SOC1 because these towns are service centres that serve an extensive rural hinterland, and so it can be seen that investment at these towns can help to ensure access to services and help to address rural deprivation.</p> <p>The only social objective for which effects have been predicted to be more questionable is SOC5 (building community identity). The scale of development is significantly less than that which is promoted at the major growth locations. Nonetheless, there may be some potential for impacts to local character and the distinctiveness of these settlements as market towns.</p>				
<p>Overall economic effects</p> <p>It is not clear that this Policy will directly lead to any economic effects of strategic significance, although it is noted that growth at these towns may play a role in terms of supporting local economic activity in these more rural areas.</p>				

Overall summary of effects

These towns have been identified as suitable for a considerable amount of development primarily taking account of access to services, facilities, employment and public transport. However, at the same time, all three towns are relatively isolated from Norwich and the major employment locations, and so promoting a level of growth significantly below that which is promoted for the major growth locations can be seen to be beneficial in terms of promoting sustainable patterns of travel and transport as well as ensuring good access.

In terms of environmental constraints, there may be potential for development on this scale to lead to impacts, but at this stage there is little evidence to suggest that effects cannot be adequately avoided or mitigated. Having said this, it is particularly important to note the potential for impacts in terms of objective ENV5 (landscapes, townscapes and the historic environment) as these are all market towns with a recognisable historic character, and it is likely that each is also closely associated with a particular landscape setting. Diss, in particular, is an attractive town with a strong historic character, and so from this perspective it can also be seen as beneficial to restrain growth. Harleston is a smaller town than Aylesham or Diss, and so it is questionable whether it should be considered for the same level of growth as these two towns without further justification.

In terms of promoting energy efficiency and use of renewable / low-carbon energy in new development, this Policy does not add further to the requirement of Policy 3. Policy 3 requires that developments of this scale connect to dedicated off-site renewable sources to meet all energy needs; or, where this is not feasible, ensure best use is made of local energy generated on site from renewable and low carbon decentralised energy sources and contribute to the carbon offset fund.

In terms of the socio-economic effects, there is little to suggest that these locations have been identified for development at this scale so that they can address existing local deprivational issues. However, these towns are service centres that serve an extensive rural hinterland, and so it can be seen that investment at these towns can help to ensure access to services and help to address rural deprivation.

Recommendations

N/a

Policy 14 - Key Service Centres				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	The key service centres have been defined taking into account the public transport routes that they are served by, as well as the availability of services and facilities to meet local needs.
ENV 2 To improve the quality of the water environment.	+	+	+	The Policy recognises that Acle, Blofield, Brundall, Loddon/Chedgrave, and Wroxham are close to the Broads and development must ensure there is no detrimental impact, including no significant detrimental effect on the Broadland SPA and Broads SAC.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	The Policy recognises that Acle, Blofield, Brundall, Loddon/Chedgrave, and Wroxham are close to the Broads and development must ensure there is no detrimental impact, including no significant detrimental effect on the Broadland SPA and Broads SAC. Other than this potential cumulative effect, it is not thought that development on this scale will lead to significant effects in terms of this objective that cannot be avoided or adequately mitigated.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	?	?	?	Given the rural nature of the landscapes in which these settlements sit, it will be important that consideration is given to avoiding sensitive landscapes and avoiding impacts to historic character, particularly in village centres.
ENV 6 To adapt to and mitigate against the impacts	0	0	0	This Policy does not have any direct implications in terms of this objective, other than those effects that relate to transport (see Env1).

of climate change.				
ENV 7 To avoid, reduce and manage flood risk.	+	+	+	It is thought that the findings of the SFRA have been taken into account when defining these key service centres. For example, it is identified that Wroxham is somewhat constrained.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	Given the scale of development proposed at any one location, it is not thought that this Policy will have any direct implications in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	+	+	+	The presence of high quality agricultural land has been taken into account when defining these key service centres.
SOC 1 To reduce poverty and social exclusion.	+	+	+	It is not thought that the need to address any existing deprivational issues has been a key consideration when defining these key service centres. However, these are rural settlements, and as they have been identified as broadly most suitable for a degree of growth, then it could be suggested that identifying these areas as key service centres is the most appropriate way to tackle issues of rural deprivation more generally.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	See discussion regarding rural deprivation under SOC1
SOC 3 To improve education and skills.	0	0	0	See discussion regarding rural deprivation under SOC1
SOC 4 To provide the opportunity to live in a decent, suitable and	0	0	0	See discussion regarding rural deprivation under SOC1

affordable home.				
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	0	0	0	See discussion regarding rural deprivation under SOC1
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	See discussion regarding rural deprivation under SOC1
SOC 7 To improve the quality of where people live.	0	0	0	Investment in community infrastructure may become available as a result of development.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	Accessibility to essential services and facilities (including schools) has been a key consideration when defining key service centres. Local employment opportunities have also been a consideration. For example, it is recognised that Poringland has limited local job opportunities, and so a new local employment area is proposed
EC 1 To encourage sustained economic growth.	+	+	+	See discussion regarding rural deprivation under SOC1
EC 2 To encourage and accommodate both indigenous and inward investment.	0	0	0	See discussion regarding rural deprivation under SOC1
EC 3 To encourage efficient patterns of movement in support of	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.

economic growth.				
EC 4 To improve the social and environmental performance of the economy.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.

Summary

Overall environmental effects

These towns have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes, and so in this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport).

These villages have also been identified as suitable for development at this scale taking account of a range of environmental constraints. There may still be potential for impacts, but at this stage there is little evidence to suggest that effects cannot be adequately avoided or mitigated. Having said this, it is particularly important to note the potential for impacts in terms of objective ENV5 (landscapes, townscapes and the historic environment) given the rural nature of the landscapes in which these settlements sit.

Overall social effects

Accessibility to essential services, facilities (including schools) and employment has been a key consideration when defining key service centres. Furthermore, there may be some benefits in terms of addressing issues of rural deprivation. In terms of other social objectives, it is thought that development on this scale is unlikely to have wide ranging effects of strategic significance.

Overall economic effects

There may be some benefits in terms of addressing issues of rural deprivation and supporting rural enterprise, but the significance of effects is uncertain.

Overall summary of effects

These villages have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes, and so in this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport).

These villages have also been identified as suitable for development at this scale taking account of a range of environmental constraints. There may still be potential for impacts, but at this stage there is little evidence to suggest that effects cannot be adequately avoided or mitigated. Having said this, it is particularly important to note the potential for impacts in terms of objective ENV5 (landscapes, townscapes and the historic environment) given the rural nature of the landscapes in which these settlements sit. It will be important that consideration is given to avoiding sensitive landscapes and avoiding impacts to historic character, particularly in village centres.

In terms of the socio-economic effects of development at this scale in these locations, there is little to suggest that there will be significant effects. However, these villages are service centres that serve a rural hinterland, and so it can be seen that investment at these villages can help to ensure access to services and help to address issues of rural deprivation.

Recommendations: N/a

Policy 15 - Service Villages				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	Service villages are defined based on having a good level of services/facilities, including a 'journey to work' public transport service (to Norwich, a main town, key service centre, or a comparable centre outside the plan area). This should help to ensure that some needs can be met locally by walking or cycling or by public transport. It is noted that in some instances services may be located within an adjacent settlement, rather than the service centre itself, and so it may be a case of limiting the distance of car journeys to meet local needs, rather than limiting car journeys themselves.
ENV 2 To improve the quality of the water environment.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective that cannot be avoided or mitigated.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective that cannot be avoided or mitigated.

ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 7 To avoid, reduce and manage flood risk.	0	0	0	It is likely that development at this scale can be accommodated whilst avoiding areas at risk of flooding.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	+	+	+	Although the scale of development proposed is small, it will still have the potential to meet acute housing need and thus help to address issues of rural deprivation.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 3 To improve education and skills.	+	+	+	Identification of these settlements as suitable for development at this scale has taken account of access to local services and facilities, including a primary school.
SOC 4 To provide	+	+	+	The Policy highlights the importance of affordable housing being delivered as part of the allocation to each

the opportunity to live in a decent, suitable and affordable home.				settlement. This will be important to tackle issues of housing affordability, which tend to be acute in rural areas.
SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	?	?	?	Although there is potential for development to impact upon existing character and sense of place, there is little evidence at this stage to suggest that effects cannot be avoided or mitigated.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+	+	+	The Policy highlights that service villages should encourage small scale local employment opportunities and enhanced local services to also provide for the diversification of the local economy (including agriculture and tourism).
SOC 7 To improve the quality of where people live.	0	0	0	See discussion under SOC5
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	Identification of these settlements as suitable for development at this scale has taken account of access to local services and facilities.
EC 1 To encourage sustained economic growth.	+	+	+	The Policy highlights that service villages should encourage small scale local employment opportunities and enhanced local services to also provide for the diversification of the local economy (including agriculture and tourism).
EC 2 To encourage and accommodate both indigenous and inward investment.	0	0	0	See discussion under EC1
EC 3 To encourage efficient patterns of	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.

movement in support of economic growth.				
EC 4 To improve the social and environmental performance of the economy.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
Summary				
Overall environmental effects				
Limiting development at these locations can be seen to be beneficial in terms of ENV1 (sustainable transport) as there will still be a considerable need for residents in the villages to rely on the private car to access employment and higher order services and facilities. In terms other environmental objectives it is not thought that development on this scale will lead to significant effects.				
Overall social effects				
Identification of these settlements as suitable for development at this scale has taken account of access to local services and facilities, including a primary school. Furthermore, although the scale of development proposed is small, it will still have the potential to meet acute housing need and thus help to address issues of rural deprivation.				
Overall economic effects				
The Policy highlights that service villages should encourage small scale local employment opportunities and enhanced local services to also provide for the diversification of the local economy (including agriculture and tourism).				
Overall summary of effects				
These villages have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes, and so in this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport). In terms other environmental objectives it is not thought that development on this scale will lead to significant effects.				
In terms of social objectives, identification of these settlements as suitable for development at this scale has taken account of access to local services and facilities, including a primary school. Furthermore, although the scale of development proposed is small, it will still have the potential to meet acute housing need and thus help to address issues of rural deprivation. The Policy highlights that service villages should encourage small scale local employment opportunities and enhanced local services to also provide for the diversification of the local economy (including agriculture and tourism).				
Recommendations: N/a				

Policy 16 - Other Villages				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	These villages have been identified as unsuitable for significant development because they have few or no services and facilities. Limiting development here is therefore beneficial from a perspective of reducing car traffic.
ENV 2 To improve the quality of the water environment.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	+	+	+	Given the size and rural nature of these rural communities, limiting development to primarily infill development is likely to be beneficial in terms of this objective.
ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.

ENV 7 To avoid, reduce and manage flood risk.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	+	+	+	This Policy identifies that there may be a need for housing to meet identified local needs.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 3 To improve education and skills.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	+	+	+	This Policy identifies that there may be a need for housing to meet identified local needs.

SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 7 To improve the quality of where people live.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	These villages have been identified as unsuitable for significant development because they have few or no services and facilities. Limiting development here is therefore beneficial from a perspective of ensuring good access to services and facilities.
EC 1 To encourage sustained economic growth.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
EC 2 To encourage and accommodate both indigenous and inward investment.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.

EC 4 To improve the social and environmental performance of the economy.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
Summary				
<p>Overall environmental effects</p> <p>Limiting development at these locations can be seen to be beneficial in terms of ENV1 (sustainable transport) as residents in these villages will rely on the private car to access services, facilities and employment. In terms other environmental objectives it is not thought that development on this scale will lead to significant effects.</p>				
<p>Overall social effects</p> <p>These villages have been identified as unsuitable for significant development because they have few or no services and facilities. Limiting development here is therefore beneficial from a perspective of ensuring good access to services and facilities.</p> <p>This Policy identifies that there may be a need for housing to meet identified local needs.</p>				
<p>Overall economic effects</p> <p>It is not thought that development on this scale will lead to significant effects in terms of economic objectives.</p>				
<p>Overall summary of effects</p> <p>These villages have been identified as suitable for only very limited, primarily infill development in recognition of the need to use the private car to access services and facilities. In this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport). In terms other environmental objectives it is not thought that development on this scale will lead to significant effects.</p> <p>In terms of social effects, limiting development at these locations can be seen to be beneficial from a perspective of ensuring good access to services and facilities. Furthermore, this Policy identifies that there may be a need for housing to meet identified local needs.</p>				
<p>Recommendations</p> <p>N/a</p>				

Policy 17 - Smaller rural communities and the countryside				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	These villages have been identified as unsuitable for significant development because they have few or no services and facilities. Limiting development here is therefore beneficial from a perspective of reducing car traffic.
ENV 2 To improve the quality of the water environment.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	+	+	+	The Policy identifies that maintaining the environmental assets of the rural area is a key justification for limiting development in these areas.
ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.

ENV 7 To avoid, reduce and manage flood risk.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	+	+	+	The Policy states that affordable housing for which a specific local need can be shown will be permitted in locations adjacent to villages as an exception to general policy
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 3 To improve education and skills.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	+	+	+	The Policy states that affordable housing for which a specific local need can be shown will be permitted in locations adjacent to villages as an exception to general policy

SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 7 To improve the quality of where people live.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	These settlements have been identified as unsuitable for significant development because of the lack of access to services and facilities.
EC 1 To encourage sustained economic growth.	+	+	+	The Policy states that farm diversification, home working, small scale commercial enterprises where a rural location can be justified, including limited leisure and tourism facilities to maintain and enhance the rural economy will also be acceptable.
EC 2 To encourage and accommodate both indigenous and inward investment.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.

EC 4 To improve the social and environmental performance of the economy.	0	0	0	It is not thought that development on this scale will lead to significant effects in terms of this objective.
Summary				
<p>Overall environmental effects</p> <p>These villages have been identified as unsuitable for significant development because they have few or no services and facilities. Limiting development here is therefore beneficial from a perspective of reducing car dependency.</p> <p>In terms of other environmental objectives it is not thought that development on this scale will lead to significant effects.</p>				
<p>Overall social effects</p> <p>It is thought that, in terms of the majority of objectives, development on this scale will not lead to significant effects. However, the Policy does identify that there may be a need for housing to meet identified local needs, which could help to address issues of rural deprivation.</p>				
<p>Overall economic effects</p> <p>It is thought that, in terms of economic objectives, development on this scale will not lead to significant effects.</p>				
<p>Overall summary of effects</p> <p>These villages have been identified as suitable for this particular scale of new development following a consideration of accessibility to local services and facilities as well as public transport routes. In this respect it is thought that this Policy performs well in terms of objective ENV1 (sustainable transport). In terms other environmental objectives it is not thought that development on this scale will lead to significant effects.</p> <p>In terms of social objectives, identification of these settlements as suitable for development at this scale has taken account of access to local services and facilities, including a primary school. Furthermore, although the scale of development proposed is small, it will still have the potential to meet acute housing need and thus help to address issues of rural deprivation. The Policy identifies that there may be a need for housing to meet identified local needs.</p>				
<p>Recommendations</p> <p>N/a</p>				

Policy 18 - The Broads				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 2 To improve the quality of the water environment.	+	+	+	Water quality is a key aspect of the 'environmental quality' that this Policy seeks to protect.
ENV 3 To improve environmental amenity, including air quality.	0	0	0	This Policy will not result in any significant effects in terms of this objective.
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	Biodiversity is a key aspect of the 'environmental quality' that this Policy seeks to protect.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	+	+	+	This Policy sets out to protect the 'setting' of the Broads.
ENV 6 To adapt to and mitigate against the impacts of climate change.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

ENV 7 To avoid, reduce and manage flood risk.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	0	0	0	This Policy will not result in any significant effects in terms of this objective.
SOC 1 To reduce poverty and social exclusion.	+	+	+	This Policy seeks to support rural enterprises associated with the Broads, which may help to secure local employment and so perhaps help to address issues of rural deprivation. However, it is important to note that issues of rural deprivation may not be as severe in the Broads area as they are in other deeply rural areas in Norfolk as a result of the thriving tourist industry.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 3 To improve education and skills.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	This Policy seeks to maintain the 'setting' of the Broads and also promote and maintain rural enterprises. In this way it is thought that this Policy will help to maintain the identity and distinctiveness associated with the Broads area.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+	+	+	This Policy seeks to support rural enterprises associated with the Broads.
SOC 7 To improve the quality of where people live.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 8 To improve accessibility to essential services, facilities and jobs.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
EC 1 To encourage sustained economic growth.	+	+	+	This Policy seeks to support rural enterprises associated with the Broads
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	This Policy seeks to support rural enterprises associated with the Broads.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

EC 4 To improve the social and environmental performance of the economy.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
Summary				
<p>Overall environmental effects</p> <p>This Policy performs well in terms of those environmental objectives that relate to the protection of ‘environmental assets’. In terms of other environmental objectives there will be no significant effects.</p>				
<p>Overall social effects</p> <p>This Policy has limited implications for social objectives, but it is noted that this Policy does seek to promote traditional rural enterprise and the distinctive character of the Broads landscape.</p>				
<p>Overall economic effects</p> <p>This Policy seeks to support rural enterprises associated with the Broads.</p>				
<p>Overall summary of effects</p> <p>This Policy seeks to draw attention to particular priorities within the Broads area. In particular, this Policy promotes the importance of ‘environmental quality’ and protection of the ‘setting’ of the Broads. Thus it is thought that this Policy may have benefits in terms of biodiversity, water quality and landscape related objectives.</p> <p>This Policy also seeks to support rural enterprises associated with the Broads, which may help to secure local employment and so perhaps help to address issues or rural deprivation. However, it is important to note that issues of rural deprivation may not be as severe in the Broads area as they are in other deeply rural areas in Norfolk as a result of the thriving tourist industry. It is also worth noting that support for traditional industries that might otherwise suffer from problems of economic viability can also be seen to have biodiversity and landscape benefits as such industries are often what has shaped the landscape that we value today.</p> <p>This Policy, along with a number of other references to the Broads in other Area Wide Policies and Policies for Places, should help to ensure that the Joint Core Strategy does not lead to significant effects on areas designated under the EU Habitats Directive as being internationally important for biodiversity. However, this requires further testing, which is the role of the Habitats Regulations Assessment – a separate assessment process that, like Sustainability Appraisal, is being undertaken in parallel to the development of the Joint Core Strategy.</p>				
<p>Recommendations</p> <p>N/a</p>				

Policy 19 – Hierarchy of centres				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	This Policy seeks to ensure that development of new retailing, services, offices and other town centre uses only occurs in areas where they can be accessed most easily by walking, cycling and public transport. At the bottom of the hierarchy are 'local centres', which is appropriate as fewer people will live within walking and cycling distance of these centres, and access by public transport may not be good enough to encourage people out of their cars.
ENV 2 To improve the quality of the water environment.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 3 To improve environmental amenity, including air quality.	+	+	+	It is important to prevent too much traffic in centres where the road infrastructure is not designed to deal with it, and where traffic may conflict with the needs of residents and pedestrians. Thus, it can be seen that this Policy has beneficial effects, as a result of promoting the greatest amount of development to the larger centres, which are likely to be less vulnerable.
ENV 4 To maintain and enhance biodiversity and geodiversity.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	+	+	+	It is important to protect the historic character of town and village centre. Thus, it can be seen that this Policy has beneficial effects, as a result of promoting the greatest amount of development to the larger centres, which are likely to be less vulnerable.
ENV 6 To adapt to and mitigate against the impacts of climate change.	+	+	+	See discussion under ENV1.

ENV 7 To avoid, reduce and manage flood risk.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 8 To provide for sustainable use and sources of water supply.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	+	+	+	It has been identified that Norwich City Centre has some previously developed sites that are available for re-development, and so in terms of this objective it is appropriate that Norwich is located at the top of the hierarchy
SOC 1 To reduce poverty and social exclusion.	+	+	+	This Policy seeks to maintain vibrancy of centres by ensuring that they receive an appropriate amount of new development. This should have wide ranging social benefits, in terms of ensuring access to a good range of services and also maintaining strong and cohesive communities.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 3 To improve education and skills.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

SOC 5 To build community identity, improve social welfare, and reduce crime and anti-social activity.	+	+	+	This Policy seeks to maintain vibrancy of centres by ensuring that they receive an appropriate amount of new development. This should have wide ranging social benefits, in terms of ensuring access to a good range of services and also maintaining strong and cohesive communities.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	+	+	+	This Policy seeks to ensure that an appropriate number of new offices might be developed in centres.
SOC 7 To improve the quality of where people live.	+	+	+	This Policy seeks to maintain vibrancy of centres by ensuring that they receive an appropriate amount of new development. This should have wide ranging social benefits, in terms of ensuring access to a good range of services and also maintaining strong and cohesive communities.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	This Policy seeks to maintain vibrancy of centres by ensuring that they receive an appropriate amount of new development. This should have wide ranging social benefits, in terms of ensuring access to a good range of services and also maintaining strong and cohesive communities.
EC 1 To encourage sustained economic growth.	+	+	+	This Policy seeks to maintain vibrancy of centres by ensuring that they receive an appropriate amount of new development. This should have local economic benefits as a result of creating opportunities for small businesses to start-up and expand.
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	See discussion under EC1.
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.

EC 4 To improve the social and environmental performance of the economy.	0	0	0	This Policy will not directly result in any significant effects in terms of this objective.
Summary				
Overall environmental effects				
This Policy is predicted to have positive effects in terms of a number of environmental objectives, and no significant effect in terms of others.				
Overall social effects				
This Policy is predicted to have positive effects in terms of some social objectives, and no significant effect in terms of others.				
Overall economic effects				
This Policy is predicted to have positive effects in terms of some environmental objectives, and no significant effect in terms of others.				
Overall summary of effects				
<p>This Policy seeks to ensure that development of new retailing, services, offices and other town centre uses only occurs in appropriate centres. More development will be allowed in the largest centres. This approach can be seen to be beneficial from a perspective of promoting sustainable patterns of transport and travel, as there will be the centres that can most easily be accessed by walking, cycling and public transport. The other key environmental benefit relates to protecting the townscape and historic character associated with many town and village centres. It can be seen that this Policy has beneficial effects in terms of this objective as a result of promoting the greatest amount of development to the larger centres, which are likely to be less vulnerable.</p> <p>This Policy can also be seen to be supportive of socio-economic objectives as it seeks to maintain the vibrancy of centres by ensuring that they receive an appropriate amount of new development. This should help to ensure access to a good range of services, maintain strong and cohesive communities and lead to local economic benefits as a result of creating opportunities for small businesses to start-up and expand.</p>				
Recommendations				
N/a				

Policy 20 – Implementation and monitoring				
SA Objective	Short-term	Medium-term	Long-term	Comments / justification and recommendations
ENV 1 To reduce the effect of traffic on the environment.	+	+	+	The Policy identifies green infrastructure, public transport facilities and 'other appropriate transport infrastructure' as likely priorities.
ENV 2 To improve the quality of the water environment.	+	+	+	The Policy identifies Sustainable Drainage Systems (SuDS) as a likely priority.
ENV 3 To improve environmental amenity, including air quality.	+	+	+	The Policy identifies green infrastructure, public transport facilities and 'other appropriate transport infrastructure' as likely priorities.
ENV 4 To maintain and enhance biodiversity and geodiversity.	+	+	+	The Policy identifies green infrastructure as a likely priority.
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment.	0	0	0	It is not thought that this Policy will have a significant effect in terms of this objective.
ENV 6 To adapt to and mitigate against the impacts of climate change.	+	+	+	The Policy identifies Sustainable Drainage Systems (SuDS) and local and renewable energy generation as likely priorities.
ENV 7 To avoid,	+	+	+	The Policy identifies Sustainable Drainage Systems (SuDS) as a likely priority.

reduce and manage flood risk.				
ENV 8 To provide for sustainable use and sources of water supply.	+	+	+	The Policy identifies water conservation measures as a likely priority.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production.	+	+	+	The Policy identifies waste management/ recycling/composting facilities as a likely priority.
SOC 1 To reduce poverty and social exclusion.	+	+	+	The Policy identifies community and recreation facilities (such as education facilities, community halls, health facilities, libraries, social services facilities, allotments etc) as well as affordable or supported housing as likely priorities.
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles.	+	+	+	The Policy identifies community and recreation facilities (education facilities, community halls, health facilities, libraries, social services facilities, allotments etc) as a likely priority.
SOC 3 To improve education and skills.	+	+	+	The Policy identifies community and recreation facilities (education facilities, community halls, health facilities, libraries, social services facilities, allotments etc) as a likely priority.
SOC 4 To provide the opportunity to live in a decent, suitable and affordable home.	+	+	+	The Policy identifies affordable or supported housing as a likely priority.
SOC 5 To build community identity, improve social welfare, and reduce	+	+	+	The Policy identifies community and recreation facilities (such as education facilities, community halls, health facilities, libraries, social services facilities, allotments etc) as well as street furniture and public art as likely priorities.

crime and anti-social activity.				
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	0	0	0	It is not thought that this Policy will have a significant effect in terms of this objective.
SOC 7 To improve the quality of where people live.	+	+	+	This Policy identifies a range of community infrastructure as likely priorities for CIL and planning obligation funds.
SOC 8 To improve accessibility to essential services, facilities and jobs.	+	+	+	The Policy identifies community and recreation facilities (such as education facilities, community halls, health facilities, libraries, social services facilities, allotments etc) as well as utilities as likely priorities.
EC 1 To encourage sustained economic growth.	+	+	+	<p>Delivery and maintenance of infrastructure to support new developments will be of primary importance to ensuring that Norwich grows in status as a good place to invest.</p> <p>On the other hand, a good deal of the investment that must be attracted is from developers, who may be discouraged as a result of having to fund community infrastructure through the CIL or planning obligations. However, it is notable that the background text adds considerable detail regarding the mechanisms that will be employed to collect funds from developers. There is an emphasis on fairness and seeking to avoid causing problems of financial viability.</p>
EC 2 To encourage and accommodate both indigenous and inward investment.	+	+	+	See discussion under EC1
EC 3 To encourage efficient patterns of movement in support of economic growth.	0	0	0	It is not thought that this Policy will have a significant effect in terms of this objective.
EC 4 To improve the social and	0	0	0	It is not thought that this Policy will have a significant effect in terms of this objective.

environmental performance of the economy.				
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Summary

Overall environmental effects
This Policy should perform well in terms of most environmental objectives, although there is one objective – ENV5 (landscapes, townscapes and the historic environment) – where it is thought less likely that there will be significant effects.

Overall social effects
This Policy should perform well in terms of most social objectives, although there is one objective – SOC6 (employment) – where it is thought less likely that there will be significant effects.

Overall economic effects
This Policy performs well in terms of economic objectives in general, although it is not thought likely that there will be significant effects in terms of all objectives.

Overall summary of effects
This Policy sets out the detailed mechanisms for ensuring that funding is available to deliver and maintain the infrastructure that will be necessary to support development. In some respects the choice of what mechanism is employed has little bearing on sustainability objectives, as long as the infrastructure comes forward as required. However, it is thought that there are elements of the approach promoted that will help to ensure that infrastructure comes forward in a way that is supportive of sustainability objectives. In particular, it is seen as beneficial that the approach promoted is not rigid and one dimensional, but rather operates at a number of levels and includes a degree of flexibility. This is thought to be supportive of delivering the full, diverse range of infrastructure that will be required to meet sustainability objectives. For example, the Policy recognises the need to pursue central funding streams that will enable major infrastructure to be delivered, as well as collecting funds through the CIL and planning obligations for local level community infrastructure. The diverse nature of infrastructure that will be pursued is reflected in the examples that are included in the Policy.

Securing the delivery of infrastructure will be important to ensure the achievement of a range of socio-economic and economic objectives, but can also lead to a financial burden on developers, which might then discourage investment in Greater Norwich. It is thought that the Policy should go some way to addressing any potential problems in this respect. The background text, in particular, adds considerable detail regarding the mechanisms that will be employed to collect funds from developers. There is an emphasis on fairness and seeking to avoid causing problems of financial viability.

Recommendations: N/a