

# Greater Norwich Local Plan

## Topic Paper: Policy 2 Sustainable Communities

**Summary** The development of Policy 2, through the various stages of the local plan process and taking account of consultation comments and evidence and assessments, is explained in this topic paper. This culminates in a consideration of the responses to the Regulation 19 Proposed Submission GNLP. It is concluded that the policy is appropriate and “sound” in accordance with the legislative requirements. However, it is accepted that some improvements for explanation / clarification could be made through minor wording changes as “additional modifications”. In addition, there are some instances where a change is sought by an objector and, although the Greater Norwich authorities do not accept that the change is necessary, the authorities have no objection to such a change being recommended as a Proposed Modification by the Inspector if deemed to be necessary to make the Plan sound.

## Purpose

1. This topic paper is part of a series of papers to provide further justification and explanation of the policy for Policy 2 Sustainable Communities for the submission of the Greater Norwich Local Plan (GNLP) and its consideration at examination.
2. Policy 2 covers a range of social, economic and environmental matters that relate to the design of development to contribute to sustainable communities. Together with policy 3, which includes the design of development reflecting local character and sense of place using local design guidance, the policy promotes well-designed places as required by section 12 of the NPPF.
3. The Topic Paper contains the following: a brief introductory “background” to the topic paper; summary of the context including any legislative considerations, national planning policy, current local policies, and the main evidence sources that have guided the policy approach, including Sustainability Appraisal and Habitat Regulations Assessment; explanation of the Regulation 18 stage consultations and the results of the Regulation 19 stage consultation. Through these it is explained how the policy approach has been developed. Reference is made to a number of evidence documents, with “links” and evidence base references provided.

## Background

4. The aim of “sustainability” is at the heart of the planning system. However, it involves the often-conflicting environmental, social and economic issues. The majority of the policies in the GNLP address particular aspects of these issues, whereas Policy 2 is intended to draw the issues together and apply them to the development of the places where people live. As such, it sets out the key elements that need to be considered in delivering communities that are sustainable.

5. In doing this, it reflects national planning policy and guidance as well as being a development of previous local planning policy approaches, having regard to particular issues in the area and taking account of opinions that were expressed through the consultation process.
6. It will be a significant factor in achieving a GNLP objective: To grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities, helping to close the gap between life chances in disadvantaged and other communities.

## Context

### Proposed Legislation

7. At the time of writing there are proposed changes to legislation that will, if enacted, affect Policy 2. The Environment Bill 2020 contains a number of proposed provisions including “about targets, plans and policies for improving the natural environment; for statements and reports about environmental protection; for the Office for Environmental Protection; about waste and resource efficiency; about air quality; for the recall of products that fail to meet environmental standards; about water; about nature and biodiversity; for conservation covenants; about the regulation of chemicals; and for connected purposes”. If enacted, elements of Policy 2 may be superseded by the legislation.
8. In addition, the Government has consulted on a Future Homes Standard including on proposed amendments to Part L of the Building Regulations (timetabled for late 2021) that would raise energy efficiency standards in developments. These changes to Building Regulations may be implemented in late 2021, with further technical standards following in later years. Therefore, it is likely that the energy efficiency element of the policy, and possibly other aspects, will be superseded in the near future.
9. As a consequence of the above, if the GNLP is not adopted when such changes take place, it may be appropriate for Proposed Modifications to be made to update the policy.

### National Policy

10. In producing the GNLP the National Planning Policy Framework (NPPF) has been followed. The Regulation 19 GNLP was published under the February 2019 (NPPF) but it also accords with the NPPF update published on 20 July 2021. The NPPF sets out the policy framework within which local plans should be prepared. It states: “The purpose of the planning system is to contribute to the achievement of sustainable development” (para 7); and it has three objectives (economic, social

and environmental) (para 8). In particular, “So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)”.

11. More detailed policies and explanation are provided on the various matters that contribute to sustainable development, with examples of particular relevance to this topic being Chapter 8 Promoting healthy and safe communities; Chapter 9 Promoting sustainable transport; Chapter 10 Supporting high quality communications infrastructure; Chapter 11 Making effective use of land; Chapter 12 Achieving well designed places; Chapter 14 Meeting the challenge of climate change, flooding and coastal change; Chapter 15 Conserving and enhancing the natural environment; and Chapter 16 Conserving and enhancing the historic environment. Of particular note is the statement in Chapter 12 that “planning policies and decisions should ensure that developments : ... (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience” (para 130). A footnote to this explains that: Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified” (footnote 49).
12. Further explanation of the policies is set out in the National Planning Practice Guidance, together with more detailed guidance in the National Design Guide. This Guide is based around 10 “characteristics” of design: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. The content of Policy 2 reflects this approach.

### **Current local policies**

13. At a local level, the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), which was adopted in March 2011 with amendments adopted in January 2014, sets out the current strategic planning approach. The Spatial Vision (Chapter 4) includes that “all communities will be safer, healthier, more prosperous, sustainable and inclusive”; and “development will be to the highest possible standards of design”. Particular spatial planning objectives are: Objective 1 to minimise the contributors to climate change and address its impact; Objective 6 to make sure people have ready access to services; Objective 7 to enhance transport provision to meet the needs of the existing and future populations while reducing travel need and impact; Objective 8 to positively protect and enhance the individual character and culture of the area; Objective 9 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; Objective 10 to be a place where people feel safe in their communities; and Objective 11 to encourage the development of healthy and active lifestyles.

14. Policies in the JCS apply these objectives. Of particular relevance are: Policy 1 Addressing climate change and protecting environmental assets; Policy 2 Promoting good design; Policy 3 Energy and Water; Policy 6 Access and transportation; and Policy 7 Supporting communities. These strategic policies are taken forward in more detail through policies in the adopted Development Management Policies Local Plans and other supporting documents of the three planning authorities.
15. The GNLP further develops the existing local planning policies, amending and updating these in light of the NPPF, relevant evidence, including studies or strategies and the Sustainability Appraisal produced on the GNLP, and the results of consultation.

## Evidence

16. Section 2 of the GNLP is a “Spatial Profile” of the Greater Norwich area. This summarises information on the main social, economic and environmental issues and includes references to supporting information. It follows from a similar portrait produced for the Reg 18A Growth Options consultation in January 2018. It identifies key trends and issues which the GNLP aims to take account of and address. Sections of particular interest are Health and wellbeing (paras 45 – 50); Transport for Norwich and the Transforming Cities programme (paras 78 – 80); Digital Infrastructure (para 81); Emissions and Climate Change (paras 83 – 86); Flood Risk (paras 87 – 91); Renewable Energy (para 92); Environmental Assets (paras 93 – 104); Soils (para 105); Water (paras 106 – 107).
17. As well as the local issues, it is acknowledged that the GNLP “will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate” (para 86).
18. The Greater Norwich Energy Infrastructure Study (2019) ([B4.1](#)) was commissioned to provide evidence for the emerging GNLP to support development and the spatial distribution of growth. This included the suggestion: “consideration of how local planning policy could help facilitate development will be beneficial to optimise the (development) schemes coming forward. The details of the policy would have to be developed by each local authority; however, the following areas are recommended focus areas in order to shape developments and ensure grid constraints are not a barrier:
- Minimising energy demand from new development – by exceeding Part L Building Regulations requirements.
  - Ensuring energy is used efficiently – look at balancing the demands across a site by identifying complementary tenancies and activities.
  - Managing peaks of electrical demand in new developments - use on-site ESCOs to balance supply and demand through the use of renewable energy and batteries.

# Greater Norwich Local Plan

- Reducing carbon intensity of energy supplies through increasing renewable generation locally and requiring greater carbon reduction from developers”. In terms of reducing energy demand, regard was also had to the UKGBC New Homes Policy Playbook – Driving Sustainability in Local Authorities Feb 2021 (B16.1) and the earlier version of September 2018 which recommended a 19% reduction against the Target Emissions Rate in Part L of the Building Regulations. The latest Playbook referred to a potentially higher figure, but as this arose late in the local plan process the original figure of 19% was adopted in the Regulation 19 GNLP.

19. The Greater Norwich Water Cycle Study (WCS) (March 2021) ([B27.4](#)) (which followed on from a WCS Final Draft Jan 2021 and Interim Draft WCS Feb 2020) assessed water supply and waste water capacity in the area, identified issues and constraints, suggested solutions to key constraints, and put forward potential planning policy approaches. The local authority response to the suggestions ([B27.3](#)) was published with the WCS. This included the addition of a further criteria to Policy 2 Sustainable Communities (iv) relating to wastewater capacity; and an addition to Appendix 1 Infrastructure Requirements under the Water section referring to possible capacity issues in some waste-water catchments and Anglian Water’s Long-term Plan, that were included in the Regulation 19 GNLP.
20. The Greater Norwich Green Infrastructure Study (Dec 2020) ([B7.1](#)) updated and expanded earlier work on green infrastructure produced for the JCS. Also, a Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) (March 2021) ([B6.1](#)) addressing potential impacts on sites protected under the Habitat Regulations, was produced for all the local planning authorities in Norfolk. A GIRAMS Interim Statement of Common Ground between the Greater Norwich Authorities and Natural England ([B6.2](#)) has been produced, setting out an agreed position for the adoption of the GIRAMS. Policy 2 will provide for on-site green infrastructure which will link and contribute to further development of area wide green infrastructure promoted through policies 3 and 4 of the GNLP. Policy 3 addresses the specific requirements of the GIRAMS and the issue is discussed in more detail in the Topic Paper Policy 3 Environmental Protection and Enhancement.
21. The above evidence was taken into account in drafting the policy. Monitoring of the Plan will be undertaken and information provided on this in the Annual Monitoring Reports. The Green Infrastructure Study and the specific measures arising from it will also be monitored and evaluated over time, including through the work of the Greater Norwich Growth Board, as will the GIRAMS in conjunction with the other partners in the Norfolk Strategic Planning Group. Such monitoring will input into the next review of the Plan.



## **Sustainability Appraisal (SA)**

22. The Sustainability Appraisal was developed through a series of stages, with account being taken of this in the related GNLP stages. The Interim Sustainability Appraisal (2018) ([B23.2](#)) was an early high-level assessment of the issues to be addressed in the GNLP (as set out in the GNLP Growth Options consultation document). It considered the proposed GNLP objectives and policy topics and evaluated these against the objectives of the sustainability appraisal framework. Relevant to Policy 2 are the objectives for Communities, Homes and Environment. The conclusions relating to these are set out in Appendix 1 to this Topic Paper.
23. Relevant "topic" or thematic policies are: Healthy lifestyles, sustainable transport and broadband; Design; Climate change; Air quality; Environment (in relation to flooding, green infrastructure, Energy and Water); and Communities. Extracts relating to these are also set out in Appendix 1.
24. In particular, it identified issues that could be addressed within the policy themes to mitigate adverse effects and maximise beneficial ones. Relevant aspects were:
- Healthy lifestyles, sustainable transport and broadband – to be consistent with external transport plans and initiatives and related promotional activities (9.12)
  - Design – to be clear about areas of particular sensitivity in terms of design quality, this will ensure that particular consideration is given to design in those areas which are most sensitive, eg. historically or prominent locations, in a manner proportionate to their status. (9.13)
  - Climate change - ensuring that climate changes considerations run through all the strategic and topic-based policies of the plan (9.18)
  - Air quality - the potential air quality impact of new development to be considered at the allocation stage as well as the application stage, and by ensuring consistency between the GNLP transport policies and external policies, strategies, and promotional activities (9.19)
  - Flooding - ensuring that catchment wide considerations are properly taken into account both through the allocation of land and by site specific flood risk assessments (9.20)
  - Environment – overall benefits from an overarching policy setting out the context of key environmental considerations and policy requirements (9.22);
  - Energy - ensuring, as far as practicable, consistency between the policy and external policies, strategies and promotional activities (9.24);
  - Water - ensuring the development is distributed, as far as is practicable within any chosen distribution, so as to minimise impact on the water environment; and that policy requirements related to SUDs include measure that would support aquifer recharge. (9.25);
  - Communities - ensuring the development is distributed, as far as is practicable within any chosen distribution, so as to create the best relationship between new development and opportunities to live healthy lifestyles; and, as far as practicable, consistency between the policy and external policies, strategies and promotional activities (9.26).

25. The results of the Interim SA were taken into account in producing the draft policies for the next stage of the process, Reg 18C and the consultation on a draft Plan.
26. The **Regulation 18C Sustainability Appraisal Report** ([B23.3](#)) put forward a number of recommendations in relation to proposed Policy 2 in the Reg 18C Draft Plan consultation. These recommendations, together with the GN authorities' responses to them, are set out in Appendix 2. This resulted in revisions being made to the policy and supporting text in relation to:
- wording added on supporting efficient water management, minimising flood-risk, avoiding developing in areas at significant risk of flooding and protecting both surface and groundwater;
  - wording added into text re air quality;
  - a reference in criteria 3 to having regard to the relevant green infrastructure strategies and delivery plans. Also, added to the beginning of the policy to include enhancing the environment as an aim;
  - expansion of the explanatory text on standards and energy in Table 8;
  - Expansion of explanatory text re healthy lifestyles and access to facilities in Table 8;
  - Expansion of explanatory text re access to IT provision in Table 8.
27. These revisions went forward into the GNLP Reg 19 Proposed Submission version.
28. The **SA Report on the GNLP Reg 19** ([A6.1](#)) raised a number of issues including some that potentially related to Policy 2. These were considered and the local authorities' response, GNLP Authorities' Response to Sustainability Appraisal Residual Effects from the Reg 19 GNLP ([A6.4](#)) published with the SA report. No amendments to Policy 2 were deemed necessary.

## Habitat Regulations Assessment

29. An "appropriate assessment" under the Habitat Regulations or Habitat Regulations Assessment (HRA) has been produced for the GNLP. The overall aim was to determine whether the plan would have a likely significant effect upon the integrity of any "European" status wildlife site. The HRA was produced in a series of stages, reflecting those of the GNLP.
30. The **HRA of the Greater Norwich Local Plan Issues and Options stage (Dec 2017)** ([B9.1](#)) was an interim assessment of the Issues and Options stage of the emerging GNLP. This focussed on direct and indirect effects of proposed housing although other matters such as transport and employment land were also assessed. The broad conclusions at this stage of relevance to Policy 2 were that:

- To alleviate recreational pressure on European sites alternative recreational opportunities should be provided. This could take the form of a new country park containing woodland, small and large waterbodies (where feasible and subject to aircraft safeguarding constraints) open grassland or potentially inland beach functions (if feasible) nearer the strategic development sites.
- Allocations need to be accompanied by a water cycle study to demonstrate no harm to the water environment of European sites, in relation to water abstraction and to waste water both in isolation and in combination with other development.

31. These points were taken into account in the drafting of Policy 2 (together with Policy 3 which has a significant overlap with Policy 2 in terms of Green Infrastructure provision).

32. The interim assessment was followed by the **HRA of the Greater Norwich Regulation 18 Draft Plan (Dec 2019)** ([B9.2](#)). This considered the policies proposed at Reg 18C draft plan consultation stage. For Policy 2 the assessment concluded:

“6.2.1 There are no pathways which could have an adverse effect upon any European site. The requirement for sustainability to be included within development means that the wider environmental impact of development is less than it might otherwise have been, with an indirect link to avoidance of those wider impacts on European sites.

6.2.2 No suitable sites for onshore wind energy development have been submitted to the GNLP for potential allocations. The only ways to display local support, as required by the NPPF, for onshore wind energy are through a Neighbourhood Plan which requires a local referendum or through any other future local plan documents which may consider suitable sites. Wind energy schemes will be supported where the proposal is in a suitable area as identified in a Neighbourhood Plan or other Local Plan documents.

6.2.3 There are no allocations for solar farms or other energy generation schemes, and the safeguard in policy 3 would prevent impact on any European site; applications may need an individual HRA.

6.2.4 It is ascertained that this policy will have no adverse effect upon the integrity of any European site”.

33. Also of relevance is the assessment of proposed Policy 1 The Growth Strategy, which stated:

“5.11.1 Subject to satisfactory completion of the ..... Water Cycle Study, it is ascertained that this policy will have no adverse effect upon the integrity of any European site”.



34. The Water Cycle Study was not yet completed, but it was known that there were some potential issues with water supply and disposal. Hence, water efficiency was deemed to be a key element for Policy 2. This was reflected in revisions to the policy and supporting text for the next stage of the GNLP, the Regulation 19 Proposed Submission publication, to emphasise the importance of efficient water management.
35. For the next stage of the plan process, the Regulation 19 Proposed Submission GNLP (2021), the HRA was updated and the **Habitats Regulations Assessment of Greater Norwich Regulation 19 Draft Plan (Dec 2020)** ([B9.3](#)) produced, including its revised recommendations. These were considered and the local authorities' response, the GNLP authorities' Response to the draft HRA (Dec 2020) recommendations for the Reg 19 GNLP ([B9.4](#)) was published with the HRA report. Final revisions were made to the Reg 19 GNLP, including in relation to the HRA recommendations.
36. The overall conclusions of the HRA were:

*"11.3 Overall conclusion*

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

The referred to matters relevant to Policy 2 were:

*"11.1 The Greater Norwich Local Plan acting alone*

*11.1.1 It is ascertained that the Greater Norwich Local Plan regulation 19 Submission Draft v1.6 would have no adverse effect upon the integrity of any European site acting alone, subject to the following outstanding matters*

*.....*

- Adoption of the Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy to achieve mitigation for in-combination recreational effects*
- The provision of suitable green space for developments over 50 homes*
- Resolution of issues with Water Recycling Centres*

*..... "*

*And*

*11.2 The Greater Norwich Local Plan in combination with other plans or projects.*

*11.2.1 Other Local Planning Authorities throughout Norfolk are progressing towards adopting the GIRAMS scheme to mitigate for impacts on European site. This scheme will act to ensure that in-combination effects of residential development would not have an adverse impact on the integrity of any European site.*

37. With regard to these points, at the time of producing the Reg 19 GNLP the GIRAMS was not yet finalised. Similarly, the Water Cycle Study was close to being finalised but not yet completed. However, as mentioned under paragraph 19

above, based on the final draft, a further criteria was added to Policy 2 Sustainable Communities relating to wastewater capacity:

*“(iv) Potential applicants for planning permission for major developments are advised to contact Anglian Water Services in the early stages of producing a development scheme in order to ensure that there is adequate capacity, or capacity can be made available, in the wastewater network. The provision of capacity could affect the timing of development. In locations where there are known to be capacity issues the local authority will expect this engagement to have taken place and for it to be demonstrated that adequate capacity will be available to serve the development (see Appendix 1 Infrastructure Requirements for currently known locations with capacity issues”).*

Also, text in Appendix 1 Infrastructure Requirements under the Water section was revised:

*“The Water Cycle Study undertaken for the GNLP identified locations where there may be future capacity issues to be addressed for the growth proposed in the GNLP within the wastewater catchments of Aylsham, Foulsham, Long Stratton, Reepham, Rackheath, Diss, Ditchingham, Saxlingham, Whitlingham Trowse and Woodton. These issues should, at least in-part, be addressed by Anglian Water’s current Long Term Plan, but revisions may be necessary to this to fully address the GNLP proposals when finalised”.*

Hence, the GNLP Reg 19 Plan addressed the potential issue identified in the Water Cycle Study and raised in the HRA report. However, as the Water Cycle Study was not completed at the time of drafting this stage of the HRA, it was accepted that the HRA might need to be revisited later.

38. Accordingly, after the Reg 19 publication an updated HRA report was published ([A7](#)) in July 2021. This had regard to the final Water Cycle Study report and also the latest situation on the GIRAMS, including a proposed Statement of Common Ground with Natural England. The conclusions of the HRA were:

*“11.1 The Greater Norwich Local Plan acting alone -*

*11.1.1 It is ascertained that the published Greater Norwich Local Plan regulation 19 Proposed Submission Draft would have no adverse effect upon the integrity of any European site acting alone, subject to the adoption of the Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy to achieve mitigation for in-combination recreational effects. Monitoring of improvements to water recycling centres is necessary to review the progress on improvements needed in the next five years.*

*11.2 The Greater Norwich Local Plan in combination with other plans or projects -*

*11.2.1 Local Planning Authorities throughout Norfolk are progressing towards adopting the GIRAMS scheme to mitigate for impacts on European site. This*

*scheme will act to ensure that in combination effects of residential development would not have an adverse impact on the integrity of any European site.*

## **11.3 Overall conclusion –**

*11.3.1 It is concluded that subject to GIRAMS adoption and monitoring of progress towards water recycling improvements there would be no adverse effect upon the integrity of any European site”.*

39. The criteria included in Policy 2 relating to green infrastructure provision and water efficiency, are relevant to this conclusion together with Policy 3 Environmental Protection and Enhancement and Policy 4 Strategic Infrastructure. Hence, with regard to green infrastructure, the finalisation and adoption of the GNLP is dependent on the prior approval and adoption of the GIRAMS by the Norfolk local planning authorities in order to comply with the HRA. A joint interim statement with Natural England on the GIRAMS issue has been produced ([A6.2](#)).

## **Regulation 18 Consultation**

### **Reg 18A Growth Options and Site Proposals Consultation (October to March 2018)**

40. Details of the Reg 18A consultation are set out in the “Greater Norwich Local Plan Statement of Consultation” ([A8.1](#)). In particular, summaries of the consultation responses are set out in the Statement of Consultation Appendix 3b Growth Options and Rep summaries GNDP ([A8.5](#)). Relevant ones to Policy 2 are:

**Question 36 – “Which approach do you support for promoting good design of new development?”**

*Option DE1: Broadly continue with the existing design and density policy approaches, with some relatively minor changes and updating, covering general high-quality design, recognising local character, encouraging walking and cycling etc.*

*Option DE2: Create a stronger policy approach to design and density, including giving a clear policy approach to higher-density development in appropriate locations or scenarios”.*

A total of 82 separate responses were received to this question. 30 respondents supported Option DE1; 43 respondents supported Option DE2 and nine favoured other approaches.

Of support for DE1, Historic England favoured a high-quality design approach which responds to local distinctiveness and seeks to reinforce local character as being of benefit to the historic environment; and NHS Norwich CCG supported its contribution to healthy living and wellbeing among the population. For DE2, support focussed on the potential benefits for accessibility / walkability but subject to being well designed and respecting local character etc.

**Question 50** “Do you support the favoured option for climate change policy? CC1 Continue the current policy approach”. Seventy-six responses were received to this question. 35 respondents supported the favoured option, 37 did not and the remainder provided comments without selecting either option.

Natural England supported the continuation of the current policy approach to using resources efficiently, minimising greenhouse gas emissions and adaptation to changing climate and weather. A number of objections related to the current policy approach not going far enough. Historic England commented that any climate change policies should address the inclusion of renewable technologies within conservation areas and to historic buildings, balancing environmental benefits and costs and limiting and mitigating any costs to the historic environment.

**Question 51** “Which approach do you favour for air quality? Option AQ1 – Require planning applications which have the potential to impact on air quality to be accompanied by air pollution impact assessments and mitigation measures. Option AQ2 – Do not have a specific policy in the GNLP on air quality”. A total of 76 responses were received to this question. Of these, 62 supported option AQ1 and 14 supported option AQ2.

Many of the comments felt that more priority should be given to air quality. Anglian Water Services Ltd sought protection for the continued operation of their water recycling infrastructure, and similar comments were made by the Environment Agency in relation to waste sites. Natural England sought protection for designated wildlife sites. NHS Norwich CCG supported AQ1 for the increased health benefits to the population.

**Question 52** “Do you support the favoured option for flood risk policy? Option FR1 – Require all relevant applications to undertake a site-specific Flood Risk Assessments and to provide a Surface Water Drainage Strategy showing how any SuDS infrastructure will be maintained in perpetuity”. 70 separate responses were received to this question. Of these, 60 supported the favoured option on flood risk and 10 did not.

Those who did not support the favoured option argued variously that the requirement did not go far enough, that the issue of flood risk was already adequately covered in national policy and guidance, that the requirement would be too expensive for small builders, or that the particular requirement for SuDS was not appropriate in all circumstances.

There were also a number of comments in opposition to development either generally or in specific locations, on the grounds that any development would be likely to increase the risk of flooding.

The Environment Agency supported the requirement for a Flood Risk Assessment and Surface Water Drainage Strategy, and suggested things for inclusion in a

policy, including that new developments should implement SuDS and seek to retain 100% of surface water on site, with SuDS included in green infrastructure. Natural England supported FR1 and requiring site Flood Risk Assessments and provision of a Surface Water Drainage Strategy, to include maintenance, and that SuDS should be in addition to new GI. Anglian Water Services Ltd thought policy should require developers to ensure that water and water recycling centres had capacity; for SuDS to be provided; and for access to water infrastructure to be maintained. Comments against FR1 included questioning the viability of SuDS in some locations and the issues were adequately addressed in the NPPF.

**Question 56** “*Should the GNLP protect additional Strategic Gaps and if so where should these be?*” There were 70 responses to this question. 47 supported protecting additional Strategic Gaps, 17 did not and six respondents either stated they did not wish to comment or made additional comments.

A theme that came through strongly was the protection of river valleys and respondents identified the Tud, Wensum, Waveney, Tas and Yare. Gaps to protect the Norwich fringe were felt to be important with some areas suggested. Historic England supported the use of strategic gaps to maintain a distance of separation between settlements in order to retain the identity of settlements and the landscape character of the area.

**Question 57** “*Should option EN1 be included in the GNLP? Option EN1: Keep a Merton policy approach but remove sustainable construction content to avoid conflict with recent Government policy changes. Also identify suitable locations for wind and/or solar power*”. 54 responses were received to this question. 36 respondents supported option EN1 (keeping a Merton policy approach to renewable energy requirements), 17 did not favour it (one respondent being of the opinion that the issue was covered adequately in national policy and guidance) and one considered that it was not possible to express an opinion on the question without clearer evidence that EN1 was the most appropriate approach.

**Question 58** “*Do you support option W1 for water efficiency? Option W1: Require sufficient infrastructure to meet the needs of additional growth, whilst at the same time promoting water efficiency (using available standards), protection of water quality and areas of environmental importance*”. 62 separate responses were received to this question. 50 respondents supported option W1, nine did not and one was undecided. Two respondents considered that the local plan should only include a policy on water efficiency if the issue was not sufficiently covered by national policy and guidance.

The Environment Agency supported a policy on water efficiency, as Greater Norwich is in an area of water stress but also to reduce bills and emissions, as did the Broads Authority and Natural England. Anglian Water Services Ltd supported the application of the Building Regulation optional higher water efficiency standard



of 110 litres per person per day. Opposite opinion focussed on the need for higher levels of efficiency than current available standards being applied.

**Question 60** *“Which option do you support (in relation to a policy requirement for Health Impact Assessments)? Option COM 2: Require that developers submit a Health Impact Assessment for sites of 500 dwellings plus Option COM 3: Do not require that developers prepare and submit a Health Impact Assessment for any scale of development”.* 45 individual responses were received to this question. Of these, 35 supported option COM2, 8 supported option COM3 and two favoured neither option. NHS Norwich Clinical Commissioning Group suggested requiring Health Impact Assessments on all application for 50 or more homes.

**Question 63** *“Do you support option BR1? Option BR1: Have a specific policy covering development proposals close to the Broads, requiring the special characteristics and nature of the Broads area to be taken into account”.* 59 responses were received to this question. Of these, 52 supported option BR1 and 7 did not.

Respondents indicated significant support for a policy covering development proposals close to the Broads, requiring the special characteristics and nature of the Broads area to be taken into account and protected. The Broads Authority raised the importance of the historic environment as well as the natural one. Natural England sought a policy that included a requirement to avoid and/or mitigate any impacts on the Broads or its setting. Historic England stated that a policy to protect the setting of the Broads was necessary and demonstrated a cross-border approach to planning in the area. Of the opponents to BR1, some felt it was not necessary, while others felt that it did not go far enough.

41. The drafting of the policy for the Reg 18C Draft Plan took into account the responses to the Reg 18A consultation.

### **Reg. 18C Draft Plan consultation (January to March 2020)**

42. The draft Policy 2 Sustainable Communities addressed a range of issues that had previously been consulted on individually through the Reg 18A consultation. In the supporting text, Table 8 set out and explained the 10 key issues that were seen as fundamental to delivering sustainable communities and so to be addressed in the policy. As a strategic policy it was intended to be at a relatively “high level” and to set the context for the more detailed development management type policies in other local plans of the Greater Norwich authorities.
43. Details of the Reg 18C consultation are set out in the “Greater Norwich Local Plan Statement of Consultation” ([A8.1](#)) This included asking a series of questions on general points and relating to individual policies. Summaries of the consultation responses are set out in the Statement of Consultation Appendix 8 Reg 18C Strategy and Evidence Reps summaries GNDP ([A8.10](#)). Relevant to Policy 2 is:

**Question 18** - *Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?* 16 Support, 16 Object, 28 Comment. Sport England supported the policy and suggested that a reference be made to their “Active Design” document; Historic England objected to the lack of a reference to the historic environment; and Natural England agreed with the key issues identified, confirmed that GI provision is acceptable offsite if cannot be provided on-site; and emphasised that development should avoid loss or severance of GI networks and contribute to strengthening them.

44. In the light of the responses received to Reg 18C, together with matters raised through the Sustainability Appraisal, Habitats Regulation Assessment, and the Water Cycle Study, a number of substantive changes (plus other minor clarification, corrections etc) were made to the draft Policy 2 and supporting text for the Reg 19 Proposed Submission version of the Plan. The substantive changes and reasons for the changes are set out in Appendix 3 of this Topic Paper. A “tracked changes” version of the GNLP, showing the changes to the policy and text is also available ([Reg. 18C to 19 track changes.pdf \(gnlp.org.uk\)](https://gnlp.org.uk/Reg_18C_to_19_track_changes.pdf)). (nb an error in the tracked changes version gives the paragraph numbers of the Reg18C document as 1 less than in the actual document).
45. The changes, in summary, are in relation to:  
including references to enhancing the environment; recreation; construction methods; green infrastructure strategies and delivery plans; “net” densities; local character and aesthetic quality (including landscape, townscape and the historic environment; “historic” character assessments; design guides and codes; including public art where appropriate; layouts that encourage walking and cycling; parking that does not dominate the streetscape; planting and careful choice of materials; supporting efficient water management; minimising flood risk; avoiding development in areas at significant risk of flooding; and protecting water quality “both surface and groundwater”; new development to provide a “19%” reduction on Part L of Building Regs; inclusion of an exception for provision of lower energy standards on viability grounds; support for wind energy schemes where supported by the local community; taking account of the National Design Guide; master-planning “particularly” encouraged for larger developments; and in terms of using legal powers to bring about strategically significant developments, that regard will be had to changes in circumstances that affect delivery, particularly economic factors; and that major developments should ensure that there is adequate waste water capacity.
46. For the supporting text a number of points of explanation / clarification have been made, particularly to Table 8 the Key Issues addressed by Policy 2.

## Reg 19 Proposed submission

### Reg 19 Proposed Submission publication (February to March 2021)

47. The Reg 19 Proposed Submission GNLP is the intended “final” version of the Plan. It has evolved over a number of years following proper procedures. The starting point was the current local plan, primarily the Joint Core Strategy, and the policies within the National Planning Policy Framework. Initial consultations looked into issues and options for the Plan, and these highlighted the importance of achieving communities that were sustainable, and that this would contribute to meeting key objectives of the Plan. Further consultations held on a draft Plan (Reg 18C) confirmed this. Evidence such as the Energy Infrastructure Study, Water Cycle Study, Green Infrastructure Study and GIRAMS, together with the Sustainability Appraisal and Habitat Regulations Assessment, supported the need for the Policy and gave direction to its approach. As such, Policy 2 is a necessary and justified part of the Plan that will help guide the future development of the area and the delivery of more sustainable communities.
48. The Reg 19 Proposed Submission GNLP was published on 1 February 2021 with the period for representations running to 22 March 2021. This stage is to allow for representations to be made on legal and “soundness” issues as set out in the legislation. A number of representations were received relating to Policy 2 or its supporting text. These can be viewed on the GNLP website at: [Regulation 19 Publication | GNLP](#). Details of the Reg 19 consultation are set out in the “Greater Norwich Local Plan Statement of Consultation” ([A8.1](#)). This includes a summary of the representations and the authorities’ response to these at Appendix 11a ([A8.19](#)). The responses include some potential minor changes proposed to be made as “additional modifications”. In addition, for some statutory bodies that have made representations Statements of Common Ground may refer to potential modifications and in some cases may give rise to revisions to the original authorities’ response. ([LINK Doc ref](#)).
49. The main issues raised in the Reg 19 stage representations were:
- Water Efficiency –
1. No justification for applying an unknown potential future government requirement; should be dealt with through a future local plan review
  2. Will policies on water efficiency be sufficient to cope with the cumulative growth of both the GNLP and Breckland?
- Climate Change/Energy –
1. No coherent climate adaptation policy; policy on climate change, energy etc is inadequate; does not reflect Government carbon emission targets;
  2. Electric vehicles will put further pressure on the already constrained energy network;
  3. Requirements for energy charging points cannot be in SPD;
  4. Requirements for energy charging points have not been taken into account in viability;

5. Requirement for a 20% (or 19%) reduction against Part L of the 2013 Building Regulations is not supported by the evidence;
6. The Greater Norwich Energy Infrastructure Study did not consider neighbouring Breckland district's power needs for the growth already in progress at Attleborough and Snetterton Heath or at Dereham.

#### Landscape –

1. Reference to strategic gap policies should be deleted.
50. These matters, and others raised in the representations are addressed in the Greater Norwich authorities' responses as set out in Appendix 11a of the Statement of Consultation and the Statements of Common Ground referred to above. One such SoCG is with Natural England ([LINK Doc ref](#)), in response to their representations on the GNLP, and this includes a joint interim statement on the GIRAMS issue ([A6.2](#)). No major modifications to the GNLP are necessary in the light of these representations, though some minor changes may be worthwhile for clarification etc.

## Conclusions

51. Proper regard has been had to legislation, national policy, evidence including Sustainability Appraisals and Habitat Regulations Assessment, and the results of community engagement and consultation. Policy 2 is appropriate and “sound” in accordance with the legislative requirements, subject to adoption of the GIRAMS as referred to in the section on the Habitat Regulations Assessment. However, it is accepted that some improvements for explanation / clarification could be made through minor changes. A tracked changes version of the policy and text showing these potential “additional modifications” is available at ([LINK \(doc ref\)](#)).

## Appendices

### Appendix 1 Interim Sustainability Appraisal (2018) Extracts

#### Objectives

**Communities: To grow vibrant, healthy communities giving people a high quality of life in well-designed developments and good access to jobs, services and facilities.**

4.6.5. It is not considered that this proposed objective would have any significant potential negative effects in relation to any of the draft SA objectives. In order to maximise the benefits of this objective it will be important to plan for a distribution of residential and economic development that meets needs and is best placed to ensure residents are well provided for in terms of services and facilities. It is also important that the distribution of development supports existing services and facilities and which more generally seeks to address key principles of good design ensuring that new development functions well, establishes a strong sense of place, responds to local character and history, creates safe and accessible environments and is visually attractive.

**Homes: To enable delivery of high-quality homes of the right size, mix and tenure to meet people's needs throughout their lives.**

4.6.6. The effects of this proposed objective are closely related to those identified for the economy objective, including positive effects in relation to the SA objectives on housing and reducing deprivation. These positive effects could be maximised by ensuring that viable sites are allocated which are able to meet any affordable housing obligation and by ensuring that development is designed to take account of crime and safety issues. As with the economic objective key conflicts result from the potential of new development to have a negative impact on issues such as air, noise and light pollution, reducing carbon emissions, protecting biodiversity, respecting landscape or heritage assets, loss of high quality agricultural land and impact on the water environment. Again, these effects can be mitigated through measures such as: ensuring development has a good relationship to services and facilities; if new services can be provided as part of new development ensuring that existing residents are also well placed to benefit from them; ensuring that sites allocated for development have the least impact on biodiversity, landscape or heritage assets; or that effective mitigation plans are put in place. It will also be important to ensure the appropriate infrastructure can be delivered to maintain the supply/demand balance for water.

**Environment: To protect and enhance the built and natural environment, make best use of natural resources, minimise contributors and adapt to climate change.**

4.6.9. It is considered that this objective has a generally positive impact in relation to the SA objectives. These positive effects can be maximised through measures such as providing appropriate policy protection for the historic environment, key landscapes, natural resources and areas of habitat or conservation important. Also, planning for new development in a manner which avoids significant impact on these features wherever



possible will be important. There are potential negative effects identified in terms of the SA objectives which seek to ensure housing needs are met and that economic development is promoted. These effects primarily relate to the possibility that housing and economic development needs may not always be met in a manner which has no impact on the objective. In order to minimise these effects it will be important to ensure that a proportionate approach is taken to the protection of assets relative to their importance, that the potential for mitigation is explored as early as possible and that effective measures are put in place on development sites. Possible negative effect could also result if development were distributed in a manner which is inconsistent with minimising contributors to climate change, in particular with regards to the impact of travel. To minimise such impact it will be important that the plan exploits opportunities for the use of sustainable transport as far as is practicable.

## **Policy themes**

(under Access and Transport)

### **Healthy Lifestyles, Sustainable Transport and Broadband – Outline of the Reason for Selecting the Alternatives Dealt with**

8.3.7. Reducing reliance on the private car and promoting more sustainable and healthy travel choices are important aspects of achieving the communities and environmental objectives of the GNLP. Therefore, the only reasonable alternative is to include a policy that addresses these issues within the plan.

Reasonable Alternative TR1: Continue current approach re public transport, walking & cycling improvements & better broadband

8.3.8. TR1 aims to encourage improvements to public transport, walking and cycling and a better broadband network. This alternative is ultimately likely to reduce the number of car journeys and increase walking, cycling and public transport use, supporting the achievement of SA1, SA2, SA8 and SA12. Better broadband would help the economy, supporting the achievement of SA11.

## **8.4. Design**

Outline of the Reason for Selecting the Alternatives Dealt with

8.4.1. Good design is indivisible from good planning. Not having a design and density policy in the GNLP, simply relying on existing development management policies, is unreasonable as the NPPF clearly requires a specific policy approach to be taken in new local plans. It would also risk a policy vacuum in some areas currently covered by JCS policies 1 and 2.

8.4.2. Two reasonable alternatives have been identified for the design policy. These would comprise continuing with the current approach (as set out in the JCS) or creating a stronger policy approach to design and density. The former would address, albeit in a fairly basic manner, national policy requirements, but may not enable full recognition of emerging national policy changes, with an increased focus on high-quality design and

density. The latter would allow greater specificity of design requirements. It could also allow identification of areas suitable for higher-density development, and perhaps specify minimum densities. It could consider the question of residential space standards, design quality and wheelchair accessibility too. Evaluating Significant Effects Reasonable Alternative DE1: Broadly continue with the existing design and density policy approaches, with some relatively minor changes and updating, covering general high-quality design, recognizing local character, encouraging walking and cycling etc. DE2: Create a stronger policy approach to design and density, including giving a clear policy approach to high-density development in appropriate locations or scenarios.

## Summary of Significant Effects

8.4.3. Alternatives DE2 has more scope to improve the efficiency of land use (SA4) than DE1. While both would enable the delivery of the objectively assessed need for homes (SA5), DE2 would also provide for diversity if it applied accessibility standards and a range of density requirements. Otherwise, the two alternatives would have a largely neutral impact on the SA objectives.

## 8.6. Climate Change

### Outline of the Reasons for Selecting the Alternatives Dealt with

8.6.1. The 2004 Planning and Compulsory Purchase Act imposes a legal duty to include “Policies designed to secure that the development and use of land in the local planning authority area contribute to mitigation of, and adaption to, climate change”. The GNLP’s draft environment objective is: To protect and enhance the built and natural environment, make best use of natural resources, mitigate against and adapt to climate change.

8.6.2. As a consequence of the above there are not considered to be any other reasonable alternatives other than to include a specific policy that continues with the current JCS policy approach on climate change.

## Summary of Significant Effects

8.6.3. Policy CC1 can reasonably be expected to directly address climate change mitigation in regards to carbon emissions, particularly from traffic by promoting sustainable modes of transport modes. It would also be expected to address climate change mitigation through measures such as green infrastructure and increased water efficiency. Policy CC1 would also indirectly address air pollution, by supporting reduced carbon emissions from traffic. All of these would result in significant positive effects on the baseline. It should be noted that other policies of the GNLP will directly impact on these issues also e.g. the transport policy and also that other influences, such as the local transport plan, could have a greater impact on these issues than the policies of the GNLP.

## 8.7. Air Quality

### Outline of the Reasons for Selecting the Alternatives Dealt with

8.7.1. Air quality is recognised as an important issue for Greater Norwich. The Norwich Area Transport Strategy will play the most important role in tackling air quality issues across Norwich and its immediate hinterland, specifically through implementation of NATS

measures such as prioritising sustainable transport on some roads. There is also a specific Action Plan that relates to the Air Quality Management Area (AQMA) in central Norwich.

8.7.2. Air quality implications relating to individual sites will be considered through the ongoing site assessment process. The inclusion of an overarching policy requiring air pollution impact assessments on appropriate development is also reasonable and is consistent with communities objective: To grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities; and, The overall vision to: To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment.

8.7.3. Given that air quality issues will primarily, and most effectively, be dealt with through NATS and specific area action plans it is also reasonable to continue without a specific air quality policy in the GNLP.

AQ1 – Require planning applications which may have potential to impact on air quality and/or are located in an area of poor air quality to be accompanied by air pollution impact assessments.

AQ2 – Do not have a specific policy in the GNLP on air quality.

#### Summary of Significant Effects

8.7.4. AQ1 is likely to have a strong positive impact on air quality where it is poor, as developers would be required to explicitly state how they plan to reduce the impact of poor air quality and of the proposed development on air quality. If alternative AQ2 was chosen, relying on the NPPF and existing DM policies would be effectively evolution of the baseline without a plan. Alternative AQ1 would require developers to consider how they might mitigate the impact of their development on air quality. The indirect impact of this is that developers are likely to maximise their contributions to sustainable transport modes, which would result in more active travel in some form. Thus, AQ1 is likely to indirectly promote healthy lifestyles.

## 8.8. The Environment

8.8.1. The environment policy of the GNLP covers flooding, mitigating effects on internationally designated wildlife sites and green infrastructure. The identified reasonable alternatives for each of these sub-areas is set out below.

#### **Flooding** – Outline of the Reasons for Selecting the Alternatives Dealt with

8.8.2. It is important that the GNLP steers new development away from flood risk area as far as possible and ensures that it mitigates against, and if necessary is adapted to, flood risk.

8.8.3. Requiring new development to follow the NPPF requirements only in regards to flooding has been considered. However, as this approach would not meet the clear recommendations of the SFRA, in particular dealing with surface water flooding risks, and would risk a lack of co-ordination between sites and a lack of clarity about the long-term

maintenance regime for SuDS infrastructure, this is considered to be an unreasonable alternative.

8.8.4. Therefore it is necessary to include a policy that specifically meets the recommendations of the SFRA guidance. This is the only reasonable alternative.

#### Evaluation of Alternatives Reasonable Alternative FR1

Include a Specific Flooding Policy in the GNLP requiring all relevant applications to undertake site-specific Flood Risk Assessments and to provide a Surface Water Drainage Strategy showing how any SuDS infrastructure will be maintained in perpetuity.

#### Summary of Significant Effects

8.8.5. Alternative FR1 has the potential to have a significant positive impact on the baseline in respect of climate change mitigation (SA2), biodiversity (SA3), protection of the historic environment (SA13) and water quality (SA15). It is however difficult to predict with any accuracy the impact of this policy in advance of the precise policy wording being developed. Therefore at this stage these impacts are identified as uncertainties.

### Green Infrastructure

#### Outline of the Reasons for Selecting the Alternatives Dealt with

8.8.9. Green infrastructure (GI) is defined in the NPPF Glossary as “a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”. 8.8.10. Defining, protecting and enhancing a Green Infrastructure network will be a key part of meeting the overall vision for the plan as well as the environmental and community objectives. Therefore the only reasonable alternative is to include a green infrastructure policy in the plan.

#### Evaluation of Significant Effects Reasonable Alternative NC3

Broadly reproduce the current JCS Policy 1 elements as they relate to green infrastructure, updating the baseline information (such as the GI Map), with each allocated site setting out the details of any specific mitigation measures/improvements within its allocation policy

#### Summary of Significant Effects

8.8.11. NC3 would ensure development contributes towards green infrastructure, which would in some cases provide routes for walking and cycling, supporting healthier lifestyles. It would also contribute to the protection and enhancement of biodiversity, help to mitigate against the effects of climate change and maintain or enhance landscape character. There may also be indirect significant benefits in terms of promoting walking and cycling as modes of sustainable transport as walking and cycling infrastructure could also enhance access to employment and education or services and facilities.

### 8.10. Energy

#### Outline of the Reason for Selecting the Alternatives Dealt with

# Greater Norwich Local Plan

8.10.1. National policy requires LPAs to demonstrate a positive strategy to promote the delivery of renewable and low carbon energy. The environmental objective of the GNLP also seeks to minimise the contributors to climate change.

8.10.2. Not having a policy at all would be unreasonable as it would not conform to the NPPF6 or the environment objective of the GNLP. A second unreasonable approach would be to require a higher minima of Decentralised and Renewable Low Carbon Energy sources than the current JCS: There is no current evidence that would demonstrate that this is achievable.

8.10.3. It is however considered reasonable to develop a policy similar to the current JCS policy, but remove policy content relating to wind energy or sustainable construction to avoid conflict with recent Government policy changes. It would also introduce an energy generation element of the policy which identifies suitable areas for renewable energy generation for wind and/or solar power. This option would be a positive step towards helping to meet carbon reduction targets and would meet the requirements of the NPPF and is consistent with the environmental objective of the plan.

## Evaluation of Alternatives

Reasonable Alternative EN1: Keep a “Merton” policy approach, but remove sustainable construction content to avoid conflict with recent Government policy changes. Also identify suitable locations for wind and/or solar power.

## Summary of Significant Effects

8.10.4. The principle aim of policy EN1 is to fulfil the obligation for a positive strategy to promote energy from renewable and low carbon sources and to maximise renewable and low carbon energy development, which would strongly support objective SA2, which aims to reduce carbon emissions. The policy would also support employment in the energy industry, which is one of the LEP’s key sectors, thus helping to achieve SA11. The impact of EN1 on other SA objectives is considered to be neutral.

## 8.11. Water

### Outline of the Reason for Selecting the Alternatives Dealt with

8.11.1. Greater Norwich, like many parts of the south and east of England, experiences low levels of rainfall and is defined by Environment Agency as an area of water stress. At the same time it has and neighbours internationally important water based environmentally protected sites. In addition, the Water Resources Management Plan 2014 emphasises the need for new development to be water efficient throughout the Anglian Water area, promoting water efficiency, enhanced metering and additional leakage control in this area and the Inspectors at the JCS firmly supported such a policy approach.

8.11.2. National planning policy requires that “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of ..... water supply and demand considerations”.

8.11.3. It is therefore essential that growth in Greater Norwich addresses water efficiency and quality issues. The JCS approach of requiring sufficient infrastructure to meet the



# Greater Norwich Local Plan

needs of additional growth, whilst at the same time promoting water efficiency, protection of water quality and protection of areas of environmental importance covers all of the key issues in relation to water and thus its continuation is considered to be the only reasonable alternative.

## Evaluation of Alternatives

Reasonable Alternative W1: Retain current approach requiring sufficient water infrastructure for growth, promoting water efficiency, protecting water quality and areas of environmental importance

## Summary of Evaluation

8.11.4. WA1 represents a continuation of current policy, and is therefore known to be generally viable and implementable. The impact on most SA objectives is therefore considered to be neutral. The exception to this is that the approach directly aims to protect areas of environmental importance, supporting the achievement of both SA3 (protection of biodiversity assets) and SA15 (maintain and enhance water quality and ensure the most efficient use of water).

## 8.12. Communities

8.12.1. In order to meet the communities objective, the plan must provide the policy background to enable new communities to grow which have a range of services, good access, and enable people to lead active and healthy lifestyles.

## Integration of Affordable Housing

### Outline of the Reason for Selecting the Alternatives Dealt with

8.12.2. Affordable housing on a mixed should be “tenure-blind”. “Pepperpotting” of affordable houses is the generally preferred approach (i.e. mixing affordable houses with market houses), but it is recognised that for Registered Providers (companies managing affordable houses), there can sometimes be economies of scale in the locating small clusters of affordable houses together. An outcome to avoid is for all the affordable housing in a development to be located in one part of the site together (perhaps separated from market housing by landscaping, trees or a significant road), which might give the impression of “affordable” and “market” parts of the site.

8.12.3. Not setting policy for the distribution of affordable housing across and within housing sites would be an unreasonable alternative. This is because it would run a significant risk of “affordable only” sections of development sites being created, with affordable houses (particularly social/affordable rented) concentrated together, separately from market sections, reducing the perception that the development could be considered as a coherent whole. It is therefore proposed that a policy seeking to achieve the integration of affordable housing is the only reasonable alternative.

## Location of Affordable Housing within Sites

## Evaluation of Alternatives

Reasonable Alternative COM1: Affordable housing should be spread evenly across and within housing sites and be of tenure-blind appearance

8.12.4. COM31 promotes an even distribution of affordable housing within a residential scheme. This approach would provide an appropriate mix of housing tenure (SA5) and have a positive impact on social integration (SA6). This could also have some benefits in addressing the fear of crime (SA9), although this is not considered to be a significant impact. Other SA objectives would not be impacted by this proposal.

## Health Impact Assessments

### Outline of the Reason for Selecting the Alternatives Dealt with

8.12.5. Health Impact Assessments (HIAs) assess the potential effects of a scheme on active lifestyles and the health of a population and identify the health care facilities required to support the development. This helps inform the design and layout to best allow for walking, cycling, open space and 90 recreation and mitigate the impacts of vehicular traffic, especially in relation to air quality and noise.

8.12.6. Whilst these considerations are those that can more generally be taken into account in the determination of a planning application, requiring a systematic process of assessment can increase the certainty over which such issues will be effectively addressed. Therefore a policy requiring HIAs on qualifying development is considered to be a reasonable alternative consistent with the communities objectives of the plan.

## Evaluation of Significant Effects

Reasonable Alternative COM2: Require developers to submit a health impact assessment for large sites COM3: Do not require developers to submit a health impact assessment for any scale of development

## Summary of Significant Effects

8.12.7. COM2 would require developers to demonstrate how their scheme affords residents the best opportunities to live healthy and active lifestyles and to identify the health care facilities required to support development. This should increase the access to health facilities (SA7 and SA8). By providing opportunities to live healthy, active lifestyles, there should be a reduction in car journeys (SA1 and SA12) and a subsequent reduction in carbon emissions (SA2). Conversely, COM3 is the absence of a positive policy, which is effectively evolution of the baseline and would have a neutral impact on all SA objectives.

## Appendix 2 Sustainability Appraisal Report Reg 18C (Jan 2020) Extracts from Appendix C plus GN authorities' response

*"C.5.4.2 It is recommended that this policy could be expanded to include the requirement to ensure the protection of designated sites, and to result in a biodiversity net gain in line with national requirements, and Policy 3".*

Response - The issue of protection of sites and biodiversity net gain is addressed in policy 3 and supporting text. Policies should not be repetitive in accordance with Govt advice. It is therefore not necessary to include in Policy 2.

*"C.5.15.2 However, it is recommended that this policy could potentially be enhanced by encouraging development on previously developed locations, in order to minimise the loss of agriculturally and ecologically important soil. This could be achieved through cross-reference to Policy 3".*

Response - The use of previously developed land does not, itself, contribute to the achievement of a sustainable community. The NPPF encourages the use of previously developed land, it is not necessary to repeat it. Also, other aspects of the Plan have regard to the issue, encouraging development on previously developed land through the spatial strategy which focuses development in urban locations, and through the identification of settlement boundaries. It is therefore not necessary to include in Policy 2.

*"C.5.16.2 Although this policy would help to ensure that water efficiency is promoted throughout the Plan area, it is uncertain how the proposed development could impact water quality. This policy could potentially be further expanded to help ensure future development within Greater Norwich does not have a detrimental impact on local water quality, in terms of groundwater and watercourses. Specific wording relating to the management of surface water quantity and quality, and development in Flood Zones would further strengthen this policy".*

Response - It is accepted that the policy would benefit from some further wording in this respect, but this should not be overly detailed reflecting the strategic nature of the policy. Further wording is proposed to be added, referring to supporting efficient water management, minimising flood-risk, avoiding developing in areas at significant risk of flooding and protecting both surface and ground-water.

*"Table 3.3 1. • The Regulation 18 Draft Plan Policies could provide a greater focus on mitigating adverse impacts from air, noise, light and vibration pollution on both human and ecological receptors. This could include reference to protecting air quality within Central Norwich AQMA, and along major transport routes. • Proposed improvements to the green infrastructure network, including the Yare Valley Green Infrastructure Corridor, provides the opportunity to naturally filter pollutants from the air. This will improve the quality of the environment in Greater Norwich. It is recommended that this vision be embedded into the*

# Greater Norwich Local Plan

*policies and that a strategy for its implementation be developed in more detail. • In line with the NPPF, development should seek to, wherever possible, help to improve environmental conditions, such as air and water quality. This target should be incorporated into the development of policies.*

Response - It is accepted that the policy and text would benefit from some further wording in this respect, but this should not be overly detailed reflecting the strategic nature of the policy. Further wording is proposed to be added into text re air quality. There are already green infrastructure strategies and associated delivery plans for the Greater Norwich Area which are being implemented. The provision of GI is addressed within the GNLP, not just Policy 2 but primarily under Policy 3 and through specific site allocation requirements. It is also addressed through existing Development Management policies. However, a reference in criteria 3 to having regard to the relevant green infrastructure strategies and delivery plans would be beneficial. Wording is also proposed to be added to the beginning of the policy to include enhancing the environment as an aim.

*“Table 3.3 2. • In line with the NPPF, any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards. • In line with the NPPF, policies should seek to prioritise renewable and low carbon energy sources, opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. • Proposed improvements to the green infrastructure network, including the Yare Valley Green Infrastructure Corridor, provides the opportunity to create water smart development addressing flooding and water supply challenges. It is recommended that this vision be embedded into the policies within the Local Plan and that a strategy for its implementation be developed in more detail. • Policy 2 could be improved through inclusion of specific wording relating to development in Flood Zones and the management of surface water quantity and quality”.*

Response - Policy 2 already reflects the NPPF in this respect, though some expansion of the explanatory text would be worthwhile and is proposed to Table 8. For GI s/flood risk see C.5.16.2 and Table 3.3.1 above.

*“Table 3.3 8. The final policies should ensure reference to Local Air Quality Action Plans. Policy 2 could potentially be expanded to detail how air quality will be protected, especially for development located in close proximity to main roads or Central Norwich AQMA.”*

Response - See Table 3.3.1.

*“Table 3.3 8. • In line with NPPF development should seek to support healthy lifestyles and address identified local health and well-being needs - for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling”.*

# Greater Norwich Local Plan

Response - This is largely already addressed within Policy 2, and in more detailed Development Management Local Plans, but some additional references and further explanatory text would be useful. Additional text is proposed to be added to Table 8.

*“Table 3.3 11. • Opportunities should be explored in the policies to achieve smart economic growth. This could be encouraged through the use of technology and innovative ways of working to increase productivity without damaging people’s quality of life or the environment. This may include greater reference within the policies to the provision of high-speed broadband to encourage working at home.*

Response - This is already addressed within Policy 2, though some clarification would be worthwhile. Additional text is proposed to be added to Table 8.

*“Table 3.3 15. • It is noted that Policy 2 within the Regulation 18 Draft Plan focuses on water efficiency, a key priority for the area. This policy, or other policies within the Plan, could potentially be expanded to ensure future development within Greater Norwich does not have a detrimental impact on local water quality, in terms of both groundwater and above ground watercourses. • Greater reference could be made within policies to specific watercourses within Greater Norwich, including the River Wensum Strategy which aims to revitalise the river including in terms of water quality. • In line with the NPPF, development should seek to, wherever possible, help to improve environmental conditions, such as water quality. This target should be incorporated into the development of policies. • It is recommended that the Greater Norwich Water Cycle Study is completed in order to determine the most sustainable approach to development in terms of water management and provide a solid evidence base. This would also provide the opportunity to incorporate green infrastructure into a robust strategy across the Plan area”.*

Response - See C.5.16.2 and Table 3.3.1. The Greater Norwich Water Cycle Study is part of the evidence base that has informed the Plan.



## Appendix 3

### Policy 2 and supporting text – summary of changes from Reg18C to Reg 19

#### Policy 2 – Sustainable Communities

#### Summary of proposed substantive changes

| <u>Paragraph Number/ Policy</u> | <u>Summary of changes</u>                                                                                                                               | <u>Reason for changes</u>                                                                                                                                          |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Table 8 1                       | Insert text on supporting healthy lifestyles and Active Design.                                                                                         | Clarification in response to comments, including from Sport England                                                                                                |
| Table 8 2                       | Replace “allow” with “make provision” and insert “such as assisting in homeworking”.                                                                    | For clarification.                                                                                                                                                 |
| Table 8 3                       | Add reference to GI documents                                                                                                                           | Clarification in response to comments made in SA in relation to Policy 3.                                                                                          |
| Table 8 4                       | Add text on determining appropriate density                                                                                                             | Clarification in response to comments made on density,                                                                                                             |
| Table 8 5                       | Expand heading of section to: <b>Local character (inc landscape, townscape, heritage )</b><br>And insert text to make reference to historic environment | Clarification in response to comments, including by Historic England                                                                                               |
| Table 8 8                       | Insert text on air quality in relation to air quality management areas and main roads                                                                   | Clarification in response to comments in SA                                                                                                                        |
| Table 8 10                      | Correction and clarification to refer to co-locating heat customers and suppliers                                                                       | Clarification in response to comments in SA                                                                                                                        |
| Policy 2                        | Insert various references and amendments for clarification                                                                                              | In response to comments including from Historic England, Natural England, Sport England and Environment Agency, and comments made in SA, HRA and Water Cycle Study |