

# **GNLP Examination – Green Party responses**

**Tuesday 1 Feb - Matter 1: Statutory Procedures & Legal matters**

**Issue 2: Does the Sustainability Appraisal (SA) including the addendum, adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?**

**1. Have the likely environmental, social, and economic effects of the Plan’s policies and proposals been adequately assessed in the SA?**

***Green Party response:***

The importance of protecting high quality soils is included in the GNLP submission document, Section 2 - Greater Norwich Profile, Soils:

“119 Large tracts of rural Greater Norwich are valuable for their agricultural land. .... Protecting high quality soils is an important consideration both for supporting agriculture and shaping our rural landscape character. This will need to be balanced with development needs through the plan.”

The Sustainability Appraisal and Strategic Environmental Assessment Non-Technical summary states, under “Soils”:

“The proposed development within the GNLP would result in the loss of approximately 1,019ha of previously undeveloped land. Development in these locations would result in the loss of approximately 912ha of Best and Most Versatile (BMV) soils. This would be expected to result in the permanent and irreversible loss of soil resources. Soil provides essential services, including nutrient cycling, abating flood risk, filtering water and carbon storage. Direct loss of soil through construction would be expected to reduce these essential ecosystem services. Although the GNLP focuses some development towards urban and brownfield sites, a residual adverse effect on local soil resources would be expected.”

Given the concerns at such a significant loss of high-quality soils it is surprising that a more detailed assessment of soils has not been undertaken to inform the plan to ensure losses are kept to a minimum. At one time, not so long ago, it was commonplace for soil assessments to be carried out to inform planning decisions. In the current post-Brexit circumstances, it is as important as ever to safeguard and support our farm land and agricultural production for a range of reasons many of which are mentioned in the plan as important and significant: maintenance of green spaces, climate sequestration, local food production to minimise food miles and carbon emissions, maintenance of the Norfolk landscape, health and wellbeing. Once land is built on access to those soils is gone, there is no turning back.

It is, therefore, clear there is the potential for significant high quality soils to be lost and this is to be avoided. It is not clear, however, how soils are to be assessed and

protected within the Plan. Neither is it clear how high quality soils will be “balanced with development needs”?

It appears Norfolk LPAs have not been carrying out land classification surveys in recent years to inform the planning process. The SA states “a residual adverse effect on local soil resources is to be expected” but a detailed, up to date, soil assessment covering the plan area is not available. We, therefore, suggest a mechanism for soil classification and monitoring needs to be included in the plan using the existing Agricultural Land Classification (ALC) approach to inform future planning decisions and protect high quality soils.