



## Greater Norwich Local Plan Examination – Matter 1 Statement: Compliance with statutory procedures and legal matters

**Date:** January 2022

**For:** Rosconn Strategic Land

**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 requirements?

### **Q2. Has the Sustainability Appraisal, including the addendum, properly assessed the likely significant effects of all reasonable alternatives including a reduced housing provision buffer?**

No. The Sustainability Appraisal underpinning the Plan is flawed because it does not adequately consider reasonable alternatives to the chosen spatial strategy. The Sustainability Appraisal Addendum dated December 2021 [D1.6] assesses further reasonable alternatives, but only does so in terms of overall housing numbers rather how they are distributed throughout the plan area. Even though individual reasonable alternative sites have been appraised, many are discounted purely for lack of consistency with the “Sustainable Growth Strategy” embodied in Policy 1 of the Plan. This begs the question as to how Policy 1 itself has been arrived at, appraised and what reasonable alternatives have been considered to it.

As one would expect the Plan has been subject to SA throughout its evolution. Six strategic growth options were identified at Regulation 18A stage in early 2018 [B23.1] but are not carried forward to subsequent SA reports with no clear explanation as to why they have been discounted or why the chosen strategy set out in Policy 1 outperforms them. We elaborate further in our response to Question 4 below.

The initial growth options identified at Regulation 18 stage were subject to assessment across the 15 SA objectives using the same framework that would later be used to assess Policy 1 at the Regulation 18C and 19 stages. It is noteworthy that the appraisal of Policy 1 results in several “major negative” effects across the SA objectives whereas three of the earlier six growth options found within Table 7.6 of the Regulation 18A SA [B23.1] result in no such effects. Whilst the submission SA [A6] appraises a greater quantum of net growth than at the Regulation 18A stage, the likely significant effects of alternative spatial strategies for distributing the same quantum are not clear.

We would request that the Plan’s sustainability appraisal is supplemented to explain clearly how the significant effects of all reasonable alternative growth strategies have been considered against the selected growth strategy. Should the SA process not support the Plan’s proposed growth strategy then clearly the growth strategy is unjustified and Plan itself will require significant revision in order to be both sound and legally compliant. The SA process should be iterative and undertaken at each stage of plan-making. It should not be retrofitted to accommodate a growth strategy that has already been selected.

### **Q4. Is it clear how the SA has influenced the Plan and choice of spatial strategy? Does it support the spatial strategy or is there anything in the SA which indicates that changes should be made to the plan?**

It is unclear how the SA has influenced the Plan and choice of spatial strategy. The Regulation 18A SA [B23.2] undertook a high-level assessment of options for both the scale and the distribution of growth. In terms of distribution, six reasonable alternative options were identified



for the growth strategy and assessed. The conclusion drawn was that no reasonable alternative clearly performed better than the others in sustainability terms. As set out in our Matter 3 statement, the Regulation 18A SA highlighted the disadvantages of continuing to direct significant growth to the Norwich Urban Area given the large-scale commitments that already exist at this location. Despite these findings, the Regulation A 18C SA [B23.3] appraised only one spatial strategy which, to quote the Growth Strategy Topic Paper [D3.2], “combined concentration of most of the development in and around Norwich and on the Cambridge Norwich Tech Corridor, with an element of dispersal to the villages to support thriving rural communities.” No reasonable alternatives to the strategy for distributing growth were appraised. The Regulation 19 SA continued this approach and whilst it appraised a greater quantum of growth than had been considered at the two previous stages SA, the strategy for distributing it remained the same as at Regulation C stage and no reasonable alternatives to were identified or assessed save for brief allusions to the Regulation 18A SA which, as set out in our Regulation 19 representations and above, appraised a lesser scale of net growth over a different plan period.

The Regulation 18A SA identified several growth strategy options as reasonable alternatives but there is no explanation in subsequent SA reports for why they apparently ceased to be such at the Regulation 18C stage or why the chosen spatial strategy is regarded as outperforming alternatives on a comparative basis.

In addition, reasonable alternatives to the spatial strategy were appraised in 2018, early on in the SA process. There is no assessment in subsequent SA reports as to whether these findings remain up-to-date and accurate nor are they placed in the context of the later SA reports which only appraise the preferred spatial strategy. This makes it challenging to gauge why the preferred spatial strategy was chosen over reasonable alternatives or else why the alternatives identified were no longer considered reasonable after the Regulation 18A stage.

For the above reasons it is unclear how the SA process has shaped the spatial strategy. Given the Regulation 18A’s comments about the difficulty in delivering high levels of growth within the Norwich urban area due to the scale of existing commitments, the SA process also strongly suggests that an alternative strategy should be pursued through the Plan. As above further clarity should be provided on how the SA process supports the preferred growth strategy. Should this not be the case then clearly the growth strategy is unjustified and Plan itself will require significant revision in order to be both sound and legally compliant. The SA process should be iterative and undertaken at each stage of plan-making. It should not be retrofitted to accommodate a growth strategy that has already been selected.