

Sustainability Appraisal of the Greater Norwich Local Plan (2018-2038)

Post-Adoption Statement

March 2024



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LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



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Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan 2018 - 2038

Post-Adoption Statement

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Acronyms and abbreviations

AAP	Area Action Plan
ALC	Agricultural Land Classification
AQMA	Air Quality Management Area
BMV	Best and most versatile
DLUHC	Department for Levelling Up, Housing and Communities
GIRAMS	Green Infrastructure and Recreational Impact Avoidance Strategy
GNDP	Greater Norwich Development Partnership
GNLP	Greater Norwich Local Plan
HELAA	Housing and Economical Land Availability Assessment
HRA	Habitats Regulations Assessment
JCS	Joint Core Strategy
LSE	Likely Significant Effect
MHCLG	Ministry for Housing, Communities & Local Government
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
RTPI	Royal Town Planning Institute
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
WCS	Water Cycle Study

1 Introduction

1.1 Context and purpose of this report

1.1.1 This report comprises the Sustainability Appraisal (SA) Post-Adoption Statement for the Greater Norwich Local Plan (GNLP) 2018-2038. It has been prepared under Regulation 16 of the Strategic Environmental Assessment (SEA) Regulations (SI 1633) 2004¹.

1.1.2 The GNLP has been prepared by the Greater Norwich Development Partnership (GNDP), which is comprised of Broadland District Council, Norwich City Council and South Norfolk Council. The aim of the GNLP is to positively plan for growth and development within the area. The GNLP is a development strategy covering 20 years which sets out strategic policies to guide future development, providing homes and jobs to meet the needs of the area, whilst protecting the environment and promoting sustainability.

1.1.3 During the preparation of the GNLP, the Councils were required to carry out an SA of the Plan. SA is a statutory process incorporating the requirements of the SEA Directive².

1.1.4 The purpose of this Post-Adoption Statement is to outline how the SA/SEA process has informed and influenced the GNLP development process, and to demonstrate how consultation on the SA/SEA has been taken into account.

1.2 The Greater Norwich area

1.2.1 Greater Norwich comprises the three local authorities of Norwich, Broadland and South Norfolk (see **Figure 1.1**). Greater Norwich is recognised nationally as a leader in science, technology and advanced manufacturing. The city of Norwich is a major regional centre for employment, tourism and culture and is Norfolk's highest-ranking retail centre. Within the city there are numerous primary and secondary schools, as well as a number of higher and further education centres, including the University of East Anglia, Norwich University College of the Arts, City College and Easton College.

1.2.2 The districts of Broadland and South Norfolk are predominantly rural in nature, with isolated towns and villages separated by large areas of open farmland. The Broads is a nationally important landscape, located to the east of the GNLP area, representing a visually and culturally distinctive part of Norfolk which has an important effect on landscape character. The River Yare, River Bure and River Waveney form the district boundaries between Broadland and South Norfolk.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/ukSI/2004/1633/contents/made> [Date accessed: 26/01/24]

² SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date accessed: 26/01/24]

1.3 About the GNLP

- 1.3.1 The aim of the GNLP is to ensure that *“by 2038 Greater Norwich will have vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure and an enhanced environment”*.
- 1.3.2 The GNLP is set out in three documents:
1. The Strategy;
 2. The Sites; and
 3. The Monitoring Framework.
- 1.3.3 The GNLP identifies the strategy for growth in this first part of the Plan, the GNLP Strategy. The sites to deliver the strategy are in the second part of the Plan, the GNLP Sites document.
- 1.3.4 Providing a framework to guide development across the three authority areas up to 2038, the GNLP sets out both strategic policies and site allocations to meet demand for housing and employment, as well as other land use matters. The GNLP has been prepared with the aim of ensuring that development is delivered in a way which promotes sustainability and the effective functioning of the Greater Norwich area, taking into account new and emerging national policy and guidance.
- 1.3.5 The GNLP has been produced by the three councils of Broadland, Norwich and South Norfolk, supported by Norfolk County Council. It supersedes the previous Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk (2008 – 2026), as well as Site Allocation Plans for each authority. The GNLP will be used in conjunction with the adopted Area Action Plans (AAPs), Development Management Plans for the three authorities, and Neighbourhood Plans.

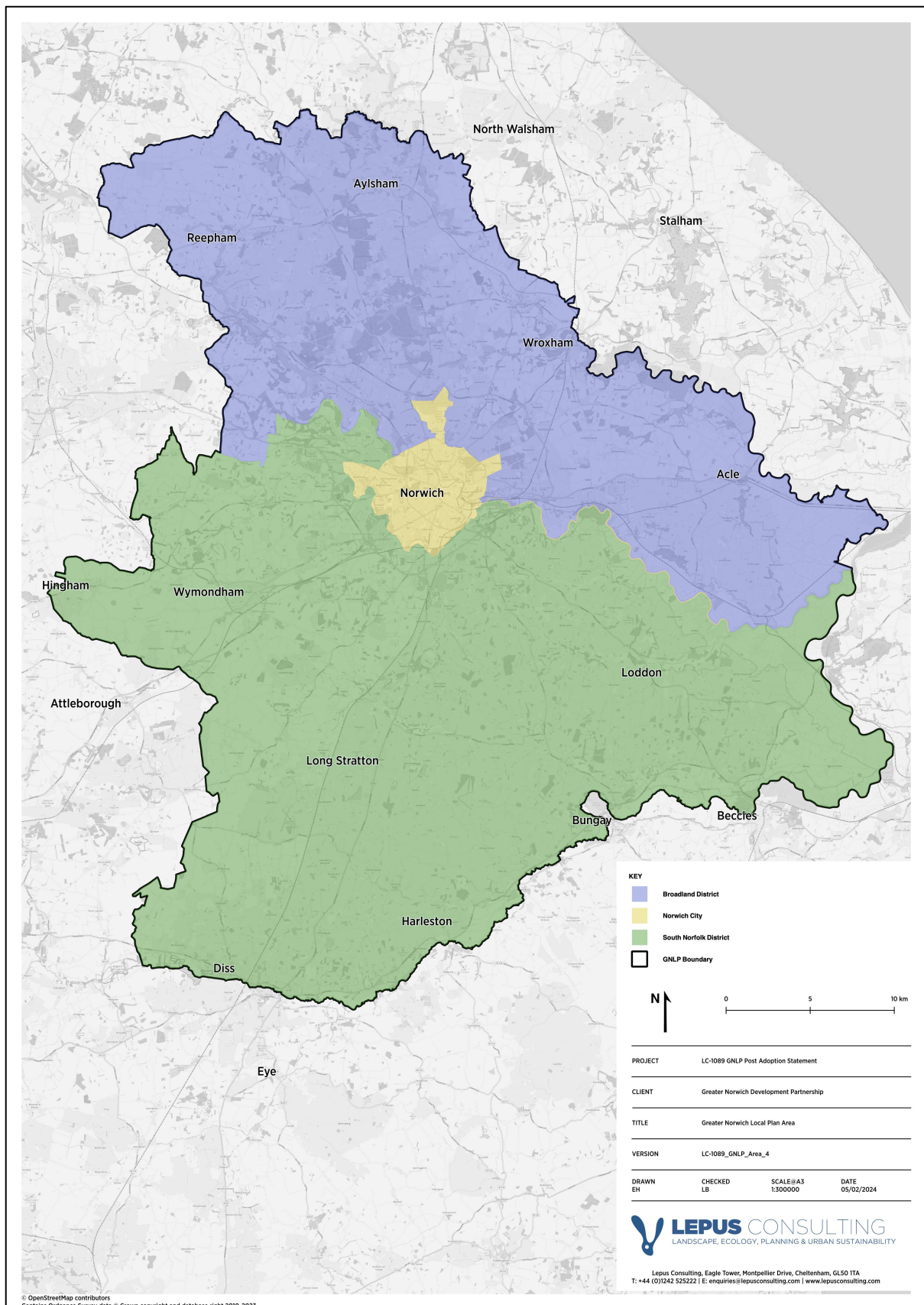


Figure 1.1: Broadland District, Norwich City and South Norfolk District boundaries

1.4 Requirement for the Post-Adoption Statement

- 1.4.1 In order to meet the legislative requirements of the European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes (2004), a Post-Adoption Statement is required to be published “*as soon as reasonably possible after the Plan has been adopted*”³.
- 1.4.2 SEA Regulation 16⁴ sets out the post-adoption procedures, including the requirement to produce a statement containing a number of particulars (Regulation 16 Paragraph 4). **Box 1.1** presents the requirements of this SA/SEA Post-Adoption Statement.
- 1.4.3 Following best practice guidance, the SEA has been incorporated into the SA of the GNLP. This Post-Adoption Statement therefore provides sustainability information beyond the strict environmental parameters outlined in **Box 1.1**, to reflect the broader sustainability appraisal process.

³ RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 26/01/24]

⁴ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/part/4/made> [Date accessed: 26/01/24]

Box 1.1: SEA Regulation 16 Post-Adoption Procedures⁵

Information as to adoption of plan or programme

16.—

- 1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall—
 - a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and
 - b) take such steps as it considers appropriate to bring to the attention of the public—
 - i) the title of the plan or programme;
 - ii) the date on which it was adopted;
 - iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained;
 - iv) the times at which inspection may be made; and
 - v) that inspection may be made free of charge.
- 2) As soon as reasonably practicable after the adoption of a plan or programme—
 - a) the responsible authority shall inform—
 - i) the consultation bodies;
 - ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and
 - iii) where the responsible authority is not the Secretary of State, the Secretary of State; and
 - b) the Secretary of State shall inform the Member State with which consultations in relation to the plan or programme have taken place under regulation 14(4), of the matters referred to in paragraph (3).
- 3) The matters are—
 - a) that the plan or programme has been adopted;
 - b) the date on which it was adopted; and
 - c) the address (which may include a website) at which a copy of—
 - i) the plan or programme, as adopted,
 - ii) its accompanying environmental report, and
 - iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.
- 4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are —
 - a) how environmental considerations have been integrated into the plan or programme;
 - b) how the environmental report has been taken into account;
 - c) how opinions expressed in response to—
 - i. the invitation referred to in regulation 13(2)(d);
 - ii. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
 - d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
 - e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
 - f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

⁵ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/part/4/made> [Date accessed: 26/01/24]

1.5 Using this document

- 1.5.1 This Post-Adoption Statement should be read alongside the GNLP (2018-2038) and associated SA documents, which are summarised in **Chapter 2** and can be found on the GNLP website⁶.
- 1.5.2 This report has been prepared in order to meet the requirements of the SEA Regulations (see **Box 1**). The chapters are structured as per the criteria presented in the Regulations, as shown in **Table 1.1**.

Table 1.1: Guide to the requirements of the SEA Regulations for this post adoption statement

Requirements of Regulation 16 (4)	Location in this report
a) how environmental considerations have been integrated into the plan or programme;	Chapter 2 (the SA Framework)
b) how the environmental report has been taken into account;	Chapter 4
c) how opinions expressed in response to— i. the invitation referred to in regulation 13(2)(d); ii. action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;	Chapter 5
d) how the results of any consultations entered into under regulation 14(4) have been taken into account;	Chapter 5
e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;	Chapter 3
f) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	Chapter 6

⁶ Greater Norwich Local Plan. Available at: <https://www.gnlp.org.uk/> [Date accessed: 12/02/24]

2 Overview of the assessment process

2.1 Integrated approach to SA and SEA

- 2.1.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 2.1.2 The SEA Directive applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.
- 2.1.3 The SEA Directive has been transposed into English law by the SEA Regulations. Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the GNLP to be subject to SEA throughout its preparation.
- 2.1.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004⁷ and should include an appraisal of the economic, social and environmental sustainability of development plans. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

2.2 Best practice guidance

- 2.2.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance including the following:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment⁸.

⁷ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 24/01/24]

⁸ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 24/01/24]

- Office of Deputy Prime Minister (ODPM) (2005) A Practical Guide to the SEA Directive⁹.
- Department for Levelling Up, Housing & Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)¹⁰.
- DLUHC and Ministry for Housing, Communities & Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)¹¹.
- Royal Town Planning Institute (RTPI) (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans¹².

2.3 SA and the sequential plan-making process

2.3.1 The SA (incorporating SEA) process has accompanied and informed the plan-making process on an iterative basis. The key SA outputs are as follows:

- SA Scoping Report (GNDP, March 2017)¹³;
- Interim SA Report (GNDP, January 2018)¹⁴;
- Regulation 18C SA Report (Lepus, January 2020)¹⁵;
- Regulation 19 SA Report (Lepus, February 2021)¹⁶;
- Consultation response: Addendum to the Regulation 19 SA Report (Lepus, September 2021)¹⁷ (focused on spatial options);

⁹ ODPM (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date accessed: 24/01/24]

¹⁰ DLUHC (2023) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf [Date accessed: 08/02/24]

¹¹ DLUHC and MHCLG (2023) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 26/01/24]

¹² RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 08/02/24]

¹³ GNDP (2017) Sustainability Appraisal Scoping Report for the Greater Norwich Local Plan. Available at: <https://gnlp.oc2.uk/docfiles/46/final-sa-scoping-report.pdf> [Date accessed: 08/02/24]

¹⁴ GNDP (2018) Interim Sustainability Appraisal of the Greater Norwich Local Plan. Available at: <https://gnlp.oc2.uk/docfiles/46/Reg.-18-Interim-Sustainability-Appraisal-of-the-GNLP.pdf> [Date accessed: 08/02/24]

¹⁵ Lepus Consulting (2020) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Regulation 18C January 2020. Available at: [https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18\(C\)_Final.pdf](https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18(C)_Final.pdf) [Date accessed: 08/02/24]

¹⁶ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Volumes 1-3) January 2021. Available at: <https://www.gnlp.org.uk/regulation-19-publication/evidence-base> [Date accessed: 08/02/24]

¹⁷ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Consultation response: Addendum to the Regulation 19 SA/SEA Report, September 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-10/LC-663_GNLP_SA_Addendum_11_270921LB.pdf [Date accessed: 08/02/24]

- Inspectors' Initial Questions: Reasonable Alternatives for Housing Number Options. Addendum to the Regulation 19 SA Report (Lepus, December 2021)¹⁸;
- Note in response to inspectors questions relating to the SA of potential development sites (Lepus, June 2022)¹⁹;
- SA of the GNLP Gypsy and Traveller Sites and Policies: Addendum to the Regulation 19 SA Report (Lepus, June 2023)²⁰; and
- SA of the GNLP Proposed Main Modifications (Lepus, October 2023)²¹.

2.3.2 **Table 2.1** sets out the stages of preparation of the GNLP and the accompanying stage of SA where relevant.

Table 2.1: *Timeline of SA reports in conjunction with GNLP preparation*

Date	GNLP stage	SA output
June to August 2016 (finalised March 2017)	Plan-making commences.	SA Scoping Report (GNDP) Identified the scope for the SA, set out the context, 15 SA Objectives and approach of the assessment.
January to March 2018	Stage A Regulation 18 Consultation of Site Proposals, Growth Options and the Interim Sustainability Appraisal	Interim Sustainability Appraisal (GNDP) This report assessed the GNLP options for growth, which included six options for the spatial strategy and policy options.
October to December 2018	Stage B Regulation 18 Site Proposals Addendum and HELAA Addendum	No SA report prepared.
January to March 2020	Stage C Regulation 18 Draft Strategy consultation Draft strategy including vision, objectives and strategic policies, a sites document and supporting evidence documents.	Regulation 18C SA Report (Lepus) This report assessed 285 reasonable alternative sites and eleven draft strategic policies.
February to March 2021	Publication: Regulation 19 Pre-Submission Draft Plan The GNLP is split into two documents: The Strategy and Site Allocations. The Strategy Document sets out the profile of Greater Norwich, the Plan vision and objectives, and	Regulation 19 SA Report (Lepus) The Regulation 19 SA Report summarised the SA process to date and helped inform the examination stage of the preparation of the GNLP. It presented the findings of the sustainability appraisal of the GNLP, which was

¹⁸ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Addendum to the Regulation 19 SA Report: Inspectors' Initial Questions: Reasonable Alternatives for Housing Number Options, December 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-12/LC-663_GNLP_SA_Addendum_7_031221IND.pdf [Date accessed: 08/02/24]

¹⁹ Lepus Consulting (2022) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan - Note in response to inspectors' questions relating to the SA of reasonable alternative sites: Addendum to the Regulation 19 SA/SEA Report, June 2022. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2023-01/Addendum%20to%20the%20Regulation%2019%20SA%20SEA%20Report.pdf> [Date accessed: 08/02/24]

²⁰ Lepus Consulting (2023) Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies: Addendum to the Regulation 19 SA Report, June 2023. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2023-06/H4.2%20G%2BT%20Sustainability%20Appraisal%20June%202023%20with%20ERRATUM%209.6.23.pdf> [Date accessed: 08/02/24]

²¹ Lepus Consulting (2023) Greater Norwich Local Plan (2018-2038) Submission Version Proposed Main Modifications: Sustainability Appraisal of the Main Modifications, October 2023. Available at: https://gnlp.oc2.uk/docfiles/82/LC-985_GNLP_SA_Main_Modifications_6_161023LB_compressed.pdf [Date accessed: 12/02/24]

Date	GNLP stage	SA output
	the strategic policies. The Site Allocations Document sets out the site allocations of the GNLP.	composed principally of 12 strategic policies and 138 site policies. This report also contained an assessment of an additional 107 reasonable alternative sites.
September 2021	Analysis of representations to the Regulation 19 consultation.	Consultation response: Addendum to the Regulation 19 SA/SEA Report (Lepus) The Addendum sought to address consultation responses related to the SA/SEA received by the GNLP during the Regulation 19 consultation, specifically in relation to the testing of reasonable alternatives and selection process for the chosen spatial strategy and distribution of growth in the Plan area.
December 2021	Submission / Examination of the GNLP.	Inspectors' Initial Questions: Reasonable Alternatives for Housing Number Options. Addendum to the Regulation 19 SA/SEA Report (Lepus) Prepared in response to the inspectors' Initial Question 7 which asked for an addendum to the SA to be produced, relating to the housing growth numbers, and addressing " <i>both smaller and minimal supply buffers as 'reasonable alternatives'</i> ".
June 2022	Examination of the GNLP.	Note in response to inspectors' questions relating to the Sustainability Appraisal of potential development Sites (Lepus) An SA note prepared to address site specific issues raised in representations made in writing or in person at the Examination in Public (EiP) Part 1 Hearings.
January to March 2023	Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation The consultation document sets out possible sites to provide residential pitches for Gypsies and Travellers.	SA of the GNLP Gypsy and Traveller Sites and Policies: Addendum to the Regulation 19 SA/SEA Report, January 2023 (Lepus) The first iteration of the SA Addendum presented the assessment of 11 reasonable alternative Gypsy and Traveller sites and accompanying site allocation policies.
June to July 2023	Site Policies for Gypsy and Traveller Permanent Residential Pitches Additional Focused Consultation The consultation document sets out possible sites to provide residential pitches for Gypsies and Travellers, including new sites identified since the previous consultation (January to March 2023).	SA of the GNLP Gypsy and Traveller Sites and Policies: Addendum to the Regulation 19 SA/SEA Report, June 2023 (Lepus) The SA Addendum was updated since the previous consultation to incorporate four new reasonable alternative sites which emerged during the consultation and updated selection and rejection information.
October to December 2023	Proposed Main Modifications Schedules of proposed Main Modifications to the Pre-Submission Version of the GNLP Sites and Strategy documents to address the matters raised during the Examination, in particular the inspectors' post-hearing letter.	SA of the GNLP Proposed Main Modifications (Lepus) The Schedules of Proposed Main Modifications were screened for potential to affect the SA, with updated or deleted policies re-assessed against the SA Framework where necessary.

2.4 SA Framework

2.4.1 The SA process used an SA Framework to appraise the Plan as it evolved. The purpose of the SA Framework is to provide a way of ensuring that the Local Plan preparation process considers the environmental, social and economic impacts of the proposed site allocations and policies on the various environmental, social and economic receptors located in and around the borough. The SA Framework offers a consistent and robust means of description, analysis and comparison for these impacts.

2.4.2 The SA Framework for the GNLP consists of 15 sustainability objectives. The extent to which these objectives will be achieved can, in most cases, be measured using a range of indicators. The SA Objectives were largely informed by topics of Annex I (f) of the SEA directive²², taking into account other relevant national, regional and local plans and programmes and local key issues. By considering each of these influences, the SA Framework allows for a robust, thorough and meaningful SA.

2.4.3 The SA Objectives included within the SA Framework are set out in **Table 2.2**.

Table 2.2: SA Framework objectives

	SA Objectives	Relevance to SEA Directive - Annex 1(f)
1	Air Quality and Noise: Minimise air, noise and light pollution to improve wellbeing.	Air.
2	Climate Change Mitigation and Adaptation: Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.	Climatic factors.
3	Biodiversity, Geodiversity and Green Infrastructure: Protect and enhance the area's biodiversity and geodiversity assets and expand the provision of green infrastructure.	Biodiversity, flora and fauna.
4	Landscape: Promote efficient use of land, while respecting the variety of landscape types in the area.	Landscape.
5	Housing: Ensure that everyone has good quality housing of the right size and tenure to meet their needs.	Population.
6	Population and Communities: Maintain and improve the quality of life of residents.	Population.
7	Deprivation: To reduce deprivation.	Population and human health.
8	Health: To promote access to health facilities and promote healthy lifestyles.	Population and human health.
9	Crime: To reduce crime and the fear of crime.	Population.
10	Education: To improve skills and education.	Population and material assets.

²² Biodiversity flora and fauna; Population; Human health; Soil; Water; Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

	SA Objectives	Relevance to SEA Directive - Annex 1(f)
11	Economy: Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintain and enhance town centres.	Population and material assets.
12	Transport and Access to Services: Reduce the need to travel and promote the use of sustainable transport modes.	Population, climatic factors and material assets.
13	Historic Environment: Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.	Cultural heritage.
14	Natural Resources, Waste and Contaminated Land: Minimise waste generation, promote recycling and avoid the sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land.	Climatic factors, material assets and soil.
15	Water: Maintain and enhance water quality and ensure the most efficient use of water.	Water

2.4.4 The likely adverse and positive sustainability effects of the GNLP as identified in the various SA reports are presented in **Chapter 4** (see **Tables 4.1** and **4.2**).

2.4.5 The SA methodology, as set out in Chapter 4 of the Regulation 19 SA Report (2021)²³, included a number of topic-specific methodologies and assumptions relating to each of the SA Objectives.

2.5 Habitats Regulations Assessment

2.5.1 The GNLP was subject to a Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)²⁴ (the Habitats Regulations).

2.5.2 Following a screening exercise (Stage 1 of the HRA process) an Appropriate Assessment²⁵ (Stage 2 of the HRA process) was undertaken to assess Likely Significant Effects (LSEs) in more detail. Identified potential impacts on a number of European sites arising from policies and allocations within the GNLP included:

- **Increased recreational pressure:** trampling of vegetation or disturbance to birds, or providing difficulties in site management for example.
- **Increased pressure on water resources:** new homes and businesses would require a reliable source of drinking water which could affect wetlands from increased abstraction.

²³ Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Volumes 1-3) January 2021. Available at: <https://www.gnlp.org.uk/regulation-19-publication/evidence-base> [Date accessed: 08/02/24]

²⁴ The Conservation of Habitats and Species Regulations (2017) SI No. 2017/1012, TSO (The Stationery Office), London.

²⁵ The Landscape Partnership (2021) Habitats Regulations Assessment of the GNLP (July 2021) Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2021-10/E16845%20GNLP%20Reg%2019%20submission%20plan%20HRA%202021-07-07%20%28003%29.pdf> [Date accessed: 26/01/24]

- **Water pollution:** waste water discharge from new developments, including foul water discharges may reduce the water quality of rivers or wetlands.
- **Air pollution:** additional traffic movements increasing emissions to air such as Nitrogen oxides (NO_x) and Sulphur dioxide (SO₂) which have the potential to result in adverse impacts upon vegetation or water quality.
- **Urbanisation of the countryside:** predation by cats, fly-tipping, increase in arson, vandalism of European site infrastructure such as fences, disturbance of livestock, etc.

2.5.3 Based on the Councils' continued adoption and progress of the relevant monitoring and mitigation strategies (in particular the Green Infrastructure and Recreational Impact Avoidance Strategy – GIRAMS), the HRA concluded that all potential LSEs on European sites caused by the GNLP alone or in-combination could be objectively ruled out.

2.5.4 In 2023, the Proposed Main Modifications were assessed in the HRA process²⁶. This assessment concluded that there would be no adverse impact on the site integrity of any European site as a result of the Main Modifications.

²⁶ The Landscape Partnership (2023) Habitats Regulations Assessment of the GNLP Proposed Modifications (March 2023) Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2023-03/E16845%20GNLP%20Reg%2019%20HRA%202023-03-17.pdf> [Date accessed: 26/01/24]

3 Why the adopted Local Plan was chosen, in light of reasonable alternatives

3.1 Reasonable alternatives

3.1.1 The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

3.1.2 At each stage of the plan-making process for the GNLP, different reasonable alternatives were identified, described and evaluated through the SA process. This included the following types of reasonable alternative:

- Housing requirements;
- Employment floorspace requirements;
- Spatial strategy;
- Policies; and
- Sites.

3.1.3 Reasonable alternatives were identified by the GNDP using a range of evidence and variables such as the Housing and Economic Land Availability Assessment (HELAA)²⁷. The reasonable alternatives have been evaluated throughout the plan-making process at various stages, using a consistent methodology for each type of alternative. Assessment findings were fed back to the plan-making team on an iterative basis to aid decision-making for the GNLP.

3.2 SA of housing requirements

Regulation 18A (2018)

3.2.1 The Growth Options Document²⁸ and associated Interim SA Report²⁹ considered four options in relation to housing requirements as part of the Regulation 18A consultation:

27 GNDP (2017) GNLP Housing and Economic Land Availability Assessment (HELAA) (December 2017) Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-01/helaa_-_reg_18_-_dec_2017.pdf [Date accessed: 26/01/24]

28 GNDP (2018) GNLP Growth Options Document. Available at: <https://gnlp.oc2.uk/document/12> [Date accessed: 13/02/24]

29 GNDP (2018) Interim Sustainability Appraisal of the Greater Norwich Local Plan. Available at: <https://gnlp.oc2.uk/docfiles/46/Reg.-18-Interim-Sustainability-Appraisal-of-the-GNLP.pdf> [Date accessed: 08/02/24]

1. GNLP Housing Requirement is equal to Objectively Assessed Need (OAN). Delivery Buffer is Approx. 20%. Forecast Windfall Housing does not form part of the Delivery Buffer.
2. GNLP Housing Requirement is equal to OAN. Delivery Buffer is Approx. 20%. Forecast Windfall Housing forms part of the 20% Delivery Buffer.
3. GNLP Housing Requirement is Equal to OAN plus Housing Response to City Deal. Delivery Buffer is Approx. 20%. Forecast Windfall Housing does not form part of the Delivery Buffer.
4. GNLP Housing Requirement is Equal to OAN plus net Housing Response to City Deal. Delivery Buffer is Approx. 20% OAN. Forecast Windfall Housing forms part of the 20% Delivery Buffer.

3.2.2 Option 2 was identified as the preferred approach, performing better in terms of air quality and climate change; however, this option also included a lower delivery buffer meaning it would be more reliant on assumed windfall projections.

Regulation 18C (2020)

3.2.3 The Regulation 18C Draft Strategy³⁰ identified a housing requirement of 44,343 for the Plan period, which was set out within Policy 1: The Sustainable Growth Strategy. The Regulation 18C SA³¹ identified potential major negative impacts in relation to air quality, climate change, and natural resources as a direct impact of the scale of growth proposed under this policy; however, positive effects were identified in relation to several socially focused SA Objectives, including major positive effects on education, transport and housing provision.

Regulation 19 (2021)

3.2.4 The Publication Draft Plan included a further 5,149 dwellings in addition to the Regulation 18C Draft Strategy to take account of the 2018 household projections, making the total housing potential for the Plan of 49,492 dwellings. The overall sustainability performance remained very similar to the Regulation 18C SA since the appraisal process is strategic and can only assess options of this nature by order of magnitude.

³⁰ GNDP (2020) Draft Greater Norwich Local Plan – Part 1 The Strategy. Available at: <https://gnlp.oc2.uk/document/42> [Date accessed: 13/02/24]

³¹ Lepus Consulting (2020) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Regulation 18C January 2020. Available at: [https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18\(C\)_Final.pdf](https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18(C)_Final.pdf) [Date accessed: 08/02/24]

Addendum to the Regulation 19 SA (December 2021)

3.2.5 Following submission of the GNLP in July 2021, the inspectors provided a series of Initial Questions for the plan-makers, including Question 7 which requested an addendum to the Regulation 19 SA to be produced, relating to the housing growth numbers, and addressing “*both smaller and minimal supply buffers as ‘reasonable alternatives’*”³². As such, the SA Addendum was prepared to evaluate two further options compared to those assessed at Regulation 18A:

5. OAN plus 10% buffer; and
6. OAN plus 1% buffer.

3.2.6 The assessment concluded that, drawing on the precautionary principle, the lower quanta options (5 and 6) should be considered more sustainable. This is because some of the identified environmental impacts are irreversible (e.g. loss of the soil resource), and more so, are beginning to be stretched to levels that whilst not irreversible are showing signs of long-term impacts with consequences for health, jobs, food production and water availability.

3.3 SA of employment floorspace requirements

Regulation 18A (2018)

3.3.1 The Growth Options consultation document³³ and associated Interim SA³⁴ assessed two options in relation to employment requirements as part of the Regulation 18A consultation:

- JT1: GNLP jobs target to be equal forecast jobs growth, plus aspirational growth between 2015 and 2036.
- JT2: GNLP jobs target to be equal forecast jobs growth between 2015 and 2036.

3.3.2 Option JT1 was identified as the preferred option, owing to the likely significant number of additional jobs that could be achieved in comparison to the JT2 ‘business as usual’ approach.

³² Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Addendum to the Regulation 19 SA Report: Inspectors’ Initial Questions: Reasonable Alternatives for Housing Number Options, December 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-12/LC-663_GNLP_SA_Addendum_7_031221ND.pdf [Date accessed: 12/02/24]

³³ GNDP (2018) GNLP Growth Options Document. Available at: <https://gnlp.oc2.uk/document/12> [Date accessed: 13/02/24]

³⁴ GNDP (2018) Interim Sustainability Appraisal of the Greater Norwich Local Plan. Available at: <https://gnlp.oc2.uk/docfiles/46/Reg.-18-Interim-Sustainability-Appraisal-of-the-GNLP.pdf> [Date accessed: 08/02/24]

Regulation 18C (2020)

- 3.3.3 The Regulation 18C Draft Strategy identified the proposed growth of 33,000 additional jobs over 360ha of employment land, which was set out within Policy 1: The Sustainable Growth Strategy. The Regulation 18C SA³⁵ identified potential major negative impacts in relation to air quality, climate change, and natural resources as a direct impact of the scale of growth proposed under this policy; however, positive effects were identified in relation to several socially focused SA Objectives, including major positive effects on education, transport and the economy.
- 3.3.4 The proposed quantum of employment development did not change between the Regulation 18C Draft Strategy and the Publication Draft of the GNLP.

3.4 SA of the spatial strategy

Regulation 18A (2018)

- 3.4.1 The Growth Options document³⁶ set out six reasonable alternative spatial strategy options:
1. Urban Concentration (close to Norwich).
 2. Transport Corridors.
 3. Cambridge Norwich Tech Corridor.
 4. Dispersal.
 5. Dispersal Plus New Settlement.
 6. Dispersal and Urban Growth.
- 3.4.2 No single spatial option emerged as an overall best performing approach in the Interim SA (2018), with each option performing differently in terms of effects on different SA Objectives.
- 3.4.3 The Growth Options document also set out two options for development within Norwich City Centre which were evaluated in the Interim SA:
- CC1: Retain the current city centre boundaries.
 - CC2: Enlarging the city centre boundary.
- 3.4.4 Option CC1 was identified as the preferred approach, as this would intensify the role of the city centre and help to reduce the number of trips.
- 3.4.5 One option was identified for the growth within the Urban Area and Fringe Parishes:
- UA1: Continue with current approach for the remainder of the urban area and fringe parishes.

35 Lepus Consulting (2020) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Regulation 18C January 2020. Available at: [https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18\(C\)_Final.pdf](https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18(C)_Final.pdf) [Date accessed: 08/02/24]

36 GNDP (2018) GNLP Growth Options Document. Available at: <https://gnlp.oc2.uk/document/12> [Date accessed: 13/02/24]

- 3.4.6 The Interim SA identified neutral or positive effects on the SA Objectives as a result of the proposal to continue with UA1's broad policy approach, which was deemed likely to provide benefits for suburban regeneration and green infrastructure as well as protection and enhancement of local services.
- 3.4.7 Two options were identified for the settlement hierarchy:
- SH1: A six-tiered strategy (1. Norwich Urban Area; 2. Main Towns; 3. Key service centres; 4. Service villages; 5. Other villages; and 6. Smaller rural communities and the countryside).
 - SH2: A four-tiered strategy (1. Norwich Urban Area; 2. Main Towns; 3. Key Service Centres; and 4. Village Clusters)
- 3.4.8 Option SH2 was identified as the preferred approach as it was thought to have potential to create more diversity, choice and completion within the housing market by resulting in a wider range of allocations in an expanded range of settlements.
- 3.4.9 Lastly, the Growth Options document and Interim SA considered two alternatives for a policy on the 'Influence of the Norwich Urban Area & Distribution of Growth'. The two alternatives were:
- NCPA1: Do not have a Norwich-centred policy area.
 - NCPA2: Retain a Norwich-centred area for some policy purposes, including recognition of the concentration of growth, to provide information to support promotion for economic purposes and to attract inward investment.
- 3.4.10 The Interim SA identified predominantly neutral effects for both options, with greater uncertainty for NCPA1 in terms of potential benefits for inward investment and policy integration. The Growth Options Document did not identify a preferred option.

Regulation 18C (2020)

- 3.4.11 Further to the work undertaken during Regulation 18A, the GNPD considered a seventh spatial strategy, which is an amalgamation of the six previously considered options. This new option was considered in the Regulation 18C Draft Strategy and was identified as the preferred spatial option for the Plan for the following reasons:
- Maximises brownfield development;
 - Broadly follows the settlement hierarchy set out in Policy 1;
 - Growth is focused in locations with the best access to jobs and services;
 - Supports a vibrant urban economy;
 - Allocates strategic scale housing sites (1,000 dwellings +) in accessible locations;
 - Allocates a significant number of medium scale and smaller scale sites; and
 - Sets a minimum allocation size of 12-15 dwellings to ensure that a readily deliverable amount of affordable housing is provided on all allocated sites.

3.4.12 The Regulation 18C SA³⁷ assessed this spatial strategy as part of Policy 1 – The Sustainable Growth Strategy. This policy also sets out the provision of homes and employment floorspace. The policy was identified as having the potential to result in major negative impacts in relation to air quality, climate change and natural resources and a minor negative impact in relation to biodiversity. The spatial strategy would be expected to result in neutral or positive impacts in relation to all other SA Objectives.

3.4.13 The proposed spatial strategy set out in the Publication Draft GNLP (and assessed in the Regulation 19 SA³⁸ through Policy 1) was the same as that set out at Regulation 18C.

Addendum to the Regulation 19 SA (September 2021)

3.4.14 Various representations were received during the Regulation 19 consultation, including those in relation to the testing of reasonable alternatives and selection process for the chosen spatial strategy and distribution of growth in the Plan area. In order to address these responses, an SA Addendum was prepared³⁹ which sought to provide further information and detail regarding these conclusions. Each each of the seven spatial options was re-assessed against the SA Objectives, with the increased housing provision that was introduced at Regulation 19 as a consequence of accommodating the latest government-calculated housing numbers using the so-called ‘standard methodology’.

3.4.15 The SA Addendum concluded that, whilst all options had potential to result in mixed effects in terms of sustainability, overall, the preferred hybrid approach provided the best balance across a range of sustainability objectives and would help to support delivery of the Plan.

3.5 SA of strategic policies

3.5.1 GNLP policies were first considered in the Growth Options document⁴⁰ during the Regulation 18A consultation. The document set out 51 policy alternatives covering broad policy areas. The Interim SA⁴¹ assessed these policy alternatives and identified preferred approaches.

3.5.2 The preferred approaches were then considered and re-drafted into the eleven draft strategic policies set out in the Regulation 18C Draft Strategy. The Regulation 18C Draft Strategy states that all policies in the GNLP are strategic and provide context for existing Local Plan policies, future revision to Local Plan documents and policies, and proposals in Neighbourhood Plans. The draft policies were assessed in the Regulation 18C SA.

37 Lepus Consulting (2020) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Regulation 18C January 2020. Available at: [https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18\(C\)_Final.pdf](https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18(C)_Final.pdf) [Date accessed: 08/02/24]

38 Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Volumes 1-3) January 2021. Available at: <https://www.gnlp.org.uk/regulation-19-publication/evidence-base> [Date accessed: 08/02/24]

39 Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Consultation response: Addendum to the Regulation 19 SA/SEA Report, September 2021. Available at: https://www.gnlp.org.uk/sites/gnlp/files/2021-10/LC-663_GNLP_SA_Addendum_11_270921LB.pdf [Date accessed: 21/08/23]

40 GNDP (2018) GNLP Growth Options Document. Available at: <https://gnlp.oc2.uk/document/12> [Date accessed: 13/02/24]

41 GNDP (2018) Interim Sustainability Appraisal of the Greater Norwich Local Plan. Available at: <https://gnlp.oc2.uk/docfiles/46/Reg.-18-Interim-Sustainability-Appraisal-of-the-GNLP.pdf> [Date accessed: 08/02/24]

3.5.3 The strategic policies were then amended, and an additional policy added to reflect updates in evidence base documents and respond to consultation comments and SA recommendations (see **Table 3.1**). The GNLP strategic policies were assessed within Appendix C of the Regulation 19 SA⁴².

Table 3.1: Strategic policies in the GNLP (Regulation 19)

Policy ref.	Policy name
1	The Sustainable Growth Strategy
2	Sustainable Communities
3	Environmental protection and Enhancement
4	Strategic Infrastructure
5	Homes
6	The Economy
7.1	The Norwich Urban Area including the fringe parishes
7.2	The Main Towns
7.3	The Key Service Centres
7.4	Village Clusters
7.5	Small Scale Windfall Housing Development
7.6	Preparing for New Settlements

Main Modifications (2023)

3.5.4 Following the conclusion of the Examination Hearings in July 2023, the GNLP prepared and consulted on Schedules of proposed Main Modifications to the Pre-Submission Version of the GNLP Sites and Strategy documents to address the matters raised.

3.5.5 The Main Modifications included amendments to the GNLP strategic policies, including the deletion of Policy 7.6 and updates to wording of the remaining eleven policies, all of which were re-assessed in the Main Modifications SA⁴³. The appraisal identified that the Main Modifications were unlikely to result in any significant effects and would not be expected to alter the overall residual effects of the GNLP identified in the Regulation 19 SA.

3.5.6 It is noted that since the Main Modifications consultation between October and December 2023, a limited number of further changes have been made to the GNLP strategic policies. This includes minor wording changes to GNLP Policy 2 (adding reference to protecting water quality), Policy 3 (adding reference to the mitigation hierarchy, conservation of existing green infrastructure and moving a paragraph) and Policies 4, 7.1, 7.2, 7.3 and 7.4 (adding reference to green infrastructure strategy updates). These changes do not alter any of the previous conclusions of the SA.

⁴² Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Volumes 1-3) January 2021. Available at: <https://www.gnlp.org.uk/regulation-19-publication/evidence-base> [Date accessed: 08/02/24]

⁴³ Lepus Consulting (2023) Greater Norwich Local Plan (2018-2038) Submission Version Proposed Main Modifications: Sustainability Appraisal of the Main Modifications, October 2023. Available at: https://gnlp.oc2.uk/docfiles/82/LC-985_GNLP_SA_Main_Modifications_6_161023LB_compressed.pdf [Date accessed: 12/02/24]

3.6 SA of development sites

- 3.6.1 Numerous reasonable alternative sites have been identified, described and evaluated by the Councils throughout the Plan-making process. As the preparation of a local plan is an iterative process, the Councils have undertaken several consultations on the sites received through the Call for Sites process: the principal means of identifying reasonable alternatives. As a result of this, further site assessment work has been undertaken at intervals throughout the process to consider new reasonable alternative sites as and when they emerged.
- 3.6.2 The Regulation 18A consultation presented more than 600 potential sites, with consultation on a further 200 sites at Regulation 18B, and a further 38 sites at Regulation 18C. At each round of site identification, the Councils reviewed each site to determine if the site was considered to be a reasonable alternative. 285 reasonable alternative sites were identified by the Councils as part of the Regulation 18C consultation, which were appraised in the Regulation 18C SA Report⁴⁴.
- 3.6.3 Following the Regulation 18C consultation, an additional 107 reasonable alternative sites were identified. The appraisal of these sites is presented in Appendix D of the Regulation 19 SA⁴⁵. The findings of these assessments were considered by the Councils in the selection of site allocations.
- 3.6.4 The GNDP's site assessment booklets⁴⁶ explain how the site assessment process evolved over the different stages of the GNLP, including how the SA findings were taken into account for the sites within each settlement cluster.
- 3.6.5 At the Regulation 18C and 19 stages, the SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA Framework. Negative impacts were mainly related to issues associated with the rural nature of most development; these included the loss of previously undeveloped land and 'best and most versatile' (BMV) soil, an increase in carbon emissions and reduction in air quality associated with a large scale of development, and the access of site end users to a number of social facilities including schools, healthcare services, local shops and transport services. Some of these negative impacts could potentially be mitigated through policy; the post-mitigation assessments explored the extent to which the identified adverse effects could be avoided or reduced by drawing on the provisions of the GNLP policies.

44 Lepus Consulting (2020) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Regulation 18C January 2020. Available at: [https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18\(C\)_Final.pdf](https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18(C)_Final.pdf) [Date accessed: 08/02/24]

45 Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Volumes 1-3) January 2021. Available at: <https://www.gnlp.org.uk/regulation-19-publication/evidence-base> [Date accessed: 08/02/24]

46 GNDP (2020) Site assessment booklets. Available at: <https://www.gnlp.org.uk/local-plan-examination-local-plan-examination-document-library/b-evidence-library> [Date accessed: 13/02/24]

3.6.6 Following consideration of all sites that have come through the plan-making process, as well as the pre- and post-mitigation SA assessments, the Councils selected 138 sites for allocation within the GNLP. Appendix G of the Regulation 19 SA provides an explanation for the selection of the 138 allocated sites, with justification provided by the GNDP.

3.6.7 At the Regulation 19 stage, Part 2 of the GNLP: The Sites⁴⁷ set out site allocation policies for each of the 138 sites which provided site-specific requirements and mitigation further to that provided in the GNLP strategic policies; the assessment of each site allocation policy was presented in Appendix F of the Regulation 19 SA. The SA identified that the site policies would improve the sustainability performance of the GNLP across many of the SA Objectives.

Main Modifications (2023)

3.6.8 Following the conclusion of the Examination Hearings in July 2023, the GNDP prepared and consulted on Schedules of proposed Main Modifications to the Pre-Submission Version of the GNLP Sites and Strategy documents to address the matters raised.

3.6.9 The Main Modifications included amendments to the GNLP site allocation policies, including 13 updated site policies, four merged site policies and 10 deleted site policies, all of which were re-assessed in the Main Modifications SA⁴⁸. The appraisal identified that the Main Modifications were unlikely to result in any significant effects and would not be expected to alter the overall residual effects of the GNLP identified in the Regulation 19 SA.

3.6.10 It is noted that since the Main Modifications consultation between October and December 2023, a limited number of further changes have been made to the GNLP site-specific policies. This includes minor wording changes to Policy GNLP0360/3053/R10 (making the requirement for appropriate archaeological assessment more clear), GNLP0409BR (to remove reference to the Area of Main Archaeological Interest, and to correct the building names) and GNLP2019 and COL1 (correcting typographical errors). These changes do not alter any of the previous conclusions of the SA.

3.7 SA of Gypsy and Traveller sites

3.7.1 During the GNLP hearing sessions in February/March 2022 it was made clear that Gypsy and Traveller accommodation needs must be addressed through site allocations in the GNLP, in accordance with the NPPF and Planning Policy for Traveller Sites.

47 GNDP (2020) Part 2 – Sites Plan. Available at: <https://www.gnlp.org.uk/regulation-19-publication> [Date accessed: 13/02/24]

48 Lepus Consulting (2023) Greater Norwich Local Plan (2018-2038) Submission Version Proposed Main Modifications: Sustainability Appraisal of the Main Modifications, October 2023. Available at: https://gnlp.oc2.uk/docfiles/82/LC-985_GNLP_SA_Main_Modifications_6_161023LB_compressed.pdf [Date accessed: 12/02/24]

- 3.7.2 The GNDP initially identified 11 reasonable alternative sites for Gypsy and Traveller pitches as part of the 'Site Policies for Gypsy and Traveller Permanent Residential Pitches Focused Consultation', which were assessed within the first iteration of the Gypsy and Traveller SA Addendum Report (January 2023)⁴⁹ based on the same methodology used throughout the SA process for the assessment of housing, employment and mixed-use sites.
- 3.7.3 Subsequently, as part of the 'Gypsy and Traveller Sites Additional Focused Consultation – New Sites June 2023' an updated version of the SA Addendum Report (June 2023)⁵⁰ was prepared to take into account new Gypsy and Traveller sites that emerged during the consultation and Call for Sites. The June 2023 version of the SA Addendum superseded the January 2023 version, and included an assessment of the 15 reasonable alternative Gypsy and Traveller sites identified in total.
- 3.7.4 The 15 reasonable alternative Gypsy and Traveller sites performed similarly overall in the SA. Following consideration of policy mitigation, the SA identified residual positive, negligible and negative effects against some SA Objectives.
- 3.7.5 Table 5.1 in the Gypsy and Traveller SA Addendum (June 2023) presents the Councils' outline of the reasons for selecting each of the reasonable alternative sites.
- 3.7.6 The GNDP's preferred sites for allocation within the emerging GNLP are Sites GNLP5004R, GNLP5013, GNLP5019, GNLP5020, GNLP5022, GNLP5024, GNLP5027 and GNLP5028. Each preferred site has an accompanying site policy which has been prepared to address site-specific issues alongside the proposed allocation.
- 3.7.7 Following consideration of the site policy mitigation in addition to the post-mitigation site assessments, GNLP5013 is considered to perform the best overall with seven minor positive impacts identified against the SA Objectives.

49 Lepus Consulting (2023) Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies: Addendum to the Regulation 19 SA Report, January 2023. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2023-05/H4.1%20G%2BT%20Sustainability%20Appraisal%20January%202023.pdf> [Date accessed: 13/02/24]

50 Lepus Consulting (2023) Sustainability Appraisal of the Greater Norwich Local Plan Gypsy and Traveller Sites and Policies: Addendum to the Regulation 19 SA Report, June 2023. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2023-06/H4.2%20G%2BT%20Sustainability%20Appraisal%20June%202023%20with%20ERRATUM%209.6.23.pdf> [Date accessed: 13/02/24]

4 How the Environmental Report has been taken into account

4.1 SA findings

4.1.1 The SA of the GNLP, in particular the Regulation 19 SA Report (SEA Environmental Report)⁵¹, identified residual positive and negative effects associated with several SEA topics. This chapter discusses the significance of the residual effects and reviews the extent to which the GNLP has responded to the findings.

4.1.2 A range of positive impacts on sustainability were identified as a result of the GNLP, which are highlighted throughout the strategic policy and site allocation assessments in Appendices C and F of the Regulation 19 SA Report, and are summarised in **Table 4.1**.

Table 4.1: Likely positive effects of the GNLP recorded in the R19 SA (2021)

Residual positive effects	
1	<p>Housing provision</p> <p>The proposed development of c.45,000 dwellings across the Plan area would be expected to make a significant and positive contribution towards meeting the identified local housing need. Policies within the GNLP would be expected to ensure that residential developments meet the needs of the local community, including affordable housing.</p>
2	<p>Employment opportunities</p> <p>The proposed development of c.33,000 new employment opportunities through development allocations within the GNLP, would be expected to make a significant and positive contribution to the employment needs of residents and to the local economy.</p>
3	<p>Multi-functional green infrastructure (GI) network</p> <p>The GNLP aims to ensure that development proposals incorporate multi-functional GI where possible and result in 10% biodiversity net gain. Although the proposed development would be expected to result in the loss of greenfield land to some extent, GNLP policies help to ensure that there are improvements to the increased provision of multi-functional green infrastructure networks across the Plan area.</p>
4	<p>Physical and mental health</p> <p>The increased provision of open space and multi-functional GI within Greater Norwich would be expected to help facilitate healthy and active lifestyles, increasing access to space for physical exercise as well as areas with mental wellbeing benefits.</p>
5	<p>Community cohesion</p> <p>The site allocations and policies within the GNLP would be likely to increase the provision of community facilities within the Plan area. This would be expected to help facilitate vibrant and interactive communities, and lead to a greater sense of place within settlements.</p>

51 Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Volumes 1-3) January 2021. Available at: <https://www.gnlp.org.uk/regulation-19-publication/evidence-base> [Date accessed: 08/02/24]

- 4.1.3 The mitigation proposals presented in the GNLP provide positive planning mechanisms for delivering sustainable development where the Plan is able to reasonably address the issue. It is recognised that the Plan cannot fully address the sustainability effects of national and international trends such as increased frequency of storm events associated with climate change.
- 4.1.4 **Table 4.2** documents all adverse residual effects, as identified in the Regulation 19 SA. The identified residual adverse effects are generally minor, but some are associated with greater levels of uncertainty and potentially could be considered to be greater in magnitude, for example residual adverse effects associated with air quality and climate change. These require careful attention outside of and beyond the GNLP; notwithstanding such uncertainties, these aspects are included in the recommendations for monitoring (see **Chapter 6**). Whilst the Plan includes positive mitigation measures, the Plan alone cannot address these matters in their entirety; these are effects that are predicted to happen with or without the Plan. The Plan includes measures to reduce these effects, however, when considered cumulatively, a residual adverse effect would still be likely to occur.

Table 4.2: Likely residual adverse effects of the GNLP recorded in the R19 SA (2021)

Residual adverse effects	
1	<p>Reduction in air quality</p> <p>Due to the volume of development proposed, an increase in traffic flows and subsequent reduction of air quality would be expected to have residual adverse effects on human health. In addition, many new residents could potentially be located within 200m of a main road. Cumulatively, this would be expected to result in a reduction of local air quality.</p>
2	<p>Increased pollutant emissions, including greenhouse gases</p> <p>An increase in pollutants including greenhouse gases would be expected following the development proposed within the GNLP. The introduction of a large number of new residents would be expected to increase traffic volumes and energy demand, which would be expected to result in an increase of pollutant emissions.</p>
3	<p>Increased greenhouse gas emissions</p> <p>The proposed development of c.45,000 dwellings within the GNLP would be expected to increase carbon emissions in the Plan area. This increase would be expected to exacerbate the impacts of climate change within Greater Norwich.</p>
4	<p>Fragmentation of the ecological network</p> <p>The GNLP would be expected to result in the loss of approximately 1,019ha of previously undeveloped land. This loss of land would be expected to include habitats and ecological links between designated biodiversity assets ultimately affecting the integrity of the wider ecological network.</p>
5	<p>Reduced access to healthcare facilities</p> <p>Many site allocations are located over 5km from an NHS hospital. Residents in some of the rural settlements of Broadland and South Norfolk would be expected to have limited access to emergency healthcare, which could potentially have detrimental impacts on human health.</p>
6	<p>Increased risk of urbanisation of the open countryside and coalescence</p> <p>A number of allocated sites are located on previously developed land in the open countryside of Greater Norwich. The proposed development within the GNLP in these locations would be expected to increase the risk of urbanisation of the countryside and coalescence.</p>

Residual adverse effects	
7	<p>Loss of tranquillity</p> <p>The proposed development of c.45,000 dwellings across Greater Norwich, with a number of developments located within rural Broadland and South Norfolk, would be likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.</p>
8	<p>Reduced access to facilities and services</p> <p>The majority of new residents would be located in areas with good access to services and facilities, including convenience stores and bus services. Nevertheless, large areas of Broadland and South Norfolk have limited access to rail services.</p>
9	<p>Increased household waste generation</p> <p>The proposed development within the GNLP would be expected to increase household waste generation within the Plan area. Although GNLP Policy 2 seeks to support sustainable waste management, there is little scope to reduce the quantity of waste generated per household.</p>
10	<p>Loss of soil resources, including BMV land</p> <p>A significant proportion of development allocated within the GNLP is located on previously undeveloped land. This would be expected to result in the permanent and irreversible loss of ecologically, and potentially agriculturally, important soil resources.</p>
11	<p>Impact on soil ecosystem services</p> <p>Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, filtering air, carbon storage and providing the basis for vegetation to flourish. The scale of development proposed within the GNLP would be expected to increase pressure on essential ecosystem services.</p>
12	<p>Reduction of water quality and ecosystem services</p> <p>A number of allocated sites are located on previously undeveloped land. The proposed development at these sites could potentially result in the contamination of nearby surface waterbodies or groundwater. The proposed development within the GNLP could also reduce the ability of the aquatic ecosystem to effectively filter water, provide the basis for vegetation to flourish, have benefits in regard to mental and physical wellbeing, and support biodiversity.</p>
13	<p>Increased demand for water</p> <p>The introduction of a large number of new residents would be expected to result in increased pressure on the local water resource. A Water Cycle Study (WCS) has been prepared, which sets out a number of recommendations to ensure that identified risks to the water environment and water services infrastructure as a result of this significant increase in pressure are addressed. The recommendations made in the WCS lie largely outside of the GNLP's control, and as such, in line with the precautionary principle it is considered that the proposed development within the GNLP could result in an adverse impact on water resources.</p>

4.2 SA recommendations

4.2.1 Throughout the SA process, recommendations have been made to improve the GNLP. Sustainability performance has been enhanced as a result of revising policies through a process of continual improvement to help reduce identified adverse effects.

- 4.2.2 Within the Regulation 18C SA⁵², Table 3.3 set out the identified adverse impacts of the reasonable alternative sites within each of the SA Objectives, and potential mitigating influence of draft GNLP policies. Where the policies were identified as being unlikely to fully mitigate these adverse impacts, recommendations were provided.
- 4.2.3 Within the Regulation 19 SA⁵³, where residual adverse effects were identified (as summarised in **Table 4.2** above), recommendations to help monitor these adverse effects were provided (see **Chapter 6** for further information on monitoring).
- 4.2.4 Appendix E of the Regulation 19 SA included updated recommendations since the Regulation 18C stage regarding how the GNLP strategic policies might be usefully expanded or modified to provide mitigation measures that will help further reduce the identified adverse effects associated with each SA Objective (where relevant). These recommendations, as well as the Councils' response to each, are replicated in **Table 4.3**.

Table 4.3: Recommendations to improve the GNLP policies and Council response recorded in the R19 SA (2021)

SA Objective	Recommendations	Council comments
1. Air Quality and Noise	<ul style="list-style-type: none"> The Regulation 18 Draft GNLP 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 reducing air pollution within Central Norwich AQMA, and along major transport routes. Proposed improvements to the GI 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 policies and that a strategy for its implementation be developed in more detail. 	<p>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, in 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.</p>
2. Climate Change Mitigation and Adaptation	<ul style="list-style-type: none"> 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 GI network, including the Yare Valley Green Infrastructure Corridor, provides the opportunity to create 	<p>The first issue is addressed through Policy 2 criterion 10 and the supporting text in Table 8. Revisions have been proposed to these to provide further clarification in line with the recommendation.</p> <p>For the second issue. The provision of GI is addressed within 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</p>

52 Lepus Consulting (2020) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan – Regulation 18C January 2020. Available at: [https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18\(C\)_Final.pdf](https://gnlp.oc2.uk/docfiles/46/GNLP_SA_Reg18(C)_Final.pdf) [Date accessed: 08/02/24]

53 Lepus Consulting (2021) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan (Volumes 1-3) January 2021. Available at: <https://www.gnlp.org.uk/regulation-19-publication/evidence-base> [Date accessed: 08/02/24]

SA Objective	Recommendations	Council comments
	<p>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.</p> <ul style="list-style-type: none"> ● GNLP 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. 	<p>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. There are already green infrastructure strategies and associated delivery plans for the Greater Norwich Area which are being implemented.</p> <p>The third issue is addressed in Policy 2 criterion 9, and revisions have been proposed to expand this in line with the recommendation.</p>
<p>3. Biodiversity, Geodiversity and Green Infrastructure</p>	<ul style="list-style-type: none"> ● It is recommended that the findings and recommendations of the HRA be incorporated into final policies. ● It is recommended that policies and site-specific masterplans seek to safeguard SSSIs within the Plan area. This will ensure that development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The output of the HRA would help to shape policies. ● Proposed improvements to the GI network, including the Yare Valley Green Infrastructure Corridor provides the opportunity to strengthen the connectivity between designated and non-designated sites across Greater Norwich. This will improve the resilience of ecological networks to current and future pressures, notably urban development and climate change. 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. This will also ensure compliance with NPPF requirements in terms of enhancing ecological networks and achieving biodiversity net gain. 	<p>The findings of the draft HRA have been taken into account in revisions, in relation to the requirement for a contribution towards mitigation measures and green-space provision as identified in the Norfolk GIRAMS, under Policy 3. The conclusions of the final HRA will also be taken into account. The protection accorded to the natural environment in Policy 3, including priority habitats, incorporates SSSIs. Proposed revisions to the policy and supporting text, and to Policy 2, have clarified on the role and importance of green infrastructure, including reference to green infrastructure strategies.</p>
<p>4. Landscape</p>	<ul style="list-style-type: none"> ● The proposed improvements to the GI network, including the Yare Valley Green Infrastructure Corridor, provide the opportunity to consider the character of existing recreational routes and this would assist in mitigating negative impacts on views experienced from users of the Public Rights of Way network as a consequence of the proposed development. ● It is noted that GNLP Policy 7.1 seeks to improve green linkages between the city centre and Whitlingham Country Park. The potential of creating green linkages to other 	<p>Such measures would be taken forward under the ongoing delivery of improvements, particularly through the Greater Norwich Development Partnership. The policies in the GNLP and in other Plans assist with this from the planning perspective. The GNLP is concerned with land-use and development, and its policies do not deal with wider issues such as the promotion of initiatives. These are more appropriately dealt with through other measures and strategies such as the Greater Norwich Green Infrastructure Strategy, delivery plans and the Greater Norwich Development Partnership investment plans etc. Information on these is obtainable elsewhere, and it would not be</p>

SA Objective	Recommendations	Council comments
	<p>Country Parks within the Plan area could be explored further through policy.</p> <ul style="list-style-type: none"> • Landscape and GI enhancement should be sought through policy development by providing more detail regarding the protection of existing GI assets and the quantity and types of GI expected to be provided by new developments. The Councils could consider the use of a Green Infrastructure Standard, such as 'Building with Nature'⁵⁴. • Delivery of the GI and landscape policies should be strengthened by providing greater clarity regarding the funding mechanisms for the delivery, management and maintenance of GI associated with new development. • Regulation 18 Draft GNLP Policies could be strengthened to promote initiatives for landscape/GI enhancement, for example, by promoting working with stakeholders on GI enhancement initiatives, including bids for funding. The delivery of GI could be included as part of the 'Delivery Statement'. • Landscape Character Policy could be included in GNLP Policy 3 so that it relates to all development including non-housing development. 	<p>appropriate for the GNLP to go into detail explaining such measures. However, revisions have been made to the policy and supporting text clarifying the relationship between development and the delivery of green infrastructure. Policy 2 and 3 includes landscape and local character and apply to all developments where relevant.</p>
6. Population and Communities	<ul style="list-style-type: none"> • The final GNLP policies should reference masterplan information regarding improved public transport links in rural areas, including more frequent bus services and consideration should be given to the provision of new local facilities. 	<p>For developments, integration with public transport infrastructure and the improvement of provision is a key consideration and has been referenced in site allocation policies where appropriate. Examples include COL1 Colney, HOU1/GNLP0307/GNLP0327 Cringleford, EAS1 Easton, GNLP0132 Sprowston, GNLP0360 East Norwich (Deal Ground).</p>
8. Health	<ul style="list-style-type: none"> • The final GNLP policies should reference masterplan information regarding the provision of new health and leisure facilities and improved accessibility to existing facilities, especially for more rural areas that are located a significant distance from an NHS hospital. • GNLP policies should ensure reference is made to Local Air Quality Action Plans. GNLP 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 the Central Norwich Air Quality Management Area (AQMA). 	<p>For developments, integration with health and leisure infrastructure and the improvement of provision is a key consideration and has been referenced in site allocation policies where appropriate. Health examples include GNLP0337R Taverham, COL1 Colney, GNLP0253 Colney, R37 Norwich; and leisure examples include GNLP0337R Taverham, GNLP0360 East Norwich (Deal Ground), GNLP 3053 Norwich (Carrow Works), COS5 Costessey. Also, the provision of recreational facilities (formal and informal) is a consideration for residential developments under the existing Development Management Local Plan policies, even when not specifically referred to in site allocation policies.</p>

54 Building with Nature (2019) Available at: <https://www.buildingwithnature.org.uk/about> [Date accessed: 13/02/24]

SA Objective	Recommendations	Council comments
	<ul style="list-style-type: none"> Proposed improvements to the GI network, including the Yare Valley Green Infrastructure Corridor, provides the opportunity to create places for active and healthy lifestyles. 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, and that reference is made to resisting the loss of existing GI where possible. 	<p>Air quality is addressed in Policy 2 criterion 8 and the supporting text in Table 8. It is accepted that this would benefit from some further clarification in this respect, but this should not be overly detailed reflecting the strategic nature of the policy. Therefore, a reference to development in AQMAs and near main roads is proposed to be added. The provision of GI is addressed within 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. There are already green infrastructure strategies and associated delivery plans for the Greater Norwich Area which are being implemented. Policy 3 requires the conservation of the natural environment, including green infrastructure.</p>
11. Economy	<ul style="list-style-type: none"> 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. GNLP Policy 6 could be expanded to make reference to the approach that will be taken to the rural economy within Greater Norwich, including agricultural businesses. It is recommended that GI delivery related to employment development as well as housing development is incorporated within policies. 	<p>Local Plan policies can only have limited effect in terms of encouraging issues such as technological improvements and agricultural development. However, Policy 6 includes reference to supporting and encouraging high quality broadband across the area to facilitate home working. The Policy supports the re-use of redundant rural buildings and identifies the strategic importance of the Food Enterprise Park and a reference to the role of the FEP in supporting agri-food businesses has been included. A reference to the provision of GI on employment sites has been included.</p>
12. Transport and Access to Services	<ul style="list-style-type: none"> Greater clarification as to the extent of public transport improvements expected within the Transport for Norwich Strategy, and the locations of these improvements, could strengthen the policies. This would be of particular importance with reference to more rural areas of Greater Norwich, where there is a greater need for more frequent bus services and links to onward travel. Policies should seek to ensure that development proposals promote sustainable transport modes and provide high quality walking and 	<p>Fuller information on public transport, and other transport, improvements proposed under the Transport for Norwich Strategy is set out in that document and the associated Local Transport Plans that are published by Norfolk County Council as the Transport Authority. Considerable explanatory detail on the matter is included in the Plan, both within Policy 4 Strategic Infrastructure and more particularly in the explanatory text (paragraphs 231 to 245). Local Plans are required to be concise and focus on land-use and development matters. Therefore, it is felt that providing significant further detail of</p>

SA Objective	Recommendations	Council comments
	<p>cycling networks (drawing on Local Cycling and Walking Infrastructure Plans). Further, planning policies should provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.</p>	<p>the Strategy and LTPs would not be appropriate for inclusion in the GNLP. For developments, integration with transport infrastructure and the improvement of provision is a key consideration and has been referenced in site allocation policies where appropriate, as well as the issue being addressed within Policy 4, and under Policy 2 Sustainable Communities. Also, existing Development Management Policy Local Plans contain policies relating to the issue. There have been some revisions to policies and supporting text, eg to clarify matters, but no further significant changes are thought necessary.</p> <p>Future large -scale transport facilities would be provided for through the Transport Authority’s transport strategy or national level strategies, such as for improvements to trunk roads by the Highways Agency or the national rail network by Network Rail. This issue is addressed in general terms by Policy 4. Specific provision for such strategic infrastructure would be brought forward through specific processes by the relevant bodies, and so it is not necessary to provide for these within the Local Plan. However, reference has been made to particularly significant matters, such as proposed improvements to the A11 and A47, A140 Long Stratton Bypass and proposed Norwich Western Link Road etc.</p>
<p>13. Historic Environment</p>	<ul style="list-style-type: none"> • Greater emphasis in the accompanying wording in the Plan regarding the irreplaceable nature of the historic resource and that the level of conservation should be proportionate to the significance of the asset. • Where a site proposal could potentially impact a heritage asset, a Heritage Statement could be required, proportionate to the significance of the asset. This would provide a site-specific assessment of the impact of a proposal on the heritage asset, and thereby help to conserve or enhance the local historic environment. 	<p>Revisions have been proposed to the policy and supporting text to clarify the position relating to heritage, this includes requiring a heritage impact assessment if significant impacts might arise.</p>
<p>14. Natural Resources, Waste and Contaminated Land</p>	<ul style="list-style-type: none"> • It is noted that GNLP Policy 3 states high quality agricultural land would be protected. It is recommended that specific policy wording is included which sets out the protection afforded to best and most versatile (BMV) agricultural land and mitigation measures where such land is likely to be lost. • It is recommended that a site-specific Agricultural Land Classification (ALC) study is carried out for all sites to determine whether the proposed 	<p>The policy requires the conservation and enhancement of natural assets, including high quality agricultural land and soils, reflecting NPPF para 170. “Best and most versatile” agricultural land is defined in the glossary to the NPPF. The policy applies to all developments in principle and would be considered for applications for planning permission and addressed at that time if appropriate, including the requirement for any studies if necessary. Further detail is not necessary.</p>

SA Objective	Recommendations	Council comments
15. Water	<p>development would result in the loss of BMV soil.</p> <ul style="list-style-type: none"> It is noted that GNLP Policy 2 within the Regulation 18 Draft GNLP 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 GI into a robust strategy across the Plan area. 	<p>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. There are other green infrastructure strategies and associated delivery plans for the Greater Norwich Area that would be relevant to improving the environment, including water quality, and other water courses as well as the River Wensum. It would not be appropriate to refer to individual ones. Policy 3 already addresses the conservation and enhancement of the natural environment, that would include water resources. 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. The Water Cycle Study is part of the evidence base for the local plan and has been taken into account in its production.</p>

5 How opinions of consultation bodies and the public have been taken into account

5.1 Consultation responses

5.1.1 As set out in **Table 2.1**, the GNLP has been prepared across a number of iterative stages accompanied by various SA outputs. At each stage, an SA report was published for consultation with both the statutory bodies (Natural England, Historic England and the Environment Agency) and the public, alongside GNLP documents where relevant.

5.1.2 The following SA reports have been subject to consultation for the GNLP:

- June to August 2016 – SA Scoping Report;
- January to March 2018 – Regulation 18A Interim SA;
- January to March 2020 – Regulation 18C SA;
- February to March 2021 – Regulation 19 SA;
- January to March 2023 – Gypsy and Traveller SA Addendum;
- June to July 2023 – Gypsy and Traveller SA Addendum (updated); and
- October to December 2023 – Main Modifications SA.

5.1.3 A summary of the key responses received at each of the consultation stages relating to the SA, including those received from the statutory bodies, are summarised in **sections 5.2 to 5.5**.

5.1.4 All consultation responses to the GNLP and the accompanying evidence base, including comments from the statutory consultees on the Plan itself, can be found on the GNLP website⁵⁵.

5.2 SA Scoping Report comments

5.2.1 The SA Scoping Report was consulted on with the statutory bodies and other organisations between June and August 2016. Following consultation, the GNLP prepared an updated Scoping Report (March 2017). **Table 5.1** summarises the key comments received, and actions taken.

⁵⁵ GNLP (2023) Greater Norwich Local Plan. Available at: <https://www.gnlp.org.uk> [Date accessed 09/02/24]

Table 5.1: Consultation on the SA Scoping Report (2016)

Consultee	Summary of comments regarding the Scoping Report	Incorporation into the final SA Scoping Report (GNDP, 2017)
Environment Agency	Broadly satisfied with the Scoping Report and set out minor comments including recommending an updated Strategic Flood Risk Assessment to be prepared, considering climate adaptation and mitigation through the GNLP, and emphasising the importance of the River Basin Management Plan.	The Scoping Report was updated to take into account comments raised including new decision-making criteria and baseline information.
Natural England	Generally supported the Scoping Report, and made recommendations for further sustainability issues to consider and expanded indicators for several SA Objectives including biodiversity, green infrastructure and landscape within the SA Framework.	The Scoping Report was updated to reflect comments including on the SA Objectives, monitoring indicators and summary of key issues.
Historic England	Provided brief comments on key plans and programmes to include in the SA, the need to reference Historic Parks and Gardens in the baseline, and further detail recommended in the key sustainability issues. Recommended renaming the 'Built Heritage' section as 'The Historic Environment'.	The Scoping Report was updated with reference to the 'Historic Environment', additional key sustainability issues and revisions to the SA Framework in light of the comments raised.
CPRE	Considered that the single most important issue to address in the SA is the impact on the environment and landscape of raising housing targets. Suggested the SA could consider possibility of a Green Belt for Norwich. Recommended a range of further local issues and baseline information to include.	Where the issues raised were deemed to be within the remit of the SA Scoping Report, amendments were made, including broader key sustainability issues.
Green Party Norfolk County Council (Cllr A Boswell)	Commented that climate change mitigation should have a stronger focus in the GNLP than climate change adaptation, with further consideration of renewable energy, carbon emissions, air quality and its health implications incorporated into the SA.	Where the issues raised were deemed to be within the remit of the SA Scoping Report, amendments were made, including with respect to baseline information.
Norwich Green Party	Felt that the SA Scoping Report did not place sufficient emphasis on the need to reduce carbon emissions, address air quality issues and adapt to climate change, and missed an opportunity to underline the role of planning in building sustainable communities.	The climate change section of the Scoping Report was revised taking into account comments raised by Norwich Green Party and various councillors.
Norfolk County Council	Commented that the SA will need to address the delivery of infrastructure required to support the proposed housing and employment growth	Additional decision-making criteria were added to the SA Framework in light of the comments raised.

5.3 Regulation 18A Interim SA comments

- 5.3.1 The Regulation 18A Interim SA was prepared by the GNDP and was consulted on with the statutory consultees and public between January and March 2018. The next SA output was the Regulation 18C SA, prepared by Lepus. **Table 5.2** summarises the key comments received regarding the Regulation 18A SA, and actions taken in the preparation of the Regulation 18C SA.
- 5.3.2 Further information on how the SA considered the consultation comments received, including site-specific queries, are set out in Table 1.2 of the Regulation 18C SA.

Table 5.2: Consultation on the Regulation 18A Interim SA (2018)

Consultee	Summary of comments regarding the Regulation 18A Interim SA	Incorporation into the Regulation 18C SA
Environment Agency	No specific comments in relation to the Interim SA.	N/A
Natural England	<p>Advised that a Water Cycle Study should be completed as soon as possible to provide the evidence required to inform the SA and enable sound judgements to be made.</p> <p>Suggested that the issue of additional recreational pressure associated with proposed growth, and measures needed to address this, should be addressed through the SA.</p> <p>Noted that site-specific ALC survey data should be used to consider the impact on soils through the SA to fully explore the justification for allocating best and most versatile (BMV) land.</p>	A range of recommendations were made in Table 3.3 of the R18C SA including preparing a Water Cycle Study and site-specific ALC studies to identify BMV land. The impacts of additional recreational pressure were considered in the R18C SA assessments.
Historic England	<p>Considered that the SA should highlight opportunities for the enhancement of the historic environment which comes from sustainable development proposals.</p> <p>The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, impacts on significance should not just be based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base”.</p>	The comments were considered in the R18C SA assessments, and a recommendation made in Table 3.3 that Heritage Statements are prepared alongside planning applications, to give site-specific detail.
Norwich Green Party	<p>Commented that within the ‘homes’ objective, there should be a mention of how good design for energy and water efficiency can minimise the negative impact on reducing carbon emissions and preserving water supply.</p> <p>Questioned assumptions made in the Interim SA.</p>	Energy and water efficiency were covered in GNLP Policies 2 and 4 which were evaluated in the R18C SA. Updated assumptions were presented in Boxes 2.1 to 2.15 of the R18C SA.
Dr Andrew Boswell (CEPP)	Dr Boswell’s comments were in relation to the emerging GNLP policies in the context of the IPCC report, and the radical reductions in GHG emissions required to meet climate targets.	The GNLP ‘Climate Change Statement’ detailed the GNDP’s approach to development with regard to climate change.

Consultee	Summary of comments regarding the Regulation 18A Interim SA	Incorporation into the Regulation 18C SA
		Within the R18C SA, carbon emissions were assessed under SA Objective 2 and recommendations were made in Table 3.3 to strengthen the draft policies.
CPRE Norfolk	CPRE comment on the changes of 'baseline information' between the SA Scoping Report 2017 and the Interim SA Report, and the briefness of the six GNLP objectives.	Baseline information was updated throughout the SA process. GNDP used the Interim SA and comments received to inform the draft policies, which were assessed in Appendix C of the R18C SA.

5.4 Regulation 18C comments

5.4.1 The Regulation 18C SA was consulted on with the statutory consultees and public between January and March 2020. **Table 5.3** summarises the key comments received regarding the Regulation 18C SA, and actions taken in the preparation of the Regulation 19 SA.

5.4.2 Further information on how the SA considered the consultation comments received, including site-specific queries, are set out in Table 2.2 of the Regulation 19 SA.

Table 5.3: Consultation on the Regulation 18C SA (2020)

Consultee	Summary of comments regarding the Regulation 18C SA	Incorporation into the Regulation 19 SA
Environment Agency	No specific comments in relation to the Regulation 18C SA.	N/A
Historic England	No specific comments in relation to the Regulation 18C SA.	N/A
Natural England	Detailed comments were provided relating to the clarity of evidence and monitoring indicators used to inform the SA under various SA Objectives, the methodology for assessing reasonable alternative sites, and recommending that the results of emerging evidence base documents such as the WCS and GIRAMS should be used to inform future iterations of the SA.	The R19 SA included assessments of further reasonable alternative sites and updated policies using the same methodology as the R18C SA. Updated baseline and methodological information for the SEA topics were prepared and a range of monitoring recommendations presented in Chapter 17.

Consultee	Summary of comments regarding the Regulation 18C SA	Incorporation into the Regulation 19 SA
		The draft WCS and GIRAMS outputs were referred to in the R19 SA.
Dr Andrew Boswell - Climate Friendly Policy and Planning on behalf of Norwich Green Party	<p>Dr Boswell's comments were in relation to the consideration of baseline carbon emissions, budgets and targets.</p> <p><i>"The methodology for assessing carbon emissions in the SA ... is naive and flawed for the following reasons. It ignores the crucial fact that the underlying carbon emission footprint must significantly decrease to meet national obligations... the SA methodology is based on minor second-order effects rather than the predominant first-order effect, and provides no reliable guidance on assessing carbon emission reductions for the SA."</i></p>	The R19 SA considered carbon emissions at a high level to provide an indication of the potential impact on the climate as a result on the GNLP. The approach is strategic, as per the requirements of the SEA Directive; more detailed appraisal of the Plan area's carbon footprint would enable more in-depth analysis.
Norfolk Geodiversity Partnership	Norfolk Geodiversity Partnership's comments were in relation to the consideration of geodiversity within the SA under SA Objective 3.	Geodiversity was included in the SA Framework as part of SA Objective 3 and the assessments included consideration of effects on County Geodiversity Sites.
Client Earth	Client Earth commented on the accessibility to sustainable transport and services in Greater Norwich, and stated that the approach to assessing the emissions impact of individual development sites and policies in the Interim Sustainability Appraisal in terms of emissions did not provide meaningful guidance on the suitability of different sites.	The potential emissions of each reasonable alternative site were considered at a high level under SA Objective 1: Air Quality and Noise. Access to sustainable transport modes has been considered under SA Objective 12: Transport and Access to Services.
Barton Willmore on behalf of Landstock Estates Ltd and Landowners Group Ltd.	<p>Commented in relation to sites promoted in Wymondham, suggesting post-mitigation assessments would bring more positive sustainability scores, and suggest incorporating the conclusions of the HRA would make the SA more robust.</p> <p>Further comments related to the definition of effects in the SA, the lack of a Non-Technical Summary for the R18C SA, and lack of clarity regarding the site selection process and monitoring targets.</p>	The R19 SA referred to the HRA findings and set out definitions for each type of effect. Full detail on the selection process for the GNLP was presented in Appendix G. Monitoring recommendations were made in Chapter 17. A Non-Technical Summary was presented in Volume 1. The post-mitigation assessments were provided in Appendix E.

Consultee	Summary of comments regarding the Regulation 18C SA	Incorporation into the Regulation 19 SA
Gladman Developments	Suggested that the Council should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any decision not to allocate sites) when considered against all reasonable alternatives.	Policy options were considered within the R18A Interim SA prepared by the GNLP team. The selection/rejection of reasonable alternative sites has been undertaken by the GNLP team; details were presented in Appendix G of the R19 SA.
David Lock Associates on behalf of Orbit Homes and Bowbridge Strategic Land	Felt that the SA had failed to evaluate policy options and that the SA methodology approach had not been made clear with particular reference to the possible Silfield Garden Village.	Policy options were considered within the R18A Interim SA prepared by the GNLP team. An assessment of the potential Silfield Garden Village sites was undertaken and presented in Appendix D of the R19 SA.

5.5 Regulation 19 SA comments

5.5.1 Following the GNLP Examination Hearings, the inspectors requested a further SA Addendum to summarise responses to the site-specific issues raised in representations made in writing or in person at the Part 1 Hearings, regarding Matter 1 Issue 2 *“Does the SA including the addendum, adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?”*⁵⁶.

5.5.2 Following a review of each site-specific comment raised, further assessment work was prepared relating to site GNLP0352 to address changes that had been made to the promoter’s proposal for the site and relating to site GNLP0415R to address the site as one combined garden village proposal. Both were appended to the SA Addendum. No other amendments were deemed necessary, and the assessments did not result in any change to the identified residual effects of the GNLP as set out in the Regulation 19 SA (and replicated in **Table 4.1** and **4.2** of this document).

⁵⁶ Lepus Consulting (2022) Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan - Note in response to inspectors’ questions relating to the SA of reasonable alternative sites: Addendum to the Regulation 19 SA/SEA Report, June 2022. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2023-01/Addendum%20to%20the%20Regulation%2019%20SA%20SEA%20Report.pdf> [Date accessed: 14/02/24]

5.6 Comments on the GNLP

- 5.6.1 The GNLP Statement of Consultation⁵⁷ documents how the Councils have involved communities and stakeholders throughout the preparation of the GNLP, and how this meets national regulations and the requirements set out in the Councils' Statements of Community Involvement.
- 5.6.2 A summary of responses to each consultation are provided in the GNLP evidence library⁵⁸.

⁵⁷ Greater Norwich Statement of Consultation, June 2021. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2021-10/Submission%20Greater%20Norwich%20Local%20Plan%20Statement%20of%20Consultation.pdf> [Date accessed: 14/02/24]

⁵⁸ GNLP Examination: Core Submission Documents A8. Available at: <https://www.gnlp.org.uk/local-plan-examination-local-plan-examination-document-library/core-submission-documents> [Date accessed: 14/02/24]

6 How the environmental and sustainability effects of the Local Plan will be monitored

6.1 Monitoring

6.1.1 The SEA Regulations require that significant effects resulting from the implementation of the plan should be monitored. SEA Regulation 17 states that:

6.1.2 *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”.*

6.1.3 The monitoring requirements typically associated with the SA process are recognised as placing heavy demands on authorities with SA responsibilities. For this reason, the proposed monitoring framework focuses on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.

6.1.4 Monitoring the impacts of the Local Plan should seek to answer:

- Was the likelihood of sustainability impacts identified in the SA process accurate?
- Is the Local Plan successful in achieving its desired sustainability objectives?
- Are mitigation measures performing as expected?
- Are there any unforeseen adverse impacts of the Local Plan, and are these within acceptable limits or is remedial action required?

6.1.5 Monitoring proposals for the GNLP, as presented in the Table 17.1 of the Regulation 19 SA report, are set out in **Table 6.1**.

Table 6.1: Monitoring proposals for the GNLP as presented in the Regulation 19 SA Report

Theme/ SEA Directive	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
	Traffic flows on main roads	Bi-annually, Plan area wide	Decrease
	Rates of public transport uptake	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
	Number of Planning Approvals granted contrary to the advice of Natural England or Norfolk Wildlife Trust or the Broads Authority	Annually, Plan area wide	Zero
	Percentage loss of the ecological network	Annually, Plan area wide	Zero
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease
	Renewable energy generation	Annually, Plan area wide	Increase
Cultural heritage	Number of Conservation Area appraisals	Annually, Plan area wide	Increase
	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
	Number of GP Surgeries	Annually, Plan area wide	Increase
Landscape	Number of Planning Approvals granted contrary to the advice of the Broads Authority on the basis of adverse impact on the Broads Landscape	Annually, Plan area wide	Zero
	Quantity of development in the open countryside	Annually, Plan area wide	Zero
	Change in tranquillity in the open countryside	Annually, Plan area wide	Zero
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
	Percentage of economically active residents	Annually, Plan area wide	Increase
	LSOAs in Greater Norwich within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
	Quantity of household waste generation	Annually, Plan area wide	Decrease
Soil	Number of dwellings built on PDL	Annually, Plan area wide	Increase
	Number of dwellings built on BMV land (Grades 1, 2 or 3a ALC)	Annually, Plan area wide	Decrease
Water quality/ flood	Number of planning permissions granted contrary to EA advice	Annually, Plan area wide	Zero
	Quality of watercourses	Annually, Plan area wide	Increase
	Water efficiency in new homes	Annually, Plan area wide	Increase

6.1.6 As part of the Main Modifications process, the Council has provided an updated monitoring framework for the GNLP⁵⁹, based on the implementation of both the Plan's policies and its objectives. The monitoring framework forms Part 3 of the GNLP and includes some of the topics in the above proposals (**Table 6.1**) as well as other relevant planning matters, with targets, triggers and actions against which to effectively monitor the GNLP Part 1 (the Strategy) and Part 2 (the Sites) and contribute towards sustainable development. The GNLP Annual Monitoring Reports (AMRs) will report back on outcomes.

59 GNPD (2023) GNLP Main Modifications - Annexes. Available at: <https://www.gnlp.org.uk/main-modifications-consultation-documents/main-modifications-annexes> [Date accessed: 14/02/24]

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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