

Greater Norwich Development Partnership

Environmental Assessment of Plans and Programmes Regulations,
2004, (16), (3), (4)

Environmental Statement

Joint Core Strategy for Broadland, Norwich and South Norfolk
March 2011

Jobs, homes, prosperity for local people



NORWICH
City Council



Norfolk County Council

1. Introduction

1.1 Broadland District Council, Norwich City Council and South Norfolk Council, working together with Norfolk County Council as the Greater Norwich Development Partnership (GNDP) prepared a Joint Core Strategy (JCS) which covers the area of the three local authorities except for the part administered by the Broads Authority. Following a public examination in November – December, 2010, the JCS was adopted by each of the local planning authorities in March 2011.

1.2 The above regulations require the authorities to produce an Environmental Statement setting out

- How environmental considerations have been integrated into the plan;
- How the environmental report has been taken into account;
- How the results of public consultation on the plan have been taken into account;
- The reasons for choosing the plan as adopted, in the light of other reasonable alternatives;
- Measures to be taken to monitor the significant environmental effects of implementation of the plan

Each of these topics will be addressed in turn in the following sections of this statement.

2. Integrating SA/SEA and the development of the core strategy

2.1 In preparing the JCS, the authorities undertook a sustainability appraisal (SA). The purpose of the SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of local development documents. It also meets the requirement to undertake a Strategic Environmental Assessment.

2.2 SA is an iterative process, and the SA was updated at each major stage in the production of the JCS. The sustainability appraisal report was published alongside the JCS as submitted, and an update published to take account of focused changes to the submitted JCS published before the independent examination. Inspectors who conducted the examination concluded in their report (see link below) that there was no requirement for further sustainability appraisal work as a consequence of the changes they recommended.

<http://www.gndp.org.uk/content/wp-content/uploads/downloads/2011/02/Report-into-the-Examination-of-the-Joint-Core-Strategy-for-Broadland-Norwich-and-South-Norfolk.pdf>
[paragraph 3]

- 2.3 The first stage in the production of the SA was to set the context and objectives, baseline, and scope. This was established through the Scoping Report which included baseline data for the area in the form of a preliminary spatial portrait of the area at the time, and the identification of key sustainability issues which needed to be addressed through the JCS. These were translated into sustainability objectives to be incorporated in the appraisal tables used at subsequent stages for the appraisal of the JCS. The scoping report was subjected to consultation with a number of bodies, including those required by statute, between July and August, 2007. The results are set out in the published report: http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/SA_SCOPING_REPORT_ADOPTED_DEC_2007.pdf . Section 10 of the report identifies the sustainability issues to be considered when producing the Local Development Framework for the Greater Norwich area.
- 2.4 The sustainability objectives derived from the scoping stage were used to assess the options under consideration at the issues and options stage of the JCS preparation, though at this stage the appraisal related to draft objectives and questions defining the options, rather than to draft policies. The document includes a commentary on the outcome of the appraisal on each of the themes used in the issues and options report: http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/04/Sustainability-Appraisal_Issues-and-Options-stage.pdf .
- 2.5 This work was used in the drafting of the preferred options stage of the JCS. However, because the regulations governing plan preparation changed, the preferred options stage of the JCS was never published. However, the sustainability appraisal is available on the GNDP web site: http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/04/Sustainability-Appraisal_Preferred-options-stage.pdf.
- 2.6 Instead, the strategy, including three possible distributions for major growth, was published as an initial Regulation 25 technical consultation document. This helped to establish the deliverability of the broad distributions, and was subsequently published as a regulation 25 public consultation including the preferred distribution, but with the others retained as appendices and available for comment. At this stage, the SA which had been prepared in-house was subjected to an external audit by Scott Wilson.
- http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/04/Sustainability-Appraisal_Regulation-25-stage.pdf
- 2.7 At the pre submission publication stage, the sustainability appraisal was undertaken by Scott Wilson. It includes a useful summary at page vii of the document and a further discussion at section 5.4 discussing

the outcome of the appraisal of the submitted option. Crucially, in table 5. 18, and the commentary on the policy relating to the Broads, the SA highlights the need for a specific assessment under the Habitats Regulations. <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/2.%20GNDP%20Pre-submission%20Joint%20Core%20Strategy%20SA%20Final%20Report.pdf>

- 2.8 Following submission of the JCS and an exploratory meeting, some additional work was requested by the inspectors. Some of this entailed a re-examination of the sustainability appraisal, and a further supplementary report was produced by Scott Wilson in response to certain proposed focused changes to the JCS. <http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/07/GNDP-SA-Update-July-2010.pdf>

3. Taking the SA Environmental Report into account

- 3.1 One specific area in which the SA report influenced the development of the JCS was in the undertaking of an Appropriate Assessment under the Habitats Regulations. This was undertaken in two stages, a stage 1 report (Test of Likely Significance), and a stage 2 report (Appropriate Assessment) produced in 2008 and 2009 respectively:

<http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/ENV-1.1-Appropriate-Assessment-Task-1-Report-2008.pdf>

<http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/ENV-1.2-256387-JA01-001-Rev-A-Joint-Core-Strategy-Task-2-AA.pdf>

- 3.2 The second report made a number of recommendations. The intent of all these was incorporated in the submitted JCS, although the form of words used in the Appropriate Assessment was broadened in some cases. The broad conclusion was that there were unlikely to be specific effects, though the possibility of in-combination and cumulative effects needed to be carefully appraised in the preparation of certain future development plan documents.
- 3.3 Elsewhere, the findings of each successive stage of the SA guided the preparation of the following stages. This included a comparison of the three options to accommodate major growth published at the Regulation 25 stage. The SA at that stage and at the submission stage acknowledged that in one specific respect, that is the allocation of growth to Long Stratton, local considerations relating to the alleviation of an existing traffic problem through the creation of a bypass were weighed against the need to focus most development on locations readily accessible to Norwich. These local considerations, and the

potential for Long Stratton to achieve a greater degree of self containment were specifically explored at the independent examination into the JCS.

4. Taking public consultation into account

- 4.1 Public consultation, both on the SA itself and on the JCS, has been an integral part each stage of the production of the JCS. The choices made for the Joint Core Strategy policy options were informed by the consultation responses. The consultation stages are set out in section 2.
- 4.2 Appendix 5 of the SA Scoping Report sets out the comments made by the relevant statutory bodies on the content of the report and the actions taken by the GNDP in relation to these.
http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/SA_SCOPING_REPORT_ADOPTED_DEC_2007.pdf .
- 4.3 Sustainability appraisal continued to provide an independent review of emerging policy options which informed the decision in selecting the favoured option.
- 4.4 The results of the first public consultation on the JCS and the SA were published in the *Issues and Options: Report of Consultation 2008*:
<http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/Issues-and-Options-Report-of-Consultation1.pdf> . The Executive Summary of the report sets out the main issues raised, including some sustainability issues. These informed the content of the Regulation 25 consultation documents.
- 4.5 In 2009, subsequent to the Regulation 25 consultations, the GNDP produced Technical & Public Consultation Summary. This report details the range of methods and the results of the consultation, including the SA, which informed the submitted version of the joint core strategy:
<http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/03/Summary-of-Reg-25-consultation-final-report-1408091.pdf> .
- 4.6 As set out in section 2, a further supplementary SA report was produced and consulted on through the focused changes to the JCS.
<http://www.gndp.org.uk/content/wp-content/uploads/downloads/2010/07/GNDP-SA-Update-July-2010.pdf>
- 4.7 The Inspectors confirmed in their report that there was no need for further SA on their changes to the strategy.

5. Reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with
 - 5.1 The iterative plan making process set out above, informed by SA and consultation throughout, involved consideration of a number of reasonable alternatives.
 - 5.2 This is particularly the case in relation to the spatial location of growth. At the Issues and Options stage ten potential growth options were put forward (plus brownfield sites in the city & suburbs). The Sustainability Appraisal was used to select options to take forward along with other evidence such as the water cycle study, public transport modelling and discussions with children's services.
 - 5.3 The former preferred options document considered alternatives for growth options and area-wide policies. The alternatives were assessed and captured in the SA document and remain in it as evidence of considering reasonable alternatives.
 - 5.4 The strategy submitted to the Secretary of State has a relatively concentrated pattern of growth in Broadland, based on sustainable urban extensions and a more dispersed pattern in South Norfolk, with growth focussed on a number of existing settlements. Earlier plan drafts, supported by the SA, included options that had promoted a somewhat less dispersed pattern of growth in South Norfolk, with more limited development at Long Stratton.
 - 5.5 Having regard to the technical evidence and public comment, the strategic preference of the GNDP was to promote growth in Long Stratton to achieve the consequent environmental improvements to the village.
 - 5.6 The strategy has been adopted subsequent to a formal Examination in Public. The independent Inspectors concluded that the plan is sound, subject to a number of required changes. These changes have been incorporated into the adopted strategy.
 - 5.7 The Inspectors supported the spatial distribution of growth, stating in paragraph 94 of their report that it is the most appropriate plan when considered against the reasonable alternatives and it broadly fulfils GNDP's duty to contribute to the achievement of sustainable development.
 - 5.8 In relation to Long Stratton, the Inspectors concluded in paragraph 86 that , "Overall, we find the JCS proposals for Long Stratton justified and effective" and "they can be undertaken in such a way as to overcome past doubts about sustainability."
 - 5.9 Therefore, since the Inspectors concluded that "The JCS sets out a sound long-term strategy for this growth and the GNDP position on this

issue is worthy of support” the strategy, with the required changes, has been adopted.

6. Monitoring the environmental effects of the core strategy
 - 6.1 The SA Scoping report contains indicators for monitoring the environmental, social and economic performance in comparison with the 2008 baseline. The SA report makes recommendations on page 74 on monitoring. These and other issues are covered by indicators in the JCS monitoring section in Appendix 8.
 - 6.2 JCS indicators are arranged under spatial planning objectives, with references to specific policies. Whilst the majority of the indicators and the spatial planning objectives cover environmental issues to some extent, the most directly relevant indicators are under objective 1, relating to climate change and objective 9, covering the natural, built and historic environment. Together, 13 indicators, some locally derived and some national indicators, will be used to monitor the progress of the JCS. These cover a variety of issues, ranging from per capita CO2 emissions to the condition of protected habitats.
 - 6.3 The authorities have committed to monitoring these indicators to 2026 through a joint Annual Monitoring Report (paragraph 7.10 of JCS).
 - 6.4 Should cuts be made in relation to national indicators which give district based data, such as per capita CO2 emissions, consideration will have to be given to the practicality of collecting such data locally.

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