SA Consultation responses

Appendix 3: Summary of consultation responses made during the previous SA consultation stages and the Council's responses (DM Policies Sustainability Appraisal)

Scoping Report comments (2010)

Organisation	Summary of representation	Response
NB: Page numbers referred to are those in the Sustainability Appraisal Scoping Report as presented to Cabinet on 12th July 2010		
Norfolk Wildlife Trust	Satisfied that the issues relevant to their area of interest are covered in the report.	Noted.
Norfolk County Council	Amend reference to Greater Norwich Housing Market Assessment on page 8 to include November 2009 update.	Agree. Make amendment as suggested.
Norfolk County Council	Clarification provided re: Norfolk Historic Environment Record (NHER) sites on page 13. A high number of records does not indicate that there is necessarily greater historical interest in that area, only that it has hitherto been investigated more thoroughly. Additionally, all listed buildings and scheduled monuments are included on the NHER, so the report may have double counted these assets. Otherwise, inclusion of the significance of the wider historic landscape is very welcome.	Agree. Amend NHER reference in table on page 13 to "sites of local archaeological interest" and change figure to 2875.
Norfolk County Council	Suggest page 14 also refers to County-run facilities, in particular that the County Council provides four Household Waste Recycling Centres within South Norfolk. It is suggested	Agree. Refer to four County-run Household Waste Recycling Centres on page 14. Include reduction of waste under 'climate change' on page 38.

	that the reduction of waste should be included within 'climate change' on page 38.	
Norfolk County Council	Suggest that ENV6 (Appendix Two) include an attribute related to landscape. An appropriate attribute may be to monitor the status of the national landscape character areas - these are already monitored through the Countryside Quality Counts programme.	Agree. Include suggested indicator & also no. of planning apps where South Norfolk Local Plan (SNLP) policy ENV1 'Protection of landscape' is reason for refusal.
Norfolk County Council	Suggest reference re: need for developer funding for the sustainable provision of facilities and infrastructure at district and county level. This could be inserted within Task 3 Sustainability Issues (Access to Services; Leisure, Culture and Recreation; Education; Transport and Accessibility; and Transport Infrastructure) or within Task 4.	Agree. Include reference within suggested sections of Task 3.
CPRE (Norfolk)	No comment on whether all relevant plans, policies and programmes included. Baseline information seems to cover appropriate areas but much of it is based on Regional Spatial Strategy figures etc. Most of sustainability issues identified but there are conflicting aspirations and potential for contradiction e.g. high level of growth & desire to protect and enhance character of area. SA objectives cover range of aims but same conflict as above e.g. ENV5 seeks to "minimise noise, vibration and light pollution" very much doubt this will be case once the 32,000 homes identified in Joint Core Strategy achieved.	Note the points raised and acknowledge potential conflicts re: growth vs. environmental protection. However, it is the role of the SA to highlight such issues so that they can be taken into account during policy development and decision-making. The potential to review the housing figures/targets falls outside of the remit of this scoping report

review its housing figures.		
East of England Development Agency (EEDA)	Suggest need more evidence to cover broader sustainable economic development in East of England and on socio-economic factors to cover: the need for the development scheme the wider socio-economic benefits and costs (including an analysis of additionality – the added value generated by the scheme, taking account value that would have happened without the scheme) an analysis of alternative options. Inclusion of appropriate headline regional ambitions from 'The Regional Economic Strategy (Inventing our Future – Collective action for a sustainable economy, 2008)' from the suggestions (below) **Productivity and prosperity** Annual growth in real workplace-based GVA over 2008 – 2031 Per capita at 2.3 per cent Per worker at 2.1 per cent **Conventional economic impacts** (GDP £)	The relative social, economic and environmental implications of development/policies will be assessed via the SA. The 'need' for a scheme can be included as part any assessment. No change. The opportunity to assess the wider socio-economic benefits and costs can be included within the existing SA framework – No change. One of the main purposes of the SA is to assess and compare the options available. No change. **Productivity and prosperity, Conventional economic impacts and Wider economic impacts** – No change. The SA is not intended to act as a detailed economic activity monitor rather it is an assessment tool to ensure that the positive and negative implications of policy/proposal options are understood and included as part of the decision making process. The elements referred to in the representation can be included in the consideration of any policy/proposal but the inclusion of individual indicators for each is not supported. **Employment** – No change. S2 (page 82) and S3 cover percentage unemployment and percentage of population of working age that are economically active. These are considered sufficient.

	Wider economic impacts (all GDP £) - Agglomeration - Imperfect competition - Labour market impacts **Employment** - Employment rate by 2031 - Working-age population at 80 per cent - 16–74 population at 70 per cent **Skills** - Share of working-age population with qualifications by 2020 (aged 19 to state pension age) - NVQ level 2 or equivalent qualification and above 90 per cent - NVQ level 3 or equivalent qualification and above 68 per cent - NVQ level 4 or equivalent qualification and above 40 per cent	**Skills –** No change. S5 (page 83) already includes percentage of working age population with NVQ level 4 or above and percentage of 16 year olds with 5+ GCSEs (grades A-C). Further detailed are not considered necessary at this point but can be added in if monitoring reveals the need.

Interim Sustainability Appraisal Report (March 2013)

Organisation	Representation	Response
Broads Authority	Lack of consistent and clear terminology relating to protecting biodiversity, natural environment and landscape could have a bearing on the SA assessment. Perhaps where the wording could be interpreted to afford lower protection (such as 'serious adverse effect') the SA assessment might rate that lower when compared to greater emphasis (such as 'unacceptable impact' or 'should make a positive contribution').	Noted, but it is not concluded that the overall assessment of sites is flawed – the individual policy/site 'commentary' reflects the significance of the environmental protection designations.
English Heritage	We assume that the third bullet point in the key sustainability issues on page 9 would encompass the historic environment – it would be better if this were explicitly stated. In regard to Table 4, objective 9 is most relevant to the historic environment, although the text is dominated by natural environmental concerns. Objective 8 is also relevant but refers principally to tourism and cultural developments. It is important	Noted, however it is not considered that insufficient prominence is given to the historic environment

	that the DM DPD is targeted at historic assets and distinctive historic character at the local level. Interim SA does not identify references in the policies to significant impacts that are inconsistent with the NPPF approach.	
Karen Dunn	DM Policies are unsound & in conflict with sustainable objectives of the policy. Sustainable Appraisal should demonstrate that the proposed policies/ sustainable development principles are sound, but if these principles/polices are not implemented according to the criteria set out, suggests the whole exercise is flawed. Examples of non-implementation of criteria in the Site specific Allocations include: i) Brown field Site 179a&b was not included as a sustainable/suitable site, yet a prime agricultural green field site nearby, site 967c, was selected; ii) Site 967c was scored inaccurately within the assessment tables& site 179a & b was clearly a more sustainable site.	The issue raised here relates to the assessment of sites within the Site Specifics Allocations and Policies DPD which is not the subject of this consultation.

Natural England	Interim Sustainability Appraisal Report: NE is satisfied, the report generally meets the requirements of the SEA Regulations, prepared in accordance with "A Practical Guide to Strategic environmental Assessment Directive". It covers the issues with Natural England's expect remit, including protection/enhancement of the natural environment. Support: SA objective 9. Recognises SN includes extensive areas of open space/wildlife sites and that people living in the areas of natural beauty have access to open countryside/river valleys/wildlife sites/special qualities of the Broads/coast. Development should focus on Brownfield land that's not of high environmental value. The SA identifies that development must provide environmental gains.	Support noted

Draft Sustainability Appraisal Report (November 2013)

Organisation	Representation	Response
Broads Authority	Commented that the text within the SA report should include more reference to the Broads, particularly in relation to tourism and renewable energy. In Table 6.1, the reference to the Broads should also be expanded here as development in South Norfolk could have similar impacts on the Broads, specifically in relation to 'wealth of natural assets', 'landscape character' and 'water quality'. Comments were also made in regard to a number of the scores in the appraisal of individual policies in Appendix 5 of the SA.	It is considered that adequate reference is provided in regard to the Broads. It is unlikely that the comments raised in regard to the scoring in Appendix 5 would have any direct impact on the overall assessment of the objective.
Alliance Planning (for Burt Boulton Holdings)	The SA Report has been used to test policies and has informed the site allocations. The representation raised a concern that the evidence of employment need used is out of date, and therefore there could be a fundamental issue over the credibility of this report.	It is our view that employment need in the district was assessed in the preparation of the Joint Core Strategy.

Natural England	Natural England is satisfied that the report generally meets the requirements of the SEA Regulations and covers the issues within Natural England's remit that we would expect to be addressed including protection and enhancement of the natural environment.	Noted