


Environmental Statement
Site Allocations DPD (2016)
Environmental Assessment of Plans and Programmes Regulations 2004, Regulation (16), (3) and (4)

Broadland District Council

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Contents

1.0 INTRODUCTION

1.1 The Site Allocations has been adopted and is subject to a six week period for legal challenge. The Site Allocations (DPD) seeks to identify or "allocate" areas of land for specific types of development, such as housing, employment, community facilities etc. It also includes the definition of development boundaries or settlement limits for those places where some further growth may take place.

1.2 The purpose of Sustainability Appraisal/ Environment Report is to ensure that the social, environmental and economic dimensions of sustainable development are considered in the preparation and adoption of Development Plan Documents. It should be viewed as an integral part of good plan making involving on-going iterations to identify and report on the significant effects of the plan and the extent to which sustainable development is likely to be achieved.

1.3 In accordance with the requirements of Article 9 of the Strategic Environmental Assessment Directive (SEA) 2001 and regulations 16 (3) and (4) (a-f as summarised below) of the Environmental Assessment of Plans and Programmes Regulations, 2004, the purpose of this *Environmental Statement* is to set out:

a) How environmental considerations have been integrated into the plan;
b) How the environmental report (i.e. the Sustainability Appraisal (SA) Report (incorporating Strategic Environmental Assessment) for Site Allocation DPD, with its Non- Technical summary , SA Tables, and the SA Report addendum for (MM) Main Modifications for Site Allocations has been taken into account;
c) How the results of public consultation on the plan and sustainability appraisal have been taken into account;
d) How trans-boundary issues have been taken into account[1]
e) The reasons for choosing the plan as adopted, in the light of other reasonable alternatives;
f) Measures to be taken to monitor the significant environmental effects of implementation of the plan.

2.0 BACKGROUND

2.1 The Site Allocations DPD and SA Report for Site Allocations was submitted to the Secretary of State for public examination into soundness and legal compliance on 26 September 2014. The appointed Inspector, Ms. Louise Crosby, held an Exploratory Meeting on 8 January, 2015. Furthermore, the Main Modifications (MM) were subject to a Sustainability Appraisal (SA) Report Addendum[2] to ensure that they did not undermine the sustainability process that has informed the preparation of the plan. A second aim of the (SA) Report Addendum was to supplement the appraisal of alternative sites presented in the (SA) Report for the Site Allocations (DPD). In addition, a Habitat Regulation

[1] Since there are no European trans-boundary issues associated with SA therefore, this issue is not covered further in this report.

[2] SA Report Addendum for Proposed Main Modifications (MM) to the Site Allocations DPD - http://broadland-consult.limehouse.co.uk/portal/sadpd/mods/modsdoc?tab=files

Assessment Addendum for the proposed Main Modifications to the Site Allocations DPD Proposed Submission[3] was also prepared. The Council then consulted on proposed Main Modification to the Site Allocations – Proposed Submission and SA Addendum Report from 23 February to 8 April, 2015. The Public Hearings for the Site Allocations were held from 30 June to the 8 July, 2015. As a result of the discussions with interested parties a number of proposed Main Modifications (MM) to the Site Allocations DPD – Proposed Submission arose for further consultation. Main Modifications (MM) are more substantive changes which significantly alter a policy or text and may be considered necessary by the Planning Inspector to make the plan sound or legally compliant. Therefore, these main modifications were subject to an SA Report Addendum[4] to supplement the appraisal of alternative sites presented within the (SA) Report for the Site Allocations DPD in addition to a Habitat Regulation Assessment (HRA) Report Addendum[5].

2.2 Furthermore, as a result of objections received the Inspector requested that additional SA work be undertaken with regards to the NPA. This resulted in the preparation of a Sustainability Appraisal Addendum: Residential Provision in the NPA[6]. Its purpose is to provide further explanation and clarification of the consideration of the provision for residential development in accordance with the Settlement Hierarchy for the Norwich Policy Area (NPA) set out in the Joint Core Strategy for Broadland, Norwich and South Norfolk

2.3 The Council consulted on a number of Main Modifications (MM) to the Site Allocations and SA Report Addendums from 1 September to 13 October, 2015. The comments received were then passed to the Planning Inspector for consideration before completing her final Inspector's Report and proceeding to Adoption. This statement sets out how the legal requirements in paragraph 1.1 have been addressed for the Site Allocations (DPD) plan. The report structure reflects the requirements of the (SEA) Directive above. In addition, reference is made to Site Allocations DPD Spatial Examination Evidence Base including external web links set out in footnotes where appropriate.

3.0 INTEGRATING SA/SEA INTO PLAN MAKING

3.1 In preparing the Site Allocations DPD, the Council undertook a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment Assessment) / Environment Report for the Site Allocations DPD as well as, an Appropriate Assessment (AA) or Habitat Regulation Assessment (HRA) including consultation with environmental bodies. The purpose of (SA)/ environment reports is to promote sustainable development through the

[3] HRA for Proposed Main Modifications (MM) to the Site Allocations Proposed Submission - http://broadland-consult.limehouse.co.uk/portal/sadpd/samods/modsdoc?tab=files

[4] SA Report Addendum for Proposed Main Modifications (MM) to the Site Allocations DPD Proposed Submission (2015) - http://broadland-consult.limehouse.co.uk/portal/sadpd/samods/modsdoc?tab=files

[5] Habitat Regulation Assessment for Proposed Main Modifications to the Site Allocations DPD – Proposed Submission (2015) http://broadland-consult.limehouse.co.uk/portal/sadpd/samods/modsdoc?tab=files

[6] SA Addendum: Residential Provision in the NPA (2015) http://broadland-consult.limehouse.co.uk/portal/sadpd/samods/modsdoc?tab=files

integration of social, environmental and economic considerations into the preparation of plans, it can be most useful when applied to alternatives. The SA Report also meets the legal requirement to undertake a Strategic Environmental Assessment (SEA), which covers only the environmental considerations relating to plan making. Whilst the European legal requirement in the (SEA) Directive is for this Environmental Statement to cover how environmental considerations have been covered in the Environmental Report (the SA), since the national interpretation of this through the Environmental Assessments of Plans and Programmes Regulations is that social and economic considerations in decision making should also be covered, this statement covers all three areas. In fact, since issues determining decisions in plan making are often inter-related, this approach is necessary.

3.2 Government advises that the (SA) should form an integrated part of the plan preparation process in order to inform the appraisal of options for the emerging local plan. For most of its plan preparation period the Site Allocations DPD has been prepared in tandem with the Development Management plan. This follows the overarching strategic plan guiding these plans, the Joint core strategy (JCS), for Broadland, Norwich and South Norfolk (2011) (2014).

3.3 At every key stage the plan-making and Sustainability Appraisal process (incorporating Strategic Environmental Assessment) iterative in nature have considered different environmental aspects. This statement is intended to demonstrate how the (SA), the (HRA) together with an extensive consultation process have influenced the development of the plan. The (HRA) relates to an Appropriate Assessment undertaken under the Habitat Regulation (HRA) required by the Conservation of Habitats and Species Regulations 2010 before deciding to give consent or permission to a plan or project which is likely to have a significant effect on a European Site, either alone or in combination with other plans or projects, the competent authority is required to make an appropriate assessment of the implications for that site in view of that site's conservation objectives. The findings from these reports together with the feedback from environmental bodies have been instrumental in the consideration of environmental factors into the plan thus informing the recommendations for mitigation measures and monitoring framework and policy development for the Site Allocations DPD and the Development Management (DPD) (2015).

3.4 The final (SA) /Environment Report (incorporating SEA) for Site Allocations (DPD) constitutes of the SA Report (incorporating Strategic Environmental Assessment) for Site Allocations DPD (2014), the SA Report Addendum(s) for Proposed Main Modifications (MM) to the Site Allocations DPD (Proposed Submission) (2015), Sustainability Appraisal Addendum: Residential Provision in the NPA, and this Environmental Statement Document.

The Sustainability Appraisal (SA) Process / Plan-making and Consultation process

3.5 The production of the Sustainability Appraisal (SA)/ Environment Report for the Site Allocations DPD and the Appropriate Assessment under Habitat

Regulation (HRA) for the Site Allocations DPD have had regard for environmental factors, these in turn have been integrated in the plan preparation process by undertaking these assessments in an iterative manner. In other words alongside the plan preparation process. In addition, there have been a number of environmental focus background shared evidence base which have also informed these documents in terms of determining the key issues such as the Strategic Flood Risk Assessment (SFRA), the Greater Norwich Green Infrastructure Delivery Plan, Water Cycle Study, SA Report for JCS, HRA for JCS, Greater Norwich Gypsy and Traveller Accommodation Assessment, etc.

3.6 The (SA)/ Environment Report has informed the plan-making process by assessing reasonable alternatives at each stage, whilst considering the environmental, social and economic effects of the plan in order to select the most sustainable sites. Furthermore, the comments received throughout numerous consultations as well as, the findings on the Appropriate Assessment or (HRA) have informed the assessment and assisted in proposing appropriate mitigation measures in the form of green infrastructure delivery to reduce any potential impacts from disturbance to Natura sites. In addition, a monitoring framework has also been recommended in order to monitor the effects of implementing the development plan document. The (SA) Report was prepared at key stages in the process, the potential effects identified and recommendations put forward for mitigation measures in order to avoid or minimise potential negative effects, or enhance positive effects. These recommendations were taken into account by Broadland District Council whilst reviewing the sites at key stages through extensive consultation with members of the public, statutory bodies, and other local authorities in the area. This led to the assessment of sites (reasonable alternatives) and ultimately selecting the most suitable sites for formal adoption. This is examined in more detail below.

4.0 TAKING THE SA/ ENVIRONMENT REPORT AND CONSULTATIONS INTO ACCOUNT

The Environmental Considerations throughout each key stage

4.1 The process of considering environmental effects in the plan making process began with the preparation of the SA / (Environment) (incorporating SEA) Report for the Site Allocations and the Appropriate Assessment undertaken under Habitat Regulation (HRA) at a later stage. The SA Report for the Site allocations DPD has been undertaken by Broadland District Council through extensive consultations with members of the public and statutory bodies.

SA SCOPING – INTIAL STAGE (2009-10)

Setting the context and objectives, establishing the baseline and deciding on the scope (2009)

4.2 The first stage of the SA preparation process was the Scoping SA Report for the Site Allocations and Area Action Plan DPD's[7] (2009) (Item B116 of Evidence Base) which included setting the context, the sustainability appraisal objectives, establishing the baseline, reviewing the plans and programmes and ultimately deciding the scope.

4.3 Developing the SA Scoping Report for the Site Allocations has involved a two-step process:

- Firstly, evidence which relates to environmental, economic and social aspects was gathered and reviewed in relation to the 'sustainability context', the 'sustainability baseline' and the 'likely future sustainability baseline without the plan'; and
- Secondly, the evidence gathered was analysed and 'key sustainability issues' for the area identified.

4.4 The (SA) framework identifies sustainability issues and the desirable directions of change, whilst the objectives define what the DPD will be assessed against. The objectives were used to appraise or 'score' the environmental, social, and economic consequences of the different policies proposed. The methodology is in accordance with the Government Guidance on Sustainability Appraisal.

4.5 The (SA) objectives covering environmental, social and economic issues, were derived from the sustainability issues, and provided the framework for the SA against which the plan's policies have been assessed. The objectives covered all of the environmental topics required by the SEA Regulations. The main SA objectives were underpinned by a series of sub questions enabling the likely significant effects arising from the Plan to be more readily identified.

4.6 These (SA) Objectives were used to guide the plan, to assess sites in order to focus on the most sustainable sites as possible. These objectives are based on those suggested in government guidance, and are tailored from findings in the policy review, baseline characterisation and identification of issues. As part of the framework, they clarify where there are any conflicts between the aims for achieving sustainability and the policies in the plan.

Broadland's Sustainability Issues

4.7 Reviewing the relevant plans, policies and programmes, and considering the baseline character of the area has highlighted a number of key sustainability issues facing Broadland. These gave an indication of the environmental, social and economic character of the Broadland and the area most likely to be affected by the plan. Many of the issues identified are influenced by a wide range of factors, including those outside of the control of the planning system (e.g. the state of the wider economy but in general they are likely to continue without the combined intervention of the Joint Core Strategy (DPD), and Site Allocations (DPD), which is the subject of the SA Report.

[7] SA Scoping Report for the Site Allocations and Area Action Plan DPD's (2009) http://www.broadland.gov.uk/images/B116_SA_Scoping_Sustainability_Appraisal_Report_Final.pdf

4.8 As part of the preparation of the SA Report (incorporating SEA) for the Site Allocations DPD, the process of considering potential effects as part of the plan-making process, also included the potential 'economic' and 'social' effects' of the Site Allocations DPD. In doing this, a Spatial Portrait for the district was prepared during the early stages of the SA Scoping Report in order to use this as a baseline or 'benchmark' for future assessment as well as to identify key sustainability issues. Furthermore, the SA objectives which included environmental, economic and social considerations utilized in the SA Report for the Joint Core Strategy were then utilized in assessing against the Site Allocations - or reasonable alternatives to take forward to adoption. The Council consulted on the (SA) Report at key stages, the comments received throughout the process have been instrumental in how environmental considerations have been integrated into the plan. This is explained in more detail below.

4.9 The main tasks in preparing the (SA) Scoping Report for the Site Allocations (DPD) involved the following:

- Review of relevant international, national, regional, county and local level plans, programmes, strategies and studies.
- Collection of baseline information and characterisation of Broadland
- Identification of key sustainability issues and problems in Broadland
- Development of an (SA) Framework i.e. sustainability objectives against which to assess potential impacts of the Site Allocations (DPD).
- Description of the SA methodology proposed. Consultation and making the document available on the Council's website for public viewing following comments received from statutory bodies.

SA SCOPING REPORT CONSULTATION (2009-10)

Consultation on the (SA) Scoping Report for the Site Allocations (DPD) (2010)

4.10 The initial consultation stages began when the Council consulted on the (SA) Scoping Report for the Site Allocations (DPD) with environmental bodies in 2009 (see Appendix K of SA Report for Site Allocations PD). Consultation with the three SEA Consultation Bodies (i.e. Natural England, English Heritage, Environment Agency) and other stakeholders. Breckland District Council, Great Yarmouth Borough Council, Kings Lynn and West Norfolk Borough Council, North Norfolk District Council, Norwich City Council, South Norfolk Council, The Broads Authority, Norfolk County Council, The Norfolk Alliance; (Local Strategic Partnership), Broadland Community Partnership (Local Strategic Partnership), East of England Development Agency , Norfolk Primary Care Trust, Royal Society for the Protection of Birds, Council to Protect Rural England, Norfolk Biodiversity Partnership, Norfolk Chamber of Commerce, Shaping Norfolk's Future. The comments received resulted in revisions to the SA Scoping Report where appropriate, this it was published alongside in the Council's website and documented in the final (SA) Scoping Report for Site Allocations (2009).

CALL FOR SITES (2009-10)

Parish and Town Council Assessment (2008-09)

4.11 The process of considering sites commenced with meetings held with the Parish and Town Councils in February 2008 on the Site Allocation process followed by a 'Parish & Town Council Assessment' (2008)[8] (Item B109 of Evidence Base) (Spring 2008) where these councils had the opportunity to consider sites of interest in their local community for the consideration of future development or for other community purpose, thirty one out of sixty five Parish & Town Councils responded. The next steps involved numerous 'Call for Sites Consultations' (2008-09) as explained below.

Site Allocations – Call for Sites Consultation (March – June) (2009)

4.12 In spring 2009 the Council held a 'Call for Sites' consultation, where the Council wrote to agents, land owners, as well as including an article in Broadland Magazine which gets delivered to all households in Broadland etc. calling for sites to be put forward for the consideration of future development or other community purpose. In response landowners, agents, etc. put sites forward to the Council for further consideration. Maps were drawn up indicating the location of each site, a site reference was allocated to each site by the Council in order to consult with the public on its suitability. In addition, approximately thirty nine allocations from the Broadland Local Plan (2006) were also included in the consultation process to check whether these sites were still considered appropriate. Approximately two hundred and nine sites were put forward at this time. However, throughout the consultation process further sites were continuously being put forward to the Council from the start to the later formal stages, as a result further consultation and rigours assessment took place.

Site Allocations – Call for Sites Consultation (July – September) (2009)

4.13 Shortly after the Council's consultation in Spring, the Council received a further thirty one site proposals known as 'PC Sites'. The Council then decided to consult on these sites from July to September, 2009.

Site Allocations - Call for Sites Consultation (October – December) (2009)

4.14 Towards the end of the year, the Council then received nineteen additional site proposals known as 'LS Sites'. Therefore, the Council decided to consult on these sites from October to December, 2009.

Site Allocations – Consultation on Alternative Sites – (December) (2009)

4.15 Shortly after the Council received six additional site proposals known as the 'VLS Sites' at this time the having held various consultations at this time council decided to consult the Parishes involved and encouraged those landowners to seek views in their local communities.

(INITIAL) SA REPORT – SHORTLISTED SITES (2011)

[8] Parish & Town Council Assessment (2008) - http://www.broadland.gov.uk/images/B109_Parish_Assessment_Summary_2008.pdf

Preparing a Basic Site Assessment for Site Allocations –Shortlisted Stage (2011)

4.16 Following extensive consultations on the Site Allocations between early 2009 and late 2010 a basic Site Assessment of the Site Allocations[9] (2011)(Item B118 of Evidence base) (Appendix I) / was prepared in order to assess or act as a 'strategic sift' against a criteria based assessment. This assessment considered all the proposals put forward to the Council for the consideration of future development (including a total 536 sites: (365 sites put forward by members of the public) and 171 sites identified by the Council as part of Strategic Housing Land Availability (SHLAA) for the Consideration of future development. Out of these sites, 66 sites were located within the 'Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle' and as such were excluded from the assessment as these sites are covered by the OSRT Growth Triangle Area Action Plan (AAP).

4.17 The assessment of sites sought to identify the sites that might be suitable for "allocating" for development in the District, or in some cases where it might be appropriate to amend a Settlement Limit / development boundary. Thus sites were determined either as "not favoured" sites, or "potentially favoured sites. The idea being that the "potentially favoured sites" form a selection of sites or shortlist' to be the basis for further technical and public consultations. The sites submitted as 'potential development sites' for inclusion in the Site Allocations DPD were considered against the 19 criteria to identify those that would seem to be the most suitable for development.

4.18 The assessment utilized the following 19 Sustainable criteria:

- Relevant Allocations,
- Locational Principles,
- Brownfield/Greenfield Status,
- Existing Designations,
- Current Use,
- Landscape Sensitivity,
- Ecology,
- Contamination,
- Topography,
- Flood Risk,
- Hazards,
- Highway Safety,
- Public Transport Access (Bus),
- Public Transport Access (Rail),
- Transport Infrastructure,
- Utilities,
- Local Facilities and Social Infrastructure,

[9] (basic) Site Assessment for Site Allocations (2011) http://www.broadland.gov.uk/images/B118_Site_Allocations_Shortlisted_Sites_Assessment_2011_including_Appendices.pdf

- Presence of bad neighbours,
- Other material planning policy considerations

4.19 In assessing the criteria a scoring system using traffic lights or points (1 to 5) was utilised (1 being very sustainable (++) and 5 (--) being very unsustainable. Impact for all the sites giving a total score. As a result the Sites being less sustainable were discounted.

4.20 Opportunities and constraints expected for each site formed the basis for assessing Site Allocations and appraise alternative options. This process was in line with PAS guidance note on 'Managing Sustainability Appraisal for Local Development Frameworks' and more recently PAS Sustainability Appraisal advice note June 2010.

Other alternatives considered and why they were rejected

4.21 During the site assessment and whilst preparing a shortlist of sites and in filtering the sites which were not 'reasonable alternatives' for consultation based on the following criteria sites considered were rejected based on the following criteria:

- **Exclusionary criteria** e.g. sites located in high flood risk areas or , in areas of landscape value, ecological sensitivity e.g. county wildlife site,
- **Locational Principles –** Based on location of each site proposal
- Sites being located within the Growth Triangle Area Action Plan were rejected as being considered within the remits of OSRT AAP,
- Sites being located within the Broads for which the Broads Authority is the Planning Authority,
- Sites being located unsustainable locations and therefore, contrary to the Joint Core Strategy (JCS) settlement hierarchy e.g. Countryside
- **Deliverability Criteria or Viability** – Site not considered viable – such as through change of ownership and not much interest being shown by landowner.
- **Access** – sites where pedestrian or vehicular access could not be achieved and recommendations from highways included not progressing site further or site being 'unsuitable'**.**
- **Adverse effects from other nearby land uses** – sites in close proximity to adverse effects from nearby land uses for example proximity to sewage treatment plant (less than 300metre in proximity) in advice given by Anglian Water / Environment Agency.
- **Hazards** – sites within the Norwich Airport safety zone or including a notifiable hazardous installation defined by the (HSE) Health and Safety Executive.
- **Other Material Consideration** – sites within a strategic landscape gap between settlements, not in keeping with the current settlement form, not sufficient in size to deliver the density of housing required.

4.22 Developing and refining options for a plan is an iterative process usually involving numerous public consultations. The (SA) can inform the decision making process by facilitating the evaluation of alternatives, it can help

document the 'story' behind the plan, as well as, identify potential effects when comparing 'reasonable alternatives' to the options being considered for a plan. 'Reasonable alternatives' is a term used in the (SEA) Directive and Regulations, and therefore legally required to be considered when preparing a plan. In addition, the SA can assist in monitoring effects identified through the SA and consider mitigation measures The Site Allocations (DPD) has considered a number of reasonable alternatives resulting in appraising and refining the Site Allocations options as described below.

(Initial) SA Report for Site Allocations – Shortlisted Sites (2011)

4.23 The council prepared an (Initial) SA Report for the Site Allocations (2011)10 (Item B120 of Evidence base) in order to appraised the decision making criteria used in the basic site assessment which considered all the site proposals against the SA objectives. This resulted in a Shortlist of sixty two sites of which the council considered to be better options for inclusion in the Shortlisted Sites Allocations for further consultation.

Shortlisted Sites and (Initial) SA Report Consultation – (2011)

4.24 The Council then consulted on the Site Allocations Shortlisted Sites and (Initial) SA Report for the Site Allocations from mid-September to mid December 2011. Numerous exhibitions around the district were held. The comments received were used to amend the (Initial) SA Report where appropriate and reconsider the sites as required. The summary of comments can be found in the SA Report: Appendix F: Summary of Comments received shortlisted sites.

Alternative Sites for Potential Development Consultation (2012)

4.25 As with every consultation, inevitably further sites were put forward to the council; this resulted in further consultation on 'Alternative Sites for Potential Development' held in the summer of 2012. This included thirty seven additional sites plus eight potential extensions to Settlement Limits.

(INTERIM) SA REPORT - PREFERED OPTIONS CONSULTATION (2013)

(Interim) (SA) Report for Site Allocations, Planning Assessment for Site Allocations – Preferred Options and Preferred Options Consultation (2013)

4.26 As a result further sites and comments considered, further analysis and assessment of sites led to the production the (Interim) SA Report for Site Allocations – Preferred Options (2013) [11] (Items B125-126 of Evidence Base),

[10] (Initial) SA Report for Site Allocations- Shortlisted Sites (2011)
http://www.broadland.gov.uk/images/B120_Site_Allocations_Initial_Sustainability_Appraisal_Report_2011.pd

[11] (Interim) SA Report for Site Allocations – Preferred Options (2013)
http://www.broadland.gov.uk/images/B125_Site_Allocations_Interim_Sustainability_Appraisal_Preferred_Options.pdf

the Planning Assessment for Site Allocations Preferred Options[12] (B127) and the Site Allocations - Preferred Options (B128). The (Interim) SA Report and the Assessment of Sites considered reasonable alternatives including sixty two shortlisted sites, thirty seven alternative sites, and eight proposals for amending Settlement Limits put forward to the council on a parish basis. It utilized the comments received as well as, the conclusions from the sustainability appraisal tables to assess the sites. This led to the preparation of the Preferred Options which the Council then consulted on forty nine 'preferred options /sites' representing the sites which were believed to provide the best options for future development needs for Broadland as set in the Joint Core Strategy (JCS) housing targets (excluding the proposed OSRT Growth Triangle area). This consultation took place from 1 July, to 2 September 2013.

New Potential Sites Put Forward by Promoters for Development Consultation (2013)

4.27 During this consultation, sixteen further sites were put forward, as a result the Council decided to consult on the sites which had not been previously considered titled 'New Potential Sites Put Forward by Promoters for Development' from 14 October to 25 November 2013, as well as assess them through the Sustainability Appraisal Report. The comments received were used to inform the assessment of the sites. The comments received from statutory consultees have assisted in shaping the development guidelines such as improved vehicular and pedestrian access, improvements to junctions, recreation provision on sites, etc.

(DRAFT) SA REPORT – PROPOSED SUBMISSION CONSULTATION (2014)

Additional Sites put forward by others (2014)

4.28 The (draft) SA Report for the Site Allocations (DPD) – Proposed Submission [13]appraised all the reasonable alternatives considered since the Preferred Options stage which included the Preferred Options, plus any other reasonable alternatives referenced as 'New Potential Sites Put Forward by Promoters for Development' 'Z Sites' and (fourteen) 'Additional Sites put forward by others' 'A Sites' suggested by members of the public which didn't necessarily own the land. Some of these sites reflected on part of some of the sites previously considered by the Council

4.29 The comments received during the Preferred Options stage (Summer 2013), the 'New Potential Sites Forward by Promoters of Development' (Autumn 2013) consultations has informed the SA Report for the Site Allocations and Site Allocations (DPD). Also where appropriate changes have been made to the SA accordingly (see Summary of comments received and officer response - Appendix E) (ii) of the SA Report.

[12] Planning Assessment of the Sites Preferred Options (2013) - http://www.broadland.gov.uk/images/B127_Planning_Assessment_of_Potential_Dev_Sites_Preferred_Options.pdf

[13] (draft) SA Report for Site Allocations DPD -Proposed Submission (2014) - http://www.broadland.gov.uk/images/B138_SA_DPD_Proposed_Submission_Sustainability_Appraisal_Apps.zip

4.30 In particular, the SA Report: 'Assessment of the Options and Appraisal Findings' ultimately makes recommendations for the best sites allocations. This includes a summary of comments received, sustainability appraisal conclusions based on SA Tables for each site with an explanation of any potential effects (and the alternatives considered). In addition, based on the findings of the Habitat Regulation Assessment HRA) , mitigation measures were recommended to be included in 'Development Guidelines' for the Site Allocations – Proposed Submission (DPD) and the DM (DPD).

Appropriate Assessment undertaken under the Habitats Regulation (HRA)

4.31 The Council prepared a Habitat Regulation Assessment (HRA) for the Site Allocations DPD[14] (March 2014), as required under the Conservation of Habitats and Species Regulations 2010 (HRA). This document assessed the likely impacts, effects and mitigation associated with the allocation of sites that may be required within the DPD in the formal context of the Habitats Regulations. This concluded that given the proximity of some allocation sites to component units of the Broadland International Sites and the Winterton-Horsey Dunes SAC, an impact on site integrity from disturbance from recreation could not be discounted. Therefore, an appropriate Assessment was required for disturbance effects on the Broads SAC and Ramsar Site, the Broadland SPA and the Winterton-Horsey Dunes SAC. The Assessment concluded that there are potential impacts from disturbance at the Broads SAC and Ramsar Site and Broadland SPA although these are likely to be very low. Nevertheless, because of the possibility of impacts mitigation is required in the form of green infrastructure/open space provision related to development sites. It was considered that the policies from the Development Management (DPD) will deliver the necessary mitigation, coupled with the element of the Community Infrastructure Levy that will go towards green infrastructure for open space provision. Therefore, it is considered that there is sufficient confidence for negative impacts on site integrity on International Sites from the Site Allocation DPD to be considered unlikely.

Publication of Site Allocations and (draft) SA Report for Site Allocations (2014)

4.32 Broadland District Council published the Site Allocations Development Plan Document (DPD) from 14 April to 30 May 2014 based on '*soundness*' as to whether the DPD *is 'justified', ' effective'* and *'consistent with national policy'* from 14 April, to 30 May 2014. This also included other background documents such as the (draft) SA Report (incorporating Strategic Environmental Assessment) for the Site Allocations (DPD) was published alongside, this appraises the sites and alternatives to ensure that social, environmental and economic dimensions of sustainable development are considered in the preparation and adoption of Site Allocations (DPD). As well as, an Appropriate

[14] Habitat Regulation Assessment (HRA) for Site Allocations DPD (2014) - http://www.broadland.gov.uk/images/B132_SA_DPD_Proposed_Submission_Habitat_Regulations_Assessment.pdf

Assessment under the Habitat Regulation (HRA) (August 2014)[15] (Item C2) prior to formally submitting documents to the Secretary of State.

4.33 Consideration has also been given to comments received on the consultation documents throughout the plan making process these are summarised in: Statement of Consultation for the Site Allocations DPD (Item C11) , Statement of Representations Submitted (2014) (Item C12), Summary of Comments Received on (draft) SA Report - Proposed Submission (2014) (Appendix E (i)), Summary of Comments Received on (Interim) SA Report – Preferred Options (2013) (Appendix E(ii)) , Summary of Comments Received on (Initial) SA Report - Issues and Options (2011) (Item B 138) (Appendix F) and Summary of Comments Received on SA Scoping Report (2009) (Items B138) (Appendix K)

SA REPORT - SUBMISSION TO SECRETARY OF STATE (2014)

4.34 Broadland District Council submitted the plans to the Secretary of State for independent Examination on 26 September, 2014. This included the Site Allocations (DPD) Submission, Policies Map and alongside the Sustainability Appraisal Report (incorporating SEA) for Site Allocations (DPD) to be followed by an Examination in public with an inspector.

4.35 The (SA) Report for Site Allocations (DPD) - Submission (2014)[16] (item C9 of Evidence Base) considers the comments received on the Site Allocations – Proposed Submission and (draft) (SA) Report (incorporating SEA) for Site Allocations – Proposed Submission, (see Appendix E (i)). If any amendments are made the plan which results in any significant changes these should be appraised and the (SA) Report updated. Changes that are not significant will not require further sustainability appraisal work. Generally speaking, significant changes are those that result in a change in the direction of policy. No such significant changes have been made. However, minor updating and correcting have been made including an overall assessment of the entire plan. See (paragraphs 5.836-5.859 and appendix A (ii).

4.36 As a starting point the Site Allocations (DPD) follows on from the overarching strategy that being the Joint Core Strategy (DPD) (2011)(2014), which has been subject to both Sustainability Appraisal (SA) process (including Strategic Environmental Assessment (SEA)) and Habitat Regulation Assessment (HRA).

4.37 As set out above, Site Allocations (DPD) has been an iterative process over time a number of potential Sites have been considered, consulted on and appraised. Initially, a Scoping (SA) Report for the Site Allocations and Growth Triangle 9 (AAP) (2009) was prepared setting the context and objectives as well as establishing the baseline and identifying the key sustainability issues,

[15] Habitat Regulation Assessment for the Site Allocations (DPD) (August 2014) - http://www.broadland.gov.uk/images/C02_Site_Allocations_DPD_Submission_Habitats_Regulation_Assessment.pdf

[16] SA Report (incorporating SEA) for Site Allocations DPD (2014) - http://www.broadland.gov.uk/images/C08_Sustainability_Appraisal_Report_Site_Allocations_Submission.pdf

developing the SA Framework for which the Site Allocations would be appraised against. The SA Scoping Report for the Site Allocations has regard to and builds from the SA Scoping Report for the JCS (2007) as it contained a range of information relevant to the production of DPD in Broadland, a comprehensive SA Assessment Framework and set of indicators for the appraisal of emerging policies. In addition, the Site Allocations is subsidiary and must conform to the overarching (JCS). Therefore, the sustainability principles applied to the JCS are equally applicable to the Site Allocations (DPD). The SA Scoping s was also consulted on with the Environmental bodies and relevant stakeholders (2009). The Final SA Scoping Report was available in the Council's website and was included for consultation along with the Call for Sites in 2010.

4.38 Further in the process whilst developing and refining the options and assessing the effects an (Initial) Sustainability Appraisal Report for Site Allocations (DPD) (see method of appraisal) was produced for consultation (September – December 2011) including a basic Site Assessment. The basic assessment was utilised as a 'strategic sift' in order to reject sites contrary to higher order policy such as the (JCS), or sites within the (OSRT) Growth Triangle (AAP). As well as, to assess the reasonable alternatives and prepare a shortlist for further consultation. Furthermore, the (Initial) (SA) Report for the Site Allocations assessed the sustainable criteria used in assessing the reasonable alternatives.

4.39 Following on from the Shortlisted Sites stage (2011), the council prepared an (Interim) SA Report for the Site Allocations along a Site Assessment and based on the conclusions on the SA Report together with the comments received recommendations were made for the Site Allocations - Preferred Options for further consultation in summer (2013).

4.40 The (SA) Report for the Site Allocations (DPD) considers the comments received during the publication of the Site Allocations – Proposed Submission and (draft) SA Report –for Site Allocation -Proposed Submission which appraised all the reasonable alternative sites considered since the (Interim) (SA) for Site Allocations (DPD) (2013). The (SA) Report ultimately assesses the sites and recommends the best site allocations and specific policies for inclusion in the Site Allocations (DPD). This includes an explanation of any potential effect (and the alternatives considered). It also identifies proposed mitigations measures for the inclusion in the development guidelines in the Site Allocations (DPD) in order to mitigate any effects identified and proposes a monitoring framework.

4.41 Based on the Comments received, the SA findings in the conclusions of the Planning Assessment for each Parish and (SA) Tables (Appendix A (i) and G (a) numerous mitigation measures have been identified. These include improved access, pollution mitigation measures, provision of green infrastructure, expansion to schools, etc.

4.42 As part of the '(Initial) Questions to the Council' from the Inspector, the inspector held an Exploratory Meeting for the Site Allocations (DPD) on 8 January 2015 to discuss issues related to the Site Allocations. As a result, number potential main modifications (MM) were suggested to the Site Allocations - Proposed Submission document for further consultation. The Planning Inspectorate guidance on Examining Local Plans Procedural Practice, December (2013) para 4.21 is clear that 'Any such proposed change should where appropriate, be subject to the same process of publicity and opportunity to make representations as regulation 19' and it also states that 'the proposed change must not undermine, or possibly undermine the sustainability appraisal process that has informed the preparation of the plan'. Therefore, the Main Modifications (MM) to the Plan was subject to a Sustainability Appraisal (SA) Report Addendum[17] to ensure that they did not undermine the sustainability process that has informed the preparation of the plan. A second aim of the (SA) Report Addendum was to supplement the appraisal of alternative sites presented in the (SA) Report for the Site Allocations (DPD). In addition, a Habitat Regulation Assessment Addendum for the Main Modifications (MM) to the Site Allocations DPD Proposed Submission[18] was also prepared.

Consultation on the Main Modifications (MM) to the Site Allocations DPD and SA Report Addendum for potential) Main Modifications (MM) to the Site Allocations DPD (2015)

4.43 The Council consulted on these main modifications (MM) to the Site Allocations – Proposed Submission and SA Report Addendum, including HRA Report Addendum from 23 February to 8 April 2015 reflecting the consultation at regulation 19 stage; and the comments were taken into account by the Inspector appointed to examine the Site Allocations DPD prior to the hearing in accordance with the Planning and Compulsory Purchase Act (2004) (as amended).

SA Report Addendum for Main Modifications (MM) to the Site Allocations (DPD) – Proposed Submission

4.44 The SA Report Addendum has concluded that based on the assessment on the potential main modifications to the supporting text in these are unlikely to cause effects to the majority of SA objectives and the rest are expected to remain neutral; therefore, no significant effects should arise overall.

4.45 Furthermore, the sustainability appraisal addendum concluded the following: 'deleting the 'delivery' wording in the allocations/ policies will result in the most sustainable sites will remain in the plan to be developed therefore possible positive aspects to environmental, social and economic objectives are that the allocations will remain for the duration of the plan; though the removal of the 'delivery requirement' to the allocations could mean that allocations will not progress to development until the end of the plan period if landowners decide to delay them also there may be a shortfall in housing

[17] SA Report Addendum for Proposed Main Modifications (MM) to the Site Allocations DPD - http://broadland-consult.limehouse.co.uk/portal/sadpd/mods/modsdoc?tab=files

[18] HRA for Proposed Main Modifications (MM) to the Site Allocations Proposed Submission - http://broadland-consult.limehouse.co.uk/portal/sadpd/samods/modsdoc?tab=files

provision. However, potential negative impacts will be addressed by undertaking timely review of the plan which it would include an assessment of the delivery of the sites and measures to address non delivery (see MM3). The modification is unlike to cause effects on the majority of SA objectives and the rest are expected to remain neutral; therefore, no significant effects should arise overall'.

4.46 Consequently, these main modifications do not pose any significant constraints on the previous assessments of alternative policies set out in section 5 of the Sustainability Appraisal – assessment of alternative sites in the submission and no further mitigation measures are required other than those referred to in the Sustainability Appraisal Report for the Site Allocations DPD.

(HRA) Report Addendum for Main Modifications (MM) to the Site Allocations (DPD) – Proposed Submission

4.47 The AA concluded that there are potential impacts from disturbance at the Broads SAC and Ramsar Site and Broadland SPA although these are likely to be very low. Nevertheless, because of the possibility of impacts mitigation is required in the form of green infrastructure/open space provision related to development sites. It was considered that the policies from the emerging Development Management (DPD) will deliver the necessary mitigation, coupled with the element of the Community Infrastructure Levy that will go towards green infrastructure for open space provision. Therefore, it is considered that there is sufficient confidence for negative impacts on site integrity on International Sites from the Site Allocation DPD to be considered unlikely.

4.48 Both the HRA for the DM DPD and Site Allocations (August 2014) (Revised) considered the suggested main modifications to the DM Policies and supporting text on the Development Management DPD following consultation and discussions with Natural England and these concluded that the modifications made to the DM DPD added greater clarity and therefore an Appropriate Assessment was not required for disturbance effects of any of the International Sites. As a result, the suggested changes to the DM DPD were put forward to the planning inspector during the Examination for the Development Management DPD on 3-4 February 2015. The assessment demonstrates that an Appropriate Assessment for these may not be required.

SA REPORT ADDENDUM FOR MAIN MODIFICATIONS (MM) TO THE SITE ALLOCATIONS (EXAMINATION) (2015)

4.50 The Examination in public for the Site Allocations DPD took place from 30 June to 8 July, 2015 as a result of the discussions with interested parties a number of Main Modifications (MM) to the Site Allocations DPD arose for further consultation and appraisal. Main Modifications are more substantive changes which significantly alter a policy or text and may be considered necessary by the Planning Inspector to make the plan sound or legally compliant. Therefore, these modifications were subject to an SA Report Addendum[19] to supplement

[19] SA Report Addendum for Proposed Main Modifications (MM) to the Site Allocations DPD Proposed Submission (2015) - http://broadland-consult.limehouse.co.uk/portal/sadpd/samods/modsdoc?tab=files

the appraisal of alternative sites presented within the (SA) Report for the Site Allocations DPD in addition to a Habitat Regulation Assessment (HRA) Addendum Report[20].

4.51 Furthermore, as a result of objections received the Inspector requested that additional SA work be undertaken with regards to the NPA. This resulted in the preparation of a Sustainability Appraisal Addendum: Residential Provision in the NPA[21]. Its purpose is to provide further explanation and clarification of the consideration of the provision for residential development in accordance with the Settlement Hierarchy for the Norwich Policy Area (NPA) set out in the Joint Core Strategy for Broadland, Norwich and South Norfolk.

SA Report Addendum for Main Modifications (MM) to the Site Allocations DPD – Proposed Submission

4.52 The SA Report Addendum has concluded that as the majority of the proposed main modifications are to the supporting text or primarily for clarification / explanation or rewording or cross referencing to other policies, they pose no significant changes to the policies. Therefore there is no need for further sustainability appraisal work on these. However, there were two main modifications (MM19 and 20) where it was felt that sustainability appraisal assessment would be beneficial in order to properly assess these modifications. For these it was concluded that the proposed modifications do not result in any impacts that would substantially change the sustainability appraisal of the allocation. The revised wording provides more flexibility over the distribution of development and open space within the site.

4.53 Consequently, these main modifications do not pose any significant constraints on the previous assessments of alternative policies set out in section 5 of the Sustainability Appraisal – assessment of alternative sites in the submission and therefore, no further mitigation measures are required other than those referred to in the Sustainability Appraisal Report for the Site Allocations DPD. The comments referred in SA Table 2 relate to previous comments received relevant to the site area and may be of relevance to the proposed main modification; however, not necessarily as a result of the proposed main modification.

(HRA) Report Addendum to the Main Modifications (MM) to the Site Allocations DPD – Proposed Submission

4.54 The HRA Addendum concluded that it is considered that there are unlikely to be significant negative effects on the International Sites arising from the proposed Modifications to the Site Allocations DPD and that Appropriate Assessment is not required.

SA Report Addendum: Residential Provision in the (NPA) Norwich Policy Area (2015)

[20] Habitat Regulation Assessment for Proposed Main Modifications to the Site Allocations DPD – Proposed Submission (2015) http://broadland-consult.limehouse.co.uk/portal/sadpd/samods/modsdoc?tab=files
[21] SA Addendum: Residential Provision in the NPA (2015) http://broadland-consult.limehouse.co.uk/portal/sadpd/samods/modsdoc?tab=files

4.55 The SA Addendum: Residential Provision in the NPA concluded that the Sustainability Appraisal has identified sufficient appropriate sites for residential development to meet and exceed the housing requirement set out in the Joint Core Strategy for the Broadland part of the Norwich Policy Area (outside the Growth Triangle Area Action Plan area). A large element of the requirement has been met through Specific Policies relating to sites that already had planning permission. Further additional allocations have been made in the Fringe Parishes as being the highest element of the JCS Settlement Hierarchy in the Broadland part of the Norwich Policy Area, with this provision being primarily in Hellesdon with the chosen sites there being favoured over other potential sites in the fringe. Consequently the remaining requirement for the Broadland NPA was exceeded by some 465 dwellings or 23.3% of the JCS requirement. For the Key Service Centres and Service Villages the Joint Core Strategy requirement has largely been met through the Specific Policies / sites with planning permission, with just three additional allocations made to meet the Joint Core Strategy requirement for Blofield Heath, Horsham and Newton St Faith and Salhouse. Overall for the NPA, land has been identified for residential development that accommodates some 2,565 additional dwellings, 565 more than the 2,000 dwellings minimum requirement in the Joint Core Strategy. This excess will give flexibility in provision to ensure that the need for housing will be met.

4.56 In addition, the Council proposed additional changes to the Site Allocations (DPD) – Proposed Submission that were minor in nature. These were not necessary for 's*oundness*' of the plan but regarded as textual and grammar corrections; re-phrasing or limited new text to add clarity; or factual updates to figures and references which were necessary due to alterations which have been made elsewhere or for which new information has come to light following the Examination Hearings. Therefore, due to the nature of these changes e.g. not altering the direction of policies, or posing any effects on the SA objectives they did not require further SA assessment. The Council then consulted on these modifications from 1st September to 13th October 2015. These comments received were then passed on to the Planning Inspector for consideration before completing her final Inspector's Report and proceeding to Adoption.

ENVIRONMENTAL STATEMENT FOR SITE ALLOCATIONS DPD – ADOPTION (2016)

4.57 In conclusion the Inspectors Report on the Examination onto the Site Allocations DPD (2016) confirms that the Council has undertaken a Sustainability Appraisal of the Plan throughout the relevant stages. Reasonable alternatives have been tested and this has led to the most appropriate sites being selected. Therefore, the SA Report for the Site Allocations DPD together with the Habitat Regulation Assessment, the background evidence base and the comments received during numerous consultations has informed the plan preparation process. This has included the consideration of comments received from adjoining authorities, utility agencies, and statutory consultees as part of duty to cooperate under the Localism Act 2011, and amends to the Planning and Compulsory Purchase Act 2004.

4.58 As a result of rigorous assessment of sites and public consultations, comments received the Site Allocations DPD contains a number of mitigation measures such as e.g. further investigation with regards to flooding, archaeology, inclusion of SUDS, water quality and pollution control measures, consideration of disposal and treatment of foul water, access and transport improvements and expansions to schools. In addition, the main emphasis has been green infrastructure / open space required related to development sites. This mitigation measure came about as a result of the appropriate assessment conclusions that there are potential impacts from disturbance at the Broads SAC and RAMSAR Site and Broadland SPA although these are likely to be very low. It is considered that the policies from the Development Management DPD will deliver the necessary mitigation coupled with the element of Community Infrastructure Levy that will go towards additional strategic green infrastructure for open space provision as specified in the Greater Norwich Infrastructure Plan (GNIP). Therefore, it is considered that there is sufficient confidence for negative impacts on site integrity on International Site from Site Allocation DPD to be considered unlikely.

5.0 THE REASONS FOR CHOOSING THE PLAN ADOPTED IN LIGHT OF OTHER REASONABLE ALTERNATIVES

5.1 The reasons for choosing the plan adopted in light of other reasonable alternatives is explained in the SA Report (incorporating SEA) for the Site Allocations DPD[22] Section 5: The Assessment of Options Considered and Appraisal Findings. These findings were shaped by the conclusions from the SA Tables which assessed all the sites considered together with the comments received, the HRA findings, and other planning considerations such as whether or not sites had planning permissions. The Councils is of the view that the sites represent the most sustainable sites which will meet the Joint Core Strategy housing and employment targets up to 2026 as well as, providing some flexibility. The Appraisal process considered numerous sites for potential development for the settlements within the appropriate level of the Settlement Hierarchy, as identified at each stage of the Plan process. Based on this and comments received at each stage, recommendations for mitigations etc. conclusions are made on what land should be identified and these are taken forward into the Site Allocations DPD.

5.2 A key factor in the consideration in the planning assessment process was that many of the alternative sites had already been determined as being suitable for residential development through the planning application process i.e. they had been given planning permission. By virtue of having planning permission, it is reasonable to conclude that they were acceptable for development and would likely be delivered, and so were preferable to other alternatives for inclusion in the plan. Accordingly, such sites were regarded as being appropriate to include within the plan as a type of allocation, referred to as “specific policies” that acknowledged their status as having planning permission. Overall for the NPA,

[22] SA Report (incorporating SEA) for Site Allocations DPD- Submission (2014) http://www.broadland.gov.uk/images/C09_Sustainability_Appraisal_Report_Appendices.zip

land has been identified for residential development that accommodates some 2,565 additional dwellings, 565 more than the 2,000 dwellings minimum requirement in the Joint Core Strategy. This excess will give flexibility in provision to ensure that the need for housing will be met.

6.0 MONITORING THE ENVIRONMENTAL EFFECTS OF THE PLAN

6.1 The monitoring arrangements for the Site Allocations DPD are based on monitoring the progress of each individual site allocation against the target set in the Housing Trajectory as shown in the Site Allocations DPD. These trajectories set out the expected delivery of housing sites. These are for sites identified within the Site Allocations DPD. Other sites are allocated within the Growth Triangle AAP, and further details on these can be seen in that document. These trajectories show that for the Site Allocations DPD the housing delivery decreases towards the end of the plan period. Development in the Growth Triangle is lower to start out, then increasing as the larger sites deliver. All of the trajectories (including sites from the Site Allocations DPD, Growth Triangle AAP, and other Greater Norwich authorities) are updated as part of the Council's Annual Monitoring Report (AMR). In addition, the JCS AMR monitors the SA baseline and the strategic objectives for the plan.

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