

Appendix 3: Consultation comments received on the Sustainability Appraisal and the Council's responses (Site Allocations 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 12 th 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)	<p>No comment on whether all relevant plans, policies and programmes included.</p> <p>Baseline information seems to cover appropriate areas but much of it is based on Regional Spatial Strategy figures etc.</p> <p>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.</p> <p>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</p>	<p>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.</p> <p>The potential to review the housing figures/targets falls outside of the remit of this scoping report</p>

	achieved.	
review its housing figures.		
East of England Development Agency (EEDA)	<p>Suggest need more evidence to cover broader sustainable economic development in East of England and on socio-economic factors to cover:</p> <ul style="list-style-type: none"> 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. <p>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)</p> <p>Productivity and prosperity</p> <ul style="list-style-type: none"> Annual growth in real workplace-based GVA over 2008 – 2031 Per capita at 2.3 per cent Per worker at 2.1 per cent <p>Conventional economic impacts (GDP £)</p> <p>Wider economic impacts (all GDP £)</p> <ul style="list-style-type: none"> - Agglomeration - Imperfect competition - Labour market impacts <p>Employment - Employment rate by 2031</p>	<p>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.</p> <p>The opportunity to assess the wider socio-economic benefits and costs can be included within the existing SA framework – No change.</p> <p>One of the main purposes of the SA is to assess and compare the options available. No change.</p> <p>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.</p> <p>Employment – No change.</p> <p>S2 (page 82) and S3 cover percentage unemployment and percentage of population of working age that are economically active. These are considered sufficient.</p> <p>Skills – No change.</p> <p>S5 (page 83) already includes percentage of working age population with</p>

	<ul style="list-style-type: none"> - Working-age population at 80 per cent - 16–74 population at 70 per cent <p>Skills - Share of working-age population with qualifications by 2020 (aged 19 to state pension age)</p> <ul style="list-style-type: none"> - 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 	<p>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.</p>
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Interim Sustainability Appraisal (2012)

	<i>Summary of Main Issues</i>	<i>Council's Assessment</i>
19788 - Hethersett Land Ltd	<p>Hethersett Land Ltd have no specific comments on the general approach to the Sustainability Appraisal Report although the site assessment tables are difficult to interpret and make reference to sites which are not identified on the maps.</p> <p>For instance the Hethersett North site has been split up into different components, which are not shown on the Preferred Options (Sept 2012) map.</p> <p>Also, some results in the assessment tables seem not to appear correct in light of some</p>	<p>The information given will be assessed and the site assessment tables will be updated appropriately</p>

	<p>available evidence and can be updated.</p> <p>Specifically, for sites north of Hethersett, the site assessment tables are out of date and can be updated to reflect current available evidence. See answer to question 12 for more comments. (See full, scanned rep)</p>	
20465 - Steve Horrocks [9331]	<p>The sustainability appraisal interim report (SAI) appears comprehensive and most sections are reasonably clear. I believe that combining the 'traffic light' approach with an easy-to-understand numerical approach would show clearly whether sites were being chosen for reasons primarily relating to objectively-ranked factors or that planning judgement reasons were considered of greater importance. Combining the traffic light notation and a numeric approach seems a clearer way of publishing and justifying the site assessment process. I would welcome South Norfolk implementing this approach to give reassurance to local stake-holders about the consistency and robustness of the process thus far. See full scanned rep attached (section 2</p>	<p>There is inevitably some subjectivity and professional judgement in reaching conclusions on each site. The reasons for choosing (or not choosing) each site have been clearly explained in the 'Comments' row in the site assessment tables. Adding extra numeric factors could add spurious legitimacy to elements (such as landscape) where planning judgement must be exercised, and could lead to sub-optimal decisions being made</p>
20181 - Bidwells (Mr Graham Bloomfield)	<p>Woodton No particular comments with regard to the appraisal and the site assessments. Specific comments relating to the Site Assessment process for Woodton and</p>	<p>Comment noted - will be responded to via Q12</p>

[1435]	Bedingham (Map 090) and our client's site (0157) are detailed at Question 12.	
18295 - Costessey Parish Council (Mrs Hilary Elias) [8570]	Councillors are concerned that whilst the SA includes environmental, social and economic objectives it often appears to be the case that development takes place without supporting infrastructure. Traffic and transport are major issues in Costessey. All development in Costessey impact on the roads and the Longwater junction with the A47. Councillors questioned the level of detail re traffic/transport for each site	The infrastructure needs of all proposed sites are considered appropriately, with the impact on Longwater junction a key element for Costessey sites. However, the full detail of traffic and transport impacts are most appropriately addressed through individual planning applications
19811 - Mr Greengrass [8593]	Bawburgh is a settlement within the NPA which can accommodate further limited additional development to help deliver the smaller sites in the NPA allowance.	Whilst Bawburgh is in the NPA, it is an "other village", with no minimum allocation, due to its lack of services. It is concluded that only one site of 5 dwellings is appropriate to allocate
18988 - Chedgrave Parish Council (Clive Boyd) [9453]	I would have preferred greater involvement of our Parish Council when SNC was first investigating potential sites	The Site Allocations document has now been subject to three rounds of public consultation, with all parish councils having been written to at each round, so it is considered that parish councils have had ample opportunity to engage in the process
19256 - mr William Ling [8742]	Good but flawed in that the public will not understand the procedure and the building industry does. Also have failed too see are	Many members of the public have understood the process and written cogent responses. South Norfolk

	elected representatives.	councillors have played a key role in preparing the document and communicating information with their residents
19839 - Bidwells (Mr Graham Bloomfield) [1435]	<p>No particular comments with regard to the appraisal and the site assessments. However, it is particularly important to consider that the site assessment process for Costessey (map 27a) and site 0036 in particular, has been superseded by appeal decision APP/L2630/A/2170575. This granted outline planning permission for 62 dwellings on site 0036.</p> <p>We would suggest that the revised status for site 0036 with the site now benefitting from outline permission should be reflected within the Site Specific Allocations & Policies DPD and proposal map 027a by including the site within the preferred development boundary.</p>	Site 0036 was granted permission on appeal largely due to the lack of a five-year housing land supply, despite the Inspector acknowledging considerable landscape harm. It is therefore not considered appropriate to include this site in the development boundary when to do so would mean that any later "infill" type proposals/densification would be much easier to achieve
18148 - Mr & Mrs AP & SA Goldring [9205]	We would have to rely on your expertise.	Comment noted
19900 - Mr Vaughan Smith [4283]	The Sustainability Appraisal has been carried out in accordance with the relevant guidance and legislation for preparing Development Plan documents. It is crucial that the appropriate Sustainability Appraisal has been undertaken in accordance with relevant legislation	Comments noted

	otherwise the document could be found unsound by the Inspector at any subsequent Public Examination. The interim report that has been published for consultation is considered to be robust at this stage and has appropriately assessed the sites that are allocated in the Preferred Options for development sites allocations and development boundaries document.	
19002 - Dr John Mann [9454]	It is clearly sensible to consider sustainability at an early stage. However, where 'a good range of facilities' is mentioned, the quality of each should be carefully assessed.	To consider the quality of services would add an element of subjectivity to the process which would be unhelpful (i.e. controversial). Restricting consideration to just the quantity of services retains an objective position
19010 - Mr Hadingham [9455]	More publicity	As the Site Allocations process has been subject to three rounds of public consultation, with all parish councils contacted at each stage, alongside press notices and articles, with copies of documentation lodged in all South Norfolk libraries, it is considered that publicity has been adequate (and in line with that required by the Council's Statement of Community Involvement)

18437 - Mr David Goldson [8643]	A complicated procedure - difficult to comprehend by the general public but satisfactory overall	Comment noted
18940 - Mr John Downing [7932]	Whilst a lot of detail is given there are inconsistencies with this document and the scoring on the site assessment table for the Norwich Fringe where site 1173 has not been assessed for intrusion on the NSBLPZ.	The site assessment for 1173 (Trowse) does consider the Norwich Southern Bypass Landscape Protection Zone, as can be seen in the 'traffic light' table
18282 - Rockland St Mary with Hellington PC (Mr M Presland) [9254]	Yes	Comment noted
19938 - Bidwells (Mr Graham Bloomfield) [1435]	No particular comments with regard to the appraisal and the site assessments. Specific comments relating to the Site Assessment process for Ditchingham (Map 090) and our client's site (061) are detailed at Question 12.	Comment noted
19961 - Diocese of Norwich (The Diocese of Norwich) [7360]	It is considered that the overall approach has been appropriate. However, in relation to the residential allocations at Framingham Earl, it is suggested that the preferred options have not sufficiently allowed for smaller scale allocations that can come forward for development rapidly. The preferred allocations consequently rely on	The Site Allocations Plan runs to 2026. All allocated sites have had their viability confirmed, and the three allocated sites in Poringland/Framingham Earl are the most appropriate to allocate

	<p>a lower quantity of landowners/developers, rather than spreading risk and opportunity.</p> <p>It is argued that the benefit of providing smaller scale allocations should not be disregarded as they enable development to be more evenly spread and can assist in providing a variety of development opportunities and outcomes.</p> <p>An edge of village proposal, slightly more distant from the village centre is evidently desirable to potential occupiers, yet still sufficiently proximate to services to be deemed sustainable and worthy of allocation.</p>	
19848 - BDP (Mr Andrew Watson) [9613]	NRP is broadly in agreement with the general approach taken in preparing the DPD, including the sustainability appraisal report, overall objectives and site assessment process.	Comment noted
18182 - Bramerton PC (Mr Brian Ansell) [8264]	Appears so.	Comment noted
18747 - Redenhall with Harleston Town Council (Mrs Margot	We consider that the approach taken has been largely appropriate. However, we do consider that further attention is required to meet the future demands on traffic flows and car parking.	The impact of development proposals on traffic flows is a key consideration in their acceptability (or otherwise). Appropriate levels of car-parking are best assessed at the planning application stage

Harbour) [8597]		
19095 - Cllr Leslie Dale [8581]	It is incomplete. The first line of the first paragraph requires the "identifying of environmental impacts". In the context of the growth areas being asked to swallow the developments, the individual site assessments and preamble make no mention of the obvious impacts upon the existing community. Reassess in retrospect.	The impact on existing communities is considered, for example, with reference to traffic impacts and impacts on the character and form of settlements. However, the overall level of growth for each settlement has already been set in the adopted Joint Core Strategy
19733 - Chedgrave Parish Council (Miss J M Bircham BSc MRICS) [9597]	It is not currently a statutory requirement and is premature to carry out at this stage. It should only be done as and when it is required.	Sustainability appraisal is a statutory requirement and has been prepared hand-in-hand with options development for the document
19484 - Mrs S De-Courtney [9517]	Not everyone has access to a computer to look up information. More consultation with local residents.	Information has been posted to those requesting it. In addition, all parish councils received hard copies of documentation, as has South Norfolk libraries. SNC officers have also undertaken a number of public 'roadshows' during the document production process. With three separate consultation rounds, and thousands of responses received, it is not accepted that more

		consultation is needed
20048 - Bidwells (Mr Graham Bloomfield) [1435]	Generally support the appraisal and site assessment approach. However specific comments relating to the assessment of Site 1005 are detailed at question 12.	Comment noted
18625 - Hethersett Parish Council (Ian Weetman) [5115]	The PC considers that the approach taken has been appropriate	Comment noted
18721 - Mr Roger Smith [9398]	Density of housing development is a major issue, which is to be "subject to form, character and servicing restraints". The implication of this is not evident from the approach being taken in determining the number of units proposed.	Form, character and servicing restraints will influence acceptable densities, but it is unlikely that an extremely low density scheme (below 20 dwellings per hectare) would be appropriate. No change is needed
19566 - Mrs Alison Morsom [9526]	The approach is too localised. The bigger picture should be looked at	The adopted Joint Core Strategy sets the bigger picture for future development in South Norfolk. In a rural district, with many small settlements, a localised approach is also necessary, however
19795 - Parker Planning Services Ltd	Mainly yes - however certain criteria such as brownfield and infill not given weight.	Both brownfield and infill statuses are given weight in the site assessment process - both form part of the 'traffic light' table

(Mr Jason Parker) [9610]		
19555 - Dr M Fewster [8404]	No I consider that too much has been done by looking at maps and statistics and too little by visiting and talking to the inhabitants of settlements over a period.	The site assessment exercise relies on a mix of published information, officers' local knowledge and the consultation responses from local residents. Inevitably there will sometimes be disagreement between what the Council believes are acceptable sites and local residents' views, but the reasons for all decisions have been made clear
20435 - Savills (Mr Mark Hodgson) [9618]	<p>The Sustainability Appraisal (SA) has to be carried out in accordance with the relevant guidance and legislation for preparing Development Plan documents. This is required by the Planning and Compulsory Purchase Act 2004.</p> <p>The Council has to ensure that its proposed Development Plan Documents have been appropriately assessed in terms of its environmental impact as a result of the requirements set out in the Strategic Environmental Assessment Directive.</p> <p>The interim report that has been published for consultation acknowledges that SA is an</p>	Comment noted

	iterative process and will be updated as the Site Specific Allocations DPD is progressed. It is important that this process is robust and can withstand challenge and investigation from third parties. At the present time we can see no reason why this should not be the case.	
18458 - Mr Roger Margand [9312]	The report has been written in a very technical way and is difficult to understand without specific focused knowledge. The abbreviations in it are often not explained or defined at the time they are used. Consequently it is difficult for a member of the public to come to any definitive views. As a draftsman by trade, I found the report whilst seeming to hit the points required by regulation, turgid, unfriendly and difficult to read. If you are serious about consultation, please try and consult in a way that encourages not discourages feedback and comment	Sustainability Appraisal is formal legal process to be followed, so an element of technical language is unavoidable. However, the next iteration of the SA will have a non-technical summary and a glossary included
19969 - Hibbert & Key [7363]	Hibbett and Key have no specific comments on the 'general' approach to the Sustainable Appraisal Report. However, some results in the assessment tables seem do not appear correct in light of available evidence and can be updated. Specifically, for sites in Framingham Earl, the site assessment tables are out of date and can be updated to reflect current available evidence. See answer to Q.12 for more detailed comments.	The information provided will be assessed and any appropriate modifications will be made

19509 - Mr Stephen Joyce [9519]	I think it is a good idea to get the residents view and take into account all the negative and positive effect the new buildings will bring to Brooke.	Comment noted. All positive and negative impacts are taken into account when considering potential sites
19019 - Ms Susan Stacey [9457]	The approach seems appropriate. However this was a lengthy document which was quite difficult to follow.	SA is a legal and technical process, and with many hundreds of potential sites to assess, a lengthy document is unavoidable
18415 - Bernard & Mary Pitt [2672]	Yes	Comment noted
19168 - A N Williams [3092]	It is impracticable to reach a considered opinion on each policy of the SAR by every member of the Parish Council in a meeting due to weight of information. The policies are created by SNDC and applied as they see appropriate where each community has not created its own Neighbourhood Plan. Therefore the Parish Council is not in a position to offer an alternative at this point. Scole Parish does however have a Community Survey completed in 2009 and updated annually which has not been considered.	Scole Parish Council could prepare a Neighbourhood Plan if they wish. The Site Allocations document can only consider those sites proposed by landowners or developers
18787 - Scole Parish Council (Mrs Corinne Moore) [9415]	It is impracticable to reach a considered opinion on each policy of the SAR by every member of the Parish Council in a meeting due to weight of information. The policies are created by SNDC and applied as they see	Scole Parish Council could prepare a Neighbourhood Plan if they wish. The Site Allocations document can only consider those sites proposed by landowners or developers

	appropriate where each community has not created its own Neighbourhood Plan. Therefore the Parish Council is not in a position to offer an alternative at this point. Scole Parish does however have a Community Survey completed in 2009 and updated annually which has not been considered.	
20218 - Parker Planning Services Ltd (Mr Jason Parker) [9610]	Site 0161 - Wortwell Brownfield/previously developed land has not been given priority in this case or infill sites.	Brownfield land is one of the assessment criteria, and it is therefore considered positively. However, the brownfield/greenfield status is only on criterion amongst many, and its presence does not necessarily mean that a brownfield site should be allocated if, say, the highways impact would be unacceptable
18314 - Tasburgh PC (Catherine. Moore) [8548]	No comment or response	Comment noted
20036 - Persimmon Homes Ltd Anglia Region [280]	No specific comments to make on Sustainability Appraisal.	Comment noted
19590 - Mrs Karin Rundle	Alpington/Yelverton: No, the infrastructure, roads, sewers and overall viability has not	Infrastructure needs are considered for all potential sites,

[9528]	been considered	and all allocated sites in Alington/Yelverton are supported by viability letters from the landowner/developer
18938 - Mr Steven Fisher [9451]	Don't agree. All options within existing boundary should have been fully explored and solutions sought, before opting for 'easy fix' of simply extending development area.	Weight has been given to all potential sites within the development boundary. However, in a largely rural district such as South Norfolk there are few brownfield sites and so it is inevitable that some greenfield extensions outside the development boundary will be necessary to help meet housing needs
20170 - Mr & Mrs R L Wharton [8270]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable.	There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be more "acceptable" sites than need to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those which are most appropriate
20187 - Mrs Michelle Richman [9540]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable.	There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be more "acceptable" sites than need

		to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those which are most appropriate
19122 - Mr & Mrs Jeremy Brown [9465] 19757 - Savills (Mr Will Lusty) [8119] 19914 - Bidwells (Mr Graham Bloomfield) [1435] 20163 - Mr Steven Fisher [9451]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable.	There is inevitably some disagreement with the conclusions reached for certain sites However, SNC feels that the sites allocated are the most appropriate
19264 - Lady Veronica Fitzroy [9479]	There are inconsistencies with the document and I did not find it terribly clear & had to really study it.	Any inconsistencies will be remedied
20086 - Mr & Mrs Ian & Julie Ward [7905]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable.	There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be more "acceptable" sites than need to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those

		which are most appropriate
20097 - Mr & Mrs Sheehan [9535]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable.	There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be more "acceptable" sites than need to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those which are most appropriate
20140 - Mr Nigel Watson [9537]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable.	There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be more "acceptable" sites than need to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those which are most appropriate
20116 - Mrs Mollie Arnold [9536]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable	There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be more "acceptable" sites than need to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those which are most appropriate

19591 - Mr Phil Gledhill [7798]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable	Inevitably there is an element of subjectivity in assessing sites' acceptability. There are also cases where a number of sites may be individually acceptable, but not all are needed to meet the allocated figure in the Joint Core Strategy. However, the Council needs to decide which sites are allocated, and the reasoning for each site is explained
20063 - Mrs Liz Alden [9530]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable.	There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be more "acceptable" sites than need to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those which are most appropriate
18921 - Mr George Bircham [6888]	More consideration should be given to the needs and housing of local people.	The overall housing allocation for each settlement has largely been set in the adopted Joint Core Strategy. Local need for affordable housing is assessed regularly, however
20198 - Mr David Richman [9193]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and	There is inevitably some subjectivity in assessing the acceptability of potential sites, and

	amber which are suitable.	in some settlements there may be more "acceptable" sites than need to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those which are most appropriate
19925 - Robert Doughty Consultancy Limited (Mr Robert Doughty) [9373]	Objection to the Sustainability Appraisal with regard to the assessment approach adopted as no attempt has been made to review individual sites with landowners	All sites suggested for development were assessed against a detailed checklist. This gave the Council a high level of detail about the suitability of each site for allocation, this coupled with the fact that information submitted about each site is kept on file, meant that it was not considered necessary to review each individual site with the landowner. The Council were aware that the owner wished to promote site A0018 for mixed use or housing as this is referred to in the conclusions column of the site assessment table. It was considered that there were more preferable sites for housing located elsewhere in Loddon with better accessibility to services and facilities
19133 - Robert	The process requires amending by looking at	The site lies in Flood Zone 1, and

Knights [5750]	the environmental impact on flooding in this 'preferred site'. This land is not the 'right place' for growth within the village as the road in from Wymondham is already inadequate for a gateway into the village due to heavy traffic flow.	is therefore not at significant risk of flooding. The site is concluded to be appropriate for allocation; 15 dwellings in Spooner Row would not add significantly to traffic flows, and is within the range allocated in the Joint Core Strategy
20075 - Mrs Cruickshank [9533]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable.	There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be more "acceptable" sites than need to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those which are most appropriate
20151 - Mr & Mrs Trevor & Linda Forder [9539]	The conclusions column does not fairly reflect a number of possible site options. In our opinion there are sites shown as red and amber which are suitable.	There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be more "acceptable" sites than need to be allocated to meet allocation figures. The Council is satisfied that the allocated sites are those which are most appropriate
19134 - Stoke Holy Cross PC (Mrs L Marsh) [9464]	The site assessment comment for sites in Stoke Holy Cross are disappointingly inadequate, and in the parish Council's opinion have resulted in an incorrect analysis of the	Stoke Holy Cross is identified for 10-20 dwellings, but has been concluded to be acceptable to accommodate some of the

	<p>capacity of the village to accept additional development and a flawed specific site assessment, that has been used to identify preferred sites.</p> <p>75 dwellings are being proposed for lower Stoke, which will undoubtedly put significant pressure on existing services and facilities in the village such as the school, drainage, and roads, and there is inaccurate assessment of their current availability and adequacy. The Parish Council is therefore very concerned that it has been assumed that this scale of growth will be acceptable when it clearly will create future planning problems that have not yet been taken into account.</p>	'floating' 1800 dwellings in the NPA. The chosen sites for 75 dwellings are concluded to be appropriate for allocation
19515 - Mr and Mrs Betts [9520]	<p>Whilst agreeing the need for strong, healthy communities we feel that the chosen site in Bracon Ash is too large a development for the needs and infrastructure of the village it will not enhance the environment and is not in the heart of the village. The access from the B1113 is highly dangerous and there is no footpath, which even if created would still be a major problem for pedestrians as this road is one with a high traffic volume.</p>	<p>Whilst some highways improvements may be necessary to the B1113/A140 junction, site 0819 is concluded to be the most appropriate to allocate in Bracon Ash</p>
20212 - Durrants (Richard)	Woodton Yes	Comment noted

Prentice) [1407]		
20422 - J M Greetham [4475]	The Council's consultation includes the preferred options for the development and use of land having regard to the Joint Core Strategy and a Sustainability Appraisal Report (SA). The SA Report and the work undertaken as part of that process has been prepared in accordance with the Government Guidance and we are satisfied that it is reasonably robust in the approach to the site assessment process.	Comment noted
18477 - Dr G. Martin Courtier [7815] 19011 - Wheatacre & Burgh St Peter Parish Council (Mr Simon Solomon) [6584]	Yes	Comment noted
18155 - Mr M C Litton [9207]	Yes appropriate.	Comment noted
20251 - Easton Landowners Consortium [7254]	Refer to full submission The Sustainability Appraisal Report and the work undertaken as part of that process has been prepared in accordance with the Government Guidance. The Council fully	Comment noted

	<p>appreciate that the process is an iterative one and acknowledges that the performance of the Plan has to be tested against identified social, environmental and economic objectives. It is our view that the sustainability appraisal follows Government Guidance and is robust and consequently it has appropriately assessed sites within the site assessment process.</p>	
18330 - Thurton PC (R Taylor) [1180]	Yes	Comment noted
19154 - Cllr Margaret Dewsbury [9466]	Yes	Comment noted
19070 - MRS SHIRLEY DENNISON [5034]	The approach seems reasonable.	Comment noted
19235 - Natural England (Ms J Nuttall) [9476]	<p>The approach taken to assessing the sites against a range of criteria that address the SA objectives identified for the DPD is welcomed; in particular Natural England is pleased to note the inclusion of a range of relevant environmental criteria that has been used to assess the sites including effects on biodiversity, landscape and soils.</p>	<p>A Habitats Regulations Assessment is being prepared in consultation with Natural England, and Natural England's assistance in the process is much appreciated</p>

	<p>We note that the SA identifies that none of the preferred allocations will have a direct adverse effect on designated sites and that any other potential effects will be confirmed as part of the 'Appropriate Assessment' required under the Conservation (Habitats and Species) Regulations 2010. Natural England advises that the results of this assessment (HRA) and any mitigation recommendations should inform preparation of this Plan and the Development Management DPD. Natural England will be pleased to provide comments on revised versions of this Plan and the Development Management Policies DPD, following completion of the HRA.</p>	
19873 - Durrants (Richard Prentice) [1407]	Yes	Comment noted
19467 - Dudley Jones [6175]	I feel that the approach taken has been entirely appropriate & reasonable.	Comment noted
19881 - Burt Boulton Holdings Limited [7336]	The approach taken to the Sustainability Report is supported in general terms.	Comment noted
18395 - Marlingford &	Yes, although resolving potential conflicts between SA objectives and site specific policy	It is inevitable that there will sometimes be negative impacts

Colton PC (Mr M Bergin) [7437]	objectives may not always be possible.	when allocating certain sites. In a largely rural district, for instance, there are relatively few brownfield sites and so many greenfield sites need to be allocated. However, the sites chosen are those assessed to have the most positive and least negative impacts
19931 - Phillip Jeans Homes Ltd (Phillip Jeans Homes Ltd) [7358]	Support results of the Sustainability Appraisal in principle however would suggest that site 530 has capacity for 300 rather than 200 dwellings to maximise the social and economic benefits of the proposal	Comments noted. The Joint Core Strategy allocates between 100-200 new dwellings for Loddon/Chedgrave. The Council have allocated to the upper limit of this requirement and do not propose to increase the size of the allocation at site 530
19110 - Mr & Mrs J Smith [7931]	Yes	Comment noted
19949 - Durrants (Richard Prentice) [1407]	Yes	Comment noted
19503 - Dr Gibson [7575]	Yes	Comment noted
18967 - Mr A Hall [2112]	Very appropriate	Comment noted
19799 -	Yes	Comment noted

Durrants (Richard Prentice) [1407]		
18959 - Mr L Gardner [9278]	Yes the approach has been appropriate with the details outlined	Comment noted
19780 - Armstrong Rigg Planning (Ms Charlotte Wyn) [9605]	It is considered that the approach taken is appropriate and that the scale of development within settlements is proportionate to the needs of the housing markets and reflects the provision of local services and needs within each settlement to support such additions to the population. The assessment criteria ensures only the most suitable sites with the ability to deliver housing within the plan period have been incorporated. (Refer to scanned rep)	Comment noted
18984 - Mr Robert Hadingham [9452]	Yes, likely significant effects of a development should be tested. Sustainable development being the key test, especially in relationships to existing services in the village	Having adequate services is a key consideration in the acceptability (or otherwise) of all potential sites

List of Representations relating to Sustainability Appraisal received as part of the Amendments to Preferred Options consultation (March-May 2013)

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
Graham Bloomfield: Bidwells 51	Comment	Not Site Specific: There were a number of examples where we did not considered that the appropriate site had been selected when assessed against the Councils own criteria and representations were made on that basis. The consultation relates to significant amendments concerning the allocation of sites or revisions to the development boundary. From the wording it would be reasonable to presume that there will be no further revisions to the allocated sites/ development boundaries set out in the document ahead of the final “pre-submission” version of the document. It is acknowledged that the current consultation is focused on the proposed changes to the process and that you are seeking comments on that basis. By not including particular sites or settlements within the current consultation, this effectively states that SNC will not be revising the preferred sites, notwithstanding the representations that were made at the preferred options stage. Where preferred sites have been removed from the process, this is either where the	The final choice of sites has not yet been made – representations will continue to be considered and, of course, circumstances could change before the Pre-Submission version is finalised. Assessing which site(s) to allocate will frequently require an element of planning judgement to be made, particularly where sites are ‘close’ in assessment. Clearly with any planning judgement there is room for disagreement between different parties, but the Council believes that the final choice of sites will be those that are most appropriate to allocate	None

		<p>landowner has failed to respond to the previous to define the site as viable and deliverable or requested that the site be withdrawn or there has been an objection from County Council on Highways or school capacity grounds.</p> <p>The site assessment criteria seem somewhat illogical and therefore brings into question the soundness of the plan.</p> <p>Site Assessment tables: For some of the locations it does not appear that the preferred site is the one that scores best against the site assessment criteria.....See letter. We would reiterate our request to discuss such matters with officers given our experience across a range of sites and locations.</p>		
Chris Marsden: LANPRO Services 118	Comment	<p>In August 2012 your council requested the promoters of all "Preferred" and "Reasonable Alternative Sites" to submit evidence to show that the land concerned remained viable to meet the test of soundness. As you will appreciate not only do these issues affect the ultimate development costs of the site, the need to provide this information has led to costs being incurred by site promoters to satisfy the Council's requirement for this information, including those sites classed as "Reasonable Alternatives". We write to ask, what status such sites now have in the overall process of allocating land for</p>	<p>"Reasonable alternative sites" are those sites which have been effectively 'first reserve' sites through the process. However, as the Local Plan process has continued, the certainty of viability and deliverability of sites has increased, such that "reasonable alternatives" will not be allocated in the final Document</p>	

		<p>development. As they are considered to be “Reasonable Alternatives”, they must be considered suitable for development, especially so where backed up by the information supplied to prove their viability. We would therefore be interested to learn</p> <p>how the Council is proposing to deal with such sites in the context of the emerging local plan.</p>		
<p>Andrew Wilford: Barton Willmore 5</p>	Objection	<p>The overall preparation of the Site Specific Allocations & Policies Document, as well as the Wymondham Area Action Plan and other Local Plan documents, is flawed. These documents should be aligned, to allow for a clearer consideration of alternatives to the overall spatial distribution of the “floating 1800” dwellings</p>	<p>The JCS tested a range of reasonable alternatives for the distribution of growth, and Alternative One was chosen. The spatial strategy of JCS Policy 9 details development in a number of strategic Norwich Policy Area locations. As an adopted plan (re-submission text notwithstanding), choosing a minimum 1800 dwellings at Long Stratton and 2200 at Wymondham is therefore in line with the JCS. JCS Policy 10 says that AAPs will be developed for both Wymondham and Long</p>	

			Stratton. The decisions on where to locate the 'floating 1800' have been taken in line with "in accordance with the settlement hierarchy and local environmental and servicing considerations", as required by Policy 9 of the JCS	
Karen Dunn 119	Object	The Sustainability Appraisal should demonstrate that the proposed Policies & sustainable development principles are sound, but if these principles & policies are not implemented according to the criteria set out then this suggests the whole exercise is flawed. Example is brownfield site 179a&b yet agricultural site 967c chosen instead.	<p>These comments do not relate to this consultation as no amendments are proposed in this settlement.</p> <p>The plan objectives seek 'the appropriate re-use of previously developed land, however this has to be measured against other competing site assessment criteria 'to allocate appropriate land for housing in the most suitable locations within the most sustainable settlements close to services'. Site 967c was chosen over site 179a&b</p>	None

			because of its proximity to the existing development boundary and nearness to the existing built area.	
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List of Representations received as part of the Pre-Submission consultation on the Site Allocations and Policies Draft Sustainability Appraisal Report

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
22750 - Keith and Dawn Shepherdson [9599]	Object	Sustainability appraisal evidence required to support the following. 7.10 Water conservation and management 7.12 Residential land allocations, deliverability and constraints 7.13 habitats regulations assessment 7.17 viability and deliverability of land allocations and land ownership	Every site was consulted on with statutory bodies including Anglian Water, Highways and Norfolk County Council and their responses are publicised in previous consultation stages. The Habitats regulation assessment was published along with the Regulation 19 Pre- submission Document along with viability and deliverability information and site assessment tables for all sites assessed. Comprehensive consultation has taken place in 2010, 2011, 2012 and 2013 to inform the Presubmission document.	No action required
22951 - Mr & Mrs Ian & Julie Ward [7905]	Object	Site R0825 will not support the sustainability of the village services e.g. the shop, butcher & post office. As a person living on The Turnpike, if you need to get your car out to go to the shops you are quite likely to travel to Wymondham, Attleborough or Norwich to use a supermarket that is	Bunwell is a dispersed service village with services and facilities that are spread throughout. All sites suggested were subject to sustainability appraisal site assessments and the most appropriate sites llocated to meet the requiremenst of policy 15 of the Joint Core Strategy. Bunwell is well served by public footpaths to the shops and to the school.	No action required

		able to offer preferential prices and will only use the local facilities on an adhoc basis. Building closer to the centre would provide better support to these services. Using a site that is further from the school will also potentially support children getting exercise to and from school as they would be able to walk safely without crossing what are potentially dangerous roads.		
22935 - Mrs Mollie Arnold [9536] 22937 - Mr Jim Cadman [10109] 22939 - Mr & Mrs R L Wharton [8270] 22942 - Mr David Richman [9193] 22944 - Mr Nigel Watson [9537] 22947 - Mr Phil Gledhill [7798]	Object		Bunwell is a dispersed service village with the services available being spread throughout. Each site was appraised against the sustainability sites assessment process and the allocated sites deemed to be the most appropriate to meet the requirements of the Joint Core Strategy.	No action required
22977 - Lanpro Services Ltd (C I	Object	Para 10.5-Until greater certainty over the status of	The Council accepts that the SA would benefit from amendment in	Propose to produce a

Marsden) [4355		<p>the Longwater junction is known, the proposed allocation of at least 1000 dwellings cannot be realised.</p> <p>Para.10.7-It is noted in the supporting paper of Housing Land Supply (Sept 2013) that there still remains 1800 houses to be allocated in the LSAAP. the remaining requirements of the JCS will not therefore be achieved within this document.</p> <p>Para.10.11-makes clear preferred options were chosen in 2011. It is further clear (para.10.12) that only minor amendments were made to these in Mar 2013, thereby confirming that the sites chosen to be allocated had already been made. It is also clear that no major amendments were made to the checklist-para 10.13 is not borne by the assessment/action of</p>	<p>parts to give a fuller explanation of the process of SA and site assessment. The Council propose to produce an additional SA addendum paper for examination and this will provide clarification about many of the issues raised in this representation</p>	<p>Technical Background paper of the site assessment process</p>
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		<p>comments received through consultation.</p> <p>Para.10.14 indicates the robustness of the selection process was informed and tested against the Sustainability Framework/SA objectives. This does nothing to show how "professional judgement" was applied to the site selection process.</p> <p>Para.10.15-'traffic light' assessment procedure. No explanation is provided as to why it is simplistic to assume that a site with more green results would be preferred over sites with more amber/red. This shows a lack of transparency in how sites have become 'preferred'.</p> <p>The foregoing points are exemplified in para.10.18 where it states that although the criteria considered to be</p>		
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		<p>most important in determining the overall sustainability of a site were its proximity to local services and flood risk, these rules were not rigidly applied. This shows that it is impossible to follow any logic in how a decision was arrived at. Without a full explanation of the process this plan is considered unsound.</p>		
23030 Lanpro Services Ltd (C I Marsden) [4355]	Object	<p>Non-technical summary –</p> <p>para.0.9 should reflect more of what is stated in para.173 of the NPPF;</p> <p>Para.0.11-we question the ability to effect a modal shift to non-car transport in a rural district;</p> <p>Further bullet point is unrealistic & ignores the purpose of the NPA of which South Norfolk is part;</p> <p>7th point contradicts the 3rd</p>	<p>The Council accepts that the SA would benefit from amendment in parts to give a fuller explanation of the process of SA and site assessment. The Council propose to produce an additional SA addendum paper for examination and this will provide clarification about many of the issues raised in this representation</p>	<p>Propose to produce a Technical Background paper of the site assessment process</p>

		<p>relating to a modal shift to non-car transport;</p> <p>Unclear of the need to improve the quality of both new and existing housing and how this is to be achieved;</p> <p>9th point is not a land-use planning matter;</p> <p>Para 0.16-no explanation why it would be over simplistic to assume that a site with more green results is automatically preferred over a site with several red/amber. Professional judgement was supposedly used to assess each site but there is no transparency here;</p> <p>Para.0.17-no indication of where this was published. There is a statement that all 'reasonable alternatives' were dispensed with;</p>		
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		<p>Para 0.18-if this statement reflects the true position then it was a fruitless exercise undertaking viability assessments of 'reasonable alternative sites';</p> <p>Para.0.20-implies that sites were proposed for allocation without any viability testing whatsoever;</p> <p>Para.0.25-the 'positive environmental benefits' are more likely to be social benefits;</p> <p>Para.0.27-the issues raised here should have been considered at the time the JCS was being prepared;</p> <p>Para.0.28-there is lack of transparency in the choice and location of allocated sites. Other than those rejected, if all other submitted sites were assessed as potentially</p>		
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		<p>acceptable locations for development, then applications should be considered favourably;</p> <p>Para.0.33-no discussion with site promoters with regard to possible mitigation measures and whether or not they might be achievable;</p> <p>Para.0.34-It is indicated that a common mitigation measure for allocated sites includes appropriate boundary landscaping. This has not been applied in the consideration of some developable sites that haven't been allocated;</p> <p>Para.0.36-contradicts para.0.24 about the inevitable increase in car usage in most of the allocated new sites;</p> <p>Para.5.30-infers the adopted JCS may not be fully</p>		
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		<p>realised-further queries in relation to the transport system and improved IT links.</p> <p>Para.5.31-acknowledges that if South Norfolk does not have a 5 year land supply, permission may be granted resulting in an increase of housing provision in villages. This suggest lack of confidence in the sites deliverability.</p> <p>Para.10.12-it is not accepted that by March 2013 final decisions on which sites would be allocated in the presub plan had not been made. This shows lack of transparency.</p> <p>Para.10.16-states some sites need to be assessed 'in competition' with other sites. Again this shows a lack of transparency in the decision making process.</p>		
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		<p>Para.10.22-Site size should not have been a significant factor in the context of site selection.</p> <p>Para. 10.24-indicates that reasonable alternative sites were dropped where the Council was confident that preferred sites were deliverable. This runs contrary to views relating to the 5 year land supply document.</p>		
22738 - David & Hilary Dobinson [9909]	Object	<p>the SA for the Site Specific Allocations & Policies Document, as it applies to TROW1: I believe the analysis is flawed and slanted towards the result the planners want. It does not give sufficient weight to the features weighing against development, such as the bypass protection zone, flooding, impact on the school, etc. To the last point, see my email to the planners (attached) regarding how decisions</p>	<p>The Council maintains that the sustainability Appraisal and site assessment process was consistently applied to all sites suggested across the District. In making its assessments of sites the Council took advice from the appropriate statutory agencies; Norfolk County Council for education, The Environment Agency and Anglian Water regarding flood zones and a landscape consultancy expert was commissioned to undertake an update to the Landscape Protection zone designations.</p>	No action required

		have been made without proper consultation on a major change to the school. At the time of writing, I have received no reply, so assume the Appraisal to be misleading and unsound.		
22966 - Atkins (Mrs Stephanie Hedgman) [10095]	Object	Sustainability Report we object to the separation of the sustainability Appraisal results into separate reports, which leads to confusion for the reader. The document lacks a clear introduction of its approach leaving the reader wondering where the results of appraisals for Wymondham can be found. In particular in Appendix 6, the tables are difficult to distinguish and therefore not easily to read and understand. Therefore, we suggest a combined submission in the interests of transparency and effectively.	The Council has produced separate Sustainability Reports for each of the Local Plan document (Site Specifics, Wymondham AAP, Development Management). The Council considers that this approach is correct and the reports can be easily compared as they follow a broadly similar format and methodology. The Council does not intend to merge the Sustainability Appraisal reports into a single document	No action required
22837 - Broads	Object	we would make the	The Council has given due	No action

Authority (Natalie Beal) [9783]		<p>following comments regarding the SA framework and site assessment tables - 5.22 - tourism is an important element of the economy as well, especially in the Broads and should be referenced in the SA.</p> <p>* Table 6.1 - could improve reference to the Broads here as development in South Norfolk could have similar impacts on the Broads. Specifically relating to 'wealth of natural assets', 'landscape character' and 'water quality'</p>	consideration to the impact on the Broads in table 6.1 and this is referenced sufficiently.	required
22748 - Mr Paul and Mrs Antoinette Curtis [10087]	Object	The sustainability report states that representations received were taken into account but that site assessment depended on evidence rather than pure opinion. I would contend that if had site visits been carried out issues like surface water flooding would have been readily apparent, the council should investigate more thoroughly	The site assessment process was based on evidence and statutory agencies (Anglian water) with responsibility for surface water drainage were consulted. Sites suggested to us which could only accommodate under 5 units were assessed for their suitability for inclusion within the development boundary. Such sites are deemed 'windfall' sites and in accordance with the NPPF these are not counted toward the required allocated	No action required.

		and would have the resources to do so. It is also perverse to not include sites that would accommodate less than 5 dwelling. The consultation process has not specifically canvassed the views of those living in the properties neighbouring the site	number. The Council maintains that it consulted widely and in accordance with the Regulations set out and its Statement of Consultation.	
22810 - Natural England (Ms J Support noted Nuttall) [9476]	Support	Natural England is satisfied that the Sustainability Appraisal provides a comprehensive assessment of the effects of the Site Specific Allocations & Policies Document on issues within our remit including biodiversity, green infrastructure, soils, landscape and access. We are also satisfied with the conclusion of the HRA.	Support noted	No action required