

BACKGROUND

On 17th April 2014 South Norfolk Council submitted three Local Plan documents – the Wymondham Area Action Plan (Wymondham AAP), the Site Specific Allocations & Policies Document (SSAPD) and the Development Management Policies Document (DMPD) – to the Secretary of State, for Examination.

Examination hearings, overseen by a Planning Inspector, were then held between October and December 2014,¹ subsequent to which the Inspector wrote to the Council identifying that some further work – to include Sustainability Appraisal – was necessary with a view to preparing a schedule of Proposed Main Modifications to the plan as submitted.

It was understood that further work should include giving consideration to alternative ways of meeting the Greater Norwich Joint Core Strategy (JCS) Policy 9 requirement to distribute 1,800 new dwellings within the 'Norwich Policy Area' part of South Norfolk.

Greater Norwich JCS Policy 9

The Joint Core Strategy for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments adopted in January 2014. It sets the overall development 'framework' for the whole of the three districts, including a settlement hierarchy and allocation numbers, but does not allocate specific sites. Rather, the JCS defers site allocations to the SSAPD, Wymondham AAP and Long Stratton AAP (although subsequently the Cringleford Neighbourhood Plan has allocated land for the minimum 1,200 dwellings allocated to Cringleford). The three (four, including the Cringleford NP) documents between them seek to allocate the sites in accordance with the requirements of the JCS.

JCS Policy 9 sets out the strategy for growth in the Norwich Policy Area, including 1,000 dwellings at Easton/Costessey, 1,200 dwellings at Cringleford, 1,000 dwellings at Hethersett, 1,800 dwellings at Long Stratton and a minimum target of 2,200 dwellings for the Main Town of Wymondham. Also included is a 'floating' housing target of 1,800 dwellings for the South Norfolk part of the Norwich Policy Area. The target is to be achieved through allocation of 'smaller sites and possible additions to named growth locations'.

At the current time, work has been completed and a schedule of Proposed Main Modifications has been published for consultation.

THE SA REPORT ADDENDUM

The Local Plan is being developed alongside a process of **Sustainability Appraisal (SA)**, a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated.

The aim of **the SA Report Addendum** is essentially to present information on the Proposed Main Modifications and alternatives, with a view to informing the consultation and subsequent plan finalisation.

This is the **Non-technical Summary** of the SA Report Addendum. This summary should be read alongside the main report.

Structure of the SA Report Addendum

This SA Report Addendum (as well as this Non-technical Summary) answers the following four questions:

- What's the scope of the SA?
- What has plan-making / SA involved up to this point?
- What are the SA findings at this stage?
- What happens next?

¹ Information relating to the examination can be found online at <http://www.south-norfolk.gov.uk/planning/6681.asp>

WHAT'S THE SCOPE OF THE SA?

An important first step in the SA process involves establishing the 'scope', i.e. those sustainability issues and objectives which should be a focus of the SA, and those that should not. An outcome of scoping work is the identification of an 'SA framework' comprising a list of objectives.

Sustainability objectives (the SA 'framework') established through scoping

Maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation
Limit or reduce vulnerability to climate change, including minimising the risks from flooding
Maximise the use of renewable energy solutions and reduce contributions to climate change
Reduce the effect of traffic on the environment
Improve air quality and minimise noise, vibration and light pollution
Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment
Minimise the loss of undeveloped land and conserve and improve the quality of soil resources
Improve water qualities and provide for sustainable sources of supply and sustainable use
Minimise the production of waste and increase recycling
Provide everybody with the opportunity to live in a decent, suitable and affordable home
Reduce poverty, inequality and social exclusion
Offer opportunities for all sections of the population to have rewarding and satisfying employment
Improve accessibility to essential services, facilities and the workplace, particularly for those most in need
Improve the education and skills of the population overall
Improve the health of the population overall
Encourage local community identity and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity
Improve the quality of where people live
Encourage sustained economic growth
Encourage and accommodate both indigenous and inward investment promoting a positive image of the District
Encourage efficient patterns of movement in support of economic growth
Improve the social and environmental performance of the economy
Improve economic performance in rural areas

WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

'Part 2' of the SA Report Addendum explains how plan-making - i.e. preparation of Main Modifications - has been informed by appraisal of alternative ways of meeting the JCS Policy 9 requirement to distribute 1,800 new dwellings within the Norwich Policy Area. Specifically, Part 2 of the SA Report Addendum explains that four sets of alternatives were developed appraised:

1. Broad (i.e. non-site specific) alternative approaches to accommodating additional growth at Wymondham;
2. Detailed alternative approaches to accommodating additional growth to the north of Wymondham;
3. Detailed alternative approaches to accommodating additional growth to the south-west of Wymondham; and
4. Detailed alternative approaches to accommodating lower growth at certain other settlements.

Part 2 presents alternatives appraisal findings, and then concludes by presenting the Council's response to the appraisal, i.e. the Council's reasons for developing the preferred approach, as set out in Proposed Main Modifications, in light of the appraisal.

The Council's reasons for developing the Proposed Main Modifications

Advantages of more housing in Wymondham are (with the scale of the advantages obviously depending on the scale of additional growth):

- Meeting housing-related needs, including affordable housing;
- Helping deliver economic growth;
- (Depending on where development is located) potential positive impacts on sustainable transport-related objectives such as accessibility to Bus Rapid Transit (although there would also be likely to be negative transport impacts if children would have to travel to secondary schools outside Wymondham); and
- (If major new schemes as opposed to piecemeal development took place) potential positive impacts on innovative "energy solutions" and reduced per-capita energy use in the built environment.

Disadvantages of more housing in Wymondham (with the scale of the disadvantages tending to increase with additional growth quanta and also being partly dependent on precisely where growth would be) are:

- Although there would likely not be significant impacts on the setting of Wymondham Abbey and the Wymondham/Hethersett Strategic Gap (at least when judged on the particular site options assessed in the SA Addendum), growth would have negative effects on the landscape of Wymondham and also Wymondham's historic environment unless limited and carefully located;
- Given the known capacity constraints of Wymondham High Academy and its inability to expand any further beyond 2,050 pupils arising from approximately 2,500 new dwellings (on its land-locked site), it is not known precisely which alternative high school any additional pupils could attend. Growth at both nearest high schools (Hethersett and Attleborough) is based on current commitments (allocations and permissions) and further expansion on the existing sites cannot be guaranteed. There could therefore be transport impacts caused by pupils potentially needing to travel long distances to attend secondary schools away from Wymondham through, principally, bus or car journeys. There would also be potential impacts (albeit perhaps limited in scale) on social cohesion caused by pupils being 'divided' on leaving primary school with potentially not all pupils being able to attend a Wymondham high school; and
- Negative impacts on traffic congestion with associated environmental impacts (dependent on scale and location); loss of agricultural land (although there is some potential to avoid impacts through a very small scheme to the north); impacts on biodiversity (not likely to be major); and negative impacts on accessibility to services/facilities (under some options).

With regards to Key Service Centres and Service Villages the appraisal (see Table 12.4 and Section 12.7) highlights that the existing preferred approach performs best in terms of socio-economic objectives, and this is an important consideration for the Council. Maintaining the vitality of rural areas and communities is a long term ambition. Whilst it is recognised that there could be merit to reducing growth in the rural area in terms of some environmental objectives and in terms of pure economic growth objectives (given that there might be consequential additional growth at higher order settlements), it is not thought that any benefits would be significant. Even taking into account the potential for 'in-combination' effects associated with development at allocated sites alongside development at sites with planning permission, there is no evidence to suggest that growth at any of the villages will lead to unacceptable pressures on services and facilities such as schools and doctors, or lead to the exacerbation of problems such as flooding.

The Council concludes that, of the alternatives tested for the distribution of the 'floating 1,800' dwellings, the most appropriate option is the Pre-Submission distribution of housing taking into account commitments (i.e. planning permissions) on allocated and non-allocated sites as of April 2014.. Taking into account the findings of the original SA Reports and the 'SA Addendum' work, the benefits generated through additional housing in Wymondham (principally delivering housing and affordable housing and economic growth) are outweighed by the negative impacts of this growth – principally the impact on high schooling (caused by lack

of capacity for Wymondham High Academy to expand) but also the impacts on Wymondham's landscape and historic setting and potential increased traffic congestion and pollution. The benefits of reducing allocations in certain Key Service Centres and Service Villages (by a relatively modest 118) are also concluded to be outweighed by the disadvantages, particularly the impact on the delivery of local infrastructure and loss of affordable housing in rural areas (a key part of rural sustainability).

WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

Part 3 of the SA Report Addendum answers the question 'What are appraisal findings at this current stage?' by presenting an appraisal of the Proposed Main Modifications.

Conclusions on the appraisal of the Proposed Main Modifications

The predicted effects of the Proposed Main Modifications are notably positive in terms of a number of SA objectives; and whilst negative effects are predicted in terms of biodiversity, effects will in all likelihood be minor.

The appraisal presented under the 'landscape and heritage' objective (Maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment) is notable as the potential for both positive and negative effects is highlighted, and there is the potential for significant effects (given local sensitivities).

In terms of socio-economic objectives, whilst the proposed modifications do not set out to support a higher growth strategy, there will now be a commitment to an early review and so there can be confidence that higher growth options will be explored in the near future. A higher growth strategy could potentially support the achievement of housing need and economic growth related objectives. Also with regards to socio-economic objectives, it is noted that the policy approach to addressing two key issues – access to secondary school education, and growth/diversification in the rural area – is set to be strengthened.

The Council and Inspector should take these appraisal findings on-board when finalising the plan, but at this stage no formal recommendations (for changes to the Proposed Main Modifications) are made.

The following recommendations, which have come out of the appraisal, relate to plan-making work subsequent to adopting the three Local Plan Documents / when moving forward with the Plan Review:

- Planning for green infrastructure at Wymondham should be a particular focus of monitoring efforts.
- The Council should not 'lose momentum' with regards to implementing a locally specific approach to carbon compliance, and to this end should undertake work to establish precisely what can be achieved through local policy (given the national policy framework). The aim should be to ensure that a suitably proactive approach can be implemented through the forthcoming Plan Review.
- With regards to planning for open space, the Council should also undertake any additional work that might be necessary to ensure that an appropriate strategic framework can be put in place in the future.

WHAT ARE THE NEXT STEPS?

Subsequent to the current consultation, it is anticipated that the Inspector will be in a position to prepare his report on the 'soundness' of the three Local Plan documents. Once found to be 'sound' the Council will be in a position to adopt the three Local Plan documents.

At the time of Adoption a 'Statement' will be published that sets out (amongst other things) 'the measures decided concerning **monitoring**'.

Monitoring measures are discussed within the SA Reports as published / submitted alongside the three Local Plan documents. In-light of the appraisal of Proposed Main Modifications, it is recommended that 'planning for green infrastructure at Wymondham' should be a particular focus of monitoring efforts