

## Responses to SA consultation including Reg 19

### Appendix 3: Consultation comments received on the Sustainability Appraisal and the Council's responses

#### Scoping Report comments (2010)

Organisation	Summary of representation	Response
<b>NB:</b> Page numbers referred to are those in the Sustainability Appraisal Scoping Report as presented to Cabinet on 12 <sup>th</sup> 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 that the reduction of waste should be included	Agree. Refer to four County-run Household Waste Recycling Centres on page 14. Include reduction of waste under 'climate change' on page 38.

	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 &amp; 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 achieved.</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>

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"> <li>the need for the development scheme</li> <li>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)</li> <li>an analysis of alternative options.</li> </ul> <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><b>Productivity and prosperity</b></p> <ul style="list-style-type: none"> <li>Annual growth in real workplace-based GVA over 2008 – 2031</li> <li>Per capita at 2.3 per cent</li> <li>Per worker at 2.1 per cent</li> </ul> <p><b>Conventional economic impacts</b> (GDP £)</p> <p><b>Wider economic impacts</b> (all GDP £)</p> <ul style="list-style-type: none"> <li>- Agglomeration</li> <li>- Imperfect competition</li> <li>- Labour market impacts</li> </ul> <p><b>Employment</b> - Employment rate by 2031</p> <ul style="list-style-type: none"> <li>- Working-age population at 80 per cent</li> </ul>	<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><b>Productivity and prosperity, Conventional economic impacts and Wider economic impacts</b> – 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><b>Employment</b> – 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><b>Skills</b> – No change.</p> <p>S5 (page 83) already includes percentage of working age population with</p>

	- 16–74 population at 70 per cent <b>Skills</b> - Share of working-age population with qualifications by 2020 (aged 19 to state pension age) - NVQ level 2 or equivalent qualification and above 90 per cent - NVQ level 3 or equivalent qualification and above 68 per cent - NVQ level 4 or equivalent qualification and above 40 per cent	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.
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### List of Representations received to the Wymondham AAP Preferred Options consultation relating to the Interim Sustainability Appraisal

Representations	Nature	Summary of main issue	Council's Assessment
21172 - Mr G Mitchell [8441]	Comment	<p>There should be a reflection of the local requests for smaller start up units which are more suited to smaller sites where demands on the infrastructure are reduced. One such site for small scale development that was proposed was site RO168a on Strayground lane. This land has been incorrectly assessed in your site assessment table, there being no water main through the site, and the landowner has offered to widen and improve Strayground lane, which is deliverable. There are no flooding issues. The site is bordered by the railway and other commercial sites and is a brownfield site, previously having been used for machinery engineering business and having a current planning permission for an Agricultural machinery business.</p>	<p>The Council do not intend to allocate site RO168a on Strayground Lane for smaller start up units as this site was rejected on accessibility grounds. The Council have revisited the site assessment process and will not be making changes to the table as the information being questioned was provided by outside bodies such as Anglian Water and Norfolk County Council.</p>

		I suggest this site could provide for further small starter units that encourage new businesses to develop, in line with government policy and local needs	
21691 - Januarys Consultant Surveyors (Mr Brian Flynn) [9737]	Comment	The Council should seek to avoid this situation arising by allocating sites which are sustainable, have no significant constraints that cannot be mitigated or addressed through careful design and layout, and can be delivered at the time anticipated during the plan period. It is likely that applications will be submitted on sites which are not 'preferred' if the Council continues with a strategy of selecting residential sites with significant and unresolvable constraints and which are undeliverable. If applications are submitted, the relevant policies of the adopted Joint Core Strategy unaffected by the recent High Court challenge and the guidance contained in the National Planning Policy Framework should be taken into account. Paragraph 47 of the NPPF will be relevant to the determination of any application, particularly the need to maintain "...a supply of specific deliverable sites sufficient to provide five years worth of housing...". The assessment of sites contained in the Sustainability Appraisal document should enable the Council to determine whether the site is suitable for residential development in sustainability terms, and whether the proposed development adequately deals with any identified constraints. It would undermine the AAP process if non-preferred sites were granted planning permission, but this is an inevitable consequence of selecting sites which cannot be delivered. We request that the Council only	Noted and agreed. All sites allocated in the WAAP will be deliverable

		identifies sites in the AAP which are deliverable.	
21422 - Natural England (Ms J Nuttall) [9476]	Comment	<p>Sustainability Appraisal Interim Report The approach taken to assessing the sites against a range of criteria that address the SA objectives identified for the AAP 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. We note that the SA identifies that none of the preferred options will have a direct adverse effect on statutory designated sites; however, please see our comments above regarding potential indirect impacts of housing development, through increased recreational disturbance, on Lower Wood, Ashwelthorpe SSSI. The SA should have identified this potential issue and put forward mitigation recommendations, including requirements to be identified in the AAP for provision of on-site multifunctional green infrastructure, as discussed above. We note that this assessment will be supplemented by an 'appropriate assessment', as 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. Natural England will be pleased to provide comments on revised versions of this Plan, following completion of the HRA.</p>	<p>Comments noted. The SA will be revised to take account of the potential indirect impacts of housing development on sites such as Lower Wood Ashwelthorpe SSSI. The Council will also be amending the Environment Chapter of the AAP to improve the approach to green infrastructure. This will also talk about improving GI and directing visitors away from sensitive areas</p>
20878 - Mr G Mitchell [8441]	Comment	<p>I wish to make comments on the following sites assume of the information is factually incorrect. You</p>	<p>Comments noted. Site A0029 has been included within the development boundary as the Council recognise</p>

		<p>suggested that I wrote to you and pointed these out.</p> <p><b>AOO29 Land adj southern boundary of Bridge Industrial Estate</b></p> <p>This land is now part of Bridge Industrial Estate. The minerals have already been removed from this site prior to its development so 'mineral safeguarding provisions' will not apply. Access already exists and is by approved route through Bridge industrial estate, so NCC access comments would not apply. An independent foul sewerage system already exists and is in use.</p> <p><b>RO168a Land off Strayground lane</b></p> <p>The water main does not cross the site, but runs along the roadside so this would not be an issue. Surface water is not a problem as the ground is light gravelly soil and would be most suited to independent soak-aways. I have already indicated that Strayground lane could easily be improved as we own the land running down the western edge, and this could be conditional to development.</p> <p><b>RO168b Land east of Strayground lane, south of Industrial Estate</b></p> <p>Water main does not cross the site but follows the boundary with the road. Foul sewerage and surface water are not a problem anymore than other sites south of Wymondham. In fact this free draining land would be most suited to independent system, so this is not a constraint. This land is incorrectly shown as being in a CWS, it is not. Four possible access routes were shown so Strayground Lane not the only route and in any event we have the ability to widen it as we own the land on the western side.</p>	<p>that this forms part of the Bridge Industrial Estate. Regarding other sites information regarding flood risk, water mains and accessibility were provided by other bodies such as Anglian Water and Norfolk County Council so South Norfolk Council do not intend to amend the site assessment table</p>
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		<p><b>Z1222 Land off Strayground Lane</b></p> <p>This land is shown as a flood risk, however it is intended to raise the ground up to road level using the excess material in neighbouring sites, this could be conditional upon the development.</p> <p>I feel it is necessary to bring these inaccuracies in the site appraisal to your attention as it appears that a very broad brush approach has been applied</p>	
21699 - Barton Willmore (Mr Andrew Wilford) [6151]	Object	<p>The current process which SNC is pursuing in relation to progressing separate DPDs to implement the JCS is not considered sound as it does not comply with provisions of SEA/SA Regulations. SNC has pre determined the distribution of the floating 1800 allocations between various settlements without testing alternative strategies through the SEA/SA process. No testing has taken place across the separate DPD's/AAP's. It is recommended that SNC should bring its DPD/AAP's into a single timetable following the outcome of the JCS review and the Inspector's Report</p> <p>The JCS sets out a minimum of 2200 new allocations at Wymondham. Due to poor housing land supply in the NPA a number of schemes have been granted planning permission as departures e.g. windfalls. The WAAP is seeking to retrospectively allocate these windfall sites and as a result only 1488 new dwellings are proposed in the WAAP. The evidence base for the JCS confirms windfalls being in addition to allocations, however the WAAP's use of windfalls as allocations is to reduce the level of new housing below that required by the JCS with the result that the overall</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 Stratton.</p> <p>The location for the 'floating 1800' was not predetermined without testing alternative strategies. Policy 9 of the JCS was followed: allocations to deliver the smaller sites in South Norfolk have been made in accordance with the settlement hierarchy and local environmental and servicing considerations. Each potential site proposed in the NPA to accommodate growth was assessed for its suitability, and allocations made on this basis, so a very significant number of alternatives have been considered.</p> <p>JCS Policy 4 says that: "Allocations will be made to ensure that at least 36,820 new homes can be</p>



		<p>housing target will never be met and the WAAP is not effective. It is not considered that SNC has adequately consulted on issues and options before setting out its current preferred option. This can be evidenced from the WAAP document which itself questions the deliverability of the preferred option confirming the necessary evidence base isn't in place to demonstrate its deliverability.</p>	<p>delivered...". The emphasis is on the delivery of homes, not purely on making allocations to deliver homes. Given that the JCS was not adopted until 2011, the BW position on this issue is not logical, because it would not allow for any applications/approvals on emerging preferred sites to 'count', despite infrastructure and sustainability requirements being highly relevant in determining the most appropriate locations for development. There has been appropriate consultation on the WAAP. The sites at South Wymondham are deliverable, as is evidenced by the resolution to grant permission in June 2013 (subject to the completion of the S106 agreement by 4 October)</p>
20892 - Mr David Underwood [8022]	Object	<p>Do not agree re land suggested for employment use in Sutton being dismissed on sustainability grounds as these sites were considered too far from services and facilities. Elm Farm (Z1258) has been successful at much greater distance from town centre</p>	<p>The main area of land allocated for employment use is at Browick Road which is well located to the town centre, rail station and A11 and scored well through the Sustainability Appraisal. Smaller extensions to existing industrial sites are proposed at Elm Farm and London Road. These were considered to be well related to existing business opportunities and only necessitated small extensions to the existing development boundary. Land at Sutton was not considered suitable for employment growth because it is some way detached from the main built up area of Wymondham. It was considered that people would be more likely to use their cars to access employment opportunities in Sutton, whereas those locations closer to the built up area of Wymondham offered possibilities for people to travel on foot, cycle or public transport</p>

**Comments received to the Site Specific Allocations and Policies Document  
Interim Sustainability Appraisal Consultation 2012**

	<i>Summary of Main Issues</i>	<i>Council's Assessment</i>
19788 - Hethersett Land Ltd	<p>Hethersett Land Ltd have no specific comments o 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 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>	The information given will be assessed and the site assessment tables will be updated appropriately
20465 - Steve	The sustainability appraisal interim report (SAI) appears comprehensive and most sections are	There is inevitably some subjectivity and professional

Horrocks [9331]	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	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
20181 - Bidwells (Mr Graham Bloomfield) [1435]	Woodton No particular comments with regard to the appraisal and the site assessments. Specific comments relating to the Site Assessment process for Woodton and Bedingham (Map 090) and our client's site (0157) are detailed at Question 12.	Comment noted - will be responded to via Q12
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	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

	Longwater junction with the A47. Councillors questioned the level of detail re traffic/transport for each site	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 elected representatives.	Many members of the public have understood the process and written cogent responses. South Norfolk councillors have played a key role in preparing the document and communicating information with their residents
19839 - Bidwells (Mr Graham Bloomfield) [1435]	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	Site 0036 was granted permission on appeal largely due to the lack of a five-year housing land supply, despite the Inspector acknowledging considerable

	<p>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 &amp; Policies DPD and proposal map 027a by including the site within the preferred development boundary.</p>	<p>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</p>
18148 - Mr & Mrs AP & SA Goldring [9205]	We would have to rely on your expertise.	Comment noted
19900 - Mr Vaughan Smith [4283]	<p>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 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.</p>	Comments noted

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]	<p>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 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</p>	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

	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.	
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 Harbour) [8597]	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
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	The PC considers that the approach taken has been appropriate	Comment noted

(Ian Weetman) [5115]		
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 (Mr Jason Parker) [9610]	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
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 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.</p>	Comment noted
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	Sustainability Appraisal is formal legal process to be followed, so an element of technical language is unavoidable. However, the next

	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	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 -	Yes	Comment noted

Bernard & Mary Pitt [2672]		
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 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
20218 - Parker Planning Services Ltd	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.

(Mr Jason Parker) [9610]		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 [9528]	Alpington/Yelverton: No, the infrastructure, roads, sewers and overall viability has not been considered	Infrastructure needs are considered for all potential sites, and all allocated sites in Alpington/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 -	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

Bidwells (Mr Graham Bloomfield) [1435] 20163 - Mr Steven Fisher [9451]		
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 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
19925 - Robert Doughty Consultancy Limited (Mr Robert	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

Doughty) [9373]		<p>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</p>
19133 - Robert Knights [5750]	<p>The process requires amending by looking at 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.</p>	<p>The site lies in Flood Zone 1, and 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</p>
20075 - Mrs Cruickshank [9533]	<p>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.</p>	<p>There is inevitably some subjectivity in assessing the acceptability of potential sites, and in some settlements there may be</p>

		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]	<p>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 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</p>	Stoke Holy Cross is identified for 10-20 dwellings, but has been concluded to be acceptable to accommodate some of the 'floating' 1800 dwellings in the NPA. The chosen sites for 75 dwellings are concluded to be appropriate for allocation

	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.	
19515 - Mr and Mrs Betts [9520]	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.	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
20212 - Durrants (Richard Prentice) [1407]	Woodton Yes	Comment noted
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 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.	Comment noted
18330 - Thurton	Yes	Comment noted

PC (R Taylor) [1180]		
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>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</p>	A Habitats Regulations Assessment is being prepared in consultation with Natural England, and Natural England's assistance in the process is much appreciated

	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.	
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 & Colton PC (Mr M Bergin) [7437]	Yes, although resolving potential conflicts between SA objectives and site specific policy objectives may not always be possible.	It is inevitable that there will sometimes be negative impacts 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	Support results of the Sustainability Appraisal in principle however would suggest that site	Comments noted. The Joint Core Strategy allocates between 100-



Ltd (Phillip Jeans Homes Ltd) [7358]	530 has capacity for 300 rather than 200 dwellings to maximise the social and economic benefits of the proposal	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 - Durrants (Richard Prentice) [1407]	Yes	Comment noted
18959 - Mr L Gardner [9278]	Yes the approach has been appropriate with the details outlined	Comment noted
19780 - Armstrong Rigg Planning (Ms Charlotte Wyn)	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	Comment noted

[9605]	<p>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.</p> <p>(Refer to scanned rep)</p>	
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 received as part of the Pre-Submission consultation on the WAAP Draft Sustainability Appraisal Report

Representations	Nature	Summary of Main Issue	Council's Assessment	Action
22885 - Mr G Mitchell [8441]	Object	The Sustainability Appraisal is flawed with inaccurate evidence or generalities not specific to the relevant areas. No details of the evidence to support the SA has been provided. Parts of the JCS have been ignored and not addressed in the DPD and WAAP such as allowing for 'The expansion of the waste recycling centre' Suggestions have been put forward by us and have not only been overlooked, but no other alternatives have been put forward.	<p>Mr Mitchell suggested his land as a potential location for an expanded household waste recycling centre (HWRC) in 2011. The Council logged it as a potential development site and considered it through the Sustainability Appraisal (SA) process along with all other sites suggested for development in Wymondham. The site was discounted through the SA process as it is partly within flood zones 2 and 3 and wholly within a County Wildlife Site. The Council have been consistent across the district in not allocating land within flood zones or County Wildlife Sites. Strayground Lane also has access limitations and Norfolk County Council Highways objected to other sites in this location through the SA process. In looking for integrated developments, if an expanded HWRC is needed this may be more appropriately located closer to the main area of growth.</p> <p>Although policy 10 of the Joint Core Strategy refers to the need for expanded household waste recycling facilities in Wymondham advice from Norfolk County Council Minerals and Waste Planning is that the AAP is not the place to allocate such facilities. The statutory responsibility for Waste Planning sits with Norfolk County Council as Waste Planning Authority and this site should have been properly considered in the Waste Site Specific Allocations (WSSA). Mr Mitchell did not submit this site as part of that process, although he did submit other sites in the area which indicates that he was aware that areas for waste allocations were being considered. The WSSA contains a number of sites for extensions to HWRC's and Wymondham was not one of these. The WSSA was subject to examination in public and no modifications were required to allocate land for an extension to the Wymondham HWRC. There are a number of policies in the Minerals and Waste Core Strategy which would be of relevance, relating to transport, environmental protection, nature conservation, flood risk and cumulative impacts</p>	No action required

22851 - S Mitchell [3825]	Object	<p>Sustainability Appraisal</p> <p>The information provided by the Council by various authorities is very general and inexact which can be misleading. The Council has not sought to question various authorities evidence where it has been challenged by the Public. I suggest the appraisal should be robust, accurate and not vague.</p>	<p>The Council is satisfied that the Sustainability Appraisal process is robust and accurate and has been consistently applied across the District. Various authorities such as Anglian Water and Norfolk County Council provided professional advice about individual sites to help inform the Sustainability Appraisal process. This information assisted with the identification of Preferred Sites, which were then consulted upon at Preferred Options stage. The various authorities in question had a chance to make comments at this stage if they felt that the Council had not interpreted their existing advice accurately. Where the advice of the various authorities was challenged by the public this was looked at by the Council and the SA was only changed where the Council felt there was suitable justification to amend the professional advice already given.</p>	No action required
23034 - Eversheds LLP (Mr Paul Wootton) [10117]	Object	<p>On behalf of Wymondham Rugby Club we submit that we have seen a copy of the final representations submitted by Barton Willmore on behalf of, inter alia, Landowners Group Limited and Landstock Estates Ltd. On behalf of Wymondham Rugby Club we endorse, so far as they are relevant to the Club, the representations submitted. In particular we completely support the comments made in respect of: the failure to comply with SEA and SA regulations;</p>	<p>The Council are confident that the Sustainability Appraisal has been written to comply with SEA and SA regulations</p>	No action required
23012 - Atkins (Mrs Stephanie Hedgman) [10095]	Object	<p>Sustainability Appraisal</p> <p>The Sustainability Appraisal states higher housing numbers were discounted early on, the reasons given are weak and we have not seen any sound evidence supporting the claim that there is no capacity for any further growth. The reasons for this decision could be addressed (e.g. provision of a new or extension</p>	<p>Whilst recognising that Policy 10 of the adopted Joint Core Strategy requires 'at least' 2,200 new homes to be built in Wymondham and the NPPF charges local authorities with the requirement to 'boost significantly the supply of housing' after careful consideration the Council have taken the approach that 2,200 should be the maximum number of new homes allocated in the AAP primarily due to secondary education capacity constraints at Wymondham High School Academy. The academy is currently on a constrained site and there is a strategic master plan in place to accommodate the pupils</p>	No action required

		<p>of an existing school; appropriate design response) and therefore should not be used as the basis for such a fundamental decision. Object: to the SA that accompanies the AAP as our client's site has been discounted purely on the basis that housing numbers are now met.</p>	<p>from the planned 2,200 new homes. This would take the school to 2050 pupils, the limit of what is feasible for a secondary school. Growth beyond 2,200 new homes would require a more radical solution to secondary education in Wymondham, which is not on the table at the current time. As an academy the High School controls its own admissions, although it is recognised that as the Education Authority Norfolk County Council still have a duty to provide school places. High Schools at nearby Attleborough and Hethersett have also recently attained academy status and are at or near capacity due to plans for future housing growth. This would potentially mean that the County Council may have to bus children into Norwich to fulfil their duty to provide secondary school places, which is not considered socially or environmentally sustainable. Wymondham High School Academy do not wish to disaggregate either their sixth form or playing fields and it is not possible to undertake further building on the existing playing fields as the academy site is already smaller than the recommended site size for a school of 2050 pupils. This view is supported by evidence from Norfolk County Council and Wymondham High School Academy and is expanded upon in more detail in an additional background evidence paper. It is considered that the Wymondham AAP is not the correct place to make wider decisions about secondary education provision to the south of Norwich and that this is better addressed through a review of the Joint Core Strategy. This approach has meant that potential allocations consulted on at preferred options stage without planning permission have now had to be dropped from the Pre- Submission version of the AAP as the 2,200 figure has been met on sites with planning permission or resolution to grant planning permission and the high school cannot accommodate the children arising from any additional houses</p>	
23010 - Atkins (Mrs Stephanie Hedgman) [10095]	Object	<p>Sustainability Appraisal: Ref 22960 As explained above, we object to the separation of the Sustainability Appraisal results into separate reports, which leads to confusion for</p>	<p>The Council have 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</p>	No action required

		the reader	methodology. The Council do not intend to merge the Sustainability Appraisal reports into a single document	
22911 - guy Mitchell [9946]	Object	The Sustainability appraisal is flawed with inaccurate evidence or generalities not specific to the relevant areas. No details of the evidence to support the SA have been provided.	The Council is confident that the Sustainability Appraisal (SA) is based on sound evidence provided by relevant bodies such as Anglian Water and Norfolk County Council. As part of the SA each site was considered against 38 different assessment criteria which were applied consistently and robustly across the district. Site visits were undertaken and comments received through public consultation were also taken into account. The Council have presented evidence to support the SA, through the SA document itself and the Consultation Statement, which details the comments received from the various rounds of public consultation Policy 9 of the adopted Joint Core Strategy (JCS) refers to the need for a new employment allocation of around 15 hectares in Wymondham. The Council assessed a number of options for the location of employment growth through the Sustainability Appraisal and identified the land either side of Browick Road as the most appropriate area to accommodate the 15 hectare allocation referred to in the JCS, primarily because of its good access directly onto the main A11 trunk road and its proximity to existing employment uses. The overall site area is more than the 15 hectares required by JCS Policy 9 because as detailed in policy WYM 5 there is a need for extensive areas of landscaping to provide a buffer to adjacent residential areas, the railway line, the A11 and the environmentally sensitive area of the Lizard. The Council do not intend to reduce the size of this allocation as then it would not meet the requirements of JCS Policy 9. The promoters of the WYM 5 site have indicated their support for the allocation through the Pre-Submission consultation. The JCS does make provision for smaller scale employment development and the Council have done this by allocating extensions to existing employment areas at Chestnut Drive and Elm Farm Business Park. Both these sites were considered more suitable for development through the Sustainability Appraisal process than R0168a and b as they are more easily accessible, being located off the main B1172 road.	No action required
22900 - guy Mitchell	Object	The sustainability appraisal is flawed	The Council is confident that the Sustainability Appraisal (SA)	No action

[9946]		with inaccurate evidence or generalities not specific to the relevant areas. No detail of the evidence to support the SA. have been provided. This has lead to the wrong strategy being adopted when there are better alternatives proposed. The development boundary should be extended south to allow for unforeseen increased development demands and lapsed planning permissions provided this is in a suitable sustainable location, such as south of Bridge Industrial Estate. RO168b.	is based on sound evidence provided by relevant bodies such as Anglian Water and Norfolk County Council. As part of the SA each site was considered against 38 different assessment criteria which were applied consistently and robustly across the district. Site visits were undertaken and comments received through public consultation were also taken into account. The Council have presented evidence to support the SA, through the SA document itself and the Consultation Statement, which details the comments received from the various rounds of public consultation. The Council are confident that the best strategy for the distribution of development in Wymondham has been followed and this is fully reasoned in the SA. Site R0168b was assessed by the Council for mixed use development but it was not allocated for mixed use, housing or employment as other sites were considered more suitable. In particular Norfolk County Council objected to the site on highways grounds as they did not consider that additional access from Park Lane was acceptable. The Council are confident that the Development Boundary in Wymondham has been drawn appropriately and does not need to be extended to allow for flexibility or alternatives to the plan	required
23013 - Atkins (Mrs Stephanie Hedgman) [10095]	Object	Sustainability Appraisal No detailed analysis of this decision has been provided and no consideration has been given to other aspects. Housing delivery is currently high on the agenda, but not the only objective set out in the NPPF, it needs to be considered alongside sustainability, economic benefits and community building. By discounting the site now, these benefits have been disregarded purely on the basis of the housing target having been met, ignoring the fact that this housing target was originally recommended as a minimum target by Policy 10 of the	The Council are confident that through the Sustainability Appraisal they have considered issues such as sustainability, economic benefits and community building alongside housing delivery. Despite the fact that the objectors site may have the potential to bring certain benefits, this needs to be weighed against the fact that the sites that have been allocated in the plan can also bring particular benefits. The Council consider that 2,200 new homes is the maximum that can be accommodated in the town due to capacity constraints at Wymondham High Academy and this 2,200 figure has now been met on sites with planning permission or resolution to grant planning permission	No action required

		Joint Core Strategy.		
23022 - guy Mitchell [9946]	Object	Sustainability Appraisal The sustainable Appraisal is flawed with inaccurate evidence or generalities not specific to the relevant areas. (see previous submission on this) No details of the evidence to support the SA have been provided. This has lead to the wrong strategy being adopted when there are better alternatives proposed	The Council are confident that the Sustainability Appraisal is robust and accurate and has been consistently applied across the District. All the evidence to support the Sustainability Appraisal can be found in the SA document. The Council believe that the Sustainability Appraisal process has led to the right strategy being adopted for Wymondham	No action required
22958 - Natural England (Ms J Nuttall) [9476]	Support	Sustainability Appraisal Natural England is satisfied that the Sustainability Appraisal provides a comprehensive assessment of the effects of the Wymondham Area Action Plan on issues within our remit including biodiversity, green infrastructure, soils, landscape and access	Support noted	No action required