

**OLD CATTON, SPROWTON, RACKHEATH AND THORPE ST ANDREW
GROWTH TRIANGLE AREA ACTION PLAN
ENVIRONMENTAL STATEMENT**

1. Introduction

1.1. Broadland District Council adopted the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Area Action Plan, hereafter referred to as the AAP, on 4th July 2016.

1.2. This Environmental Statement has been produced to satisfy Article 9 of the Strategic Environmental Assessment Directive 2001 and regulations 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004. The Statement addresses the following particulars¹:

- a) How environmental considerations have been integrated into the AAP;
- b) How has the environmental report been taken into account;
- c) How the results of public consultation have been taken into account;
- d) The reasons for choosing the AAP as adopted, in the light of other reasonable alternatives; and,
- e) Measures to be taken to monitor significant environmental effects of implementation of the AAP.

1.3. As the approach of the UK Government is to integrate social, economic and environmental considerations in plan making through the production of a Sustainability Appraisal (SA), which incorporates a Strategic Environmental Assessment (SEA). This Statement covers all three of these areas.

2. Context

2.1. The AAP was produced following the adoption of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk in March 2011, with amendments adopted January 2014. The JCS establishes a series of policies that specifically relate to the scale and form of development within the Growth Triangle, alongside a number of overarching policy requirements. The AAP policies and objectives of the AAP are consistent with the requirements established in the adopted JCS.

2.2. The environmental report for the AAP does not reassess matters addressed at higher levels of the plan process, in particular, those the JCS, which were adopted having taken into account a separate environmental report, or those in

¹ Alongside the particulars listed in 1.2 a-e, Article 9 of the Strategic Environmental Assessment Directive 2001 and regulations 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004 require that it be shown how trans-boundary issues have been taken into account. This criterion does not apply to the Growth Triangle AAP and so is not dealt with in this statement.

plans, projects or proposals that fall outside the responsibility of Broadland District Council as Local Planning Authority.

3. How environmental considerations have been integrated into the AAP.

- 3.1. Environmental, social and economic considerations were integrated into the AAP through the concurrent development of the SA report, which incorporated SEA.
- 3.2. The first stage of the SA was to establish its scope, i.e. reviewing relevant plans and programmes, collecting baseline information, identifying sustainability issues and developing a sustainability appraisal framework of objectives and decision aiding questions against which the AAP, its policies and allocations would be assessed.
- 3.3. A draft scoping report was subject to consultation with the Environmental Bodies and selected other stakeholders during April and June 2009. A number of changes were made to the draft scoping report as a result of representations before it was finalised. A summary of the comments and resultant changes is included as Appendix 5 of the Sustainability Appraisal Scoping Report for Broadland's Site Allocations and Area Action Plan Development Plan Documents – Final Report, August 2009².
- 3.4. The framework established in the SA Scoping has then been used as part of an iterative plan making process to shape the policies of the adopted AAP. The SA process involved appraising the likely significant impact on the baseline / likely future baseline, drawing on identified Sustainability Issues and using the methodological framework of the Sustainability Objectives of the plan and reasonable alternatives. The SA Objectives and decision aiding questions established in the SA Framework are shown in Appendix A.
- 3.5. The findings of the SA appraisal process during the development of the AAP were explained and consulted on through the publication of reports at different stages of the plan making process. This is set out in more detail in section 4
- 3.6. In addition, a Habitat Regulations Assessment (HRA) was produced for the AAP as required under the Conservation of Habitats and species Regulations 2010. The overall conclusion was that there was sufficient confidence for negative impacts from development on internationally important wildlife sites to be considered unlikely. This was taken into account in the Sustainability Appraisal.

4. How the environmental report been taken into account.

- 4.1. As explained in section 3, the SA report was developed concurrently with the production of the AAP. This has meant that SA considerations have been taken into account at all stages of plan production. As a result the findings of the SA report have been central to the choice of Reasonable Alternatives that were

² A copy of the Final SA Scoping Report is included as Technical Appendix A of the Sustainability Appraisal for the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Area Action Plan Submission Version, December 2014.

advanced as policy in the draft plan as well as the derivation of policies and themselves. Its findings also influenced the monitoring framework included in the AAP.

- 4.2. Sections 6 of this Statement explains how the consideration and appraisal of reasonable alternatives was undertaken and the reasons for choosing the plan as adopted in light of other reasonable alternatives Section 7 deals with measures to be taken to monitor significant environmental effects. For the sake of brevity these issues are therefore not address in detail in this section.
- 4.3. As set out in 3.2 the SA Scoping Report established a Framework of SA Objectives and decision aiding questions against which the AAP, its policies and allocations would be assessed. A brief explanation of the assessment process is set out in para 3.4. The following paragraphs explain how the evolution of the SA report has influenced the plan making process.
- 4.4. An Interim Draft Sustainability Appraisal, December 2012 was produced alongside the Issues and Option (Reg.18) Options Consultation Draft of the AAP, December 2012. This interim draft SA was provided to Broadland's elected members on 31 January 2013 alongside the Options Consultation Draft of the AAP to inform their decision on the publication of the AAP for consultation.
- 4.5. The Interim SA included an appraisal of draft policies and reasonable alternatives, taking account of updated baseline information where relevant. Specifically the interim SA report appraised draft AAP objectives against the SA Framework as well as the various draft policies on Housing, Economic Development, Design, Green Infrastructure, Recreational Open Space, Transport Principles, and Strategic Requirements. The Interim SA also considers alternatives for variously distributing development between three defined different "Core Development" and alternative Option Development areas in the eastern, western, and northern sectors of the Growth Triangle. Alternatives were also considered for routing the Inner Orbital Link and the provision green infrastructure.
- 4.6. Following the completion of the Issues and Option (Reg.18) consultation, the AAP was revised in conjunction with the Sustainability Appraisal, taking account of representations. This led to the production of the Proposed Submission (Reg.19) version of the AAP and SA Report, June 2014. The submission version of the Sustainability Appraisal for the Old Catton, Sprowston, Rackheath and Thorpe St. Andrew Growth Triangle AAP, December 2014, identified and appraised reasonable alternatives, appraised both the individual policies and allocations of the proposed submission version of the AAP, and the proposed submission version of the AAP as a whole, against the SA framework, and assessed whether additional monitoring, above and beyond that established by the JCS, should be included in the AAP. As with the Interim report updated baseline information was taken into account where relevant.

4.7. The Proposed Submission version of the SA Report was provided to elected members on 3 July to inform their decision on the pre-submission publication of the SA report and AAP. The preferred reasonable alternatives translated to policy within the AAP at this time were consistent with the findings of the SA report in terms of those that performed best in sustainability appraisal terms. Specifically the appraisal found that:

The appraisal suggests that the draft policies of the AAP lead to likely significant negative effects on the baseline in terms of the following objective:

- ENV9 - To make the best use of resources, including land and energy, and to minimise waste production.

This effect is principally related to the release of "Reserve Sites" should planning permission not be secured on sufficient sites by 2019/20 as set out within policy 19 of the draft AAP. Should the plan be delivered without the need to release the "Reserve Sites" then the significance of the negative impact would be greatly reduced.

An uncertain effect is also identified in relation to:

- ENV1 - To reduce the effect of Traffic on the Environment

This effect is also directly related to the "Reserve Sites" identified in the plan. Specifically, should these sites be released then the overall scale of development allocated within the Growth Triangle would increase by a further 10% (1,000 units). This would to some extent exacerbate the negative effects predicted within the JCS SA Appraisal (December 2012), namely additional traffic giving rise to increase air and noise pollution, disruption to amenity and potential secondary health impacts. However, it need also be recognised that the JCS confirmed that the Growth Triangle was a suitable place for major strategic growth. Therefore any such uplift would continue to be located in an appropriate location.

The following recommendations are made in regards to mitigating these negative and uncertain effects:

- Ensure that every effort is made to effectively apply Policy 21 of the JCS in order to maximise the chance the planning permission will be secured on allocated sites, removing the need to release the "Reserve Sites". The effective application of this policy ensures that a positive approach will be taken to planning applications, with acceptable scheme being permitted without delay.
- Ensure that the progress of allocated development sites is monitored effectively through the Annual Monitoring Report (AMR) in order to identify at an early stage whether allocation sites are encountering difficulties and allow for appropriate interventions
- Ensure that the Strategic and Local Infrastructure Funds established under the Greater Norwich City Deal are used effectively to stimulate the

development of sites or help to overcome obstacles preventing the delivery of sites.

Significant positive effects on the baseline were predicted in regards to the following sustainability objectives:

- ENV1 - To reduce the effect of traffic on the environment
- ENV4 - To maintain and enhance biodiversity and geodiversity
- SOC2 - To maintain and improve the health of the whole population and promote healthy lifestyles
- SOC4 - To provide the opportunity to live in a decent, suitable and affordable home.
- SOC7 - To improve the quality of where people live.
- SOC8 - To improve accessibility to essential services, facilities and jobs.
- EC3 - To encourage efficient patterns of movement in support of economic growth
- EC4 - To improve the social and environmental performance of the economy

These benefits are predicted in light of the fact that the policies of the draft AAP seek to capitalise on the inherent opportunities available within the Growth Triangle that make it suitable for major sustainable growth.

- 4.8. Prior to the submission of the AAP for examination consideration was given to specific comments made on the SA report, with two minor changes resulting, this is explained in more detail in section 7.
- 4.9. The Submission version of the AAP and SA Report were considered by elected members at meetings held on 14th and 22nd January 2015 and the findings of the SA report informed their decision to submit the AAP for Independent Examination.
- 4.10. In preparation for the submission of the AAP a series of potential main and additional modifications were developed. These would address issues raised by respondents to the publication of AAP if the Independent Inspector considered it appropriate to do so. These modifications were considered by members prior to the submission of the AAP for Independent Examination but were not at that stage considered within the SA report. This is because they would only be included in the plan if the examining Inspector considered it necessary. This approach was explained within the SA Report presented to elected members.
- 4.11. The Modifications to the AAP were advanced following its independent examination in July 2015 were subject to screening and appraisal in the Sustainability Appraisal for the Old Catton, Sprowston, Rackheath and Thorpe St. Andrew Growth Triangle AAP Addendum Report, November 2015, this included a consideration of the impact of the modifications on identified reasonable alternatives and a full reappraisal of the AAP, with modifications.

4.12. The screening process identified that most modifications simply clarified or otherwise fine-tuned policies of the plan and resulted in no likely significant effect on the SA baseline. Three modifications were seen as being more significant, these being:

- A substantial rewriting of Policy 16 for the North Rackheath allocation to increase the “area of search” for the masterplanning and thereby increasing opportunities to optimise the layout and distribution of development, and the integration of infrastructure. This modification does not increase the overall scale of allocation at North Rackheath. The supporting text to the modified policy is clear that any further allocation of land will be subject to a Local Plan review.
- The deletion of the Reserve Sites (Policy 20) and consequential allocation of former reserves sites GT21 White House Farm (North East) and GT22 Land East of Broadland Business Park (North Side). This modification is expected to contribute between 800-1,000 new homes.
- Clarification that the orbital link between Plumstead Road and Salhouse Road remains an aspiration of the Growth Triangle Area Action Plan but that it is not an essential infrastructure requirement. Other orbital links from the Norwich Airport Industrial Estate to Salhouse Road, and from Plumstead Road to the Broadland Business Park, are unaffected by this modification. Without the Plumstead Road to Salhouse Road link additional pressure is put on the existing road network, such as Salhouse Road and Woodside Road, and the Northern Distributor Road (NDR) junctions in the future.

4.13 The appraisal of the plan (as submitted) plus modifications within the addendum found that:

The performance of the draft AAP (as submitted) plus modifications is very similar to the draft plan itself. Indeed none of the predicted significant effects, either in positive or negative terms is considered to change as a result of the proposed modifications. However, the modifications are considered in some instances to positively reinforce or diminish predicted significant effects in certain instances. These are summarised below:

- The modifications remove the uncertainty in terms of the impact of the plan in relation to ENV1. The previous uncertainty resulted from two scenarios in which the former reserve sites were either delivered, or were not required. As modified, there is significantly greater certainty that the former reserve sites will be delivered as they have been redefined as allocations. The relative increase in the overall level of housing allocation is expected to increase levels of traffic, giving rise to increased air and noise pollution, disruption to amenity and potential secondary health impacts. However, because the policies of the plan will result in a good relationship between jobs, homes and services and will effectively afford residents with transport choice beyond the private car, it is considered that even with the increased level of development the plan still has a significant positive impact.

- It is however acknowledged that the positive impact resulting from the good relationship between jobs, homes and services and transport choice that is a consequence of the AAP would be diminished to some extent if the Salhouse Road to Plumstead Road link is not delivered. This is a consequence of reduced connectivity between and accessibility of development sites and relative increases in traffic pressures on local roads, junctions and the NDR when compared with a scenario that includes a road link between Salhouse Road and Plumstead Road. The effect relates to objectives ENV1, ENV3, ENV6, ENV9, SOC8, EC3 and EC4.
- The plan as modified also reinforces the predicted significant negative impact on the baseline in relation to ENV9 as a consequence of the increased certainty of greater levels of greenfield land lost to development in order to meet JCS targets. This results from the modification that increases certainty of delivery of former reserve sites, including loss of grade II agricultural land related to Land East of Broadland Business Park (North Site).

4.14 The following recommendations are made in regards to mitigating negative effects and maximising positive effects:

- Whilst it would not be justified to make a complete link road a requirement of the plan efforts should be made by working with landowners and developers to deliver the Salhouse Road to Plumstead Road link as its delivery will improve connectivity between and accessibility to new and existing development. Also that it will increase the resilience of the highway network in the context of planned growth.

4.15 Elected Members considered the SA Addendum when resolving to not raise objection to the proposed AAP Modifications at the Council meeting on 25 February 2016.

5. How the results of public consultation have been taken into account

5.1 Throughout the stages of preparing the AAP several rounds of public participation have taken place. In general terms the consultation work can be divided into five periods: Principles for Development taking place between November 2008 and January 2009; the Growth Triangle Workshops during September and October 2011; the Issues and Option (Reg.18) Options Consultation Draft of the AAP consultation between March and June 2013; the Publication of the Regulation 19 Pre-Submission Growth Triangle AAP between August and September 2014; and, lastly, a consultation took place on proposed Main Modifications during February and March 2016 following the public hearing sessions that took place in July 2015.

- 5.2 During the various stages of consultation the public and other stakeholders had the opportunity to respond in writing and attend workshops, exhibitions and drop-in sessions. Details of all the consultation work for the Growth Triangle AAP prior to submission to the Planning Inspectorate can be found in the Statement of Consultation (Regulation 22c) Report. Details of the pre-submission consultation can be found in the Statement of representations Submitted (Reg20) (Reg 22c) report.
- 5.3 An Interim Draft Sustainability Appraisal, December 2012 was published alongside the consultation on the Issues and Option (Reg.18) Options Consultation Draft of the AAP. The comments received were taken into account in during the iterative and parallel development of the AAP and SA Report.
- 5.4 The detailed responses to representations on the Issues and Option (Reg.18) Options Consultation Draft of the AAP can be found in the Statement of Consultation (Reg 22c) report. The responses directly addressed issues raised and referred consultees to sources of evidence, including, where relevant, to where issues were addressed in the SA report.
- 5.5 For example where concerns were raised in regards to water supply, further technical work was undertaken to confirm sufficient water would be available and this was augmented by specific consultation with Anglian Water. This technical work, and subsequent liaison with Anglian Water was reflected in the SA Report, see commentary under Objective ENV2 – To improve the quality of the water environment on page 84 of the SA report Submission Version, December 2014. Respondents were referred to where this appraisal and the relevant information could be located in the Council’s response to consultation.
- 5.6 Similarly when considering the likely significant impact of development under SA Objective 7 – To improve the quality of where people live for Policy GT16: North Rackheath in the Proposed Submission and Submission version of the SA report it was acknowledged “*that significant concern has been expressed about the principle of development and its intrinsic impact upon existing residents who will experience change. This change of itself could make some existing residents less satisfied with their neighbourhoods*”. Thus in this example the results of consultation directly affected the appraisal of AAP policies within the SA Report.
- 5.7 The Growth Triangle AAP Sustainability Appraisal Non-Technical Summary, Main Report and Technical Appendix were then published alongside the Regulation 19 Pre-Submission Growth Triangle AAP. A detailed summary of representations and responses can be found in the Area Action Plan (proposed submission version) Representations Report (Regulation 20). As was the case with the representations with the responses to the Issues and Option (Reg.18) Options Consultation Draft of the AAP, the responses directly addressed issues raised and referred consultees to sources of evidence, including, where relevant, to where issues were addressed in the SA report.

- 5.8 In addition 5 representations were specifically submitted in response to the publication of the Growth Triangle AAP Sustainability Appraisal. A summary of these representations, and responses to them are included as Appendix A of the Growth Triangle AAP Sustainability Appraisal, Main Report, December 2014. The responses to representations clarify where and how the issues and concerns raised by respondents are address in the SA report and elsewhere in evidence.
- 5.9 Furthermore, two specific changes to the SA were made as a result of these representations: Natural England sought an additional Monitoring Indicator in relation to recreational impact on N2K sites. An additional monitoring indicator to this effect was subsequently recommended through section 10 of the SA report, proposed by the Council to the Inspector as a Proposed Main Modification to the AAP and subsequently incorporated into the Plan as Main Modification MM15. This modification can be found in the Inspectors report appendix schedule of main modifications, May 2016.
- 5.10 In addition a number of the conclusions of the SA technical appendix in relation to the identification of preferred alternative sites was challenged by Savills, who provided updated information on the scale and rate of development on site White House Farm (North-East). This new information was used to update Technical Appendix H of the SA report. The updated appendix confirmed that the conclusions of the SA report remained justified.
- 5.11 Having considered all representations submitted in response to the publication of the Pre-Submission Growth Triangle AAP, it was considered that the policies and allocations of the AAP remained the most appropriate means to deal with the growth requirements laid out in the JCS.

6 The reasons for choosing the plan as adopted, in the light of other reasonable alternatives

- 6.1 Chapter 6 of the Growth Triangle Area Action Plan Submission Version, December 2014, sets out how and what reasonable alternatives were considered. The reasonable alternatives were identified taking into account the objectives and geographical scope of the AAP. The objectives of the AAP are set out in Chapter 2 of the SA report. The AAP objectives were originally derived for the Issues and Option (Reg.18) Options Consultation Draft of the AAP and revised into a more focused form for the Regulation 19 Pre-Submission Growth Triangle AAP, following consideration of representations made on the Options Consultation Draft. The geographical scope of the plan is the Old Catton, Sprowston, Rackheath and Thorpe St. Andrew Growth Triangle as defined in the JCS.
- 6.2 The AAP contains two main policy elements: (1) Strategic Policies – which apply to a particularly large area or the Growth Triangle as a whole; and, (2) Area

Based Policies – which related to the allocation of a specific site. Consideration was given to each of these main policy elements.

GT1 Form of Development

- 6.3 It was determined that there were limited alternatives to the different elements of this policy. The principal identified alternatives related to whether the policy should require a 1:30 ratio of non-residential to residential floorspace in mixed use developments or if this requirement should be higher or lower. In this regard it was considered that, whilst a higher ratio was proposed, 1:20, on the North Sprowston and Old Catton development, this scheme was based on a specific long term viability model. Elsewhere, it was considered that this level of requirement may impact on viability. A lower ratio was considered to risk not achieving the appropriate range of services and facilities within the Growth Triangle. The 1:30 ratio requirement forms part of the adopted AAP.

GT2 Green Infrastructure

- 6.4 There were limited alternatives to a number of different elements of the policy. The principal alternative related to whether additional areas should be identified as large set piece public open spaces. Specifically these areas were Thorpe Woodlands and parts of the Historic Parks and Gardens of Rackheath Hall. It was not considered that there was not clear mechanism for the delivery of these sites other than potential development and there remains doubt about whether acceptable development schemes could be identified. Consequently neither site form is an open space allocation in the adopted AAP. Specific support for proposals for public open space are given support in policy GT2 of the adopted AAP. This element of the policy was maintained in the AAP, despite general support for such uses in other parts of the development plan in recognition of other potential areas of open space, that were not allocated, in the Growth Triangle.

GT3 Transport

- 6.5 There were two elements of the policy where specific alternatives were considered. Firstly there was alternatives were identified in relation to the completion of orbital road links across the Growth Triangle. These alternatives related to whether a new link road should be created between Salhouse Road and Plumstead Road, whether this link should follow a route west of (1) or through Thorpe Woodlands (2) and whether relying on no new link between Salhouse Road and Plumstead Road was reasonable (3). 2 was discounted on the basis of expected impact on the wildlife interest of Thorpe Woodlands. Both 1 and 3 were considered reasonable with 1 preferred as it was considered to perform better in terms of creating accessibility between development and improving connections to jobs and services. Whilst modification to the AAP have clarified that 1 is not a requirement of the AAP the enabling of 1 remains within the adopted AAP and the Council has taken steps to overcome identified

barriers. The other alternative related to routes for BRT other than Salhouse Road, in particular Wroxham Road. However, these routes were discounted as they would require significant diversions to serve Rackheath and the centre of other proposed developments, and in particular for Wroxham Road the route was considered constrained between the outer ring road and Norwich City. Salhouse Road remains identified route within the adopted AAP.

Area Specific Policies

6.6 The identification of allocations (Area Specific Policies) was based on a four step process. These steps are outlined below as: “Sites with Planning Permission”, “Reasonable Alternative Sites”, “Appraisal of Strategic Alternative”; and, “Site Selection”.

Identification of Sites with Planning Permission

6.7 The first stage in the process was to identify sites within the Growth Triangle which had secured planning permission after 2008, meaning that they would contribute towards the JCS housing requirement for the Growth Triangle. These sites were considered to form part of the AAP baseline and provide 4,288 new homes. Not taking these sites into account was considered an unreasonable alternative.

Identification of Reasonable Alternative Sites

6.8 The second stage was to identify which of the available sites without planning permission were Reasonable Alternative Allocation Sites. This appraisal is set out in Technical Appendix D, and summarised in Appendix H of the SA. This appraisal identified that 13 of the 19 available sites should be considered reasonable alternatives.

Appraisal of Strategic Alternatives

6.9 Stage two identified 13 Reasonable Alternative Sites. If all were allocated, in addition to the sites identified in stage 1, then total housing yield was assessed to be 15,269 units. This led to the consideration of three strategic alternatives:

- Alternative 1: Allocate the most suitable sites to deliver a minimum of 7,000 homes by 2026, rising to at least 10,000 thereafter.
- Alternative 2: Allocate the most suitable sites to deliver a minimum of 7,000 homes by 2026, rising to at least 10,000 thereafter including reserve sites made up of non-preferred suitable sites (up to approx. 5,000)
- Alternative 3: Allocate the most suitable sites to deliver a minimum of 8,440 homes by 2026, rising to at least 15,269 thereafter i.e. allocate all reasonable alternative sites.

6.10 On the basis of the analysis of the above alternatives it was considered that Alternative 2 is the best performing alternative in sustainability terms.

Reasons for rejecting alternative 3

6.11 Alternative 3, which sought to allocate all reasonable alternative sites was considered the least appropriate of all of the alternatives as:

- In releasing land sufficient to accommodate an approximately 5,000 additional homes beyond JCS minimum requirements it would inevitably lead to greater volumes of traffic. This would increase traffic flows and in doing so lead to a significant negative effect on the baseline.
- It would allocate approximately 175ha more greenfield land for development than would be needed to provide for JCS minimum housing numbers. Some of this land would undoubtedly have some biodiversity importance which contributes to the functioning of wider ecological networks.
- It would have a greater impact on the landscape in terms of the amount of greenfield land that would be developed, effecting the landscape setting of the Norwich Urban Area.
- It would create increased demands in terms of energy, water, land and materials beyond that which was required to meet the objectively assessed need for housing.

Reasons for rejecting alternative 1

6.12 Alternative 1 performed well against the Sustainability Objectives, because to a large extent it had no significant effect on the baseline. However, it performed worse than Alternative 2 in one key area:

- It did not provide any flexibility to deal with the effects of unforeseen or changing circumstances which undermined one or more of the allocated sites, i.e. if one site failed the objectively assessed needs could not be met through the plan.

Reasons for selecting alternative 2

6.13 Alternative 2 was selected as the most appropriate option as:

- It enabled the plan to meet the objectively assessed need for housing and provided a level of flexibility to meet unforeseen or changing circumstances which delayed or undermined delivery of housing allocation sites.
- If housing allocations were delivered as expected it would not result in any more land being released for housing than was necessary to meet the objectively assessed needs.
- By identifying only those sites, or parts of sites, as contingency sites which were likely to contribute within the plan period, the additional negative effects brought by Alternative 3 on the baseline line in terms of traffic, biodiversity, landscape and resources are mitigated.

- It follows that the site selection process should focus on those sites with the greatest potential to start early and deliver within the JCS plan period, on which the AAP is predicated. This will help to address the identified shortfall in delivery as soon as possible and minimise the chance of reserve sites needing to be released.

Site Selection

6.14 Having identified Alternative Two as the most appropriate choice, the Reasonable Alternative Sites were considered to determine which should be allocated.

6.15 Technical Appendix H of the Growth Triangle SA sets out the approach to site selection within the Area Action Plan. On the basis of Appendix H the sites within the following table have been chosen as preferred allocation sites.

Table 10: Preferred Allocation Sites			
Site	Forecast Start Date	Forecast No. Home by 2026	Total Housing Yield
Home Farm, Sprowston (Phases 4&5 Uplift from 2008)	Under Construction	23	23
Trinity Close, Rackheath	Under Construction	26	26
Austin Green, Old Catton	Complete	40	40
Land Adj. Salhouse Road	2015/16	79	79
North Sprowston & Old Catton	2016/17	1,736	3,520
Land North of Repton Avenue	2016/17	300	300
Land South of Green Lane West	2016/17	300	300
Land North of Plumstead Road	2016/17	45	45
Land South of Salhouse Road	2017/18	1,275	1,400
Land East of Buxton Road	2017/18	300	300

Brook Farm	2017/18	600	600
Land East of Broadland Business Park	2018/19	850	850
Norwich RFU	2018/19	250	250
North Rackheath	2019/20	1,300	3,000
Land South Green Lane East	2022/23	150	150
Total		7,274	10,883

6.16 Section six of Appendix H discusses potential alternative site allocation choices. Specifically, whether "White House Farm (North-East)" should be selected instead of "Land South of Green Lane East". However it concludes that this would not be a preferred approach for the following reasons:

- The allocation of the whole of "White House Farm (North-East)" would significantly exceed the JCS housing requirements, and go beyond the objectively assessed need. This would be inappropriate for the reasons set out in paragraph 6.11 above.
- "White House Farm (North-East)" is a continuity site for the consortium involved in the existing permitted site "White House Farm (South-West)". Therefore the site is not expected to be brought forward ahead of the completion of the existing allocation site. Any delay to the completion of this site, which has already suffered significant delays White House Farm (South-West), would significantly affect the potential for this site to deliver in a timely manner.
- Whilst there may be potential to allocate a self-contained site of around 500 homes, this would not overcome the second issue.

6.17 Whilst not preferred as allocation sites, a smaller site at "White House Farm (North-East)" and the omitted element of "Land East of Broadland Business Park" have been included as Reserve Sites to be brought forward in the event of significant delays to other allocation sites. This is consistent with the findings of the analysis in Technical Appendix D, which identified both as suitable Reasonable Alternative sites.

6.18 Modifications within the adopted AAP now allocated GT21 White House Farm (North East) and GT22 Land East of Broadland Business Park (North Site). The

SA Addendum considered this change and found it to be a different expression of Alternative 2 rather than a wholly new alternative.

Employment Land

6.19 For the employment allocations in the AAP, given the specificity, both in terms of scale of development and location within the JCS, there were not considered to be any reasonable alternatives for the AAP as sufficient land at Broadland Business Park already had planning consent and there were no other suitable alternative sites at Rackheath.³

7 Measures to be taken to monitor the significant environmental effects of implementation of the plan

7.1 A monitoring framework is included in section 9 of the AAP. This framework augments the monitoring arrangements set out in Appendix 8 of the JCS. The Greater Norwich authorities have committed to monitoring the indicators set out in Appendix 8 of the JCS.

7.2 The adequacy of these arrangements was tested through the SA report for the AAP. Specifically, where the SA for the AAP identified a significant effect on the baseline, either positive or negative, consideration was given for whether additional monitoring was needed. The table below sets out the conclusions of this assessment, and includes the additional monitoring indicator identified as a result of consultation as set out in paragraph 5.9 above.

Table 12 - Monitoring

Objective	Significant Effect	Relevant Indicator	Gap in Coverage and/or New suggested Indicator
ENV1	Positive	Percentage of residents who travel to work by private motor vehicle, public transport, foot or cycle, and work mainly at home.	Due to commuting patterns being a major component of people's total journeys the existing Annual Monitoring Report indicator is considered sufficient.
ENV4	Positive	Net change in County Wildlife sites in positive management. Percentage of Sites of Special Scientific Interest (SSSI) in a) favourable condition, b) unfavourable but	The monitoring framework proposed within the AAP will in relation to the provision of new large public parks and consistency with the emerging Informal Open Space policy of the Development Management

³ Ibid, paragraphs 6.17 to 6.24, pages 59 to 60

		<p>recovering, c) unfavourable and no change, d) unfavourable and declining, and e) destroyed/part destroyed.</p> <p>Number of Tree Preservation Orders (TPOs) where trees are lost through development.</p>	<p>DPD provides an appropriate addition to the monitoring framework.</p> <p>The Greater Norwich Infrastructure Programme is an appropriate management mechanism for the delivery of green infrastructure.</p> <p>However, an additional indicator could ensure clarity and transparency in terms of the impact of development on N2K sites.</p> <p>Suggested Indicator: Indicator: Number of Area Action Plan Allocations granted contrary to the advice of Natural England on the grounds of recreational impact on N2K sites Target: Zero.</p>
ENV9	Negative	<p>Percentage of dwellings built on previously developed land.</p> <p>Percentage of dwellings completed at a) less than 30 per hectare, b) 30-50 per hectare, c) more than 50 per hectare.</p> <p>Waste arising: a) kilograms of waste produced per head of population b) percentage change on previous year.</p> <p>Recycling --percentage of household waste a) recycled and b) composted.</p>	<p>The AAP monitoring framework specifically tracks the progress in terms of achieving sufficient planning permissions to obviate the need to release reserve sites. This is considered to be appropriate and proportionate in terms of monitoring in terms of the effect predicted on this objective.</p>
SOC2	Positive	<p>Number of Lower Super Output Areas in national most deprived 20%.</p>	<p>Existing indicators could be sufficient, but may be usefully supplemented. Additional monitoring may be required to track how many</p>

		<p>Number of people killed or seriously injured in road traffic accidents.</p> <p>Percentage of working age population receiving Employment Support Allowance and Incapacity Benefit.</p> <p>Healthy life expectancy at age 65 of a) males and b) females.</p> <p>Accessibility of leisure and recreation facilities based on Sport England Active Place Power website.</p>	<p>doctors are practising in the Growth Triangle, as currently GP practices are located outside the Growth Triangle, the nearest being either in the urban fringe or at Hoveton.</p> <p>The delivery of large new Public Parks and extra informal open space is included within the AAP monitoring table. These facilities will be valuable in giving people the choice to live a healthier, more active lifestyle. This provides appropriate monitoring.</p>
SOC4	Positive	<p>Net housing completions.</p> <p>Affordable housing completions.</p> <p>New house completions by bedroom number based on proportions set out in the most recent Sub-regional Housing Market Assessment.</p> <p>Housing to meet the needs of older people, defined as key group in the housing market assessment. Assessed by satisfaction of people over 65 with both home and neighbourhood.</p> <p>(Data from Building for Life Standard will be used where available, but it is recognised that following the Government's Housing Standards Review this</p>	<p>Existing indicators are still considered appropriate to track progress against SOC4 objectives on providing decent, suitable and affordable homes.</p>

		information may become less commonly collected.)	
SOC7	Positive	<p>Number of Lower Super Output Areas in national most deprived 20%.</p> <p>Percentage of developed land which is vacant for more than 5 years.</p> <p>Percentage of units vacant in defined primary shopping areas.</p>	Existing indicators are considered sufficient, but could be expanded in to recording the amount of newly created publicly accessible informal open space, due to "quality of local open space being a criterion to SOC7. Examples being the new country park at Beeston and Rackheath Broads Buffer. This is provided for in the AAP Monitoring Framework.
SOC8	Positive	<p>The proportion of households without a car in rural areas able to access a market town or key service centre at least twice a week by public transport in 30 minutes.</p> <p>Accessibility to market towns and key centres of employment during the morning peak (0700-1000) returning in the afternoon peak (1600-1900).</p> <p>Net change in retail floorspace in city centre.</p> <p>National retail ranking for Norwich.</p> <p>Percentage of units vacant in defined primary shopping areas.</p> <p>Accessibility of leisure and recreation facilities based on Sport England Active Place Power website.</p>	The current indicators span public transport provision, occupancy of shops, and the availability of sports provision so are considered detailed and broad-ranging enough to monitor SOC8 objectives.

EC3	Positive	Percentage of residents who travel to work by private motor vehicle, public transport, foot or cycle, and work mainly at home. Average distance travelled to the workplace by residents.	The indicators already chosen provide a strong data source, covering the means and how far people commute. This is regarded as sufficient to monitor the AAP against EC3 objectives.
EC4	Positive	Amount of various employment development on previously developed land or conversions. Unemployment benefit receipt a) percentage of population in receipt of Job Seekers Allowance (JSA) b) claimants of JSA by age range, 16-24 years old, 25-49 years old, 50+ years old.	The percentage of people in receipt of JSA is regarded as a good indicator for the state of the local economy, and is relevant to the Growth Triangle. As a predominately greenfield area, the employment development on previously used land is less relevant, and so an alternative may be used. For example, the new floor space created at Broadland Business Park and the Rackheath Industrial Area.

7.3 The approach to monitoring in the AAP was reconsidered in the AAP Sustainability Appraisal Addendum 2015. The Addendum concluded that:

“On the basis that the appraisal of the draft AAP (as submitted) plus modifications does not predict any additional significant positive or negative impacts on the baseline it is not considered that any further monitoring indicators are required”.

7.4 However, it was also concluded that:

“The already proposed indicator which sought to monitor the number of homes with planning permission on eligible sites in the Growth Triangle would however appear defunct following modifications. This is because it intended to directly monitor the trigger point for the Policy 20: Reserve Sites which would no longer exist following modifications”.

7.5 This indicator has thus been removed from the AAP monitoring framework in accordance with Main Modification MM51 of the Inspectors report appendix schedule of main modifications, May 2016

Appendix A – SA Objectives and Decision Aiding Questions

Objective	Decision Aiding Questions
Environmental Objectives	
<p>ENV 1 - To reduce the effect of traffic on the environment.</p>	<ul style="list-style-type: none"> • Will it reduce traffic volumes, ease the flow of traffic and reduce congestion? • Will it increase the proportion of journeys using modes other than the car? • Will it reduce the effect of HGV traffic on people and the environment? • Will more benign modes of travel be encouraged? • Will new development be in the best locations to reduce the need for people to travel?
<p>ENV 2 - To improve the quality of the water environment</p>	<ul style="list-style-type: none"> • Will it improve the quality of the water environment (streams, rivers, lakes etc)? • Will it help to support wetland habitats and species?
<p>ENV 3 - To improve environmental amenity, including air quality.</p>	<ul style="list-style-type: none"> • Will it improve air quality? • Will it reduce the emission of atmospheric pollutants?
<p>ENV 4 - To maintain and enhance biodiversity and geodiversity.</p>	<ul style="list-style-type: none"> • Will it conserve / enhance natural or semi-natural habitats, and promote habitat connections? • Is it likely to have a significant effect on sites designated for international, national or local importance? • Will it conserve / enhance species diversity, and in particular avoid harm to protected species? • Will it protect & enhance sites of geological value?
<p>ENV 5 - To maintain and enhance the quality of landscapes, townscapes and the historic environment.</p>	<ul style="list-style-type: none"> • Will it protect and enhance the quality of landscapes, townscapes and countryside character, including the character of the Broads and its setting where relevant? • Will it maintain and enhance the distinctiveness of the landscapes/townscapes and heritage? • Will it reduce the amount of derelict, underused

	<p>land?</p> <ul style="list-style-type: none"> • Will it protect and enhance features of historical, archaeological and cultural value?
ENV 6 - To adapt to and mitigate against the impacts of climate change.	<ul style="list-style-type: none"> • Will it reduce emissions of greenhouse gases by reducing energy consumption? • Will it lead to an increased proportion of energy needs being met from renewable sources? • Will it increase the capacity of the area to withstand the effects of climate change? • Will it ensure that risks to lives, land and property are minimised?
ENV 7 - To avoid, reduce and manage flood risk.	<ul style="list-style-type: none"> • Will it minimise the risk of flooding to people and property?
ENV 8 - To provide for sustainable use and sources of water supply.	<ul style="list-style-type: none"> • Will it conserve groundwater resources? • Will it minimise water consumption and promote water efficiency?
ENV 9 - To make the best use of resources, including land and energy, and to minimise waste production.	<ul style="list-style-type: none"> • Will it minimise consumption of materials and resources? • Will it promote the use of land in sustainable locations that has been previously developed? • Will it use land efficiently? • Will it minimise the loss of "greenfield" land? • Will it avoid the loss of good quality agricultural land and preserve soil resources? • Will it minimise energy consumption and promote energy efficiency? • Will it promote the use of renewable energy sources? • Will it lead to less waste being produced? • Will it lead to less waste being disposed, by promoting more recycling and composting? • Will it increase waste recovery for other means e.g. energy generation?
Social Objectives	
SOC 1 - To reduce poverty and social	<ul style="list-style-type: none"> • Will it reduce poverty and social exclusion in those areas most affected?

exclusion.	<ul style="list-style-type: none"> • Will it help to reduce deprivation levels? • Will the needs of residents best be met?
SOC 2 - To maintain and improve the health of the whole population and promote healthy lifestyles.	<ul style="list-style-type: none"> • Will it improve access to high quality health facilities? • Will it encourage healthy lifestyles? How? • Will adequate health infrastructure be provided for <ul style="list-style-type: none"> • existing and new communities? • Will the links between poorer health and deprivation be addressed? • Will links to the countryside be maintained and enhanced?
SOC 3 - To improve education and skills.	<ul style="list-style-type: none"> • Will it improve qualifications and skills for both young people and amongst the workforce? • Will it help to retain key workers and provide more <ul style="list-style-type: none"> • skilled workers from school leavers? • Will adequate education infrastructure be provided for existing and new communities? • Will lifelong learning and skills training be promoted? • Will links between lower levels of education and deprivation be addressed?
SOC 4 - To provide the opportunity to live in a decent, suitable and affordable home.	<ul style="list-style-type: none"> • Will it increase the range of types, sizes and affordability of housing for all social groups? • Will it reduce the housing need and ensure that housing provision addresses the needs of all? • Will housing requirements best be accommodated to provide for sustainable communities? • Will best use be made of existing housing stock?
SOC 5 - To build community identity, improve social welfare, and reduce crime and anti-social activity.	<ul style="list-style-type: none"> • Will it encourage engagement in community activities? • Will it contribute to the achievement of a mixed and balanced community? • Will it reduce actual levels of crime? • Will it reduce the fear of crime?

<p>SOC 6 - To offer more opportunities for rewarding and satisfying employment for all.</p>	<ul style="list-style-type: none"> • Will it reduce unemployment overall? • Will it help to improve earnings?
<p>SOC 7 - To improve the quality of where people live.</p>	<ul style="list-style-type: none"> • Will it improve the quality of dwellings? • Will it improve the quality of local open space? • Will it improve the satisfaction of people with their neighbourhoods?
<p>SOC 8 - To improve accessibility to essential services, facilities and jobs.</p>	<ul style="list-style-type: none"> • Will it improve accessibility to key local services and facilities (including health, education, leisure, open space, the countryside and community facilities)? • Will it improve accessibility for all whilst reducing dependency on the private car? • Will access to jobs and services be improved for all? • What transport infrastructure is required for the existing situation and for proposed future development?
<p>Economic Objectives</p>	
<p>EC 1 - To encourage sustained economic growth.</p>	<ul style="list-style-type: none"> • Will it assist in strengthening the local economy? • Will it improve business development and enhance competitiveness? • Will it reduce vulnerability to economic shocks? • Will it promote growth in key sectors? • Will it increase vitality & viability of town centres and improve economic diversity?
<p>EC 2 - To encourage and accommodate both indigenous and inward investment.</p>	<ul style="list-style-type: none"> • Will it encourage indigenous businesses? • Will it encourage inward investment? • Will it make land and property available for business? • Will it improve economic performance across the Greater Norwich area? • Will it support / encourage rural diversification? • Will it support / encourage small city businesses?
<p>EC 3 - To encourage</p>	<ul style="list-style-type: none"> • Will it improve provision of local jobs?

<p>efficient patterns of movement in support of economic growth.</p>	<ul style="list-style-type: none"> • Will it improve accessibility to work, particularly by public transport, walking and cycling? • Will it reduce journey times between key employment areas and key transport interchanges? • Will it improve efficiency and sustainability of freight distribution? • Will it support provision of key communications infrastructure? • How can access to jobs be improved?
<p>EC 4 - To improve the social and environmental performance of the economy.</p>	<ul style="list-style-type: none"> • Will it reduce the impact on the environment from businesses? • Will it reduce the impact on residents from businesses? • Will it attract new investment and skilled workers to the area? • Will existing business and employment provision be maintained? • Where would employment provision best be located to serve urban and rural residents?