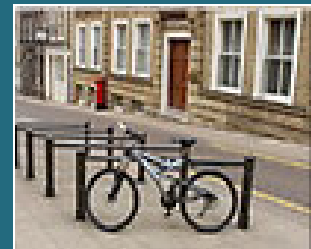


Norwich Development Management Policies DPD: Sustainability Appraisal Report

Prepared for Norwich City Council
by
Land Use Consultants

December 2010



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NON-TECHNICAL SUMMARY

What is Sustainability Appraisal?

The Planning and Compulsory Purchase Act, 2004 (as amended by the Planning Act in 2008) in England and Wales sets out the requirement for Development Plan Documents (DPD) to be subject to Sustainability Appraisal (SA). SA aims to assess the impacts of a plan on social, economic and environmental issues. SA in the UK incorporates Strategic Environmental Assessment (SEA). This is a requirement of the SEA Directive, a European Directive, transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004.

This Non-Technical Summary is a summary of the SA report prepared to assist with the development of preferred policies for the Development Management policies DPD which will be consulted upon as part of Regulation 25 consultation in early 2011. NCC commissioned Land Use Consultants (LUC) to undertake this work in September 2010.

SA comprises a number of Stages from A-D. Stage A defines the Scope of the SA and is used to consult on a framework of objectives which will subsequently be used to appraise the Plan. The various elements of Stage A are combined into a 'Scoping Report' which is then consulted upon – the views of the statutory environmental bodies (Natural England, Environment Agency and English Heritage) must be taken into account at this stage. A Scoping Report was prepared and consulted upon in 2010. This Scoping report set out the SA Framework. There are 21 headline SA objectives and sub-objectives therein which cover Environmental, Social and Economic themes. The 21 headline objectives are reproduced below:

SA Objective
ENV 1: To reduce the effect of traffic on the environment.
ENV 2: To Improve the quality of the water environment.
ENV 3: To Improve environmental amenity, including air quality.
ENV 4: To maintain and enhance biodiversity and geodiversity.
ENV 5: To maintain and enhance the quality of landscapes, townscapes and the historic environment.
ENV 6: To adapt to and mitigate against the impacts of climate change.
ENV 7: To avoid, reduce and manage flood risk.
ENV 8: To provide for sustainable use and sources of water supply.
ENV 9: To make the best of resources, including land and energy and to minimise waste production.
SOCI: To reduce poverty and social exclusion.
SOC 2: To maintain and improve the health of the whole population and promote healthy lifestyles.
SOC 3: To improve education and skills.
SOC 4: To provide the opportunity to live in a decent, suitable and affordable home.
SOC 5: To build community identity, improve social welfare and reduce crime and anti-social activity.
SOC 6: To offer more opportunities for rewarding and satisfying employment for all.
SOC 7: To improve the quality of where people live.
SOC 8: To improve accessibility to essential services, facilities and jobs.

EC 1: To encourage sustained economic growth.
EC 2: To encourage and accommodate both indigenous and inward investment.
EC 3: To encourage efficient patterns of movement in support of economic growth.
EC 4: To improve the social and environmental performance of the economy.

This report represents part of Stage ‘B’ of the SA process which is about appraising options and assessing effects. SA is an iterative process and the results of this report (as well as earlier parts of the process, such as Scoping) will be drawn together into a final SA report which will be submitted with the final version of the Development Management Policies DPD. The final SA report will be compliant with all aspects of the SEA Directive.

Development Management Policies DPD

In line with the Government’s new format for development plans, Norwich City Council (NCC) is preparing a folder of planning documents for the city of Norwich called a Local Development Framework (LDF). The LDF will contain a number of plans and strategies about land use and spatial planning in Norwich, and will provide the basis for determining planning applications and future development. The LDF is composed of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The Councils of Broadland, Norwich and South Norfolk, supported by Norfolk County Council, have prepared a single Joint Core Strategy DPD. The plan provides the strategy to guide, manage and deliver the growth deemed necessary for the entire area and is currently in the final stages of its preparation; the Examination in Public was held in November 2010. The Development Management policies DPD builds on the Joint Core Strategy DPD, and, alongside the proposals map, will set out more detailed guidance on a range of policy issues for the management of development in Norwich. There are 33 proposed development management policies covering a broad range of policy topics.

Sustainability Appraisal Approach

The approach to SA of the Development Management Policies DPD has been firstly to review the detailed SA framework and ensure it is fit for purpose for appraising this DPD. Most of the objectives and sub-objectives therein were considered relevant with the exception of a small number which have been discounted from further appraisal work. These are set out in the table below together with the reasons for screening them from the appraisal:

SA Objective	SA Sub-objective	Reasoning
ENV 9 To make the best use of resources, including land and energy and to minimise waste production	ENV9 (b) Will it promote the use of land in sustainable locations that has been previously developed?	Use of land in sustainable locations that has been previously developed is most likely addressed by Joint Core Strategy policies regarding the efficient use of land, and through the Site Allocations DPD.
	ENV9 (e) Will it avoid the loss of good quality agricultural land and preserve soil resources?	Avoiding the loss of good quality agricultural land and preserving soil resources are most likely addressed by Joint Core Strategy policies, and through the Site Allocations DPD.

SA Objective	SA Sub-objective	Reasoning
	ENV9 (j) Will it increase waste recovery for other means e.g. Energy Generation?	Increasing waste recovery for other means is most likely to be addressed by waste planning policies.
SOC 1 To reduce poverty and social exclusion	SOC1(a) Will it reduce poverty and social exclusion in those areas most affected?	Reduction of poverty and social exclusion is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities', 'The economy', and 'Access', and through the Site Allocations DPD.
SOC 3 To improve education and skills	SOC3 (a) Will it improve qualifications and skills for both young people and amongst the workforce?	Improving qualifications and skills for both young people and amongst the workforce is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (b) Will it help to retain key workers and provide more skilled workers from school leavers?	Helping to retain key workers and provide more skilled workers from school leavers are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (d) Will it promote lifelong learning and skills training?	The promotion of lifelong learning and skills training are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (e) Will links between lower levels of education and deprivation be addressed?	The links between lower levels of education and deprivation are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all	SO6 (b) Will it help to improve earnings?	Improving earnings overall is most likely to be addressed by Joint Core Strategy policies regarding 'The economy'.
EC1 To encourage sustained economic growth	EC1(c) Will it reduce vulnerability to economic shocks?	Reducing vulnerability to economic shocks is most likely to be addressed by Joint Core Strategy policies regarding 'The economy'.
EC 2 To encourage and accommodate both indigenous and inward investment	EC2 (e) Will it support/encourage rural diversification?	Support/encouraging rural diversification is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting communities' and 'The economy'.
EC 3 To encourage efficient patterns of movement in support of economic growth	EC3(c) Will it reduce journey times between key employment areas and key transport interchanges?	Reducing journey times between key employment areas and key transport interchanges is most likely to be addressed by Joint Core Strategy policies regarding 'Access and Transportation' and in the Site Allocations DPD regarding new sites for employment uses.
	EC3 (d) Will it improve efficiency and sustainability of	Improving efficiency and sustainability of freight distribution is most likely to be addressed by Joint Core Strategy policies regarding 'Access and

SA Objective	SA Sub-objective	Reasoning
	freight distribution?	Transportation' and in the Norwich Area Transportation Strategy.

The Development Management policies were then grouped in 'clusters'; each cluster corresponding to a specific theme – Planning Statements, Environment and Design, Telecommunications, Housing, Economy, Communities, University of East Anglia, Norwich Airport and Transport. An appraisal was undertaken of each policy cluster focusing on any likely significant effects (both positive and negative) arising from their implementation. Recommendations were made to improve policies in the light of this appraisal.

The appraisal also provided an assessment of any reasonable alternatives to the published policies, in line with the requirements of the SEA Directive.

Sustainability Appraisal Results

Planning statements

The proposed policy framework regarding planning statements should enable a clear and efficient development management process, and ensure that proposals are accompanied by appropriate assessments and mitigation proposals (positive effects on ENVI-7, ENV9, SOCI-2, SOC4, SOC7 and ECI-4). No significant negative effects are anticipated.

It is recommended that a 'sustainability statement' is added to the list of required supporting documents.

Environment and design

The proposed policy framework regarding environment and design should support: future development that meets the needs of all of its users and is conducive to promoting safe (in relation to crime, environmental protection and flood risk) (positive effect on SOC1, SOC4, SOC5, ENV6, and ENV7), healthy and high quality communities (positive effect on SOC1, SOC2, SOC4, SOC7, and SOC8); the protection of the natural and built environment, and where possible enhancement through new development (ENVI, ENV2, ENV4, and ENV5); and minimisation of the extra pressure placed by new development on existing energy resources, with energy efficiency, the development of renewable energy and enabling sustainable modes of travel proposed (positive effect on ENV6, ENV8 and ENV9). Potential negative effects are noted in relation to development in areas prone to flood risk in regeneration areas (negative effect on ENV7).

Recommendations for this policy cluster include: greater support for the upgrading of poor quality housing; greater detail regarding how development design will address fear of crime; landscaping criteria that support multi-functional usage; and clearer articulation regarding positively involving the local community in developing appropriate solutions for open space provision.

Telecommunications

The proposed policy framework regarding telecommunications should enable the delivery of sufficient telecommunications infrastructure to meet a future growth in

community demand (positive effect on SOC1 and EC2). Whilst development is recognised as having inherent visual and landscape impacts, and potentially amenity (negative effect on ENV5, SOC1 and SOC7), it is not considered that such impacts would be unreasonable. No significant negative effects are anticipated.

Housing

The proposed policy framework regarding housing should ensure housing delivery: meets identified levels and types of demand (positive effect on SOC4 and SOC7); is adaptable and sensitive to the needs of its residents (positive effect on SOC1, SOC4 and SOC7); is sensitive to the environment, townscape and landscape (positive effect on ENV4 and ENV5); and promotes mixed communities (positive effect on SOC5). Whilst the framework seeks to limit negative effects, inherent negative effects are recognised: extra pressure on resources within and supplying the plan area (negative effects on ENV1, ENV2, ENV3, ENV8 and ENV9) and extra pressure on local facilities and services (negative effect on SOC8). No significant negative effects are anticipated.

Recommendations for this policy cluster include: greater detail regarding how affordable housing will be positively delivered; greater support for the upgrading of existing housing stock of a poor quality; support for the provision of gypsy and traveller and travelling showpeople sites that are large enough to enable mixed residential and business use; and clearer articulation regarding positively involving the local community in developing appropriate solutions for housing provision.

Economy

The proposed policy framework regarding the economy should: support economic growth and related development within the plan area, including small and medium sized businesses (positive effect on EC1 and EC2); concentrate growth in accessible locations (i.e. town and local centres) which will enable people to choose more sustainable modes of transport, and support and protect the vitality and diversity of town and local centres, including through seeking a balance between different centre uses (positive effect on EC1, EC2, EC3 and EC4). Negative effects are noted in relation to economic growth, and a subsequent increase in traffic and vehicle emissions as a result of increased passenger miles (negative effect on ENV1, ENV2, ENV3, ENV6 and EC4) and extra pressure being placed on energy and water resources (negative effect on ENV8 and ENV9). No significant negative effects are anticipated from this policy cluster.

Recommendations for this policy cluster include: greater support for street and farmers markets; greater support for creative and innovative uses of vacant sites (e.g. pop-up shops); greater recognition of the role of 'neighbourhood centres' in meeting retail need; and clearer articulation of how opportunities to support growth within deprived areas will be sought.

Communities

The proposed policy framework regarding communities should: protect and improve the provision of community facilities (positive effect on SOC8); support a diverse and vibrant range of leisure, evening and night-time uses which do not negatively impact on the character, amenity and vitality of the city centre, bringing both social benefits and economic benefits to the community (positive effect on ENV5, SOC1, SOC8, EC1, EC3 and EC4); ensure that any future expansion of hot food takeaways in

identified centres does not negatively impact amenity and the vitality within these areas (SOC2, SOC7, EC1, EC2 and EC4); and restrict further expansion in retail warehouses and the sale of non-bulky goods from existing warehouses in Norwich such that the vitality and viability of the city centre is supported through ensuring these retail spaces do not draw consumers away from the city centre (positive effect on EC1 and EC3). Inherent negative impacts are noted resulting from the enhancement of the evening, leisure and late night economies (negative effect on ENVI, ENV3, ENV6, ENV9, SOC7 and EC4) and potential negative impacts on employment within Black and Minority Ethnic (BAME) communities resulting from restrictions on hot food takeaways (negative effect on EC2)¹. No significant negative effects are anticipated from this policy cluster.

It is **recommended** that the quantitative and qualitative need for additional floorspace for different types of retail and leisure developments is included in any related needs assessment.

University of East Anglia

The proposed policy framework regarding the University of East Anglia should result in positive economic impacts for the plan area resulting from employment opportunities within the University and a potentially higher number of students (positive effect on EC1 and EC2) and in relation to improving education and skills (positive effect on EC3). Whilst this policy seeks to manage any growth in vehicle numbers, potential negative effects are noted (negative effect on ENVI, ENV3, ENV6 and ENV9). No significant negative effects are anticipated from this policy.

Recommendations for this policy cluster include: reference made to protecting local undesignated biodiversity assets; and greater detail regarding how public access to open space will be delivered.

Norwich Airport

The proposed policy framework regarding Norwich Airport Expansion should support positive effects with regards employment (SOC8) and economic development (EC2 and EC4), but a significant negative effect is noted with regards the growth in the use of an unsustainable mode of travel with subsequent increases in the emission of greenhouse gases (significant negative effect on ENV9). A cumulative significant negative effect, as a result of airport development combined with general transport growth, is predicted with regards the emission of atmospheric pollutants (negative effect on ENV3). There are also potential subsequent impacts on biodiversity (negative effect on ENV4) and health (negative effect on SOC2).

Recommendations for this policy cluster are: Provision of greater detail regarding how the potential positive economic effects of airport growth are to be balanced with the potential significant negative environmental impacts; and that a Sustainability Appraisal / Strategic Environmental Assessment of Norwich Airport Masterplan should be undertaken.

Transport

¹ The text says that it 'may' have an impact as data is not available regarding the nature of employment within hot food takeaways in Norwich; however, it is often the case that hot food takeaway units are owned or provide employment primarily for BAME communities. Refer to Appendix I: Barking and Dagenham LDF: Representations from the Mayor of London: www.london.gov.uk/.../barking_&_Dagenham_LDF_pre_submission_of_core_strategy_appendix.rtf and the Equality Impact Assessment for Waltham Forest's SPD on Hot Food Takeaways: <http://www.pas.gov.uk/pas/aio/590466>

The proposed policy framework regarding transport should: enable the use of sustainable modes of transport through using development design and layout, and restricting car use in areas well serviced by public transport, whilst ensuring less mobile members of society are not penalised (e.g. parking provision for disabled drivers) (positive effect on ENVI, ENV3, ENV6, ENV9, SOCI and SOC8); restrain commuting by car through controlling city centre parking (positive effect on ENVI, ENV3, ENV6 and ENV9); ensure access from new development is sensitive to the urban environment and safety issues (positive effect on SOCI and SOC4); ensure development includes appropriate levels of parking for residents and servicing activities (positive effects on SOCI and SOC4); support car free or low car housing (positive effect on ENVI, ENV3, ENV6, and ENV9); and ensure the additional demand placed by new development on transport infrastructure and servicing is addressed through development contributions (positive effect on SOCI, SOC4, SOC8 and EC3). Potential negative effects are noted with regards parking provision enabling continued car use (negative effect on ENVI, ENV3, ENV6, and ENV9), with the potential for air pollution to be exacerbated particularly in identified air quality management areas in and around the city centre. No significant negative effects are anticipated from this policy cluster.

Recommendations for this policy cluster include: greater support for the provision of electric car charging points in new developments; priority given to car club parking spaces in public parking; and greater support given to car free housing developments.

Next Steps

The Council is currently gathering evidence to help inform development of the Development Management Policies. This includes the conclusions and recommendations arising from this SA report.

There will be an opportunity for individuals, organisations and stakeholders to have their say on the draft policies. This consultation is anticipated in early 2011. The Regulation 25 document will be accompanied by a draft SA report, setting out the likely sustainability effects of the preferred policies as well as any reasonable alternatives. Comments will be welcome on the draft SA report.

1 Introduction

- 1.1 In line with the Government's new format for development plans, Norwich City Council (NCC) is preparing a folder of planning documents for the city of Norwich called a Local Development Framework (LDF). The LDF will contain a number of plans and strategies about land use and spatial planning in Norwich, and will provide the basis for determining planning applications and future development. The LDF is composed of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The Councils of Broadland, Norwich and South Norfolk, supported by Norfolk County Council, have prepared a single Joint Core Strategy DPD. The plan provides the strategy to guide, manage and deliver the growth deemed necessary for the entire area and is currently in the final stages of its preparation, the Examination in Public expected was held in November 2010. The Development Management policies DPD builds on the Joint Core Strategy DPD, and, alongside the proposals map, will set out more detailed guidance on a range of policy issues for the management of development in Norwich.
- 1.2 Norwich City Council lies in a predominately urban area, bordered by Broadland District and South Norfolk District (which together form the greater Norwich area). There are four Neighbourhood Areas in the city, organised by ward boundaries; North, South, East and West.

Sustainability Appraisal

- 1.3 Under the Planning and Compulsory Purchase Act 2004, as amended by the Planning Act (2008), DPDs are subject to a process called Sustainability Appraisal (SA), which aims to assess the impacts of a plan on social, economic, and environmental issues. SA must also meet the requirements of the Strategic Environmental Assessment (SEA) Directive², as transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004. As part of the production of the Norwich Development Management Policies DPD, a sustainability appraisal is being undertaken. The first stage of which was the production of a scoping report which was opened to public consultation in April and May 2010. Following this, Land Use Consultants (LUC) was appointed by NCC in September 2010 to complete the SA of the Norwich Development Management policies DPD.

WHAT IS SUSTAINABILITY APPRAISAL?

SA is a process through which the sustainability implications of a plan or programme, generally prepared by a public authority, are assessed. The SA process aims to test the overall plan, and each policy it contains, against the sustainability objectives which have been agreed for this purpose. The plan then can be altered, if appropriate, to maximise its benefits and minimise its adverse effects. SAs are intended to help planning authorities work towards achieving sustainable development in line with the five principles set out in the UK Sustainable Development Strategy:

Living Within Environmental Limits

Respecting the limits of the planet's environment, resources and biodiversity – to

² European Commission (2001) European Directive 2001/42/EC.

improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations.

Ensuring a Strong, Healthy and Just Society

Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all.

Achieving a Sustainable Economy

Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised.

Promoting Good Governance

Actively promoting effective, participative systems of governance in all levels of society – engaging people’s creativity, energy, and diversity.

Using Sound Science Responsibly

Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

OBJECTIVES AND STRUCTURE OF THE SA REPORT

- I.4 The SEA Directive has detailed requirements for the information to be given in an environmental report which presents the results of an SA/SEA. Those requirements will be met by the final SA Report on the Development Management Policies DPD. At this early stage of DPD preparation, however, this report does not attempt to meet all the reporting requirements of the SEA Directive. Instead, it summarises the likely key issues arising from the policies under consideration for inclusion in the Development Management Policies DPD that will need to be taken into account in more detail as the DPD progresses.
- I.5 This introductory section (**Section 1**) summarises the purpose of the sustainability appraisal and LUC’s role in conducting appraisals of the LDF to date. The remainder of this report is structured into the following sections:
- Section 2 –Norwich City Local Development Framework** describes the LDF and the Development Management Policies DPD, and the progress that has been made on the policies to date.
- Section 3 – SA methodology and framework** describes the methodology that will be used to undertake the SA as the Development Management Policies DPD progresses, including the framework of SA objectives.
- Section 4 – Appraisal** sets out the potential sustainability effects arising from: a ‘business as usual’ scenario; alternative development management policy options; and the preferred policy options.
- Section 5 – Conclusions and next steps**, concludes as to likely sustainability effects that will need to be taken into account in more detail as the Development Management Policies DPD progresses.

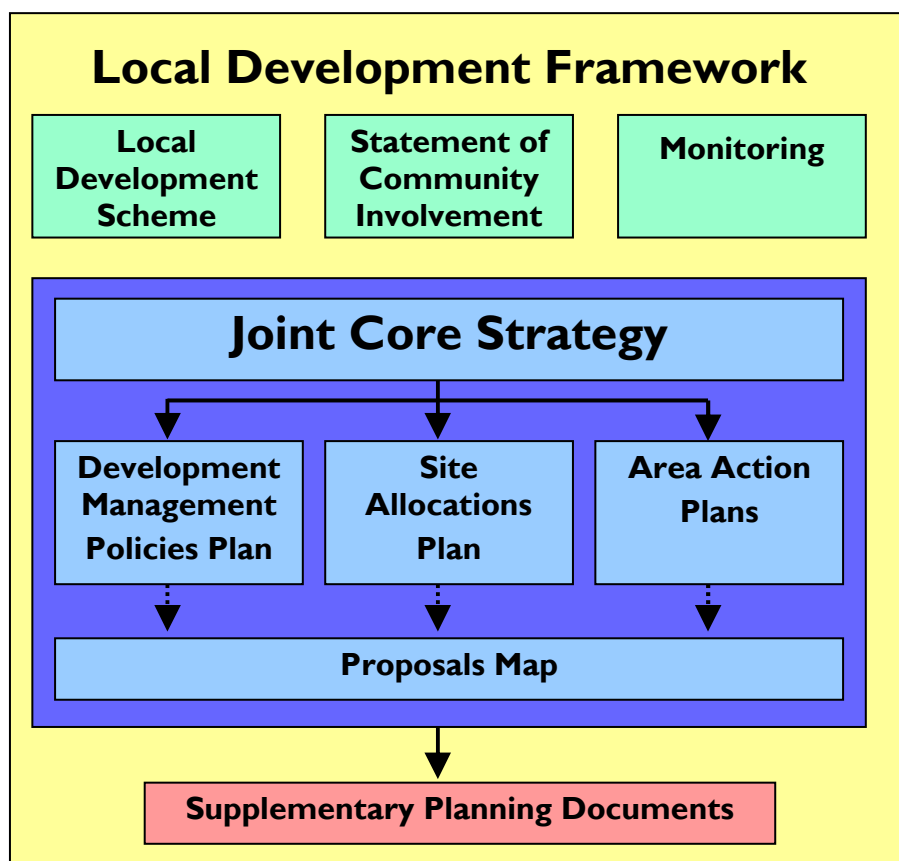
Appendix 1 provides a copy of the SA objective screening exercise

Appendix 2 provides a copy of the appraisal of reasonable alternatives to the proposed policy options, provided by NCC.

2 Norwich Local Development Framework

- 2.1 The relationship and conformity of the Development Management Policies DPD to other documents within the Local Development Framework is set out in the Local Development Scheme³ (LDS) and reproduced in **Figure 2.1**.

Figure 2.1 Local Development Framework Summary⁴



- 2.2 The Coalition Government's recent announcement on the revocation of Regional Strategies, has brought some uncertainties over the future of strategic planning, however, the Greater Norwich Development Partnership (GNDP) reaffirmed in late June its commitment to making progress on the Joint Core Strategy to deliver much needed housing for local people, and encourage investment and growth in the economy of the area.
- 2.3 Many other documents provide ideas, policies and strategies which could affect, or already affect, Norwich. They form part of the evidence used by NCC to develop the Local Development Framework.

DEVELOPMENT MANAGEMENT POLICIES DPD

- 2.4 The emerging Development Management Policies DPD builds on the Joint Core Strategy, outlining detailed policy guidance on a range of policy issues to

³ Local Development Scheme for Norwich 2009 to 2012 (March 2010) Norwich City Council.

⁴ Draft Site Allocations Development Plan Document (November 2009) Norwich City Council

help determine planning applications and provide effective development management.

2.5 The development management policies will replace the saved policies of the City of Norwich replacement local plan which was adopted in November 2004.

2.6 There are 33 proposed development management policies (with additional *alternative* policy options for each *proposed* policy option) covering a broad range of policy topics which have been organised into the following policy themes:

- Planning Statements (1 policy)
- Environment and design (9 policies)
- Telecommunications (1 policy)
- Housing (4 policies)
- Economy (6 policies)
- Communities (4 policies)
- University of East Anglia (1 policy)
- Norwich Airport (1 policy)
- Transport (6 policies)

3 Sustainability Appraisal Methodology and Framework

- 3.1 The Development Management policies DPD relates to how development will be controlled and managed, rather than the scale and location of development (which are addressed at the strategic level in the Joint Core Strategy and at the detailed level in the Site Allocations DPD). The focus of the SA is on the extent to which the policies will help to achieve sustainable outcomes in the delivery of development. In this context, the SA seeks to consider issues such as the criteria and quality standards governing planning permission. Where appropriate, the SA Report also makes recommendations with regards policy detail or criteria.

SUSTAINABILITY APPRAISAL METHODOLOGY

- 3.2 The first stage of the SA process, setting the context and objectives, establishing the baseline and deciding the scope, had already been undertaken through the Development management policies DPD SA Scoping Report (April 2010)⁵. To ensure a consistent approach, the 2010 Scoping report takes into account and builds upon the 2007 Greater Norwich Joint Core Strategy SA Scoping Report⁶.

Task 1: Consultation Responses to the SA Scoping Report

- 3.3 The SA Scoping Report (April 2010) was opened to public consultation over April and May 2010. Responses received as a result of this consultation that are of relevance to the Development Management Policies DPD are set out below:
- **Norfolk Landscape Archaeology** – The following recommendations were made: reference should be made to non-designated assets detailed in the Historic Environment Record; it should be emphasised that the historic environment will be preserved and enhanced whilst being faced by widespread development pressure; and it should be made clear that the historic environment includes archaeological assets and is not solely ‘the built environment’.
 - **NCC (Environment, Transport and Development)** – The following recommendations were made: the contribution of undesignated historic landscapes in creating local distinctiveness should be explicitly recognised; and the importance of understanding these historic landscapes at an early stage of the development process should be emphasised
 - **English Heritage** – The following recommendations were made: baseline information should include information on development pressures and/or enhancements to the heritage assets and character of Norwich resulting from recent developments in the city, especially in the historic core; and

⁵ Norwich Local Development Framework Development Management Policies Development Plan Document Sustainability Appraisal Scoping Report, April 2010, Norwich City Council.

⁶ Joint Core Strategy for Broadland, Norwich and South Norfolk Sustainability Appraisal Scoping Report (December 2010). Broadland Council et al.

recognition of potential pressures on the built environment should be widened to include reference to the archaeological resource.

- **Environment Agency** – The following recommendations were made: in addition to improving energy efficiency, tackling congestion and promoting reduction, reuse and recycling of waste, retrofitting of water efficiency measures/devices should also be encouraged; and the protection of water quality is particularly important in the plan area, given that most of the Norwich City Council area lies within a Source Protection Zone and over a Principal Aquifer, and as such it should be noted that the improvement/protection of water quality extends to groundwater in addition to streams, rivers and lakes, and that contaminated land is adequately remediated before use in order to protect groundwater quality; support would be given to strict water efficiency targets.
- **Natural England** – The following recommendations were made: the increased stress of climate change impacting water availability should be addressed; and Local Nature Reserves and County Wildlife Sites should be acknowledged as part of the key wildlife conservation designations in the plan area.

Task 2: Reviewing the SA Framework

- 3.4 The first task within this SA has been to review the SA framework to ensure the objectives and criteria are fit for purpose for assessment of the Development Management Policies DPD. Recognising that the DPD relates to delivery of development rather than location, in a few cases, those sub-objectives which do not relate to implementation on the ground have been screened out of the assessment. Table 3.1 below sets those sub-objectives that have been screened out (i.e. those that will not be taken forward for the appraisal of policies).

Table 3.1: Screened-out Sustainability Objectives

SA Objective	SA Sub-objective	Reasoning
ENV 9 To make the best use of resources, including land and energy and to minimise waste production	ENV9 (b) Will it promote the use of land in sustainable locations that has been previously developed?	Use of land in sustainable locations that has been previously developed is most likely addressed by Joint Core Strategy policies regarding the efficient use of land, and through the Site Allocations DPD.
	ENV9 (e) Will it avoid the loss of good quality agricultural land and preserve soil resources?	Avoiding the loss of good quality agricultural land and preserving soil resources are most likely addressed by Joint Core Strategy policies, and through the Site Allocations DPD.
	ENV9 (j) Will it increase waste recovery for other means e.g. Energy Generation?	Increasing waste recovery for other means is most likely to be addressed by waste planning policies.
SOC 1 To reduce poverty and social exclusion	SOC1(a) Will it reduce poverty and social exclusion in those areas most affected?	Reduction of poverty and social exclusion is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities', 'The economy', and 'Access', and through the

		Site Allocations DPD.
SOC 3 To improve education and skills	SOC3 (a) Will it improve qualifications and skills for both young people and amongst the workforce?	Improving qualifications and skills for both young people and amongst the workforce is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (b) Will it help to retain key workers and provide more skilled workers from school leavers?	Helping to retain key workers and provide more skilled workers from school leavers are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (d) Will it promote lifelong learning and skills training?	The promotion of lifelong learning and skills training are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3 (e) Will links between lower levels of education and deprivation be addressed?	The links between lower levels of education and deprivation are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	SO6 (b) Will it help to improve earnings?	Improving earnings overall is most likely to be addressed by Joint Core Strategy policies regarding 'The economy'.
EC1 To encourage sustained economic growth	EC1 (c) Will it reduce vulnerability to economic shocks?	Reducing vulnerability to economic shocks is most likely to be addressed by Joint Core Strategy policies regarding 'The economy'.
EC 2 To encourage and accommodate both indigenous and inward investment	EC2 (e) Will it support/encourage rural diversification?	Support/encouraging rural diversification is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting communities' and 'The economy'.
EC 3 To encourage efficient patterns of movement in support of economic growth	EC3(c) Will it reduce journey times between key employment areas and key transport interchanges?	Reducing journey times between key employment areas and key transport interchanges is most likely to be addressed by Joint Core Strategy policies regarding 'Access and Transportation' and in the Site Allocations DPD regarding new sites for employment uses.
	EC3 (d) Will it improve efficiency and sustainability of freight distribution?	Improving efficiency and sustainability of freight distribution is most likely to be addressed by Joint Core Strategy policies regarding 'Access and Transportation' and in the Norwich Area Transportation Strategy.

Task 3: Appraisal of Development Management Policies

- 3.5 Due to the high number of policy options, and to enable a more integrated approach, the appraisal has been structured by policy theme, some of which

are made up of 'clusters' of policies. The policy themes are: *Environment and Design; Economy; Communities; Planning Statements; Housing; Transport; Planning Obligations and University and Airport.*

- 3.6 The SEA Directive requires the assessment to identify, describe and evaluate *'the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives'*. The environmental report should also include information on *'the likely evolution [of the current state of the environment] without implementation of the plan'*.
- 3.7 These requirements have been met by:
- Including under each policy cluster an assessment of the sustainability effects of not implementing the Development Management policies DPD (the 'business as usual' scenario) and instead relying on relevant national policy (as set out in Planning Policy Statements and Planning Policy Guidance), and emerging local policy (as set out in the Submission Joint Core Strategy).
 - Assessing policy options that represent reasonable alternatives (these have been provided by NCC).
 - Including an appraisal of the likely significant effects on the environment (positive and negative) of each policy cluster. This includes reviewing the policy clusters against the streamlined SA framework to help focus on where the 'significant' effects are likely to arise. The SA objectives likely to be significantly affected are therefore listed at the head of the appraisal of each policy cluster.
- 3.8 The appraisal of each policy cluster concludes with recommendations to help maximise sustainability benefits and minimise any adverse effects. Cumulative effects have been considered by drawing together the outcomes from the appraisal of each policy cluster and determining the likely impact of the plan as a whole on the SA objectives.

Task 4: Appraisal of preferred policy options

- 3.9 The council is currently gathering evidence to help inform the preferred policy options for the Development Management Policies DPD. This includes identifying local priorities, ensuring compliance with (but not repeating) national and regional planning policies, using evidence studies which informed the Joint Core strategy and consulting members of the council.
- 3.10 There will be an opportunity for individuals, organisations and stakeholders to have their say on the draft policies, preferred and alternative options and the SA report. This consultation is expected to be in early 2011. All comments from this consultation will be considered to inform the next stage of the plan production.

4 Appraisal of Development Management Policies

- 4.1 This section provides the detailed appraisal of the preferred development management policy options being considered. Policy options are appraised within clusters of policy themes (as detailed in Chapter 3; Task 3). In line with the requirements of the SEA Directive, an appraisal of reasonable alternatives to the published policies has been undertaken. **Appendix 2** provides a copy of this appraisal. The appraisal of each policy cluster concludes with an assessment of whether the preferred options are the most sustainable as compared with the appraised alternatives. Where appropriate, recommendations to help develop the most sustainable option are provided.

PLANNING STATEMENTS

- 4.2 This cluster includes the following policy option:
- Planning Statements (DMI)
- 4.3 This policy outlines the requirement for all planning applications to be accompanied by supporting documentary evidence. The required supporting documents, which vary depending on the complexity of the development and/or characteristics of the site and wider area, are detailed in the Norwich City Council validation checklist and include the following: design and access statement; refuse and servicing statement; draft S106 agreement or undertaking and evidence of title; energy efficiency statement; transport assessment and statements; flood risk assessment; retail assessment; open space assessment; arboricultural assessment; ecological assessment; noise impact assessment; air quality assessment; and land contamination desk top studies and intrusive investigations. Detail is also provided of what is required for applications seeking: listed building consent; conservation area consent; advertisement consent; certificate of lawful use or development; variation or removal of a condition; and prior notification.

SA objectives likely to be significantly impacted

- 4.4 This policy requires that applicants demonstrate that their proposed development has emerged from a full assessment of their site's characteristics. This information in turn informs the development management process and should support an appropriate assessment of the potential positive and negative impacts of a proposal. As such, this policy cluster is indirectly relevant to the following SA objectives:
- ENVI: To reduce the effect of traffic on the environment
 - ENV2: To improve the quality of the water environment
 - ENV3: To improve environmental amenity, including air quality
 - ENV4: To maintain and enhance biodiversity and geodiversity
 - ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic environment

- ENV6: To adapt to and mitigate against the impacts of climate change
- ENV7: To avoid, reduce and manage flood risk
- ENV9: To make the best use of resources, including land and energy and to minimise waste production
- SOC1: To reduce poverty and social exclusion
- 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
- EC4: To improve the social and environmental performance of the economy

Sustainability effects of business as usual

- 4.5 A ‘do nothing’ approach would rely on the *Development Management Policy Annex*⁷ and the accompanying *Guidance on information requirements and validation*⁸ to ensure that applications are accompanied by the required supporting document evidence. Whilst the local validation list is shaped by national requirements, such requirements are not outlined succinctly in one list, but rather result from various circulars and national policy detail/guidance. Having a clear and succinct local list makes the application process clearer and more efficient for applicants and should support the submission of applications which are adequately supported by required document (in turn, supporting the efficiency of the development management process). The local policy framework provides greater clarity and certainty that the effects of proposed development are adequately addressed by the applicant prior to submission. This would not be achieved through reliance only on national guidance. There is no specific policy in the Joint Core Strategy⁹ regarding documents required to support planning applications.

Sustainability effects of policy cluster

- 4.6 This policy should support a clear and efficient development management process, and ensure that appropriate assessments are undertaken of all proposals, taking into account potential positive and negative impacts (e.g. on traffic, ecology, and servicing capacity), and proposals for mitigation. As such, this policy cluster will indirectly have a positive effect on many of the SA objectives (apart from ENV8, SOC3, SOC5, SOC8, EC1, EC2, EC3 and EC4). No significant negative effects are anticipated from this policy.
- 4.7 It is recommended that a ‘sustainability statement’ is added to the list of required supporting documentary, covering topics such as efficient use of land, heritage management, pollution control and water management. As highlighted by the Environment Agency in their consultation response (see

⁷ Development Management Policy Annex: Information requirements and validation for planning applications. CLG, 2010.

⁸ Guidance on information requirements and validation. CLG, 2010.

⁹ Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed submission document, 2009.

page 7), protection of water quality is particularly important in the plan area, given that most of it lies within a Source Protection Zone and over a Principle Aquifer. Water management, especially in the light of the impact of climate change on availability, is also a key issue (highlighted by the Environment Agency and Natural England). As such, ensuring water pollution and management are effectively addressed by applicants is very important. Criteria may be included detailing which types of developments a sustainability statement would apply to, if not for all e.g. for applications of a particular size. It is also recommended that the following change is made to policy wording to ensure it is consistent with national policy: 'Failure to provide support documents essential to the determination of the application will lead to the *application being invalidated*'.

Conclusions

- 4.8 Planning statements enable informed decision making in the development management process. Policy DM1 highlights the requirement of supporting documentation, ensuring that applicants are aware of their obligations and supporting a clear and efficient development management process. Subject to the recommendations outlined above, this policy option is considered to be the most favourable, with the alternative option entailing unnecessary duplication.

ENVIRONMENTAL DESIGN

- 4.9 This cluster includes the following policy options:
- Amenity considerations (DM2)
 - Design principles (DM3)
 - Energy (DM4)
 - Water (DM5)
 - Environmental assets (DM6)
 - Trees and development (DM7)
 - Open space (DM8)
 - The historic environment and heritage assets (DM9)
 - Environmental protection (DM11)
- 4.10 This policy cluster seeks to ensure that sustainability criteria (social, environmental and economic) guide the design of new development. This is to ensure that development is delivered that promotes and enables safe, healthy and thriving communities, mitigates the causes and adapts to the effects of climate change, and that protects the natural and built environments.

SA objectives likely to be significantly impacted

- 4.11 This policy cluster is relevant to the following SA objectives:
- ENVI: To reduce the effect of traffic on the environment

- ENV2: To improve the quality of the water environment
- ENV3: To improve environmental amenity, including air quality
- ENV4: To maintain and enhance biodiversity and geodiversity
- ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic environment
- ENV6: To adapt to and mitigate against the impacts of climate change
- ENV7: To avoid, reduce and manage flood risk
- ENV8: To provide for sustainable use and sources of water supply
- ENV9: To make the best use of resources, including land and energy and to minimise waste production
- SOC1: To reduce poverty and social exclusion
- 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
- SOC5: To build community identity, improve social welfare and reduce crime and anti-social activity
- SOC7: To improve the quality of where people live
- SOC8: To improve accessibility to essential services, facilities and jobs
- EC2: To encourage and accommodate both indigenous and inward investment
- EC3: To encourage efficient patterns of movement in support of economic growth
- EC4: To improve the social and environmental performance of the economy

Sustainability effects of business as usual

- 4.12 A 'do nothing' approach would rely on national and regional policy and Joint Core Strategy policies to guide environmental design. In relation to the various policy topics that come within this cluster, national planning policy aims to: protect amenity (including open space amenity) of residents in the context of new development (PPS3¹⁰), including waste development (PPS10¹¹); promote high quality design (PPSI¹²; PPS3), although it is noted that local planning authorities should develop design policies which are specific to the local area; promote energy efficiency and the development of renewable energy (PPSI Supplement¹³); promote flood risk management, including accommodating the impacts of climate change (PPS25¹⁴); protect biodiversity

¹⁰ Planning Policy Statement 3: Housing. CLG, 2010.

¹¹ Planning Policy Statement 10: Planning for Sustainable Waste Management. ODPM, 2005.

¹² Planning Policy Statement 1: Delivering Sustainable Development. ODPM, 2005.

¹³ Planning Policy Statement 1 (Supplement): Planning and Climate Change. CLG, 2007.

¹⁴ Planning Policy Statement 25: Development and Flood Risk. CLG, 2006.

and networks of natural habitats, with greatest protection afforded to internationally and nationally designated sites (PPS9¹⁵) (specific guidance is not given on trees and woodlands); promote effective local planning for open space provision, based upon local assessments of need and opportunity (PPG17¹⁶); recognise the value of heritage assets to current and future generations, and encourage the positive re-use of heritage assets (draft PPS5¹⁷); and to protect against impacts on health in relation to the quality of land, air or water, and also to protect these natural resources from pollution resulting from development (PPS23¹⁸).

4.13 Joint Core Strategy¹⁹ policies relevant to this policy cluster are:

- Policy 1 (Addressing climate change and protecting environmental assets) which seeks to ensure that *'all development is located and designed to use resources efficiently, minimise greenhouse gas emissions and be adapted to climate change and more extreme weather'*. This policy also seeks to protect nature conservation and heritage assets and contribute to the provision of open space.
- Policy 2 (Promoting good design) which seeks to ensure that *'all development is designed to the highest possible standards, creating a strong sense of place'*.
- Policy 3 (Energy and water) which states that *'development in the area will be low or zero carbon and local renewable energy production will be maximised'*.

4.14 Reliance on the 'business as usual' framework would result in policy gaps given the locally-specific sustainability issues of the plan area (highlighted in the SA Scoping Report, April 2010) and the need for a locally-specific policy framework to address these. For example, Norwich has a rich history dating back to the Roman era, with 17% of the city designated as conservation areas, including the whole of the city centre, and a wealth of registered heritage assets. Whilst the national policy framework addresses nationally designated heritage assets, policy option DM9 provides a local policy level which seeks to protect locally identified heritage assets and defined areas of archaeological interest, and promote heritage interpretation within new development schemes. In addition, in the case of renewable energy proposals (DM4), the national policy framework requires the development of locally defined criteria for assessing applications for renewable energy development. More generally, the proposed policy framework provides a layer of detail regarding the management of development that is not present in either the national or emerging local policy frameworks and that will better support the delivery of development that meets sustainability objectives for the plan area – for example: the detailing of locally significant views to inform development; the identification and protection of green infrastructure opportunity areas; and policy detail regarding the protection of trees.

¹⁵ Planning Policy Statement 9: Biodiversity and Geological Conservation. ODPM, 2005.

¹⁶ Planning Policy Guidance 17: Planning for open space, sport and recreation. ODPM, 2002.

¹⁷ Planning Policy Statement: Consultation – Consultation Paper on a new Planning Policy Statement 5: Planning for the Historic Environment. CLG, 2009.

¹⁸ Planning Policy Statement 23: Planning and Pollution Control. ODPM, 2004.

¹⁹ Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed submission document, 2009.

Sustainability effects of policy cluster

- 4.15 All of the proposed policies within this cluster build on and add further detail and local specificity to the national and local policy framework that already exists or is due to exist alongside this DPD. The proposed policies provide a thorough framework, which should support: future development that meets the needs of all of its users and is conducive to promoting safe (in relation to crime, environmental protection and flood risk) (positive effect on SOC1, SOC4, SOC5, ENV6, and ENV7), healthy and high quality communities (positive effect on SOC1, SOC2, SOC4, SOC7, and SOC8); the protection of the natural and built environment, and where possible enhancement through new development (ENV1, ENV2, ENV4, and ENV5); and minimisation of the extra pressure placed by new development on existing energy resources, with energy efficiency, the development of renewable energy and enabling sustainable modes of travel proposed (positive effect on ENV6, ENV8 and ENV9). Policy DM5 states that *'Sites identified within the site allocations DPD or sites within identified regeneration areas will not be subject to the sequential test although the sequential approach should be applied when locating development within the site to ensure that the most vulnerable development is located within the lowers risk areas of the site'*. This specification may result in a negative effect on ENV7 (To avoid, reduce and manage flood risk) as development may be located in areas prone to flood risk that otherwise would not have been developed on (i.e. on sites out with regeneration areas).
- 4.16 Overall, the sustainability effects of this policy cluster should be positive (including some significant positive effects) and long-term, with possible negative impacts resulting from potential development on sites prone to flood risk within regeneration areas. Effects would be both direct and indirect. For example, supporting the creation of a biodiversity-rich environment through landscaping criteria (Policy DM3) directly supports biodiversity objectives; comparatively, criteria regarding the provision of adequate open space should indirectly support healthier communities. No significant negative effects are anticipated from this policy cluster.
- 4.17 The following recommendations are made with regards specific policies in this cluster:
- **Policy DM2:** Greater clarification should be provided regarding the meaning of *'high standard of amenity'* and how this will be measured in relation to new development proposals.
 - **Policy DM2:** Given that there are areas within Norwich where a significant number of properties fail to meet the 'decent home' standards (SA Scoping Report, April 2010), it is recommended that extra detail is included within this policy stating that the upgrading of poor quality housing will be supported.
 - **Policy DM3:** In relation to landscaping criteria (i) and creating a biodiversity-rich environment (b), drought resistant native plant species could also be promoted to support a landscape that is adaptable to climate change.

- **Policy DM3:** Greater detail could be provided in relation to how the public realm within new developments can be designed to reduce fear of crime, and potentially actual levels of crime. Such ‘safety by design’ features’ include providing for adequate natural surveillance, restricting high front boundary walls, avoiding secluded alcoves, and encouraging a mix of housing types in a development to increase the likelihood of occupation at different times of the day.
- **Policy DM3:** within *h) Materials and details*, a recommendation could be included regarding the adoption of waste management plans (particularly for large-scale developments) during the construction phase.
- **Policies DM3 and DM8:** Greater emphasis should be placed on the flexibility and adaptability of landscaping (Policy DM3(i)) and open spaces (Policy DM8) to allow for multi-functional usage and to promote open space that more effectively meets the needs of *all* of its users. For example, providing open space which is not single-use or overly prescriptive, but that allows for a broad range of uses (e.g. recreation (including for children and youth), biodiversity enhancement, and food growing, and water management).
- **Policy DM5:** Reference should be made, either in the policy or supplementary text, to the water efficiency requirements of new development outlined in proposed Joint Core Strategy Policy 3 (this does not require detail of Policy 3 requirements, but rather a justification for why water efficiency is not included within this DPD). Highlighting water efficiency requirements is important given the existing pressure on water resources in the plan area, with East Anglia being one of the driest areas of the country. This was highlighted in consultation responses from both the Environment Agency (*‘support should be given to strict water efficiency targets’*) and Natural England (*‘the increased stress of climate change impacting water availability should be addressed’*).
- **Policy DM6:** As well as within Green Infrastructure Opportunity Areas, it is also recommended that, where possible, opportunities are sought through all new development, to establish ‘green links’ between existing and new green spaces.
- **Policy DM8:** As with Policy DM22, it is recommended that a statement is included within this policy regarding the involvement of the local community in developing appropriate solutions for the replacement and/or improvement of existing open spaces, including allotments.
- **Policy DM8:** It is recommended that additional detail is provided clarifying that any assessment of open space requirements includes both quantitative and qualitative data, such that the qualitative value of existing open spaces are recognised before these are deemed to be ‘surplus to requirements’. In addition, where open spaces are deemed to be ‘surplus to requirements’ because the *type* of open space is not meeting local need and hence the space is not being used, these spaces should be modified to meet need rather than deemed surplus.

- **DM11:** In its consultation response, the Environment Agency highlighted the importance of protecting water quality in the plan area: *‘the protection of water quality is particularly important in the plan area, given that most of the Norwich City Council area lies within a Source Protection Zone and over a Principle Aquifer, and as such it should be noted that the improvement/protection of water quality extends to groundwater in addition to streams, rivers and lakes, and that contaminated land is adequately remediated before use in order to protect groundwater quality’*. It is recognised that the supplementary text states that any method of treatment of contaminated land must ensure that water resources and other environmental resources are not adversely affected. It is recommended that reference is made to water quality within the policy text, whilst detail is included within the supplementary text, recognising that water resources refer to both groundwater and surface water.

Conclusions

- 4.18 Ensuring sustainability criteria (social, environmental and economic) are adequately addressed within the design of new development is essential given the long-lasting impact that such development can have, and the potential for development to promote and facilitate safe, healthy and thriving communities, mitigate the causes and adapt to the effects of climate change, and protect the natural and built environments. It is essential that such design is informed by an understanding of the locality (e.g. the make-up of the local community, the character of the natural and built environments, and how the plan area and region will be impacted by climate change). Subject to the recommendations outlined above, this cluster of policy options is considered to be the most favourable. The alternative options would, in cases, have both greater positive effects in relation to specific issues (e.g. greater protection for designated environmental assets and open space), but also greater negative effects (e.g. in relation to provision of space and facilities to enable residents to live comfortably and conveniently, and in relation to using available space most effectively and efficiently). It is considered that the preferred cluster of policy options strikes a good balance between having criteria which seek to positively control the impact of development, whilst ensuring criteria is not as stringent and prescriptive so as to negatively impact development delivery.

TELECOMMUNICATIONS

- 4.19 This cluster includes the following policy option:
- Telecommunications (DM10)
- 4.20 This policy outlines criteria for the development of telecommunication infrastructure. It seeks to ensure that such development only occurs where there is no feasible ‘site sharing’ option available, and that development would not have an unacceptable impact on the character and appearance of the area and on amenity.

SA objectives likely to be significantly impacted

- 4.21 This policy cluster is relevant to the following SA objectives:

- ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic environment
- ENV9: To make the best use of resources, including land and energy and to minimise waste production
- SOC2: To maintain and improve the health of the whole population and promote healthy lifestyles
- SOC8: To improve accessibility to essential services, facilities and jobs
- EC1: To encourage sustained economic growth
- EC2: To encourage and accommodate both indigenous and inward investment

Sustainability effects of business as usual

- 4.22 A ‘do nothing’ approach would rely on national policy and the emerging Joint Core Strategy policies to guide telecommunications development within the plan area. PPG8²⁰ gives detailed guidance on planning for telecommunications development, including requirements with regards: discussions and consultation; environmental considerations; health considerations; and other development.
- 4.23 Joint Core Strategy²¹ policies relevant to this policy cluster are:
- Policy 10 (Locations for major new or expanded communities in the Norwich Policy Area), an objective of which is to ‘*ensure high quality telecommunications and adequate energy supply and sewerage infrastructure*’.
- 4.24 The ‘business as usual’ framework already provides detailed policy guidance on telecommunications development, meaning the potential sustainability effects of such development would be managed by this existing framework – positive effects with regards ensuring sufficient provision to meet public and business demand (positive effect on SOC8 and EC3) and negative effects on the landscape (ENV5). However, policy DM10 does build on this national framework by providing some more locally defined criteria (i.e. relating to designated and undesignated heritage assets and green infrastructure protection and opportunity areas); as such, without DM10, these assets may not be afforded as high a degree of protection as without it. In relation to Joint Core Strategy Policy 10, policy DM10 provides detail as to how the objective to ensure sufficient telecommunications infrastructure will be delivered and managed at a proposal-level.

Sustainability effects of policy cluster

- 4.25 Policy DM10 will have both positive and negative sustainability effects. Whilst it should enable the delivery of sufficient telecommunications infrastructure to meet a future growth in community demand (positive effect on SOC1 and EC2) without incurring an unreasonable impact on the character of the area, amenity and highway functioning, any telecommunications development will inherently have negative visual and landscape and townscape impacts, in turn

²⁰ Planning Policy Guidance 8: Telecommunications. ODPM, 2001.

²¹ Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed submission document, 2009.

potentially impacting amenity (negative effect on ENV5, SOCI and SOC7). No significant negative effects are anticipated from this policy.

Conclusions

- 4.26 Telecommunications developments are an essential component of an area's infrastructure, meeting business and public need. Policy DM10 enables sufficient development of the telecommunications network, but seeks to restrict the impact of such development, such as on the character of the area, and ensure the existing network is used most efficiently. This policy option is considered to be the most favourable, with the alternative option potentially resulting in overly prescriptive criteria that may restrict sufficient provision of telecommunications infrastructure to meet need.

HOUSING

- 4.27 This cluster includes the following policy options:
- Principles for all residential development (DM12)
 - Flats, buildings of multiple occupation and residential institutions (DM13)
 - Gypsy and Travellers and Travelling Showpeople (DM14)
 - Loss of residential accommodation (DM15)
- 4.28 This policy cluster seeks to ensure that sustainability objectives guide the siting, design and delivery of new housing development. As such, housing development should be delivered that meets the needs of its residents, effectively addresses the nature of housing demand in the plan area, and is sensitive to the local environment, townscape and landscape.

SA objectives likely to be significantly impacted

- 4.29 This policy cluster is relevant to all of the SA objectives, apart from ENV7 (To avoid, reduce and manage flood risk).

Sustainability effects of business as usual

- 4.30 A 'do nothing' approach would rely on national policy and the emerging Joint Core Strategy policies to guide housing delivery within the plan area. In relation to the various policy topics that come within this cluster, national planning policy (PPS3²²) has an overarching objective to create '*sustainable, inclusive, mixed communities in all areas*', with an emphasis on ensuring housing meets the needs of the community and in making the housing market more accessible. Detail is provided with regards how to achieve a mix of housing (both type and tenure) and the siting of housing. The national policy framework is quite detailed but provides space for local specificity (e.g. affordable housing targets, provision for gypsy and traveller and travelling showpeople).
- 4.31 Joint Core Strategy²³ policies relevant to this policy cluster are:

²² Planning Policy Statement 3: Housing. CLG, 2010.

²³ Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed submission document, 2009.

- Policy 1 (Addressing climate change and protecting environmental assets) which seeks to ensure that *‘all development is located and designed to use resources efficiently, minimise greenhouse gas emissions and be adapted to climate change and more extreme weather’*. This policy also seeks to protect nature conservation and heritage assets and contribute to the provision of open space.
 - Policy 2 (Promoting good design) which seeks to ensure that *‘all development is designed to the highest possible standards, creating a strong sense of place’*.
 - Policy 4 (Housing delivery) outlines an overall housing target for the plan area, then provides a broad outline of the approach for delivery, including housing mix, affordable housing (with a 40% target), and gypsy and traveller provision (with detailed pitch targets and locations).
 - Policy 10 (Locations for major new or expanded communities in the Norwich Policy Area) which includes the objectives *‘to deliver healthy, sustainable communities with locally distinctive design’* and *‘provide for a wide range of housing need’*.
 - Policy 12 (The remainder of the Norwich urban area, including the fringe parishes) which includes the objectives *‘to identify and regenerate tired suburbs and promote neighbourhood-based renewal’*, and *‘for small and medium-scale redevelopments to increase densities, where a design and access statement demonstrates that an improvement to townscape will result’*.
- 4.32 The ‘business as usual’ framework provides a thorough framework to guide development. However, there would be no certainty relating to housing density and lifetime homes as no locally-specific target would be available. In addition, without a locally-specific policy framework, proposals for the conversion of existing buildings to flats, bedsits and houses in multiple occupation, and development resulting in the loss of residential units, would not be sufficiently addressed.

Sustainability effects of policy cluster

- 4.33 Most of the proposed policy text within this cluster build on and add further detail and local specificity to the national and local policy framework that already exists or is due to exist alongside this DPD. The proposed policy framework should deliver housing that: meets identified levels and types of demand (positive effect on SOC4 and SOC7); is adaptable and sensitive to the needs of its residents (positive effect on SOC1, SOC4 and SOC7); is sensitive to the environment, townscape and landscape (positive effect on ENV4 and ENV5); and promotes mixed communities (positive effect on SOC5). It should be recognised that, whilst the policy framework seeks to limit these, housing delivery will inherently result in some negative sustainability impacts – for example, extra pressure, whether this be minimal or not, on resources within and supplying the plan area (e.g. energy and water) (negative effects on ENV1, ENV2, ENV3, ENV8 and ENV9), and extra pressure on local facilities and services (negative effect on SOC8).

- 4.34 As such, the sustainability effects of this policy cluster would be both positive and negative, and predominantly long-term. In addition, effects are both direct and indirect. For example, locating housing sites with good pedestrian access to local bus routes should indirectly result in reduced vehicle emissions; comparatively, restricting loss of residential accommodation directly supports sufficient provision of housing to meet demand. No significant negative effects are anticipated from this policy cluster.
- 4.35 The following recommendations are made with regards specific policies in this cluster:
- **Policy DM12:** The SA Scoping Report (April 2010) identifies housing affordability as a key issue. It is recommended that this policy builds on the affordable housing target outlined in Joint Core Strategy Policy 4. For example: detail should be provided regarding how the provision of affordable housing will be guided by the nature of demand (e.g. the size and type of affordable housing, which may vary depending on the location of the housing development (should be guided by the findings of the Housing Needs Assessment)); an objective could be included to ensure that affordable housing is fully integrated within housing developments (i.e. to steer away from the tendency for affordable housing to ‘stick out’ within housing developments); and an objective could be included which supports the delivery of ‘intermediate’ housing, to meet the needs of those seeking to gain a first step on the housing ladder (as outlined in PPS3).
 - **Policy DM12:** PPS3 states that local authorities should set out an approach for seeking developer contributions to facilitate provision of affordable housing. Whilst there is the presumption that affordable housing would be provided ‘on-site’, there may be situations where this is not feasible, and there may be a need to provide policy guide for such situations, such as off-site provision or a financial contribution in lieu of on-site provision (coupled with strict guidelines ensuring such an approach would contribute to the creation of mixed communities in the local authority area).
 - **Policy DM12:** The SA Scoping Report (April 2010) states that there are significant areas of terraced housing adjacent to the city centre which comprise the largest proportion of homes that fail to meet the ‘decent home’ standards. A statement could be included within this policy regarding supporting the upgrading of the existing housing stock to meet housing criteria outlined in this policy.
 - **Policy DM12:** It is recommended that this policy cross-refers to policy DM4 regarding the requirement to maximise energy efficiency in all new development. Extra detail could be included regarding supporting schemes which seek to meet the highest level of the Code for Sustainable Homes (builds on Joint Core Strategy Policy 3).
 - **Policies DM12 and DM14:** PPS3 states that ‘*Local Planning Authorities should develop a shared vision with their local communities of the type of residential environments they wish to see*’. It is recommended that a positive statement is included within these policies regarding the involvement of

the local community, including gypsy and traveller and travelling showpeople communities, in developing appropriate solutions for housing provision.

- **Policy DM14:** It is recommended that further detail is included regarding appropriate on-site conditions, including ground conditions and levels of land, and provision of services (e.g. waste collection), and that reference is made to policy DM5 regarding not locating development within areas of flood risk.
- **Policy DM14:** It is recognised that gypsy and traveller and travelling showpeople communities may run their businesses from the site on which their caravans are stationed (ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites). It is recommended that a statement is included within this policy, or within the supplementary text, stating that wherever possible, sites will be supported that are suitable for mixed residential and business uses, having regard to safety and amenity of the occupants and neighbouring residents.

Conclusions

- 4.36 The SA Scoping Report (April 2010) states that creating balanced and integrated communities, developing housing of all types and tenures, and ensuring access to the housing market for young people, are key issues for the plan area that should be addressed by the Local Development Framework. This policy cluster should support the delivery of housing development that meets the needs of its residents, effectively addresses the nature of housing demand in the plan area, and is sensitive to the local environment, townscape and landscape. Subject to the recommendations outlined above, this cluster of policy options is considered to be the most favourable. The alternative options would, in cases, have both greater positive effects in relation to specific issues (e.g. greater protection for residential units), but also greater negative effects (e.g. in relation to protecting the character of the local area if less stringent standards are applied to gypsy and traveller accommodation). It is considered that the preferred cluster of policy options strikes a good balance between having criteria which seek to positively control the impact of housing development, whilst ensuring criteria is not as stringent and prescriptive so as to negatively impact housing delivery.

ECONOMY

- 4.37 This cluster includes the following policy options:
- Employment development (DM16)
 - Protection of small and medium scale business (DM17)
 - Town centres uses (DM18)
 - Offices (DM19)
 - Change of use within retail centres (DM20)
 - District and Local retail centres (DM21)

- 4.38 This policy cluster seeks to ensure that development is managed to protect existing business and employment activities, enable future business and employment growth, ensure this growth is concentrated in locations that support sustainable access, and support and protect the vitality and diversity of town and local centres, including through seeking a balance between different centre uses.

SA objectives likely to be significantly impacted

- 4.39 This policy cluster is relevant to the following SA objectives:
- ENVI: To reduce the effect of traffic on the environment
 - ENV3: To improve the environmental amenity, including air quality
 - ENV6: To adapt to and mitigate against the impacts of climate change
 - ENV8: To provide for sustainable use and sources of water supply
 - ENV9: To make the best use of resources, including land and energy and to minimise waste production
 - SOC1: To reduce poverty and social exclusion
 - SOC2: To maintain and improve the health of the whole population and promote healthy lifestyles
 - SOC6: To offer more opportunities for rewarding and satisfying employment for all
 - SOC8: To improve accessibility to essential services, facilities and jobs
 - EC1: To encourage sustained economic growth
 - EC2: To encourage and accommodate both indigenous and inward investment
 - EC3: To encourage efficient patterns of movement in support of economic growth
 - EC4: To improve the social and environmental performance of the economy

Sustainability effects of business as usual

- 4.40 A 'do nothing' approach would rely on national and regional policy and Joint Core Strategy policies to guide economic growth and related developments. In relation to the various policy topics that come within this cluster, national planning policy (PPS4²⁴) outlines key issues that local development plan documents should address when planning for sustainable economic growth, including safeguarding land from other non-economic uses, setting out a strategy for the management and growth of centres over the plan period, and planning for a diverse range of uses.

- 4.41 Joint Core Strategy²⁵ policies relevant to this policy cluster are:

²⁴ Planning Policy Statement 4: Planning for Sustainable Economic Growth. CLG, 2009.

²⁵ Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed submission document, 2009.

- Policy 5 (The economy) which seeks to ensure that *'the local economy will be developed in a sustainable way to support jobs and economic growth both in urban and rural locations'* and that sufficient employment land will be allocated in accessible locations to meet identified need.
- Policy 9 (Strategy for growth in the Norwich Policy Area) which outlines the strategy for the delivery of employment development at strategic locations within this policy area (includes an office floorspace target of 100,000m²; and proposals for the expansion of health, higher education and science park activity)
- Policy 11 (Norwich City Centre) which outlines development proposals for Norwich City Centre, including enhancing its retail and employment centre functions.
- Policy 12 (The remainder of the Norwich urban area, including the fringe parishes) which outlines development proposals for this area, including the retention and improvement of local jobs, including through protecting existing employment allocations

4.42 Under the 'business as usual' framework, the national policy framework outlines key objectives for sustainable economic growth and provides a broad framework which local plans should seek to 'flesh' out based upon their local evidence base and through policies that enable delivery against these objectives. The emerging Joint Core Strategy policies outline the local strategies for economic development in the plan area as a whole, and in more specific policy areas, but detail is not included as to how these strategies will be delivered. This detail is provided by the proposed development managed policies. For example, Policy 11 states that the role of Norwich City Centre will be promoted by *'expanding its function as an employment centre, including provision of high quality office premises'*; development management policy option DMI9 details how this will be delivered (i.e. through protecting the redevelopment or change of use of office space, supporting upgrading of existing poor quality office space, and requiring that new development in 'office areas' must provide a substantial proportion of office floorspace). Therefore, in the absence of the proposed development policies in this cluster, the Joint Core Strategy policies could not be effectively delivered. In addition, an element of control is necessary, particularly given the current economic climate, to ensure employment/indigenous investment is supported and protected.

Sustainability effects of policy cluster

4.43 All of the proposed policies within this cluster build on and add further detail and local specificity to the national and local policy framework that already exists or is due to exist alongside this DPD. The proposed policies provide a policy framework which should: support economic growth and related development within the plan area, including small and medium sized businesses (positive effect on EC1 and EC2); concentrate growth in accessible locations (i.e. town and local centres) which will enable people to chose more sustainable modes of transport, and support and protect the vitality and diversity of town and local centres, including through seeking a balance

between different centre uses (positive effect on EC1, EC2, EC3 and EC4). Whilst the policy framework seeks to promote sustainable access to employment and retail centres, economic growth within the plan area may still result in an increase in traffic and vehicle emissions as a result of increased passenger miles (negative effect on ENV1, ENV3, ENV3, ENV6 and EC4). This also applies to energy and water resources, with economic growth inherently adding extra pressure, whether this be minimal or not, to resources within and supplying the plan area (negative effect on ENV8 and ENV9).

4.44 As such, the sustainability effects of this policy cluster would be both positive (including significantly positive) and negative, and predominantly long-term. In addition, effects are both direct and indirect. For example, the retention of office space directly ensures there is available floorspace for incoming investment; comparatively, protecting and promoting the vitality and viability of local centres should indirectly result in the use of more sustainable modes of transport, including walking and cycling. No significant negative effects are anticipated from this policy cluster.

4.45 The following recommendations are made with regards specific policies in this cluster:

- **Policy DM17:** It is recommended that reference is made to existing markets (street and farmers markets) within the plan area, with a policy aim to protect these and to support opportunities for additional markets where there is demand. This links to Policy 5 of the emerging Joint Core Strategy which states that the rural economy will be supported by the '*promotion of farmers markets, farm shops and cottage industry*'. Street and farmers markets support small and medium scale businesses, can be important in linking food producers and consumers, and add to the diversity of retail options available to residents and visitors.
- **Policy DM20:** This policy refers to areas/premises that suffer from long term vacancies, and that on such sites permission may be granted for non retail uses. There is detail within the supplementary text regarding vacant properties stating that '*temporary planning permission may be granted for community uses within vacant premises where this would improve the vitality of the area*'. We recommend that this detail is included with the policy text to ensure that the potential for positive effects resulting from such an approach are more likely realised. In addition, this would support Joint Core Strategy Policy 5 which seeks to meet the '*needs of small, medium and start-up businesses*' and use '*innovative approaches in new and existing residential developments to encourage local work and business opportunities*'. The SA Scoping Report (April 2010) also states that a key focus in promoting growth in and around Norwich should be in assisting business start-up growth, and innovative use of vacant sites, such as pop-up shops²⁶, could be a possible mechanism through which this support could be provided.

²⁶ A pop-up retail space is a venue that is temporary (http://en.wikipedia.org/wiki/Pop-up_retail) — the trend enables vacant spaces to be used in innovative ways for a short period of time until a long-term use can be found.

- **Policy DM21:** Greater emphasis could be placed on the role of local clusters of shops (sometimes referred to as ‘neighbourhood centres’) which play a crucial role in ensuring that residents’ day-to-day needs can be met easily and without the need to use private motor vehicles. Whilst other centres within the hierarchy can meet this need (e.g. town, local and district centres), some residential areas may not be in easy access of these larger scale centres, reinforcing the importance of neighbourhood centres in meeting retail need.
- **Priority areas:** The SA Scoping Report (April 2010) states that there is potential for the spatial distribution of new employment opportunities to take into account accessibility to deprived sections of the population (e.g. the western sector). It is recommended that the distinct differences in deprivation levels between the different areas of the city are referenced within text supporting the economic development policies (e.g. DM19), such that attention is given to capitalising on opportunities to support growth within more deprived areas (e.g. where vacant sites exist in these areas).

Conclusions

- 4.46 This policy cluster seeks to protect existing business and employment activities, enable future business and employment growth, and focus this growth in locations that support sustainable access, and support and protect the vitality and diversity of town and local centres. Subject to the recommendations outlined above, this cluster of policy options is considered to be the most favourable. The alternative options would, in cases, have both greater positive effects in relation to specific issues (e.g. greater protection for office space), but also greater negative effects (e.g. insufficient protection afforded to small and medium sized businesses). It is considered that the preferred cluster of policy options strikes a good balance between having criteria which are flexible enough to positively support future growth of the economy, whilst ensuring that this growth does not negatively impact on indigenous and small-scale economic activity, or the vitality and viability of centres and the plan area more generally.

COMMUNITIES

- 4.47 This cluster includes the following policy options:
- Community facilities (DM22)
 - Evening, leisure and the late night economy (DM23)
 - Hot food takeaways (DM24)
 - Retail warehouses (DM25)
- 4.48 This policy cluster seeks to ensure that the provision of community, leisure, evening and large retail facilities and services is consistent with sustainability objectives, such that it supports the economic viability and vibrancy of centres and meets the needs of the community, whilst being sensitive to the character of the locality, the environment, and amenity issues.

SA objectives likely to be significantly impacted

- 4.49 This policy cluster is relevant to all of the SA objectives, apart from ENV2 (To improve the quality of the water environment); ENV4 (To maintain and enhance biodiversity and geodiversity); ENV7 (To avoid, reduce and managed flood risk); ENV8 (To provide for sustainable use and sources of water supply); SOC3 (To improve education and skills); and SOC4 (To provide the opportunity to live in a decent, suitable and affordable home).

Sustainability effects of business as usual

- 4.50 A 'do nothing' approach would rely on national policy and the emerging Joint Core Strategy policies to guide 'community-related' development within the plan area. In relation to the various policy topics that come within this cluster, PPS1²⁷ states that local policy should address accessibility to community facilities. PPS4²⁸ states that local policy should '*encourage a diverse range of complementary evening and night-time uses which appeal to a wide range of age and social groups*'. It also states that policies should '*set out the number and scale of leisure developments they wish to encourage taking account of their potential impact*'. There is no national policy guidance regarding hot food takeaways.
- 4.51 Joint Core Strategy²⁹ policies relevant to this policy cluster are:
- Policy 5 (The economy) which states that leisure industries will be promoted in the plan area.
 - Policy 8 (Culture, leisure and entertainment) which states that '*existing cultural assets and leisure facilities will be maintained and enhanced. The development of new or improved facilities...will be promoted*'.
 - Policy 10 (Locations for the major new or expanded communities in the Norwich Policy Area) which includes an objective to include new or expanded community and recreational facilities within each major development location.
 - Policy 11 (Norwich City Centre) which seeks to promote the role of the centre, including through expanding the early evening economy and leisure uses across the city centre, and late night activities focused in identified areas.
- 4.52 The 'business as usual' framework does not provide sufficient detail regarding how sufficient community facilities will be delivered and how the evening, leisure and the late night economy will be both supported and managed to minimise negative impacts on amenity and character. For example, supporting accessibility to community facilities is an objective of PPS1, whilst policy DM22 outlines how this objective will be delivered at the local level; in this case, through protecting existing facilities and provision of new facilities. In addition, development management policies DM24 and 25 address issues that are specific to the plan area (hot food takeaways and retail warehouses), and

²⁷ Planning Policy Statement 1: Delivering Sustainable Development. ODPM, 2005.

²⁸ Planning Policy Statement 4: Planning for Sustainable Economic Growth. CLG, 2009.

²⁹ Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed submission document, 2009.

as such, without this local level framework, there would be a policy gap with regards addressing these issues.

Sustainability effects of policy cluster

- 4.53 Most of the proposed policy text within this cluster build on and add further detail and local specificity to the national and local policy framework that already exists or is due to exist alongside this DPD. The proposed policy framework should: protect and improve the provision of community facilities (positive effect on SOC8); support a diverse and vibrant range of leisure, evening and night-time uses which do not negatively impact on the character, amenity and vitality of the city centre, bringing both social benefits and economic benefits to the community (positive effect on ENV5, SOCI, SOC8, EC1, EC3 and EC4); ensure that any future expansion of hot food takeaways in identified centres does not negatively impact amenity and the vitality within these areas (SOC2, SOC7, EC1, EC2 and EC4); and restrict further expansion in retail warehouses and the sale of non-bulky goods from existing warehouses in Norwich such that the vitality and viability of the city centre is supported through ensuring these retail spaces do not draw consumers away from the city centre (positive effect on EC1 and EC3). Whilst these policies seek to limit any negative impact they may incur, in the case of Policy DM23, there are inherent negative impacts that will arise from the enhancement of the evening, leisure and late night economies, for example with regards potential increases in noise intrusion or traffic generation as the city centre attracts more evening visitors (negative effect on ENV1, ENV3, ENV6, ENV9, SOC7 and EC4). Restricting hot food takeaways may also have a negative impact with regards supporting employment within Black and Minority Ethnic (BAME) communities³⁰ (negative effect on EC2); concurrently it is also recognised that this restriction may support access to healthier food options (positive effect on SOC2).
- 4.54 As such, the sustainability effects of this policy cluster would be both positive and negative, and predominantly long-term. In addition, effects are both direct and indirect. For example, Policy DM25 directly restricts the potential development of additional warehouse space and in turn the direct impact that such development could potentially have on the character of the townscape; restricting further retail warehouse space indirectly protects the vitality and viability of the city centre. No significant negative effects are anticipated from this policy cluster.
- 4.55 The following recommendations are made with regards specific policies in this cluster:
- **Policy DM23:** PPS4 states that when assessing the need for leisure development local planning authorities should take account of both the quantitative and qualitative need for additional floorspace for different types of retail and leisure developments. The supplementary text for this policy details the quantity of additional leisure space required; if there is

³⁰ The text says that it 'may' have an impact as data is not available regarding the nature of employment within hot food takeaways in Norwich; however, it is often the case that hot food takeaway units are owned or provide employment primarily for BAME communities. Refer to Appendix I: Barking and Dagenham LDF: Representations from the Mayor of London: www.london.gov.uk/.../barking_&_Dagenham_LDF_pre_submission_of_core_strategy_appendix.rtf and the Equality Impact Assessment for Waltham Forest's SPD on Hot Food Takeaways: <http://www.pas.gov.uk/pas/aio/590466>

qualitative data within the Norwich Sub Region Retail and Town Centres Study, it is recommended that this also be included within the supplementary text to provide more detail regarding the types of leisure development that will be supported, and how this provision will seek to meet the needs of the whole community, particularly those living in the more deprived sections of the city.

Conclusions

- 4.56 This policy cluster should ensure that the provision of community, leisure, evening and large retail facilities and services supports the economic viability and vibrancy of centres and meets the needs of the community, whilst being sensitive to the character of the locality, the environment, and amenity issues. Subject to the recommendations outlined above, this cluster of policy options is considered to be the most favourable. The alternative options would, in cases, have both greater positive effects in relation to specific issues (e.g. greater protection for community facilities), but also greater negative effects (e.g. impacts on residential amenity from the late night economy). It is considered that the preferred cluster of policy options strikes a good balance between having criteria which are flexible enough to positively support the future growth of evening, leisure and late night uses, in line with demand, whilst ensuring that this growth does not negatively impact on residential amenity, the character of the area and the environment. This policy cluster should also ensure adequate provision of community facilities, whilst ensuring this provision is flexible enough so as to be able to respond to changing economic and social circumstances.

UNIVERSITY OF EAST ANGLIA

- 4.57 This cluster includes the following policy option:
- University of East Anglia (DM26)
- 4.58 This policy regards the delivery of development within the UEA campus, and seeks to ensure that such development does not negatively impact on the landscape and townscape in the locality, that the potential transport impacts resulting from the growth of the university are managed (through the UEA Travel Plan), and that development has a positive impact on access to public open space.

SA objectives likely to be significantly impacted

- 4.59 This policy cluster is relevant to the following SA objectives:
- ENVI: To reduce the effect of traffic on the environment
 - ENV2: To improve the quality of the water environment
 - ENV3: To improve environmental amenity, including air quality
 - ENV4: To maintain and enhance biodiversity and geodiversity
 - ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic environment
 - ENV6: To adapt to and mitigate against the impacts of climate change

- ENV9: To make the best use of resources, including land and energy and to minimise waste production
- SOC3: To improve education and skills
- SOC
- SOC8: To improve accessibility to essential services, facilities and jobs
- EC1: To encourage sustained economic growth
- EC2: To encourage and accommodate both indigenous and inward investment
- EC3: To encourage efficient patterns of movement in support of economic growth
- EC4: To improve the social and environmental performance of the economy

Sustainability effects of business as usual

4.60 There is no national policy guidance regarding the University of East Anglia (UEA), although generic National policy would still apply. Therefore a ‘do nothing’ approach would rely on the emerging Joint Core Strategy policies to guide development within the UEA campus. Joint Core Strategy³¹ policies relevant to this policy:

- Policy 7 (Supporting communities) states that the ‘learning city’ role of Norwich will be promoted by facilitating the continuing enhancement of tertiary education facilities including the University of East Anglia.
- Policy 9 (Strategy for growth in the Norwich Policy Area) which states that employment development, in relation to health, higher education and science, will be supported at the University of East Anglia.

4.61 The ‘business as usual’ framework provides an overarching objective regarding supporting and enhancing the role of UEA, but there is no detail regarding the delivery of this objective, which is detailed in policy DM26. Other proposed development management policies should seek to manage development at UEA to ensure negative sustainability effects are minimised (e.g. on amenity (DM2), landscape and townscape (DM3), energy efficiency (DM4) and environmental assets (DM6)). However, DM26 provides site-specific criteria e.g. retaining a green edge, and implementing the UEA travel plan), and these factors would not be addressed solely through the ‘business as usual’ framework. A lack of policy guidance regarding the UEA travel plan could result in negative sustainability effects on greenhouse gas emissions (negative effect on ENVI, ENV3, ENV6 and ENV9).

Sustainability effects of policy cluster

4.62 This policy option should ensure that development that occurs within the UEA campus is sensitive to the landscape and townscape around it, that the potential for increased private motor vehicle generation resulting from new development is minimised, and that public access to open space is promoted.

³¹ Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed submission document, 2009.

Expansion of the university should result in positive economic impacts for the plan area (positive effect on EC1 and EC2), resulting from employment opportunities within the University and a potentially higher number of students (bringing in spending power to the plan area, with a potential indirect growth in employment). Positive impacts will also result with regards improving education and skills, and with Norwich's high retention of graduates (SA Scoping Report, April 2010), much of the benefit from this should remain within the plan area.

- 4.63 Whilst this policy seeks to restrict car use to and from the campus, if the University is to expand there will be an inherent increase in car use, be this small or not, leading to an increase in vehicle emissions (negative effect on ENVI, ENV3, ENV6 and ENV9). Supplementary text for the policy states that, with the expansion of the university, it will be necessary to extend the boundaries of the campus, with the potential to result in negative effects, for example, on local biodiversity assets (undesignated), open space provision, agricultural land, views and general landscape character. No significant negative effects are anticipated from this policy.
- 4.64 It should be noted that a separate Sustainability Appraisal of the UEA Development Framework Strategy is being undertaken.
- 4.65 The following recommendations are made with regard policy text:
- Whilst a presumption is made that development will be managed in line with policy DM6, policy DM6 does not make reference to local biodiversity assets that are not designated and as such it is recommended that DM26 includes criteria for minimising impacts on biodiversity.
 - With regard promoting public access to open space, it is recommended that detail is provided regarding how this would be achieved through this policy/through development within the UEA campus as this is unclear at present.
 - It is presumed that policy DM26 will be delivered in parallel with all other development management policies, such as DM3 (Design principles) and DM4 (Energy efficiency); it is recommended that a cross-reference is made to such policies such that the priorities for development on the UEA site are more clearly articulated.

Conclusions

- 4.66 This policy should ensure that development within the UEA campus does not negatively impact on the landscape and townscape in the locality, or the provision of open space, that the potential transport impact resulting from the growth of the university is managed. Subject to the recommendations outlined above, this policy option is considered to be the most favourable. The alternative options would, in cases, have both greater positive effects in relation to specific issues (e.g. greater protection for environmental assets), but also greater negative effects (e.g. restricting the role of the university in the local and regional economy). It is considered that the preferred policy option strikes a good balance with regards the size of the identified campus, enabling growth of the university whilst limiting this so as to manage the potential impact on the surrounding environment.

NORWICH AIRPORT

- 4.67 This cluster includes the following policy option:
- Norwich Airport (DM27)
- 4.68 This policy regards what development would be acceptable within the airport boundary (airport operational purposes, uses ancillary to the function of the airport, and providing improved transport links).

SA objectives likely to be significantly impacted

- 4.69 This policy cluster is relevant to the following SA objectives:
- ENVI: To reduce the effect of traffic on the environment
 - ENV3: To improve environmental amenity, including air quality
 - ENV4: To maintain and enhance biodiversity and geodiversity
 - ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic environment
 - ENV6: To adapt to and mitigate against the impacts of climate change
 - ENV9: To make the best use of resources, including land and energy and to minimise waste production
 - SOC2: To maintain and improve the health of the whole population and promote healthy lifestyles
 - SOC8: To improve accessibility to essential services, facilities and jobs
 - EC1: To encourage sustained economic growth
 - EC2: To encourage and accommodate both indigenous and inward investment
 - EC3: To encourage efficient patterns of movement in support of economic growth
 - EC4: To improve the social and environmental performance of the economy

Sustainability effects of business as usual

- 4.70 The Aviation White Paper (2003) provides a national policy framework regarding the development of airport capacity in the UK. It does not itself authorise or preclude any particular development, but acts as a guide for decisions on future planning applications. The paper proposes a balanced approach which recognises the importance of air travel to economic prosperity but seeks to reduce and minimise the impacts of airports on those who live nearby and on the natural environment. With regards Norwich Airport, the paper states that *'there is scope for the airport to grow to satisfy local demand'*. Therefore a 'do nothing' approach would rely on the emerging Joint Core Strategy policies to guide development within the airport boundary. Joint Core Strategy³² policies relevant to this policy:

³² Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed submission document, 2009.

- Policy 6 (Access and transportation) which seeks to support growth and the regional significance of Norwich International Airport for both leisure and business travel.
- Policy 9 (Strategy for growth in the Norwich Policy Area) which supports employment opportunities at a new business park of around 30ha associated with the Airport and focused on uses benefiting from an airport location.

4.71 The 'business as usual' framework provides an overarching aim for potential growth at Norwich Airport; it does not provide necessary detail regarding the type of development that would be allowed on the site, and as such, without DM27, this would not be present within the policy framework.

Sustainability effects of policy cluster

4.72 Whilst there is little detail within this policy regarding criteria for minimising the potential negative impact of any development on, for example, traffic generation, air quality, and landscape and townscape, this is not considered problematic given that other development management policies (e.g. DM2, DM3, DM6 and DM28) address these issues.

4.73 Expansion of the airport will have both positive and negative sustainability effects. Whilst the growth of the airport will result in positive effects with regards employment (SOC8) and economic development (EC2 and EC4), it will result in a growth in the use of an unsustainable mode of travel (negative effect on ENVI, ENV3, ENV6, ENV9 and EC4), which in turn may negatively impact biodiversity that is susceptible to air pollution (negative effect on ENV4) and health (negative effect on SOC2). Whilst the growth of this airport may divert use away from Stansted Airport, many of the journeys to which are made by car, the comparative carbon footprint of these two forms of travel mean that the effect on greenhouse gas emissions would be **significantly negative** (significant negative effect on ENV6), with a cumulative significant negative effect on ENV3 (emission of atmospheric pollutants).

4.74 This policy should result in positive sustainability effects with regards a growth in the local economy (the SA Scoping Report, April 2010 recognises the airport as a key asset within the plan area) and employment (positive effect on SOC8, EC1, EC2).

4.75 The following recommendations are made with regard policy text:

- As noted above, expansion of the airport and any resulting increase in usage will result in an increase in carbon emissions. The SA Scoping Report (April 2010) recommends that the policy approach for the airport balances the benefits of increased air travel against the environmental impacts (including impacts on the amenity of nearby residents). At present there is no recognition within this policy's supplementary text regarding the potentially large environmental impact of the airport's expansion; rather the emphasis is solely on the economic benefits of the airport. It is recommended that this is redressed, and that detail is provided regarding how the positive impacts outlined are to be balanced

with the negative environmental impacts of the proposed expansion (as recommended within the SA Scoping Report, April 2010).

- It is recommended that the Norwich Airport Masterplan, once complete, is subject to Sustainability Appraisal/Strategic Environmental Assessment.

Conclusions

- 4.76 This policy seeks to control the nature of development within the airport boundary. Subject to the recommendations outlined above, this policy option is considered to be the most favourable. The alternative options would, in cases, have both greater positive effects in relation to specific issues (e.g. greater protection for environmental assets where the airport boundary is restricted), but also greater negative effects (e.g. on residential amenity where the airport boundary is extended). It is considered that the preferred policy option strikes a balance with regards the size of the airport, enabling growth of the airport to meet local demand, whilst limiting this so as to manage the impact on greenhouse gas emissions, the surrounding environment and residents.

TRANSPORT

- 4.77 This cluster includes the following policy options:
- Encouraging sustainable travel (DM28)
 - City centre public off-street car parking (DM29)
 - Access and highway safety (DM30)
 - Car parking and servicing (DM31)
 - Car free and low car housing (DM32)
 - Transport contributions (DM33)
- 4.78 This policy cluster seeks to ensure that development is managed to support sustainable transport objectives outlined within national and emerging local policy. It also seeks to ensure that the transport implications of new development, such as parking and servicing requirements and access issues, are appropriately addressed through development type, design and developer contributions.

SA objectives likely to be significantly impacted

- 4.79 This policy cluster is relevant to all of the SA objectives, apart from ENV2 (To improve the quality of the water environment); ENV4 (To maintain and enhance biodiversity and geodiversity); ENV7 (To avoid, reduce and managed flood risk); ENV8 (To provide for sustainable use and sources of water supply); SOC3 (To improve education and skills); SOC5 (To build community identity, improve social welfare and reduce crime and anti-social activity); and EC4 (To improve the social and environmental performance of the economy).

Sustainability effects of business as usual

4.80 A 'do nothing' approach would rely on national policy and the emerging Joint Core Strategy policies to guide transport planning within the plan area. In relation to the various policy topics that come within this cluster, national planning policy (PPG13³³) is developed around three key objectives: promoting more sustainable transport choices for people and moving freight; promoting accessibility to jobs, shops etc.; and reducing the need to travel. PPG13 then outlines how these objectives should be supported through local development documents, such as through optimising the potential of the public transport system, locating day-to-day facilities in local centres, and using parking policies to promote sustainable transport choices. PPS3³⁴ promotes accessibility of new development, both to local facilities and services, and to public transport, with an emphasis on minimising carbon emissions through appropriate siting of new housing development. PPS4³⁵ promotes the delivery of sustainable transport infrastructure which is required to support planned economic development, and states that '*developments which generate substantial transport movements [should be located or co-located] in locations that are accessible (including by rail and water transport where feasible), avoiding congestion and preserving local amenity as far as possible*'. PPS4 promotes, where relevant, high density development within centres to support accessibility by sustainable modes of transport. PPS4 has a specific policy regarding car parking for non-residential development and states that local planning authorities should set maximum parking standards taking into account various factors, including the need to encourage sustainable access to development.

4.81 Joint Core Strategy³⁶ policies relevant to this policy cluster are:

- Policy 6 (Access and transportation) which states that '*the transportation system will be enhanced to develop the role of Norwich as a Regional Transport Node, particularly through the implementation of the Norwich Area Transportation Strategy*'.
- Policy 9 (Strategy for growth in the Norwich Policy Area) which includes proposals for transport improvements in this policy area to support the delivery of the strategy.
- Policy 10 (Locations for major new or expanded communities in the Norwich Policy Area) which includes the objective to achieve a modal shift away from the car and proposals for improvements to bus services linking district and local centres.
- Policy 11 (Norwich City Centre) which includes the objective to support sustainable transport access to and within the city centre in accordance with the Norwich Area Transportation Strategy
- Policy 12 (The remainder of the Norwich urban area, including the fringe parishes) which includes the objective to establish a comprehensive cycle

³³ Planning Policy Guidance 13: Transport. ODPM, 2001.

³⁴ Planning Policy Statement 3: Housing. CLG, 2010.

³⁵ Planning Policy Statement 4: Planning for Sustainable Economic Growth. CLG, 2009.

³⁶ Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed submission document, 2009.

and walking network and to implement a Bus Rapid Transit network through the construction of the Northern Distributor Road.

- 4.82 When comparing the proposed development management policy framework with the 'business as usual' framework, the national policy framework is very thorough and as such there are cases where policy wording does not add greatly to existing national policy (e.g. Policy DM28 predominantly repeats national policy, although extra detail is provided through reference made to the Riverside Walk and setting the requirement for provision to be made for the inclusion of a car club). The sustainability effects of the 'business as usual' framework would be both positive and negative, with the overarching objectives (and subsequent policy detail) of PPG13 being to support sustainable transport choices and reduce the need to travel (positive effects on, for example, greenhouse gas emissions); this is echoed in PPS4, but an emphasis on ensuring there is transport infrastructure to support planned economic growth may result in negative effects (e.g. inherent increases in vehicle miles resulting from economic growth). Where the development management policy framework adds detail is in enabling the realisation of national objectives. For example, PPG13 states that '*new residential areas should be designed to encourage low traffic speeds and may be car free*' whilst proposed Policy DM32 (car free or low car housing) provides policy guidance for car free housing sites identified in the site allocations plan. In relation to parking standards, PPS4 sets out a requirement for local authorities to detail local standards, and as such, the proposed development management policy framework is needed to guide car parking provision and development in the plan area.
- 4.83 With regards the emerging Joint Core Strategy, policies outline the local strategies for transport planning in the plan area as a whole and in more specific policy areas, whilst the proposed development management policy framework provides an essential additional layer of detail regarding how these strategies will be supported through the delivery of development, such as through car free or low car housing, or through transport contributions.

Sustainability effects of policy cluster

- 4.84 Most of the proposed policy text within this cluster build on and add further detail and local specificity to the national and local policy framework that already exists or is due to exist alongside this DPD. The proposed policy framework should: enable the use of sustainable modes of transport through using development design and layout, and restricting car use in areas well served by public transport, whilst ensuring less mobile members of society are not penalised (e.g. parking provision for disabled drivers) (positive effect on ENVI, ENV3, ENV6, ENV9, SOC1 and SOC8); restrain commuting by car through controlling city centre parking (positive effect on ENVI, ENV3, ENV6 and ENV9); ensure access from new development is sensitive to the urban environment and safety issues (positive effect on SOC1 and SOC4); ensure development includes appropriate levels of parking for residents and servicing activities (positive effects on SOC1 and SOC4); support car free or low car housing (positive effect on ENVI, ENV3, ENV6, and ENV9); and ensure the additional demand placed by new development on transport infrastructure and servicing is addressed through development contributions (positive effect

on SOCI, SOC4, SOC8 and EC3). However, there are potential negative sustainability implications (notably vehicle emissions) with regards policies in this cluster. Policy DM29 (city centre public off-street car parking), whilst seeking to limit car parking within the city centre, does retain provision at the 2004 level of 10,002 spaces, and as such enables the current level of private vehicle use for accessing the city centre (negative effect on ENVI, ENV3, ENV6, and ENV9). As well as more generally, this may result in continued air quality issues within the identified air quality management areas, as these are located on key roads leading into the city centre area (Augustines Street and Grapes Hill) and within the central area (Castle Meadow).

4.85 As such, the sustainability effects of this policy cluster would be both positive and negative, and predominantly long-term. In addition, effects are both direct and indirect. For example, requiring that city centre car parking operates with a tariff that encourages short and medium stay use should discourage commuting by car to the city centre (and in turn congestion and vehicle emissions); comparatively, enabling car free or low car housing directly reduces car use resulting from new development. No significant negative effects are anticipated from this policy cluster.

4.86 The following recommendations are made with regards specific policies in this cluster:

- **Policy DM28:** It is recommended that a criterion is included regarding the provision of electric car charging points within new developments.
- **Policy DM29:** It is recommended that special provision is made for car parking spaces reserved for car club vehicles
- **Policy DM32:** This policy, whilst supporting the development of car free housing, restricts this to identified locations. It is recommended that the policy wording is broadened to include a general statement of support for car free housing proposals.
- PPS4 states that specific consideration should be given to development that generates substantial transport movements, and to locate or co-locate this in accessible locations (including by rail and water transport where feasible). Whilst not repeating national policy, it is recommended that policy detail is included regarding development that generates substantial transport movements, including heavy goods vehicles. Detail could be included identifying existing sustainable transport routes that could be optimised as well ensuring options for co-location are sought before new sites are proposed.

Conclusions

4.87 This policy cluster seeks to ensure that development is managed to support sustainable transport objectives outlined within national and emerging local policy. This will be achieved through managing parking and servicing requirements, access, the design of developments and developer contributions for transport infrastructure. Subject to the recommendations outlined above, this policy option is considered to be the most favourable. The alternative options would, in cases, have both greater positive effects in relation to specific issues (e.g. potential reduction in car use resulting from

lower levels of car parking provision), but also greater negative effects (e.g. inadequate parking provision negatively impacting on the local economy). It is considered that the preferred policy option strikes a good balance with regards reducing the negative sustainability effects of the plan area's transport system, whilst not being overly prescriptive so as to not enable transport infrastructure to meet the requirements of future growth.

CUMULATIVE EFFECTS

4.88 Looking across the development plan it is clear that there will be a number of positive effects arising from the combined effects of all the policies. It is considered that there will be significant positive effects on the following objectives:

- ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic environment.
- SOC1: To reduce poverty and social exclusion.
- SOC 2: To maintain and improve the health of the whole population and promote healthy lifestyles.
- SOC 4: To provide the opportunity to live in a decent, suitable and affordable home.
- SOC 7: To improve the quality of where people live.
- SOC 8: To improve accessibility to essential services, facilities and jobs.
- EC1: To encourage sustained economic growth.
- EC2: To encourage and accommodate both indigenous and inward investment.
- EC3: To encourage efficient patterns of movement in support of economic growth.
- EC4: To improve the social and environmental performance of the economy.

4.89 Whilst it is recognised that the suite of policies seek to minimise car-based travel as far as possible, the transport policies in particular, will still result in continued travel by car. This combined with the expansion of Norwich airport (as set down in policy DM 27) will result in cumulative **significant negative effects** on objectives ENV 3 (local air quality) and ENV 6 (carbon emissions).

5 Conclusions and Next Steps

- 5.1 This section provides an overview of the Sustainability Appraisal (SA) of the Development Management Policies DPD, summarising the potential sustainability effects (both positive and negative) of implementing the proposed policy framework.

Context

- 5.2 Norwich plays a key role in the East of England; it is one of the largest urban areas within the region; it is the region's highest ranking retail centre; and it is a regional centre for employment, tourism and culture. Norwich has been identified as a key area for growth in the region, for both housing and jobs: between 2008 and 2026, at least 36,740 new homes will be built and approximately 27,000 new jobs will be created. Alongside residential and economic development, growth in the retail, leisure and cultural role of the city will also be supported. Infrastructure required to support this growth, most notably transport, will need to be developed.
- 5.3 Future growth will need to be guided, managed and delivered such that it maximises sustainability benefits (environmental, economic and social) and minimises potential negative sustainability effects. More specifically, any growth will need to be planned and delivered to address key sustainability issues in the plan area, as highlighted by the SA Scoping Report (April 2010). Such issues include:
- Provision of accessible facilities and services
 - Retention and attraction of young people through job provision and access to the housing market
 - Preservation and enhancement of the character and quality of the natural and built environments
 - Mitigation of causes, and adaptation to the effects of climate change
- 5.4 Key issues highlighted through consultation responses to the SA Scoping Report (April 2010) highlight the historic environment (including undesignated assets), water availability and water quality as key issues for the plan area.
- 5.5 The Development Management Policies DPD seeks to manage development in Norwich CC to avoid exacerbating existing sustainability issues, and enhance the social, economic and natural and built environment where possible. There are 33 proposed policies (with additional *alternative* policy options for each *proposed* policy option). The policies cover a broad range of policy topics, which, for the purpose of this appraisal, have been organised into policy themes (Planning Statements; Environment and design; Telecommunications; Housing; Economy; Communities; University of East Anglia; Norwich Airport; and Transport).

SA of the Development Management Policies DPD

- 5.6 We have undertaken the SA to assess the likely sustainability effects (both positive and negative) of implementing this DPD. The purpose of SA is to minimise negative effects (and in particular avoid significant negative effects) and maximise beneficial effects.
- 5.7 Broadly speaking, the plan is comprehensive and should result in a number of positive sustainability effects. The plan needs to be sufficiently flexible to respond to rapidly changing circumstances, particularly in the current climate, but also provide sufficient certainty to enable development to be effectively managed and delivered; the SA process demonstrates that the plan should achieve this.
- 5.8 When the Plan is considered as a whole, **significant positive** effects are predicted for the following SA objectives:
- ENV5: To maintain and enhance the quality of landscapes, townscapes and the historic environment.
 - SOC1: To reduce poverty and social exclusion.
 - SOC 2: To maintain and improve the health of the whole population and promote healthy lifestyles.
 - SOC 4: To provide the opportunity to live in a decent, suitable and affordable home.
 - SOC 7: To improve the quality of where people live.
 - SOC 8: To improve accessibility to essential services, facilities and jobs.
 - EC1: To encourage sustained economic growth.
 - EC2: To encourage and accommodate both indigenous and inward investment.
 - EC3: To encourage efficient patterns of movement in support of economic growth.
 - EC4: To improve the social and environmental performance of the economy.
- 5.9 Concurrently, for the following SA objectives it is considered that there will be negative effects (negative effects are also predicted for other SA objectives, but it is for the objectives listed below that potential effects are considered to be most likely):
- ENV 1: To reduce the effect of traffic on the environment.
 - ENV 8: To provide for sustainable use and sources of water supply.
- 5.10 Taking account of the proposed expansion to Norwich Airport and likely increase in car based travel, **significant negative** effects are predicted in relation to the following SA objectives:
- ENV 3: To improve environmental amenity, including air quality.
 - ENV 6: To adapt to and mitigate against the impacts of climate change.

5.11 Throughout the SA, recommendations have been outlined in relation to each policy cluster, to help develop the most sustainable policy option. With regards the SA objectives listed above which are predicted to be negatively impacted (and in the case of ENV 3 and 6 significantly negatively impacted), these recommendations include:

- Adding a 'sustainability statement' to the list of required supporting documents for planning applications to ensure that potential impacts on water quality are adequately addressed by applicants.
- Provision of greater detail regarding how the potential positive economic effects of airport growth are to be balanced with the potential significant negative environmental impacts.
- Greater support for the provision of electric car charging points in new developments.
- Priority given to car club parking spaces in public parking.
- Greater support given to car free housing developments.

NEXT STEPS

5.12 The Council is currently gathering evidence to help inform development of the Development Management Policies. This includes the conclusions and recommendations arising from this SA report.

5.13 Once the Council has drafted its policies, there will be an opportunity for individuals, organisations and stakeholders to have their say on the draft policies. This consultation is anticipated to be in early 2011.

APPENDIX I
SA OBJECTIVE SCREENING EXERCISE AND
SUSTAINABILITY CRITERIA

SA Objective	Sub-objective	Reasoning
ENV 1 To reduce the effect of traffic on the environment	ENV1(a) Will it reduce traffic volumes, ease the flow of traffic and reduce congestion?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; parking policies which restrict high car use; density of development (congestion) ; accessibility of key services.
	ENV1(b) Will it increase the proportion of journeys using modes other than the car?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; parking policies which restrict high car use; accessibility of key services.
	ENV1(c) Will it reduce the effect of HGV traffic on people and the environment?	Managed through criteria for to development regarding air pollution, traffic and congestion, and health and safety (which can be enacted through conditions attached to any granted permission).
	ENV1(d) Will it encourage more benign modes of travel?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of pedestrian pathways within and between developments, and the inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; accessibility of key services.
	ENV1(e) Will new development be located such to reduce the need for people to travel?	Principles for the design and delivery of housing/employment development, such as provision of services and ensuring development links to existing network of foot/cyclepaths; delivery and protection of services in town/local/neighbourhood centres.
ENV 2 To improve the quality of the water environment	ENV2(a) Will it improve the quality of the water environment (streams, rivers, lakes etc)?	Environmental protection policy; protection/mitigation/enhancement criteria for proposed development in relation to environmental assets.
	ENV2(b) Will it help to support wetland habitats and species?	Environmental protection policy (water quality, air and noise pollution); protection/mitigation/enhancement criteria for proposed development in relation to environmental assets; design principles for housing/employment development in relation to green infrastructure (e.g. green links for wetland species).
ENV 3 To improve environmental amenity, including air quality	ENV3(a) Will it improve air quality?	Environmental protection policy (air pollution); enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; parking policies which restrict high car use; density of development (congestion).

SA Objective	Sub-objective	Reasoning
	ENV3(b) Will it reduce the emission of atmospheric pollutants?	Environmental protection policy (air pollution); enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; parking policies which restrict high car use; density of development (congestion).
ENV 4 To maintain and enhance biodiversity and geodiversity	ENV4(a) Will it conserve/enhance natural or semi-natural habitats, and promote habitat connections?	Protection/mitigation/enhancement criteria for proposed development in relation to environmental assets; design principles for housing/employment development in relation to green infrastructure (e.g. creating new and connecting existing green links, with consideration given to how these can address potential impacts of climate change).
	ENV4(b) Is it likely to have a significant effect on sites designated for international, national or local importance?	Protection/mitigation/enhancement criteria for proposed development in relation to environmental assets.
	ENV4(c) Will it conserve/enhance species diversity, and in particular avoid harm to protected species?	Protection/mitigation/enhancement criteria for proposed development in relation to environmental assets; design principles for housing/employment development in relation to green infrastructure (e.g. creating new and connecting existing green links, with consideration given to how these can address potential impacts of climate change).
ENV 5 To maintain and enhance the quality of landscapes, townscapes and the historic environment	ENV5(a) Will it protect and enhance the quality of landscapes, townscapes and countryside character, including the character of the Broads and it's setting where relevant?	Protection/mitigation/enhancement criteria for proposed development in relation to heritage assets and designated landscapes; principles for the design of development, including landscaping (i.e. sensitivity to surrounding townscape / landscape).
	ENV5(b) Will it maintain and enhance the distinctiveness of the landscapes/townscapes and heritage?	Protection/mitigation/enhancement criteria for proposed development in relation to heritage assets and designated landscapes; principles for the design of development, including landscaping (i.e. sensitivity to surrounding townscape / landscape).
	ENV5(c) Will it reduce the amount of derelict, underused land?	Housing density criteria; principles for regeneration.
	ENV5(d) Will it protect and enhance features of historical, archaeological and cultural value?	Protection/mitigation/enhancement criteria for proposed development in relation to heritage assets and designated landscapes; principles for the design of development, including landscaping (i.e. sensitivity to surrounding townscape / landscape).

SA Objective	Sub-objective	Reasoning
ENV 6 To adapt to and mitigate against the impacts of climate change	ENV6(a) Will it reduce emissions of greenhouse gases by reducing energy consumption?	Design principles for housing/employment development (i.e. regarding integration of energy efficient design principles); enabling use of sustainable modes of transport (e.g. inclusion of cycle storage and cycle lanes in new development); provision of travel plans alongside proposed developments; parking policies which restrict high car use.
	ENV6(b) Will it lead to an increased proportion of energy needs being met from renewable sources?	Principles for housing/employment development regarding the integration of on-site and off-site renewable energy.
	ENV6(c) Will it increase the capacity of the area to withstand the effects of climate change?	Design principles for housing/employment development which consider potential effects of climate change (e.g. flood storage features, SUDs, natural ventilation design features)
	ENV6(d) Will it ensure that the risks to lives, land and property are minimised?	Design principles for housing/employment development which consider potential effects of climate change (e.g. flood storage features and SUDs); Health and Safety principles for development.
ENV 7 To avoid, reduce and manage flood risk	ENV7(a) Will it minimise the risk of flooding to people and property?	Design principles for housing/employment development which consider potential effects of climate change (e.g. flood storage features and SUDs).
	ENV7(b) Can it incorporate new designs to adapt to possible flood risk?	Design principles which ensure housing/employment development is flexible and adaptable to incorporation of new design features which addressed flood risk.
ENV 8 To provide for sustainable use and sources of water supply	ENV8 (a) Will it promote the use of sustainable drainage systems to reduce run off?	Design principles for housing/employment development which include SUDs.
	ENV8 (b) Will it conserve groundwater resources?	Design principles for housing/employment development, including landscaping and how this will be managed, which include water efficiency.
	ENV8(c) Will it minimise water consumption?	Design principles for housing/employment development, including landscaping and how this will be managed, which include water efficiency.
ENV 9 To make the best use of resources, including land and energy and to minimise waste production	ENV9 (a) Will it minimise consumption of materials and resources?	Design principles for housing/employment development which promote the reuse and recycling of materials during the construction process (including a requirement for waste management plans) and once development is in use (e.g. ensuring integration of recycling facilities into new development); design principles for water and energy efficiency; enabling use of sustainable modes of transport.
	ENV9 (b) Will it promote the use of land in sustainable locations that has been previously developed?	Use of land in sustainable locations that has been previously developed is most likely addressed by Joint Core Strategy policies regarding the efficient use of land, and through the Site Allocations DPD.

SA Objective	Sub-objective	Reasoning
	ENV9(c) Will it use land efficiently?	Principles for housing/employment development regarding efficient use of space and the density of development.
	ENV9(d) Will it minimise the loss of 'greenfield' land?	Principles for resisting development on garden land.
	ENV9 (e) Will it avoid the loss of good quality agricultural land and preserve soil resources?	Avoiding the loss of good quality agricultural land and preserving soil resources are most likely addressed by Joint Core Strategy policies, and through the Site Allocations DPD.
	ENV9 (f) Will it minimise energy consumption and promote energy efficiency?	Design principles for housing/employment development regarding energy efficiency; enabling use of sustainable modes of transport.
	ENV9 (g) Will it promote the use of renewable energy sources?	Principles for housing/employment development regarding the integration of on-site and off-site renewable energy.
	ENV9 (h) Will it lead to less waste being produced?	Design principles for housing/employment development which promote the reuse and recycling of materials during the construction process (including a requirement for waste management plans) and once development is in use (e.g. ensuring integration of recycling and composting facilities into new development).
	ENV9(i) Will it lead to less waste being disposed, by promoting more recycling and composting?	Design principles for housing/employment development which promote the reuse and recycling of materials during the construction process (including a requirement for waste management plans) and once development is in use (e.g. ensuring integration of recycling and composting facilities into new development).
	ENV9(j) Will it increase waste recovery for other means e.g. Energy Generation?	Increasing waste recovery for other means is most likely to be addressed by waste planning policies.
SOC 1 To reduce poverty and social exclusion	SOC1(a) Will it reduce poverty and social exclusion in those areas most affected?	Reduction of poverty and social exclusion is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities', 'The economy', and 'Access', and through the Site Allocations DPD.
	SOC1(b) Will it help to reduce deprivation levels?	Overall improvement of built environment (open space provision, designing out crime, provision of housing that meets the diverse needs of the community, pollution prevention etc.)
	SOC1(c) Will it help to meet the needs of residents most effectively?	Principles for housing development which address provision of services, accessibility of development, flexibility and adaptability of development.

SA Objective	Sub-objective	Reasoning
SOC 2 To maintain and improve the health of the whole population and promote healthy lifestyles?	SOC2(a) Will it improve access to high quality health facilities?	Principles for housing development which address provision of key services, accessibility.
	SOC2(b) Will it encourage healthy lifestyles?	Principles for housing/employment development regarding enabling walking/cycling; provision of open space and amenity facilities; provision of key services (e.g. shops that meet day-to-day needs such as fresh food).
	SOC2(c) Will it provide adequate health infrastructure for existing and new communities?	Principles for housing development which address provision of key services.
	SOC2(d) Will the links between poorer health and deprivation be addressed?	Overall improvement of built environment (open space provision, designing out crime, provision of housing that meets the diverse needs of the community, pollution prevention etc.)
	SOC2(e) Will links to the countryside be maintained and enhanced?	Principles for housing/employment development regarding green infrastructure and green links (creation of new links and enhancement of existing links).
SOC 3 To improve education and skills	SOC3(a) Will it improve qualifications and skills for both young people and amongst the workforce?	Improving qualifications and skills for both young people and amongst the workforce is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3(b) Will it help to retain key workers and provide more skilled workers from school leavers?	Helping to retain key workers and provide more skilled workers from school leavers are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3(c) Will adequate education infrastructure be provided for existing and new communities?	Principles for housing development regarding provision of key services.
	SOC3(d) Will it promote lifelong learning and skills training?	The promotion of lifelong learning and skills training are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
	SOC3(e) Will links between lower levels of education and deprivation be addressed?	The links between lower levels of education and deprivation are most likely to be addressed by Joint Core Strategy policies regarding 'Supporting Communities' and 'The economy'.
SOC 4 To provide the opportunity to	SOC4(a) Will it increase the range of types, sizes and affordability of housing for all social groups?	Principles for housing development regarding design, densities, multiple occupancy, gypsy and travellers and travelling showpeople.

SA Objective	Sub-objective	Reasoning
live in a decent, suitable and affordable home	SOC4(b) Will it reduce the housing need and ensure that housing provision addresses the needs of all?	Principles for housing development regarding design, densities, multiple occupancy, gypsy and travellers and travelling showpeople.
	SOC4(c) Will it provide the most appropriate solutions to address the housing requirements needed for creating sustainable communities?	Principles for housing development regarding design (including adaptability and flexibility, energy and water efficiency), densities, multiple occupancy, gypsy and travellers and travelling showpeople.
	SOC4(d) Will it make the best use of existing housing stock?	Principles regarding the refurbishment of existing housing development.
SOC 5 To build community identity, improve social welfare and reduce crime and anti-social activity	SOC5(a) Will it encourage engagement in community activities?	Principles for engaging the community in the development of their local facilities and services, and where proposed developments may impact upon amenity etc.
	SOC5(b) Will it contribute to the achievement of a mixed and balanced community?	Principles for housing development regarding densities, multiple occupancy, gypsy and travellers and traveling showpeople.
	SOC5(c) Will it reduce actual levels of crime?	<i>Safety-by-design</i> principles for housing/employment development and the public realm will indirectly impact actual levels of crime.
	SOC5(d) Will it reduce the fear of crime?	<i>Safety-by-design</i> principles for housing/employment development and the public realm.
SOC 6 To offer more opportunities for rewarding and satisfying employment for all.	SOC6(a) Will it reduce unemployment overall?	Principles to protect employment land, office space and SMEs may have an indirect impact on unemployment.
	SO6(b) Will it help to improve earnings?	Improving earnings overall is most likely to be addressed by Joint Core Strategy policies regarding 'The economy'.
SOC 7 To improve the quality of where people live	SOC7(a) Will it improve the quality of dwellings?	Principles for the design of housing development and the refurbishment of existing housing stock.
	SOC7(b) Will it improve the quality of local open space?	Principles for enhancing open space alongside housing and employment development, including integrating new spaces within new development.
	SOC7(c) Will it improve the satisfaction of people within their neighbourhoods?	Principles for housing/employment development regarding the design of the private and public realms, safety-by-design principles, access to key services, provision of open space and amenity facilities etc.

SA Objective	Sub-objective	Reasoning
SOC 8 To improve accessibility to essential services, facilities and jobs	SOC 8(a) Will it improve accessibility to key local services and facilities (including health, education, leisure, open space, the countryside and community facilities)?	Principles regarding the provision of accessible key services and facilities alongside housing development.
	SOC8(b) Will it improve accessibility for all whilst reducing dependency on the private car?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments; accessibility of key services (both by walking/cycling and public transport).
	SOC8(c) Will it improve access to jobs and services for all?	Principles regarding the provision of accessible key services and facilities alongside housing development.
ECI To encourage sustained economic growth	ECI (a) Will it assist in strengthening the local economy?	Protection and enhancement of town/local/neighbourhood centres.
	ECI (b) Will it improve business development and enhance competitiveness?	Through improvements to transport infrastructure (both within the plan area, and connecting the plan area nationally and internationally).
	ECI (c) Will it reduce vulnerability to economic shocks?	Reducing vulnerability to economic shocks is most likely to be addressed by Joint Core Strategy policies regarding 'The economy'.
	ECI (d) Will it promote growth in key sectors?	Protection and enhancement of town/local/neighbourhood centres.
	ECI (e) Will it increase vitality & viability of town centres and improve economic diversity?	Protection and enhancement of town/local/neighbourhood centres; principles regarding change of use.
EC 2 To encourage and accommodate both indigenous and inward investment	EC2(a) Will it encourage indigenous businesses?	Protection of SMEs may have an indirect impact on indigenous businesses.
	EC2(b) Will it encourage inward investment?	Overall improvement of urban environment and provision of suitable housing will indirectly influence attracting new investment and skilled workers.
	EC2(c) Will it make land and property available for business?	Principles for retail space and maintaining rental space for businesses; the night-time economy.
	EC2(d) Will it improve economic performance across the Greater Norwich area?	Principles to protect employment land and office space; proposed improvements to the transport infrastructure to support connectivity.

SA Objective	Sub-objective	Reasoning
	EC2(e) Will it support/encourage rural diversification?	Support/encouraging rural diversification is most likely to be addressed by Joint Core Strategy policies regarding 'Supporting communities' and 'The economy'.
	EC2(f) Will it support/encourage small city businesses?	Principles regarding the protection of small to medium scale business; principles for change of use.
EC 3 To encourage efficient patterns of movement in support of economic growth	EC3(a) Will it improve provision of local jobs?	Principles for protecting employment land, office space and SMEs.
	EC3(b) Will it improve accessibility to work, particularly by public transport, walking and cycling?	Enabling use of sustainable modes of transport (e.g. principles for the design of housing and employment development, such as inclusion of cycle storage and cycle lanes); provision of travel plans alongside proposed developments.
	EC3(c) Will it reduce journey times between key employment areas and key transport interchanges?	Reducing journey times between key employment areas and key transport interchanges is most likely to be addressed by Joint Core Strategy policies regarding 'Access and Transportation' and in the Site Allocations DPD regarding new sites for employment uses.
	EC3(d) Will it improve efficiency and sustainability of freight distribution?	Improving efficiency and sustainability of freight distribution is most likely to be addressed by Joint Core Strategy policies regarding 'Access and Transportation' and in the Norwich Area Transportation Strategy.
	EC3(e) Will it support provision of key communities infrastructure?	Principles for the provision of key services alongside housing/employment development.
EC 4 To improve the social and environmental performance of the economy	EC4(a) Will it reduce the impact on the environment from businesses?	Design principles for employment development regarding energy/water efficiency, protection/mitigation/enhancement of environmental assets, provision and enhancement of green infrastructure.
	EC4(b) Will it reduce the impact on residents from businesses?	Design principles for employment development regarding energy/water efficiency, accessibility criteria for new development (e.g. ensuring business development does not increase local traffic and congestion), provision and enhancement of green infrastructure / open space.
	EC4(c) Will it attract new investment and skilled workers to the area?	Overall improvement of urban environment and provision of suitable housing will indirectly influence attracting new investment and skilled workers.

SA Objective	Sub-objective	Reasoning
	EC4(e) Will it maintain existing business and employment provision?	Principles regarding protecting town/local/neighbourhood centres; protection of small and medium sized businesses.

APPENDIX 2
APPRAISAL OF ALTERNATIVE OPTIONS

Norwich Development Management Policies DPD Draft SA: Appraisal of alternative options

Policy name and number	Alternative option	Appraisal
Planning Statements		
DM1: Planning Statements	A second alternative is to incorporate a list of information requirements as part of the policy. This would result in an overly lengthy policy and run the risk of duplicating information already available through the planning application process. It would also be possible to include the information requirements within an appendix of this plan; however as information requirements change this would result in the plan becoming out of date and in need of a review.	With regards potential sustainability effects this would be the same as for the preferred policy option. However, this alternative policy option would result in unnecessary duplication; a local list is already available on the council's website.
Environment and design		
DM 2: Amenity	A second alternative is to remove the guidelines for internal space standards and to determine all applications on a case by case basis. It is considered that the internal space standards, which are taken from the Homes and Community Agency's proposed core housing design and sustainability standards consultation, are an appropriate guideline to ensure that all new residential dwellings have sufficient space for comfortable and flexible living. These standards are appropriate for urban areas with comparable standards being given within the London Housing Design Guide.	Removing guidelines for internal space standards may result in proposals not sufficiently addressing the need to ensure sufficient provision of space and facilities to enable residents to live comfortably and conveniently (negative effect on SOC2, SOC4 and SOC7). Removing the guidelines may also result in a slower development management process as applications may need to go through a greater degree of alteration before they are deemed acceptable.
DM 3: Design	The alternative options include more prescriptive standards. This option would not support the approach for having flexible criteria-based guidelines that allow for site specific considerations to be taken into account in securing high quality sustainable design.	The exact nature of the standards would shape the potential sustainability effects arising from this policy. Including more prescriptive standards may compromise the potential for site specific characteristics and considerations to effectively be considered to ensure design principles are adopted that suit the site (e.g. the layout of a development should make efficient use of land and maximise the potential for energy efficient measures; if standards are too prescriptive, the potential for these positive sustainability effects may be minimised).
DM6: Environmental assets	A second option is to provide stronger protection for Norwich's environmental assets and to not allow any form of development within national, regional and local sites and green infrastructure protection areas. This approach would rule out all development, some of which may be appropriate and acceptable within these areas. Within Green infrastructure opportunity areas, stronger protection may prevent development of areas in need of regeneration. It is not the aim to restrict development within these areas but	This option would provide a greater degree of protection for designated environmental assets and green infrastructure protection areas (positive effect on ENV4); however, it may be the case that treating these areas as 'no go', whilst ensuring these areas are protected, may result in undesignated environmental assets being negatively impacted as development is squeezed into a smaller area. In addition, as stated, development within, for example, green infrastructure opportunity areas

Policy name and number	Alternative option	Appraisal
	to ensure that provision is made for green infrastructure as an integral part of developments.	may enable enhancement of green infrastructure assets.
DM8: Protection of existing open space	An alternative option would be to not provide detailed guidance on the protection and provision of open space. This would not achieve the aims of national guidance in PPG17 to improve and enhance open space provision.	This option may result in inadequate provision and protection of open space (negative effect on SOC2 and SOC7). As such it is considered to be contrary to PPG17 and is not a reasonable alternative.
	A second option is to provide stronger protection of existing areas of open space; however this may result in areas of open space which are surplus to requirement and where it is not viable to reuse the space for alternative forms of open space to become neglected and disused. It would also reduce opportunities to improve recreational facilities.	This option would provide a greater degree of protection for existing open space (positive effect on SOC2 and SOC7). However, it is important that existing provision of open space makes the most efficient use of space, such that where open space provision does not meet local need (e.g. because of its location), these spaces should be made available for other uses otherwise negative effects may result on the efficient use of land (ENV9).
	The provision of new open space and the enhancement of existing open space will mainly be provided through the Community Infrastructure Levy and as such options are limited. An alternative approach could be to require on site child play space and informal open space on smaller development than currently proposed within the policy, however, this may result in some developments becoming unviable and may result in pockets of open space which are not used due to their size and location.	The requirement for on-site child play space and informal open space on smaller developments would support higher levels of provision of open space (positive effect on SOC2 and SOC7), but as stated, this may result in some developments becoming unviable (negative effect on SOC4) and may result in provision of open space that does not meet the requirements of residents (negative effect on SOC7).
Telecommunications		
DM10: Telecommunications	A second alternative is to have a more restrictive policy. This approach may not allow enough flexibility for the efficient development of the network and the demands imposed by the technology.	The exact nature of the policy wording would shape the potential sustainability effects arising from this policy. As sited, having a heavily prescriptive approach may not allow for efficient development of the network to meet need (negative effect on EC3)
Housing		
DM13: Flats, buildings of multiple occupation and residential institutions	An alternative approach is to assess the effect on the character of the area by setting a percentage of which properties within a street should remain as single residential dwelling units to ensure that HMOs and residential institutions do not over-dominate. It is considered that this approach would not allow sufficient flexibility across the city and it makes assumptions about the impacts of all HMOs and residential institutions. As such with regards to the effect on surrounding areas it is considered more appropriate to determine applications on a case by case basis.	This alternative option would ensure that HMOs and residential institutions do not over-dominate (positive effect on SOC4); but having a more inflexible policy approach may mean that housing provision does not efficiently meet need (negative effect on SOC4).

Policy name and number	Alternative option	Appraisal
DM14: Gypsy and Travellers and Travelling Showpeople	Alternative options are to have more stringent or less stringent criteria. It is considered that the preferred policy achieves the right balance as it is flexible enough to meet the need identified within the Joint Core Strategy whilst ensuring that future sites are accessible, have safe access, are of sufficient size and do not have a detrimental impact upon the character of the area.	Having more stringent criteria for the development of gypsy and traveller and travelling showpeople accommodation may support positive effects in relation to accessibility of sites, safe access, ensuring sites are of a sufficient size, and minimising any detrimental impact upon the character of the area (positive effects on SOC4, ENVI, ENV2, ENV3, ENV4, ENV5, ENV7 etc), but may be too prescriptive so as to restrict the delivery of acceptable sites that would meet the need of residents (negative effect on SOC4); having less stringent criteria may result in negative effects on factors above (negative effect on SOC4 and Environmental Objectives) and whilst enabling sites to be more easily delivered, may result in sites being accepted that do not sufficiently meet need (negative effect on SOC4).
DM15: Loss of residential accommodation	Alternative options are to have more stringent or less stringent criteria. It is considered that the preferred policy achieves the right balance as it is flexible enough to allow the loss of residential units where there are wider community and regeneration benefits and where it will improve the standard of housing whilst it prevents the loss in most circumstances. The significant loss of housing units would contravene the Joint Core Strategy which seeks to provide an additional 3,000 dwellings on top of existing commitments up to 2026.	Having more stringent criteria for the loss of residential accommodation would provide stronger protection for the loss of residential accommodation (positive effect on SOC4), but may restrict the potential for positive community and regeneration effects. Having less stringent criteria would provide an insufficient degree of protection for residential accommodation, in turn resulting in an unacceptable degree of loss (negative effect on SOC4).
Economy		
DM16: Employment development	A second alternative is to differentiate between prime and general employment areas. This approach would not be in accordance with the evidence base.	Protection focussed on those sites of most value to employment, but may restrict overall employment provision (negative effect on EC2, EC3 and EC4).
	A final alternative is to allow greater levels of flexibility with regards to town centre uses. This approach is likely to have detrimental impacts on local and district centres and the city centre, would reduce land availability for employment uses and would increase car use.	Having greater levels of flexibility with regards to town centre uses may have a negative effect on the role of district and city centres (where employment and retail is concentrated) (negative effect on EC1), and in turn on the positive effect that this role can have on promoting use of sustainable modes of transport (negative effect on ENVI).
DM17: Protection of small and medium scale	An option is to designate sites on the proposals map. This would offer more certainty, but at the cost of considerable inflexibility. This approach would imply selection of the most important areas, which would require prescription and choice that may prove to be difficult to justify, and is inflexible in changing	Designating sites on the proposals map would offer more certainty with regards protecting small and medium scale businesses (positive effect on EC2); however, it may also negatively impact on the efficient use of available space within the plan area and is not flexible enough to enable

Policy name and number	Alternative option	Appraisal
business	circumstances.	adaptability in changing circumstances.
	Alternative options are to have more stringent or less stringent criteria. It is considered that the preferred policy achieves the right balance as it is flexible enough to allow the loss of small and medium scale sites and premises in certain circumstances whilst it protects small and medium sites where there is demand for sites and premises.	Having more stringent criteria would offer more certainty with regards protecting small and medium scale businesses (positive effect on EC2); however, it may also negatively impact on the efficient use of available space within the plan area and may not be flexible enough to enable adaptability in changing circumstances. Having less stringent criteria will not provide sufficient protection to small and medium scale businesses (contrary to need outlined in the evidence base) (negative effect on EC2).
DM19: Offices	Alternative options are to have more stringent or less stringent criteria for the protection of offices. It is considered that the preferred policy achieves the right balance as it is flexible enough to allow the loss of offices where it is not economically viable to retain them whilst there is a presumption that their loss will not be treated favourably.	Having more stringent criteria for the protection of offices would provide a higher degree of certainty regarding their retention (positive effect on EC1 and EC2) but may not support a flexible enough approach that can respond to changing economic and social circumstances to ensure the most efficient use of available space. Having less stringent criteria for the protection of offices would provide an insufficient degree of certainty regarding their retention (negative effect on EC1 and EC2).
	A further option is to only protect offices within the city centre. It is however considered that there are offices outside the city centre which should be protected as they are sustainably located.	Only protecting offices within the city centre would not adequately recognise the need for office employment throughout the plan area, creating an unbalanced provision of office space, potentially leading to inadequate provision of office space to meet need (negative effect on EC1, EC2 and SOC8).
	Other alternatives are to have a larger or smaller defined office area and to increase or decrease the site threshold. It is considered that the preferred policy achieves the right balance.	Having a larger defined office area whilst supporting sufficient provision of office space (positive effect on EC2) may mean there is overprovision within the plan area, not efficiently meeting need, whilst having a smaller defined office area may mean there is under provision of office space (negative effect on EC2). A balance needs to be sought based on evidence.
DM20: Changes of use within retail centres	One alternative is to adopt different boundaries for the primary and secondary retail areas, the Large District Centres and the frontages within these areas. The ones selected are based broadly on the Local Plan. These have proved successful at retaining and strengthening retail areas, particularly the Primary area, and have informed the Joint Core Strategy.	The nature of potential sustainability effects would depend on the proposed boundaries for primary and secondary retail areas. *It is assumed that the proposed boundaries are based on an up to date evidence base.
	Another option is to set different thresholds for non retail uses within the	Lowering the threshold for non retail uses within the retail frontages

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	<p>retail frontages. Lowering the threshold is likely to undermine the city centre's role as a regional shopping centre, through the deterioration of the range of shopping. Raising the threshold could be damaging to the vitality and viability of the city centre, reducing opportunities to enable evening activities to spread around the city centre. The preferred thresholds achieve a good balance and many, for example 85% within the primary retail area, have previously been supported in a number of appeal decisions and therefore they are considered to be the most appropriate.</p>	<p>may negatively impact the city centre's role as a regional shopping centre (negative effect on ECI), whilst raising the threshold may result in an unbalanced provision of 'services' (e.g. restricting evening activities), negatively impacting on the vitality and viability of the city centre (negative effect on ECI and SOC7).</p>
DM21: District and local retail centres	<p>One alternative is to adopt different boundaries for the district and local centres. The boundaries chosen are considered appropriate as they are tightly drawn around the clusters of town centre uses, in accordance with PPS4 and are based on up to date survey work.</p>	<p>The nature of potential sustainability effects would depend on the proposed boundaries for district and local centres. *It is assumed that the proposed boundaries are based on an up to date evidence base.</p>
	<p>Another option is to continue the Local Plan approach which sets a uniform threshold for all local and district centres. It is considered that this does not acknowledge the current situation or take into consideration the individual function of each centre. The preferred thresholds are considered appropriate. Lowering the threshold within centres may result in them not providing for everyday retail needs whereas raising the threshold could be damaging to the vitality and viability of the centres.</p>	<p>Setting a uniform threshold for all local and district centres is not flexible enough as to recognise the different functions of the centres within the plan area (negative effect on ECI).</p>
Communities		
DM22: Community facilities	<p>Alternative options are to have more stringent or less stringent criteria for the protection of community facilities. It is considered that the preferred policy achieves the right balance as it is flexible enough to allow the loss of community facilities where it is not economically viable to retain them or where satisfactory alternative provision exists.</p>	<p>Having more stringent criteria for the protection of community facilities would provide a higher degree of certainty regarding their retention (positive effect on SOC8) but may not support a flexible enough approach that can respond to changing economic and social circumstances to ensure the need is met most effectively and available space is used most efficiently. Having less stringent criteria for the protection of community facilities would provide an insufficient degree of certainty regarding their retention (negative effect on SOC8).</p>
DM23: Evening, leisure and the late night economy	<p>As the broad approach is set out within the Joint Core Strategy, options are limited. The main alternatives are to extend or reduce the boundaries to the defined leisure and late night activity areas. It is considered that the preferred option is appropriate as it promotes the evening and late night economy whilst taking into consideration the issue of residential amenity.</p>	<p>Extending the boundaries of the leisure and late night activity areas may result in negative impacts on residential amenity (negative effect on SOC7) but positive impacts on the local economy (positive effect on ECI) and provide a more evenly distributed provision of services; reducing the boundaries would restrict the evening and late night</p>

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		economy, impacting on the local economy (negative effect on EC1) and potentially not meeting demand, but would result in positive impacts on residential amenity (positive effect on SOC7).
DM24: Hot food takeaways	A second alternative option is to also restrict hot food takeaways where they would be in close proximity to schools. It is not considered appropriate to include this as a criterion for three reasons. Firstly, such an approach would be a relatively “blunt instrument” as some takeaways can, and do, provide healthy options on their menus. Secondly, the issue of school pupils eating unhealthy food is not confined to hot food takeaways. AI retail units can also sell unhealthy ‘junk’ food. Thirdly, relatively few of the secondary schools in Norwich are located close to defined retail centres.	Restricting hot food takeaways near schools may support school children to have a healthier diet (positive effect on SOC2), but may have a negative effect on the local economy and provision of jobs for all (negative effect on EC1).
University of East Anglia		
DM26: University of East Anglia	The third alternative is for the policy to cover a different area, either retaining the existing Local Plan boundaries, or expanding the area to cover a larger area than the campus proposed in this document and the Site Allocation plan. The spatial coverage of the policy is based on the masterplanning work and shows the amount of land needed for expansion, taking account of the need for environmental protection. To achieve the growth needed to reflect the strategic importance of the UEA to the local and regional economy, the masterplan has shown that restricting development within the present university campus boundaries would not be practical, therefore limited expansion of the campus boundaries is proposed. Greater expansion of the boundaries is not a preferred option due to the likely environmental impacts, particularly on the Yare Valley.	Expanding the area covered by the campus may result in a negative environmental impact, particularly on the Yare Valley (negative effect on ENV2 and ENV4). Restricting the area covered by the campus may result in a positive environmental impact (positive effect on ENV2 and ENV4) but may negatively impact the needs of the university with regards growth and supporting the strategic role of UEA to the local and regional economy (negative effect on SOC3, EC1, and EC2).
Norwich Airport		
DM27: Norwich Airport	An alternative option would be to have a policy to cover a different area, either retaining the existing Local Plan boundary, or expanding the area to cover a larger area.	Expanding the area of the airport may result in negative effects on the environment (including with regards emissions) (ENV1, ENV3, ENV4 and ENV6) and amenity (SOC7). Retaining the local plan boundary may result in positive effects on the environment (including with regards emissions) (ENV1, ENV3, ENV4 and ENV 6) and amenity (SOC7) but may negatively impact on the growth of the airport and its role in the local and regional economy (negative effect on EC1, EC2 and SOC8).
Transport		

Policy name and number	Alternative option	Appraisal
DM29: City centre public off-street car parking	A second alternative is to relax the criteria for new off street car parking. This may result in low quality, non permanent parking areas which do not make efficient use of land. It would also reduce the opportunities for new well located, high quality strategic car parks.	Having less stringent criteria for off street parking may result in provision of a lower quality car parking (negative effect on ENV5, and SOC7), that does not effectively and efficiently meet need (negative effect on ENV9). It may also impact on economic development and local businesses (negative effect on EC1 and EC2).
	A third alternative is to reduce the overall number of spaces within the city centre. It is considered that a reduction in overall car parking would be inappropriate as this would not provide for future need which will arise from growth within the Norwich Policy Area. Furthermore NATS does not indicate a reduced level of parking provision.	Reducing the overall number of spaces within the city centre may result in positive environmental effects (relating to a potential reduction in car use) (positive effect on ENV1, ENV3, ENV6, and ENV9) as well as enabling such spaces to be used for other uses, such as retail and offices (positive effect on SOC7, ENV9 and EC2). However, it may also mean that parking provision does not adequately meet demand, impacting on the local economy and the needs of the community within the plan area (negative effect on EC1 and EC2).
	The final alternative is to maintain levels at 10,002 spaces but to not identify areas for an overall reduction in parking and areas for an overall increase in parking. This may reduce opportunities to readdress the balance of parking provision across the city centre. The preferred approach seeks to focus new parking provision within or near areas identified within the Joint Core Strategy and within this plan for retail and leisure development and to reduce parking provision within areas where there is currently an over supply.	Not identifying areas for an overall reduction in parking and areas for an overall increase in parking would not enable a redistribution of parking provision that effectively meets needs within the city centre and uses space within the city centre most efficiently (negative effect on EC1, EC3 and ENV9).
DM31: Car parking and servicing	Alternative options are to be more stringent or less stringent with regards to car parking standards. It is considered that the preferred policy achieves the right balance for both residential and non residential development. With regards to residential the proposed levels take into consideration car ownership levels, accessibility and the efficient use of land. For non residential development the proposed levels help achieve the aims and objectives of NATS whilst still encouraging investments within the city.	Reducing the proposed levels of car parking may have positive environmental impacts with regards discouraging car use and in turn emissions (positive effect on ENV1, ENV3, ENV6, and ENV9) as well as enabling space that would otherwise have been for car parking to be used for other uses, such as open space, residential, retail and offices (positive effect on SOC7, EC2 and ENV9). Increasing the proposed levels of car parking may have negative environmental impacts with regards enabling greater car use and in turn resulting in an increase in emissions) (negative effect on ENV1, ENV3, ENV6, and ENV9) and would reduce the amount of land available for other uses, such as open space, residential, retail and offices (negative effect on SOC7, EC2 and ENV9).