



The countryside charity
Norfolk

15 Pigg Lane
Norwich
NR3 1RS

Telephone: 01603 761660
Email:
planning@cprenorfolk.org.uk

www.cprenorfolk.org.uk

Working locally and nationally to
promote, protect and enhance a
beautiful and thriving countryside
for everyone's benefit.

Further Written Statement for GNLP Public Examination – CPRE Norfolk

Matter 1, Issue 2: Does the Sustainability Appraisal (SA) including the addendum, adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?

Q2 Has the Sustainability Appraisal, including the addendum, properly assessed the likely significant effects of all reasonable alternatives including a reduced housing provision buffer?

The answer to this is no.

The Inspector rightly identified that the SA failed to model smaller and minimal buffers as reasonable alternatives. However, what the Partnership has proceeded to carry out is a purely nominal attempt to model the effect of different buffers in the SA Addendum (D.16) but without any corresponding acknowledgement that alternatives to the spatial strategy (based on this different buffer) should also have been assessed.

All of the purported reasonable alternatives to the spatial strategy are still based a 20% buffer. No attempt has even been made to identify any altered spatial strategy based on a reduced buffer. That is a fundamental flaw with the SA. The SA Addendum is a purely token exercise which does not meet the legal requirement to assess all reasonable alternatives.

The SA Addendum itself recognises the limitations of its own assessment based on a purely numerical adjustment to the housing numbers without any further consideration of how much additional housing would be required in terms of size and location. For example, the SA Addendum states at 3.7.3: *“the effect of each housing option on the landscape is difficult to quantify as it depends on many contextual factors that cannot be determined at this high level”*. The table at Table 3.2 is therefore in substance of very little (or indeed no) value in understanding how each option performs against the objectives set out in the SA.

It certainly does not show a proper attempt to assess reasonable alternatives *“to the selected spatial strategy including a reduced housing provision buffer”*: it is clear that there was no attempt to visit that spatial strategy in light of the Inspector's concerns over the buffer being set disproportionately high. All of this serves to demonstrate the criticality of setting an appropriate housing requirement (and buffer) in the first place: it is not something that can be revisited at a later date as the spatial strategy is premised on it.

In any event, the SA addendum strongly supports the view of CPRE Norfolk that the high amount of housing in the GNLP, with its 10% buffer, 12% “flexibility allowance” and further flexibility provided by the Costessey contingency site, the likelihood of more windfalls and the possibility of the minimum number of houses in the SNVCHAP being exceeded, would be significantly more damaging than options 5 or 6 with a much smaller buffer. Therefore, to follow NPPF paragraphs 11a, 15, 16a and 16b, the GNLP should be based on one of these options, with option 6 being most preferable as a conclusion of this document is that as “the lower quanta options (5 and 6) should be considered more sustainable” (4.1.6). As this is the case it follows that the lowest quanta option (option 6, OAN & 1%) would be the most sustainable option of those assessed, with the likelihood that an option based only on the OAN without any buffer would be even more sustainable.

Q4 Is it clear how the SA has influenced the Plan and the choice of spatial strategy? Does it support the spatial strategy or is there anything in the SA which indicates that changes should be made to the plan?

CPRE Norfolk remains highly concerned that assessment carried out early in the formation of the Plan has been largely ignored during the Plan's progression, as it appears that these earlier conclusions have been put aside in favour of an emphasis on unnecessarily high levels of economic and housing growth, with much housing being allocated where sites have been proposed with insufficient attention paid to these earlier conclusions. Moreover, the unnecessarily large housing buffer, "flexibility allowance" and other additions, make the spatial strategy and housing numbers incompatible with the pre-SA reports, the SA and the inadequate SA addendum. The latter document in particular clearly has not influenced the choice of spatial strategy at all, because it clearly has not been revisited as the Partnership did not reconsider its spatial strategy based on a lower buffer.

In particular, we draw attention to the table on page 80 of the GNDP papers for their meeting of 23 June, 2017. This clearly shows that the best performing growth strategy is option 1 (urban concentration (close to Norwich), with options 2 (transport corridors) and 3 (Cambridge – Norwich Tech Corridor) being next best performing, while the worst performing are options 4 (dispersal) and 5 (dispersal plus one new settlement.) Given these findings it is difficult to understand why these conclusions were seemingly overlooked later in the plan-making process, if a priority was to ensure a plan-led approach with sustainability at its heart, as required by the NPPF.

Climate Change

Moreover, as the topic paper: how climate change issues have been addressed in the GNLP (23 December 2021) states, "climate change and its implications are fundamental issues to be addressed within Local Plans" (para. 3), "the local plan can do this [address climate change] by **ensuring that new development is located** [our emphasis] and designed to mitigate climate change and to be adapted to a changing climate" (para. 3), and that "the GNLP has had full regard to the legislative and national policy requirement to contribute to the mitigation of and adaption to climate change" (para. 30.) However, we contend that the GNLP does not show this "full regard".

Despite this, when the five examples of how the climate change issue has been addressed in the GNLP are examined, none of them refer to how the location of new housing and the spatial strategy have been led by the need to address this fundamental issue, apart possibly from the statement 'the delivery of growth and addressing climate change states: *"to achieve this plan's visions and objectives it is essential that we deliver planned growth through an effective policy framework which will both help decarbonise development and assist in addressing climate change"* (para. 28.)' If the GNLP really has full regard for this issue, then it would ensure the location of new development is guided by the conclusions of the 2017 assessment, maximizing urban concentration and eliminating dispersal, along with minimizing rather than maximizing total housing numbers.

The importance of climate change for selecting the most appropriate growth option, along with the other sustainability factors from the table of page 80 of the GNDP papers for 23 June 2017 does not appear in the "Foreword – the choices we face" (GNDP Report Appendix 1, GNDP papers, 20 November 2017) and it appears these important factors disappear from the GNDP's thinking in forming the growth strategy for the GNLP thereafter. Economic growth, the need for a lot of new housing, and infrastructure all feature prominently in this foreword as the key issues which need to be taken into account when decided on a growth strategy. However, climate change is not mentioned, whilst the environment is mentioned once in passing: hardly showing the "full regard" to these issues which is needed and required.

Document B23.2 (Interim Sustainability Appraisal, March 2018) at 7.5 describes the various growth options for the GNLP before including a table at 7.6 which assesses these in a similar way to the table at page 80 of the GNDP papers for 23 June 2017. However, the results of these assessments changed markedly with no explanation as to why these differences occurred. For example, for SA2, to continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change, changed as shown here:

Growth Options	23 June 2017 SA2	March 2018 SA2
1. Urban concentration (close to Norwich)	++	+
2. Transport corridors	+	+
3. Cambridge – Norwich Tech Corridor	+	+
4. Dispersal	-	0
5. Dispersal plus new settlement	-	0
6. Dispersal and urban growth	0	0
7. Dispersal urban growth new settlement	0	N/A

This shows, without explanation or justification in the documentation that the urban concentration option 1 apparently would no longer have a likely strong positive effect, but just a likely positive effect: the same as options 2 and 3. At the same time the two dispersal options changed from having a likely adverse effect to having a likely neutral/no effect: the same as option 6 (and 7.) A satisfactory answer as to why this change in assessment was made has not been given. This is highly significant, as following the Reg. A consultation in January – March 2018 the preferred growth option was included in The Reg. C consultation in January – March 2020. By then the favoured growth strategy was shown on the key diagram and “includes Greater Norwich’s part of the Cambridge Norwich Tech Corridor, including the Norwich urban area, Hethersett and Wymondham and key strategic jobs sites at Hethel and the Norwich Research Park. Growth is also focussed in towns and villages to support vibrant rural communities” (Stage C Regulation 18 Draft Strategy and Site Allocations, Policy 1 – the sustainable growth strategy.) In addition, the following was given as an alternative approach: “combines most of the development in and around Norwich and on the Cambridge Norwich Tech Corridor, with an element of dispersal to villages to support thriving rural communities”. For sustainability and climate change to be given full regard, the changes in the SAs as described above, and why the more sustainable growth option particularly with regard to climate change was put to one side in favour of what appears to be a growth option based on the availability of sites and the desire for expansion, should have been fully explained and justified.

Document B23.3 (Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan, Regulation 18 (C), January 2020) discusses the impact of new housing on climate change in ‘SA Objective 2, climate change, mitigation and adaptation – assessment methodologies and assumptions’, but does not assess the impact of different spatial strategies or growth options on climate change, instead looking at overall numbers of new houses. When looking at the identified adverse impacts and potential mitigating influence of Local Plan policies, section 2 looks at climate change mitigation and adaptation. Promotion of low carbon energy generation and sustainable building design, green infrastructure and more sustainable transport are discussed, without any assessment of the different growth options. At section 5.2, policy assessment conclusions, it is stated that “the majority of policies assessed would be likely to result in overall adverse impacts in terms of compromising climate change mitigation, primarily due to the scale of development proposed resulting in increased carbon emissions in relation to current levels across the Plan period” (5.2.5.) This in itself argues against excessive housing targets, but also omits to examine which of the growth options would be more or less harmful in terms of climate change impacts. The scale of new housing is acknowledged as having “a major negative impact on climate change mitigation and adaptation” (C.4.3.3.) We expected this SA to assess the various growth options, to understand why the favoured option in the Stage C Regulation 18 draft strategy was selected. This deficiency makes the process unsound.

Document A6.1 (Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan, vol. 1 of 3: non-technical summary, January 2021) includes two paragraphs specifically on the topic of climate change (paras. N57 and N58.) These acknowledge the detrimental effects of losing approximately 1,019ha of previously undeveloped land to development, along with an estimated increase on local carbon emissions by approximately 27.1%, while stating that the GNLP’s policies would go some way towards mitigating these adverse impacts on the climate. However, no mention is made on the impact of the location of the proposed new development on climate change and associated issues, which is an important omission given the necessity to ensure that new development is located to mitigate climate change.

Document A6.2 (Sustainability Appraisal and Strategic Environmental Assessment of the Greater Norwich Local Plan, vol.2 of 3: Regulation 19 SA Report) when discussing SA Objective 2 – Climate Change Mitigation and Adaptation, does not cover the differences that varying locations of development and different strategic growth options would bring in

any detail, instead covering impacts resulting from total housing numbers. We contend that more thorough assessment of the different growth strategies would underline the original assessment that concentration of new development in and close to Norwich would be less harmful, whilst dispersal of new housing would be most harmful.

This SA also briefly explains the six growth options from the Reg. 18A consultation at 5.4.3 (page 58), concluding that “no single spatial option emerged as a best performing option since each option performed differently in terms of effects on SA objectives (see Fig 5.4). At this stage in the plan making process the Councils concluded that no one option was preferred to the others”. Had the original analysis shown on page 80 of the GNDP papers, 27 June 2017 been used, it would have clearly shown that option 1, urban concentration (close to Norwich) was the most favourable, while option 4, dispersal, was the least favourable.

Document D1.6 (Sustainability Appraisal Addendum, December 2021) looks at the impacts from different total amounts of housing over the plan period without looking in any detail at the locations for this housing. Again, this is an important omission, as the location of new development would be important in assessing impacts on climate change.

Overall, the SA process has failed to examine and assess the impacts of the various growth options regarding climate change. Throughout more recent documents there are unsupported assertions that increased amounts of electric vehicles will be a positive, without acknowledging the breadth and depth of negative factors associated with climate change which would result from dispersed housing, as well as the unnecessary and unneeded large total of housing. As such, the GNLP has failed to give full regard to mitigating climate change and to be adapted to a changing climate. Insufficient attention has been paid or drawn to the importance of the location of new development with regard to climate change.