



South Norfolk Local Development Framework

Sustainability Appraisal: Scoping Report

Stakeholder Feedback

Responses, proposals and amendments following consultation

South Norfolk Council
Planning Policy Team



APRIL 2006

Summary

South Norfolk's exploratory issues and options stage of the Local Development Framework process, focussing on the Core Strategy and Site Specific Proposals, was accompanied by consultation on the draft Sustainability Appraisal Scoping Report between 28th December 2005 and 3rd February 2006.

Comments and proposed changes were sought from the four statutory Sustainability Appraisal bodies (Environment Agency, Countryside Agency, English Nature and English Heritage), seven neighbouring local authorities and other stakeholders with environmental, economic and social responsibility.

By drawing together those responses we can target improvements to both the scoping exercise and the ongoing appraisal process, both for use in the Core Strategy and Site Specific Proposals, and wider LDF formulation or revision.

The report is structured in the same manner as the consultation questions asked, and highlights both recommendations and actions to be taken. It is considered that revising the sustainability appraisal process will be an ongoing task as the changing circumstances in South Norfolk can be reflected in a flexible appraisal mechanism informed by relevant, up-to-date background information and assessment criteria.

Respondents

Comments were received from the bodies listed below.

- Countryside Agency (Landscape, Access and Recreation Division)
- English Nature
- Environment Agency
- Broadland District Council
- Norwich City Council
- Norfolk Wildlife Trust
- Royal Society for the Protection of Birds

Contents

To be consistent with the five themed questions we asked the consultees, the contents of the report are structured as follows:

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1. Relevant Plans and Programmes Reviewed

Comments and recommended amendments

Ref A1	<p>Environment Agency [recommendations]</p> <p>The relevant policies, plans and programmes outlined in Appendix 1 of the draft Scoping Report appear to be appropriate. The Council's LDF may also wish to consider the possible influence of the Broadland Rivers Catchment Flood Management Plan (CFMP) and the Broadland Rivers Catchment Abstraction Management Strategy (CAMS).</p> <p>The CFMP is a strategic planning tool for decision makers within catchments to formulate policies for sustainable flood risk management, including infrastructure and flood defence standards / alleviation. This CFMP concerns the Rivers Yare, Bure, Waveney, Ant and Thurne and tidal rivers of the Broads.</p> <p>PPS1 – 'Creating Sustainable Communities' states the need to avoid new development in flood-risk areas, and so this should be identified within the review stages of the Scoping Report.</p>
A2	<p>Response [officers' views]</p> <p>Support for the document review is welcomed. The opportunity to enhance our understanding of the watercourse and flood requirements on a catchment-wide basis is laudable. Reviews and consultation of the strategy at the allocations and site-specific proposals stage will ensure that development documents pay regard to the impact of catchment-based management. Appropriate strategies or indicators can then be incorporated into the SA framework for testing a proposal in a more specific manner.</p>
A3	<p>Actions [changes made to the Scoping Report]</p> <p>The PPS1 review will be supplemented with the need to avoid increasing flood risk to new development. This will also be highlighted as an issue in an additional environmental baseline data / background section. See also responses G1 and G2.</p> <p>Additional information for the literature review can be seen in the attached Appendix 1.</p>
B1	<p>Countryside Agency</p> <p>The approach taken (para 2.1) is a sensible one if the time lag between preparation of documents "higher" in the hierarchy and the current exercise is allowed for. Some areas will need to be supplemented with policy documents published more recently.</p> <ul style="list-style-type: none"> • Replace the review of the 1999 national sustainable strategy with the Defra March 2005 'Securing the Future: the UK Government Sustainable Development Strategy'. • Include a review of the Defra 2004 'Rural Strategy'. • Update the regional '<i>State of the Countryside in the East of England</i>' report to 2004 version. • The '<i>Regional Housing Strategy for the East</i>' has been approved and is no longer draft version. • Make reference to the Integrated Regional Strategy '<i>Sustainable Futures</i>' (EERA 2005). • Consider '<i>The Broads Plan</i>' for implications at the local level.

B2	<p>Response Recognition of the value of a 'hierarchical' approach to literature review is appreciated. All recommended changes are valid and will be added to the Scoping Report.</p>
B3	<p>Actions The literature review / consideration of plans and programmes (Appendix 2 of the Draft report) will be supplemented with the addition of those contained in the attached Appendix 1. Additions include:</p> <ul style="list-style-type: none"> • 'Securing the Future: the UK Government Sustainable Development Strategy' (2005) • 'Rural Strategy' (Defra, 2004) • 'Sustainable Futures: The Integrated Regional Strategy' (EERA 2005) • 'The Broads Plan' (The Broads Executive Authority, 2004)
C1	<p>Broadland District Council Land use plans may need to consider the following documents as material considerations:</p> <ul style="list-style-type: none"> • EC Habitats Directive. • 96/82/EC Hazardous Substances Directive, as referenced in PPS12. • The Air Quality Strategy for England, Scotland, Wales and Northern Island (Jan. 2000) and its first Addendum (Feb 2003), as referenced in PPS12.
C2	<p>Response The UK has a requirement to ensure that conservation of habitats of specified value remains a priority over development in these areas. Such designations include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Local authorities must include provision within policy for spatial management of hazardous substances, and must fulfil a duty to ensure that local air quality is assessed against national air quality objectives and implement a strategy to overcome failings.</p>
C3	<p>Actions The hierarchical nature of the LDF allows review at the national and regional strategy level to suffice for local level development planning. Nevertheless, these are material considerations and so the SA will include a short summarised review of all, seen in Appendix 1 (attached).</p>
D1	<p>RSPB The RSPB is pleased to see a comprehensive list provided in Scoping Report Appendix 1, which contains the major policies and legislation that we would expect to see included.</p> <ul style="list-style-type: none"> • Recommended inclusion of a review of the '<i>UK Biodiversity Action Plan</i>'.
D2	<p>Response The UK Biodiversity Action Plan will be valuable as a guide for forming policy, and the local Norfolk BAP is used to inform the appraisal framework and add to the environmental baseline data subsequently included within the revised Scoping Report.</p>

D3	<p>Action In addition to a short review of the Norfolk BAP in Appendix 1 (attached), BAP targets are considered within the SA Framework as an Investigative Question (“<i>Will it help to achieve local BAP targets?</i>”) and as baseline indicator: <i>Progress in Biodiversity Action Plan targets:</i></p> <ul style="list-style-type: none"> a) <i>% Habitat Actions in progress / completed;</i> b) <i>% Species Actions in progress / completed</i>
E1	<p>Norfolk Wildlife Trust The Norfolk Biodiversity SPG should be added as a reviewed document.</p>
E2	<p>Action The biodiversity SPG will be valuable for informing the environmental baseline assessment that was added to the background issues section (see also comments from G1).</p>

2. Background Info, Baseline Data, Sources, and Issues.

Comments and recommended amendments

<p>F1</p>	<p>Environment Agency Desire to see that consideration is given to flood risk and reducing its occurrence.</p> <p>The avoidance of habitat fragmentation is important in terms of the protection and conservation of biodiversity features. Need to consider ‘vulnerability’ of habitat and site zones – there is a specific need to afford buffer zones surrounding a designated site the same protection as afforded to the sites themselves. A vulnerability analysis could be applied towards the creation of buffer zones around sensitive nature conservation sites to demonstrate the sensitivity of habitat and species. Any development within this buffer zone area would be weighed against social and economic considerations to the same extent as development proposals within or crossing the designated site itself would be. This should effectively provide equal standing for the environmental protection policies to apply both to nature conservation sites and their surrounding buffer zones.</p> <p>Further, an environmental sensitivity assessment would consider the sensitivity of landscape, biodiversity and cultural heritage in areas earmarked as having development potential. By paying regard to the sensitivity of a landscape, we can determine suitability and mitigation for proposals.</p>
<p>F2</p>	<p>Response Flood risk is a material consideration in the formulation of plans as well as the determination of applications and is treated as such throughout the LDF formulation. Recognition of this in the Scoping Report is important.</p> <p>Biodiversity sensitivity, application of buffer zones around designated sites and the level of protection afforded to them is certainly a valid area for investigation, particularly as there are so many competing pressures on land. It is likely that this possibility will be examined through the individual LDF documents.</p> <p>The vulnerability/sensitivity of the District’s environment, landscape and heritage resources to potential development is an important consideration if we are to plan effectively towards sustainable development. As part of the evidence base for the LDF, a Landscape Character Assessment and Wind Turbine Sensitivity study will inform allocations and policies within the LDF. Measures on a site-specific scale could certainly include incorporating buffer zones into development to be addressed through individual LDF documents.</p>
<p>F3</p>	<p>Actions As part of a wider Environmental Characteristics section, and throughout the identification of issues, flood risk is included as a material consideration: <i>“South Norfolk Council will undertake a Strategic Flood Risk Assessment that establishes sensitive areas for development based on flood plains for tidal surges and fluvial flooding, and suggests mitigation measures for some areas presently at risk.”</i></p> <p>Biodiversity also features within the ‘Environmental Characteristics’ section; see Appendix 2.</p>

<p>G1</p>	<p>Countryside Agency</p> <p>The characterisation of the District (Scoping Report section 3.2)...is concerned almost entirely with the social profile of the population, vitally important as it is, but lacks discussion of the local economy or the environment. This is unhelpful and should be rectified. The relevant areas are covered in the table at Appendix 3...and more of this material should be drawn upon.</p> <p>We welcome the fact that further work is underway to develop the earlier South Norfolk Landscape Assessment. Appraisal baseline information should identify the inherent landscape character types. The point is raised that the Countryside Agency's '<i>Countryside Quality Counts</i>' survey found that "marked changes inconsistent with character" had occurred in the CA84 Mid Norfolk Joint Character Area between 1990 and 1998. Though this area also includes Norwich, the district policy should be aware that it is an area susceptible to change.</p> <p>There is an almost complete lack of consideration of recreational needs and provision or access to open space...[which are] important considerations for quality of life and health of the population. There is only a passing reference to this in [initial] Appendix 3 <i>Issues for South Norfolk</i> and so these omissions should be rectified. If this is not an issue and so does not feature in Figure 3, evidence to this effect should be provided. Further, this matter can relate to numerous sustainability areas (social, environmental) but its existence should be made clear, (eg. noted as inclusion within the 'accessibility to facilities' issue).</p>
<p>G2</p>	<p>Response</p> <p>Appendix 3 was intended as a synopsis of the issues affecting the District to complement the baseline characteristics of section 3.2. Such advice is to welcomed, and links between the two will be improved by integrating Appendix 3 into the body of the Scoping Report.</p> <p>Landscape character areas will continue to form a vital part of the LDF sustainability considerations and appraisal mechanism and so it is certainly worth demonstrating the differences in character in the District. As part of a varied evidence base, the South Norfolk Landscape Assessment would consider changes within the character areas and advise the direction that policy could take to address any inconsistencies or prevent future adverse changes. LDF progression will consider updated versions of the 'Countryside Quality Counts' initiative as an accompaniment to landscape studies.</p> <p>Access to open space and recreation areas may well prove a significant issue for consideration in South Norfolk following the 'Open Space and Leisure Facilities' study which examines this in greater detail to inform the LDF. This comment is appreciated.</p>
<p>G3</p>	<p>Actions</p> <p>Baseline information has been expanded to include more environmental and economic characteristics and identify some of the issues forthcoming (see Appendix 2). Landscape character areas are included within this. As part of a 'Key Sustainability Issues' section (achieved by incorporating Appendix 3 into the body of the Scoping Report) the issues of protecting landscape character and providing access to quality open space are highlighted. Though these are discussed as social issues, they are definitely cross-cutting. There are also opportunities to show how the issues will be considered through Sustainability Appraisal objectives.</p> <p>Sustainability Appraisal Objective S8 includes the decision making criterion of:</p> <ul style="list-style-type: none"> • <i>Will it increase access to and provision of quality open space?</i>

H1	<p>RSPB</p> <p>In establishing a baseline, it is necessary to address the status, abundance, distribution and condition of habitats and species. This will inform the current state of the environment, as required within the SEA. Future trends and threats to these ecological aspects should then be identified in order to fully understand the potential influence the LDF might impose upon them.</p> <p>Within the Scoping Report the Council should identify the environmental resources of the District, which include: Designated sites (international, national, regional and local); BAP habitats and species; protected species and Red Data Book Species; ancient woodland, and brownfield land of conservation interest.</p> <p>It is recommended that greater attention be given to the possible effects of the LDF on these resources throughout the SA to fulfil the needs of Strategic Environmental Assessment.</p>
H2	<p>Response</p> <p>The baseline data and issues section will examine in greater detail the environmental resources of the District. Appendix 3, currently detailing characteristics and issues, such as those species at risk and landscape sensitivity, also builds on these characteristics.</p> <p>Linking the possible effects on sites brought through the LDF, and examining the role that SA (and SEA) can play in identifying these issues and mitigating the consequences, is the purpose of the SA framework, assessing options and proposals.</p>
H3	<p>Actions</p> <p>Some habitat data has been considered within the environmental characteristics section, which is seen in Appendix 2, attached.</p> <p>Opportunities to help achieve BAP targets and other initiatives to promote ecological benefit will all be considered in due course through individual LDF documents. This is reaffirmed within SA assessment framework as SA objective ENV1 includes the decision-making criteria: <i>“Will it contribute to achieving Biodiversity Action Plan targets?”</i></p>
I1	<p>English Nature</p> <p>This section seems thin in detail and would have liked to see a fuller account of the area giving salient points of its environmental characteristics. The issues need greater development and we would like to see a more detailed analysis of the key sustainability issues that would then be summarised in Appendix 3.</p> <p>Figure 3 (issues summary) could have some amendments and additions, including the following:</p> <ul style="list-style-type: none"> • Conserving water resources (this includes both quality and quantity) • Changing farm practices and diversification • Obtaining energy from renewable resources • The need to reduce energy demands

I2	<p>Response This important advice is welcomed for use in analysing the baseline data and the Scoping Report environmental characteristics (Appendix 2, attached), and will inform the issues identification section.</p>
I3	<p>Action The environmental resources of the District are considered in the attached Appendix 2, and the Issues Appendix expanded to build on these findings. Figure 3 (now Fig. 5) uses the suggestions listed, to include:</p> <ul style="list-style-type: none"> - Achieving sustainable quality and supply of water resources and conserving these resources - Managing the effects of climate change, such as impacts on agriculture practice and assisting farming diversity - Developing renewable energy resources and reduce energy demands
J1	<p>Norfolk Wildlife Trust There is no specific coverage of environmental data. This could be done descriptively or statistically to highlight the distinctive character of South Norfolk from a landscape and wildlife viewpoint and to link to indicators.</p>
J2	<p>Response The Scoping Report baseline characteristics and Issues Identification sections will detail some environmental characteristics that inform the creation of sustainability appraisal objectives.</p>
J3	<p>Action Environmental data and the resources of the District are examined in greater detail in the attached Appendix 2 a supplement to the existing 'Character of the District'</p>

3. Sustainability Appraisal Objectives	
Comments and recommended amendments	
K1	<p>Environment Agency Although we consider that the headline objectives capture all the issues relevant to the Council's area, the objective concerned with maintaining and enhancing biodiversity [ENV3] should also have as its aim the implementation of net gain and avoidance of habitat fragmentation. Current wording is not sufficiently pro-active and we would recommend that the objective is reworded...or the matter of implementing net gain and avoiding habitat fragmentation could be dealt with as a sub-objective.</p> <p>ENV7, and general concerns throughout the report for reducing vulnerability to, and accommodating for the effects of, climate change will need to pay regard to PPS25 'Development and Flood Risk'.</p>
K2	<p>Response We welcome the acknowledgement for more pro-active biodiversity consideration to reduce habitat fragmentation and encourage relocation / replacement.</p> <p>We will ensure that PPS25 is considered as a material consideration and that there is a more traceable link between issues identified and objectives of the Sustainability Appraisal.</p>
K3	<p>Action Biodiversity concerns are discussed in the background information section in Appendix 2 attached to this report.</p> <p>As reworded, ENV1 (nee ENV3) reads: <i>"To maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation"</i>.</p> <p>As reworded, ENV2 (nee ENV7) reads: <i>"To limit or reduce vulnerability to climate change, including minimising the risks from flooding"</i>.</p> <p>There is now specific inclusion within Scoping Report Section 4: Identifying Key Sustainability Issues of where an objective emerges from certain background issues.</p> <p>A revised list of Sustainability Objectives can be seen in the attached Appendix 3, Figure 4 of the revised Scoping Report.</p>
L1	<p>Countryside Agency The list of objectives appears to be comprehensive, on the understanding that Objectives S7 and S8 between them cover the recreation / open space issues (referred to in G1), though this is not clear in Table A4.1. Suitable decision-making criteria [regarding open space provision and quality] should be included, unless it can be demonstrated that this issue is not relevant.</p> <p>ENV4 decision-making criteria should be amended to be expressed in terms of consistency with and impact on landscape character, rather than high- or low quality landscapes.</p>

L2	<p>Response Support is welcomed and including this open space issue is important. Objectives S4 and S8 (nee S7 and S8) are intended to cover this aspect, and amendments will be added accordingly.</p> <p>Objective ENV6 (nee ENV4) is intended to prevent local landscape distinctiveness from being eroded by inappropriate proposals. The Landscape Character Assessment will ensure that preserving landscape character by complementary appropriate development design is appreciated in appraisal stages.</p>
L3	<p>Action Decision-making criteria to clarify the importance of considering open-space provision in development now feature as part of Objective S8, and read: <i>“Will it increase access to, and provision of, quality open space?”</i></p> <p>As part of protecting landscapes within sustainability appraisal objectives, the following decision-making criteria will be added to revised objective ENV6 (nee ENV4 and ENV5), which includes replacing those concerned with landscape quality:</p> <ul style="list-style-type: none"> • <i>Will it protect vulnerable and valued landscapes, or mitigate the effects of inappropriate development?</i> • <i>Will it ensure that building design makes a positive contribution to the local area, and enhances the character of local landscape??</i> • <i>Will it reduce the amount of derelict, degraded and under-used land?</i> • <i>Will the District’s heritage be preserved or enhanced?</i>
M1	<p>RSPB The RSPB is supportive of the sustainability objectives.</p> <p>In particular, we strongly support objective ENV3, which gives direct reference to ‘maintain and enhance biodiversity’. We are also supportive of further environmental objectives to improve air quality, minimise production of waste and those relating to climate change.</p>
M2	<p>Response Support is welcomed. A revised list of the Sustainability Objectives can be seen in the attached Appendix 3, including the amendment to ENV3 (now ENV1) as: <i>“To maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation”.</i></p>
N1	<p>English Nature With regard to ENV8, there is a need to consider the sustainability of water resources in terms of quality as well as quantity.</p>
N2	<p>Response It is recognised that the sustainability of water resources does include issues of quality. This will be identified in baseline discussions and identifying issues.</p> <p>Using indicators and investigative questions / decision making criteria will help to ensure that a broader range of factors are considered within the appraisal process than simply those mentioned specifically within objectives.</p>

N3	<p>Action Within the appraisal framework, this issue is reflected through revisions to ENV8, which now reads: <i>“To improve water qualities and provide for sustainable sources of supply and sustainable use.”</i></p>
O1	<p>Broadland District Council At the moment, the Compatibility Matrix (Table 4.4) is largely a mirror image, but there are a number of examples where the compatibility for two given objectives is different depending on which way it is read on the table. It is possible that assessing the compatibility of objectives against each another may provide different conclusions depending on interpretation and circumstances prevalent.</p>
O2	<p>Response The assessment by nature is rather subjective. It was initially felt that applying the SA Objectives in different circumstances could provide differing aspects of compatibility, resulting in a matrix that was not symmetrical in its outcome. However, the reasoning behind the ‘mirror image’ approach is sound, and suggested by Guidance, so the South Norfolk assessment will be adapted to also follow this format.</p>
O3	<p>Action The Scoping Report continues to include a revised Compatibility Matrix (Scoping Report Appendix 3) but, in light of these comments, has been adapted to show the equal consideration of applied Sustainability Appraisal Objectives.</p>

<p>P1</p>	<p>Norwich City Council The list of potential sustainability objectives needs to be kept manageable without omitting any significant area of evaluation.</p> <p>There may be a case for reducing the number of sustainability appraisal objectives, and in that context there may already be some duplication of areas covered.</p> <p>Examples provided are:</p> <ul style="list-style-type: none"> • S7 covering many of the same areas as S4 and/or ENV4. • S9 appears to cover the same ground as the latter part of S5. • EC5 may be unnecessary as it repeats the whole process specifically for sustainability of economic development, which should in fact be a theme, captured within all the other economic objectives. <p>There are also areas where objectives' content is missing. Suggestions include:</p> <ul style="list-style-type: none"> • The need to make the most efficient use of land resources, an area that is essential to comply with Government policy (eg. use of brownfield sites). • Enhancing the cultural resources of the district and individual communities. • Ensuring a diversity of the economic base, including technological development. • Providing the means to regenerate economically deprived areas.
<p>P2</p>	<p>Response These comments are all welcomed and will certainly prove helpful.</p> <p>A review of the objectives will help develop a comprehensive assessment procedure whilst maintaining a manageable format for the appraisal framework and the suggestions for additional content within the objectives will all be incorporated as part of that review.</p>
<p>P3</p>	<p>Action Some duplication has been removed from those originally contained in the Scoping Report as part of a revision to the SA Objectives, as seen in the attached (Appendix 3 to this report). Original objectives ENV5 and S9 were amalgamated into the new ENV6 and S7.</p> <p>Where there is content missing from certain objectives, these have been amended to include:</p> <ul style="list-style-type: none"> • ENV7 (nee ENV10): <i>To minimise the loss of undeveloped land and conserve and improve the quality of soil resources.</i> • S7 (nee S5): <i>To encourage local community identity, and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity.</i> <p>The original S7 applies to neighbourhoods and community, whereas S4 concerns the immediate housing stock and infrastructure and ENV4 is concerned with design and conservation. All three are therefore distinct and retained: S8, S1 & ENV6 respectively. Objective EC5 is retained, (as revised objective EC4).</p>

4. Indicators used to measure the implementation of plans and policies

Comments and recommended amendments

Q1	<p>Environment Agency Objective ENV4 could be illustrated through an indicator to assess the effect that planning permissions have in eroding the locally-distinctive features of landscapes as defined by the Landscape Character Assessment studies. Any development that erodes these qualities could presumably be identified and quantified in an area-based sense.</p> <p>In addition to those suggested for biodiversity and encouraging the enhancement of habitat, an indicator could measure permissions granted for development that result in the loss of natural landscape features such as hedges and copses.</p>
Q2	<p>Response These suggestions are welcomed and the possibility to develop such measurements will provide valuable consideration for LDF policy. At present, it is unlikely that such an indicator could provide realistic accounts. In the interim period whilst landscape change assessments are developed, these aspects will be better placed as Investigative Questions at the assessment stages of plans. This would achieve a pro-active approach, complemented by baseline information for protection of designated areas.</p>
R1	<p>Countryside Agency Objective ENV4 is illustrated through using two ‘best value performance’ indicators that do not actually enable a judgement to be made on progress towards the objective. It is acknowledged that monitoring change to landscape character is not yet well established and so this could perhaps be acknowledged as being undeveloped at present.</p>
R2	<p>Response These comments are welcomed.</p> <p>It is acknowledged that ENV6 (nee ENV4) uses some indicators that do not fully demonstrate the effectiveness of the objective. In the time whilst more appropriate indicators are found or developed through studies such as the Conservation Area appraisal process, they can offer some worth in influencing policy assessments. For example, the amount of housing built on previously-developed land can be shown as some indication of the ability to preserve the countryside/greenfield landscape.</p>
S1	<p>English Nature Many suggestions are brought forward for replacement, amended or additional indicators, in particular relating to air quality, water resource availability and quality thereof, renewable energy, and increasing the areas of biodiversity assessment. Various indicators for use throughout the Framework are suggested, including:</p> <ul style="list-style-type: none"> • Conditions of County Wildlife Sites, and related effects imposed upon them via planning permissions granted. • Land in active conservation management, such as through Higher Level Schemes.

S2	<ul style="list-style-type: none"> • Biodiversity Action Plan progress. • Measured water consumption: industrial / business / residential. • Water quality measurements based on Environment Agency assessments. <p>Response As part of a review of the indicators used, these suggestions are incorporated within the baseline assessment and policy / options appraisal stages as decision making criteria for example. In particular, there is a need to include biodiversity assessments from areas other than those that benefit from statutory designations to develop more widespread protection.</p>
S3	<p>Action Inclusion of Decision Making Criteria (ENV1):</p> <ul style="list-style-type: none"> • Will it protect sites of nature conservation value from inappropriate development? • Will it contribute to achieving BAP targets? <p>ENV8:</p> <ul style="list-style-type: none"> • Will it reduce water consumption? • Will the supply of water be efficient in terms of the overall network?
T1	<p>Broadland District Council Measurable targets should be included in the SA framework based on information provided by the indicators. These targets could be based on improvements against comparison figures as well as specific targets.</p>
T2	<p>Response This is a welcome suggestion as the use of complementary targets and comparison values will certainly be useful in assessing the success of appraisal against a particular objective (see also 6 iii). In the event that some targets are not met, assessment could show that these areas need closer attention.</p> <p>There are some key areas where targets are required perhaps by national policy or desirable local-scale intentions, such as working towards 60% of development being on brownfield land, but these do not exist for every area within the sustainability appraisal. Instead, by considering the effects of plans and policies, throughout the assessment stages, against the baseline information gathered from indicators is able to provide a wider field of consideration. Where targets do exist these will be built into development plans.</p>
U1	<p>Norwich City Council The relationship and relevance of some indicators to their objective and decision-making criteria question may not always be reflective of what is trying to be achieved. This would provide an inaccurate measurement of the ability of those sustainability objectives to secure beneficial consideration throughout plans and policies during the appraisal process. Suggested areas where this may be found are: ENV4; ENV6; S4; EC1; EC2, and EC4.</p>
U2	<p>Response / Action The use of indicators to demonstrate the ability of a sustainability objective to influence policy from the outset can prove problematic. In many areas measurable and meaningful indices</p>

	<p>from the outset can prove problematic. In many areas, measurable and meaningful indices may not be available, so a close alternative is chosen to illustrate the general trend.</p> <p>A review of objectives and their indicators will seek to find more methods to demonstrate the effect of policies and plans introduced through the LDF.</p> <p>The revised format of objectives and indicators, which provide baseline information and some targets for the appraisal assessment to consider, are included in Appendix 4 of the revised Core Strategy Scoping Report.</p>
V1	<p>Norfolk Wildlife Trust Suggestions for amendments to indicators include having a limited number of further indicators, other than those relating to SSSIs, to support ENV3, such as the effect of planning on County Wildlife Sites and their ongoing condition. Indicators relating to Biodiversity Action Plans may also be appropriate, as could assessing the impact of agri-environment schemes.</p>
V2	<p>Action As part of a review of the indicators, progress against Biodiversity Action Plan targets is included as baseline data to ENV1 (nee ENV3). Ongoing partnership work with other organisations will establish monitoring systems to chart BAP progress at county-level. Other locally-important sites are considered as decision-making criteria at the assessment stage when measuring the effects on non-statutory designated sites.</p>
W1	<p>RSPB Many suggestions are brought forward for inclusion, in particular relating to air quality, biodiversity, land availability and use efficiency, energy efficiency, and water consumption.</p>
W2	<p>Response / Action These are welcome suggestions to feed into the review of indicators and objectives used.</p>

5. The Sustainability Appraisal Framework

Comments and recommended amendments

X1	<p>RSPB</p> <p>We believe the Sustainability Appraisal Framework is generally sound, but that it should include the following further questions as part of the decision-making criteria section:</p> <ul style="list-style-type: none"> • ENV1 – a) “Will it reduce the emissions of greenhouse gases from traffic?” • ENV1 – b) “Will it reduce traffic congestion?” • ENV3 – “Will it contribute to achieving BAP targets?”
X2	<p>Response</p> <p>The support indicated for the Framework is welcome. The emissions of greenhouse gases from traffic will be reduced should we be able to reduce congestion, overall traffic volumes and the distances that people need to drive. All these are covered by decision-making criteria elsewhere to ensure that controlling emissions remains a priority throughout the appraisal.</p>
X3	<p>Action</p> <p>The following questions have been added as decision making criteria for the assessment framework of the revised Core Strategy Scoping Report:</p> <p>ENV1 (nee ENV3) – “Will it contribute to achieving BAP targets?”</p> <p>ENV4 (nee ENV1) - “Will it reduce traffic congestion?”</p>

6. Additional Revisions to the SA Scoping Report	
i	The environmental issues section also considers the possibility that habitat re-creation and relocation/compensation may be required to combat climate change pressure on sensitive habitats. The regional biodiversity opportunities mapping project may indicate possibilities for allocating land for new habitat and provide implications for spatial planning.
ii	The links between objectives, and the issues from which they arise are clarified in the Scoping Report discussion of issues affecting South Norfolk.
iii	Following advice from an independent reviewer, there have been improved links between establishing the Baseline Data (Report Appendix 4) and incorporating its findings into the assessment framework. This has been established by including the 'Indicator-based Concerns' as part of the Revised Framework.
iv	Using comparison data of indicator performance at different scales to South Norfolk will provide vital information in the assessment of the likely impacts of policy or plan. As well as being a comparison these can act as substitute data for any areas where district-scale data is not readily available. This data has been added to the Scoping Report as Appendix 4.
v	Links between the SA and the Strategic Environment Assessment Directive requirements are clarified through additions to Section 1 and 5 of the Scoping Report, including a summary table to illustrate where the SA objectives cover the SEA topics.
vi	<p>Habitats Directive requirements:</p> <p>The Directive requires all Development Plan Documents to be subject to Appropriate Assessments to consider effects on sites of European importance (inc. SACs and SPAs). An SA must ascertain whether a DPD might bring significant negative effects to a European site, and if so, the SA must determine whether an Appropriate Assessment is necessary. If significant negative effects from a DPD are in conflict with the conservation objectives of the European site, alternative options and mitigation measures should be examined to avoid damaging effects.</p> <p>This is accounted for in the decision making criteria of the Core Strategy Assessment Framework through the addition of the following investigative question: ENV1: "Will it bring negative effects to designated sites, and what would this involve?"</p> <p>In the event of there being any perceived negative impacts, the Sustainability Appraisal process will have to investigate this further, including making an assessment of effects against conservation objectives at those sites of European importance. Any subsequent Appropriate Assessment will include investigating how the DPD can mitigate those effects.</p>
vii	<p>Additions to the Sustainability Appraisal Framework:</p> <p>There have been extensive changes to the Framework and associated commentary within the SA Scoping Report. The SA Framework now includes a wider appreciation for the extent of the issues surrounding every objective. The effects of a policy's implementation are considered over differing time spans: short-term, meaning the three-year period before the LDF undergoes a revision; medium-term, meaning the lifespan of the LDF until 2021; and long-term, to consider the effects that the LDF process leaves as a legacy after 2021. A scoring system continues to provide an indication of the severity of the impacts. Rather than using the indicators within the assessment stages, their context has been used as a target (<i>'indicator-based concerns'</i>) to consider the effects.</p> <p>Whilst the original Framework was able to consider the implications of a policy or option against singular objectives, there was a need to consider the cumulative effects of all the</p>

policies, when combined, which constitute a particular option. These cumulative effects can then be assessed more realistically in terms of sustainability, as their effects may differ when being affected by other policies. This is made possible through the use of another assessment table template, Appendix 10 of the revised Scoping Report (**Appendix 4 attached**).

Finally, 'at-a-glance' reviews of Options can be seen in Appendix 7 and 8 of the revised Scoping Report to help consider the overall impacts of one option against those of another. Such a summary can prove useful when finalising the preferred strategies for South Norfolk, comparing the wider benefits over various time-frames.

Appendix 1: Additions to the Review of Plans and Programmes

Appendix 2: Environmental Characteristics of South Norfolk (section 3.3)

Appendix 3: Revised Sustainability Appraisal Objectives (Figure 6)

Appendix 4: Considering the cumulative effects of development plan policies against the Sustainability Appraisal objectives

Appendix 5: Comparison of Options

APPENDIX 1: Additions to the Review of Plans and Programmes

Document Title (Policy / Para. No.)	Key objectives relevant to LDD and SA	Key Targets and Indicators	Implications for LDD	Implications for SA
International				
The Conservation of Natural Habitats and of Wild Fauna and Flora Directive (92/43/EC)	<p>The aim of this Directive shall be to contribute towards ensuring biodiversity is encouraged through the conservation of natural habitats and of wild flora and fauna.</p> <p>Measures should maintain and restore, to a favourable conservation status, natural habitats and species of wild flora and fauna, accounting for socio-economic and cultural requirements and local characteristics.</p> <p>The Directive requires all Development Plan Documents to be subject to Appropriate Assessments to consider effects on sites of European importance (inc. SACs and SPAs).</p>	To contribute to the maintenance of ecological development of special areas of conservation to South Norfolk	<p>LDDs have a significant role to play in the protection and management of biodiversity and areas of significant habitat and ecological importance.</p> <p>The LDDs can also consider their role in achieving these objectives in line with wider requirements.</p> <p>If significant negative effects from a DPD are in conflict with the conservation objectives of the European site, alternative options should be examined to avoid damaging effect.</p>	<p>Encourage development to avoid areas of particular importance.</p> <p>Plans must address this as a high priority.</p> <p>An SA must ascertain whether significant negative effects, on a European site, from a DPD are likely. If so, the SA must determine whether an Appropriate Assessment is necessary.</p> <p>Appropriate Assessment includes presenting mitigation measures and alternative options.</p>
The Air Quality Framework Directive (96/62/EC), with successive Daughter Directives ('99-'02).	<p>Policy on air quality aims to develop and implement appropriate instruments to improve air quality and establishes air quality standards.</p> <p>Air Quality Strategy (2000) also sets objectives for air quality with management plans process if unmet.</p>	These are built into national plans	Planning's decisions will influence the ability to meet targets, such as emissions values and development design.	SA must ensure that air quality is an important factor in decision-making.
Hazardous Substances Directive (96/82/EC)	Established to limit the consequences of hazardous waste through considerate development and controls on the location of new development.		Policy will need to include controlling procedures for locating premises that use or transport hazardous substances.	Implications across SA.

Document Title (Policy / Para. No.)	Key objectives relevant to LDD and SA	Key Targets and Indicators	Implications for LDD	Implications for SA
National				
PPS9: Biodiversity and geological conservation	<ul style="list-style-type: none"> • Policies and plans should seek to maintain, enhance and add to the biodiversity conservation interests. Developments that conserve or enhance biodiversity and geological interests should be considered favourably. • Policies should be grounded on up-to-date information about environmental characteristics of an area. • LDDs should be consistent with national, regional and local biodiversity objectives. • LDFs should identify any areas for the restoration or creation of new priority habitats, which contribute to regional targets, and support this restoration through appropriate policies. • International and national designations should be protected in appropriate policy, and regional and local sites with criteria based policies, with other sites identified. • Networks of habitats should be enhanced and protected against fragmentation, perhaps as open space or access provisions. • Brownfield sites with recognised importance should retain or incorporate interest features. • Lists of habitats and species of statutory protection as decreed by Defra should be protected for biodiversity importance. 	Careful monitoring of designated sites will be required	<p>LDDs should reflect national and local biodiversity and geologic conservation priorities through the use of policies that are consistent with those underlying objectives.</p> <p>Governments aim is to conserve, enhance and restore the diversity of wildlife and geology.</p> <p>Sites will need to be identified on proposals maps and where relevant should be acknowledged in policy.</p> <p>Policy should consider the requirements for enhancing connectivity between habitats.</p> <p>LDDs should ensure that re-use of previously developed land recognises the potential value of established habitats and its implications for housing capacity.</p>	<p>Developments that conserve or enhance biodiversity and geological interests of the area and/or the immediate locality should be considered favourably.</p> <p>SA will have to assess the implications of policies and proposals on wildlife and geology.</p>
Securing the Future: the UK Government Sustainable Development	A Government-led UK strategic framework for sustainable development covering the period up to 2020. Its intension is to integrate progress towards the main aims across all Government agencies and devolved authorities.	The Strategy has a system of indicators to measure progress	<p>The concept of Sustainable Development underlies the whole LDD process, with immediate action being taken towards:</p> <ul style="list-style-type: none"> • Sustainable Consumption 	Implications across SA to ensure that policies consider the overriding national need of working towards these aims.

Document Title (Policy / Para. No.)	Key objectives relevant to LDD and SA	Key Targets and Indicators	Implications for LDD	Implications for SA
Strategy (Defra, 2005)	<p>Strategy has 4 main aims:</p> <ol style="list-style-type: none"> 1. social progress which recognises the needs of everyone 2. effective protection of the environment 3. prudent use of natural resources 4. maintenance of high and stable levels of economic growth and employment <p>The Strategy also outlines priorities for the future in the UK and 10 guiding principles for Government policy</p>		<p>and Production</p> <ul style="list-style-type: none"> • Climate Change and Energy • Natural Resource Protection and Environmental Enhancement • Sustainable Communities 	
Rural Strategy (Defra, 2004)	<p>In addressing the economic and social disparities in rural areas, a new approach to policy and delivery is needed for service partnerships at different scales.</p> <p>The 3 priorities are:</p> <ul style="list-style-type: none"> • Economic and social regeneration – targeting greater resources at areas of greater need. • Social justice for all – tackling exclusion and providing fair access to services and opportunities. • Enhancing countryside value – protecting the natural environment. 		<p>To encourage local partners to work together in a collaborative way to deliver more sustainable rural communities and an enhanced and enriched countryside.</p>	<p>SA will have to ensure that there is a consistent balance between objectives to bring rural enterprise to benefit communities and care for the environment.</p>
Sustainable Futures: The Integrated Regional Strategy for the East of England (EERA, 2005)	<p>With a vision 'to improve the quality of life for everyone who lives or works in the East of England', the IRS will provide a joined-up framework to drive forward the many priorities for the Region held by public bodies.</p> <p>IRS priorities for the Region include:</p> <ol style="list-style-type: none"> 1 - Achieving high quality and sustainable solutions in areas facing growth and regeneration pressures. 2 - Harness strengths in science, research and development. 3 - Address persistent deprivation and social exclusion. 		<p>LDDs should also work towards integrated policy that strives to meet the priorities for the Region and promote sustainable development.</p>	<p>Implications across SA.</p>

Document Title (Policy / Para. No.)	Key objectives relevant to LDD and SA	Key Targets and Indicators	Implications for LDD	Implications for SA
	4 - Use and manage resources and environmental assets efficiently. 5 - Sustainable management of the Region's transport infrastructure.			
County				
Norfolk Biodiversity Action Plan (2004)	Looks at Biodiversity in Norfolk, what it is, why its important and what is being done to help conserve species and habitats in Norfolk. Contains a number of individual Habitat and Species Action Plans		To develop policies which promote biodiversity, protect and enhance the natural environment, habitats and species	Maintain and enhance biodiversity, geodiversity, flora and fauna
Broadland Rivers Catchment Flood Management Plan (CFMP) (pending, 2006)	<p>The aims of Catchment Flood Management Planning are to set the overall direction of flood risk management at the catchment scale. They represent long-term aspiration targets that are not necessarily deliverable within the life of a single CFMP. Aims are:</p> <ul style="list-style-type: none"> • To reduce the risk of flooding and harm to people, the natural, historic and built environment caused by floods; • To maximise opportunities to work with natural processes and to provide multiple benefits from flood risk management, and make an effective contribution to sustainable development; • To support the implementation of EU Directives, the provision of government and other stakeholder policies and targets, and the Environment Vision; • To promote sustainable flood risk management; • To inform and support planning policies, statutory land use plans and implementation of the Water Framework Directive 		<p>Collaboration with key decision-makers to identify and agree policies for sustainable flood risk management.</p> <p>Implications for infrastructure locations, flood defence standards and flood defence alleviation options.</p> <p>To ensure development is not located in flood risk areas or does not increase the risk of flooding to people, the natural, historic and built environment.</p> <p>Catchment covers: rivers Yare, Bure, Waveney, Ant, Thurne and tidal rivers of the Broads.</p>	<p>To maximise the use of renewable energy solutions and reduce contributions to climate change (decision-making criteria – to reduce the risk of flooding).</p> <p>To reduce vulnerability to climate change.</p>
Broadland Rivers Catchment Abstraction Management Strategy (CAMS)	The Broadland Rivers CAMS sets out a strategy to manage water resources sustainably over the next six years in the Broadland rivers catchments. The document provides guidance for existing for existing abstractors and new applicants setting out how water		To ensure water supply can meet development demand whilst protecting the needs of the local environment.	To provide for sustainable use and sources of water supply.

Document Title (Policy / Para. No.)	Key objectives relevant to LDD and SA	Key Targets and Indicators	Implications for LDD	Implications for SA
(Environment Agency, pending 2006)	will be managed to ensure that it is available for abstraction whilst protecting the needs of the natural environment.		Will provide information on water resources availability and licensing practice.	
The Broads Plan 2004: A strategic plan to manage the Norfolk and Suffolk Broads Chapter 4: Living Landscapes (20-year aims)	<ul style="list-style-type: none"> To become a naturally functioning flood plain of connected habitats accommodating climate change over the next 100 years and being managed according to risks. Communities to be actively engaged in management through sustainable living practices. Defending the Broads against sea level rise etc. and preserving the archaeological / historic sites. Establish a policy framework to maintain the Broads as a unique and special landscape, enabling regeneration and diversification. 		<ul style="list-style-type: none"> Policies should include best practice measures to achieve environmentally sustainable landscape and habitat management. Flood risk should be accounted for, highlighting strategic constraints. Need to value the landscape and built heritage as important assets, environmentally and economically. 	Providing a high priority to landscape and environmental assets will be important to ensure economic and social benefit from tourism investment.
Chapter 5: Water, Habitats and Wildlife (20-year aims)	<ul style="list-style-type: none"> Water bodies will have achieved 'good' Water Framework Directive status by 2015. 2,400ha of open fen restored and managed for biodiversity. Grazing marshes for agriculture and biodiversity, but arable land only used where used for important biodiversity habitat. Environmental Stewardship schemes to support delivery of biodiversity objectives. 	'Good' Water Framework Directive status by 2015.	<p>Policy must ensure that natural habitats can be retained where possible and restored or relocated if damage is likely.</p> <p>Policy should collaborate to achieve joint biodiversity promotion across executive areas.</p>	A high priority to landscape and environmental assets important to ensure economic and social benefit from tourism investment.
Chapter 6: Tourism and Recreation (20-year aims)	<ul style="list-style-type: none"> Tourism and recreation will be promoted and managed at environmentally and socially sustainable levels. Recreation will be allocated to suitable locations based on clearly understood and sustainable policy. Access to the water will be possible for all, sensitively managed and respectful to protecting the special qualities and ambience of the Broads area. Land access will include footpaths, cycle and bridle ways. 		<ul style="list-style-type: none"> Tourism should be promoted in a manner that is socially and culturally sustainable. Maintaining the identity and assets of individual attractions will be important to the environmental balance. Joint initiatives will be required to manage development that impacts on 	Partnership will be required to ensure that policy objectives can benefit the many stakeholders involved.

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Document Title (Policy / Para. No.)	Key objectives relevant to LDD and SA	Key Targets and Indicators	Implications for LDD	Implications for SA
			wider areas than just main attractions.	

APPENDIX 2: Environmental Characteristics of South Norfolk (section 3.3)

Geographical Setting

South Norfolk is a varied district, historically rural in nature and containing a mix of scattered settlements and historic market towns, some of which have significant relationships to the neighbouring city of Norwich. The natural environment is a mixture of broad, open arable farmland and six main river valleys, with the additional interests of the Norfolk and Suffolk Broads and the major watercourses the rivers Yare and Waveney to the north and east acting as boundaries between neighbouring districts. South Norfolk is built on glacial deposit geology and is dominated by the broad 'national character area' of the South Norfolk and High Suffolk Claylands.

The environment is a vital aspect of recreation and the economy for South Norfolk. Traditionally farming has acted as a custodian of the environment. Today's modern methods continue to shape the landscapes of the area, through, for example, Environmental Stewardship schemes. These have been able to benefit both residents, who enjoy the tranquillity and peaceful surroundings, and the range of biodiversity found in the District. More recently, the tourist economy has realised these features and continues to grow by utilising the unique character of South Norfolk and advocating its protection.

Biodiversity

The importance of South Norfolk's environmental features is illustrated through the number of important natural habitat and wildlife sites, including internationally protected Ramsar wetlands of the Broads and Special Areas of Conservation sites of the River Wensum, the Norfolk Valley Fens and the Broads. There are also: 26 unique distinctive SSSI habitat and geological sites, such as Hardley Flood; numerous scattered sites, including National and Local Nature Reserves; some 1,700 ha of County Wildlife Site semi-natural habitat; and multiple stands of Ancient Woodland. Plans should seek to conserve these areas of wildlife and habitat importance and give protection to those species identified by law. In doing so, South Norfolk's planning strategy can contribute to the achievement of Norfolk's Biodiversity Action Plan targets.

At a time of climatic change and growth pressures, there may be significant value in identifying where vulnerable habitats exist, making provision for either their relocation or replacement in other suitable locations, as was achieved as part of the Cleylands wetland project. The regional environment strategy recognises the importance of being proactive, believing the Fens in particular to contain 40% of the East of England's potential sites. There may also be value in designating natural corridors or 'biodiversity highways' that can assist the movement of species between areas and reduce fragmentation of the natural habitat.

Landscapes

An important characteristic of South Norfolk, the historic and rural landscape has been protected to ensure that it continues to be recognisable despite the growing pressures of development. Plans must strive to minimise the amount of greenfield land required for development and ensure retention of the District's best features. All design should strive to appreciate the sensitivity of landscapes, reflect their existing form, cultural

heritage and biodiversity assets. Proposals should be assessed individually for their sustainability.

The first stage in any attempt to embrace landscape character within strategic plans must be to identify those features that make the District unique. A Landscape Character Assessment categorises differences across the area and gives guidance how development should seek to integrate with its surroundings in a sensitive manner. Further, the sensitivity of landscape types in relation to wind turbine proposals has also been assessed.

The South Norfolk Landscape Assessment defines seven separate landscape types:

- Rural river valley
- Tributary farmland
- Tributary farmland with parkland
- Settled plateau farmland
- Plateau farmland
- Valley urban fringe
- Fringe farmland

These landscape classifications have been further refined into detailed character area descriptions to better reflect specific local features and characteristics, such as those relevant to individual river valleys.

Additional measures introduced to ensure that the rural setting of some of South Norfolk's settlements is maintained include designating 'areas of open land that maintain a separation between settlements in the Norwich area' within which inappropriate development will not be allowed. These designations seek to prevent the loss of those gaps/areas where segregation and/or historical relationship to the countryside are discernable features of a settlement e.g. maintaining separations between Cringleford, Hethersett and Wymondham.

On a larger scale, the area around the A47 to the south of Norwich has also been recognised for its contribution to the historic setting of the city of Norwich, and receives protection against inappropriate development. This measure has worked effectively in maintaining the landscape setting of the A47 and preventing it from becoming a boundary for development. The Broads and many river valleys, largely sparse in settlement and containing some very distinctive historical features and land use, have also been protected in the past.

Issues affecting the landscapes that we value so much are real and ongoing. The Countryside Agency's *Countryside Quality Counts* initiative found that in the Joint Character Areas (JCA) covering parts of South Norfolk between 1990 and 1998, there had been "limited or small changes consistent with character" for The Broads and South Norfolk and High Suffolk Claylands areas. In the Mid Norfolk JCA, however, there was evidence of "marked changes inconsistent with character".

Built Heritage

The distinctive style of South Norfolk's townscapes and historic architecture is an important consideration within development strategies, playing a large role in settlement character, rural lifestyles and tourism attractions. The preservation and enhancement

of the 3,464 Listed Buildings, 46 Scheduled Ancient Monuments and 51 different Conservation Areas in the District is of national importance, and seen as vital in order to protect the District's unique identity and heritage. However, there are clear threats to their preservation and enhancement; 60 listed buildings remain on the 2005 Buildings at Risk Register, and many historic parklands are under threat and disappearing as maintenance costs and the attractiveness of development opportunities increase. There are 18 Parks and Gardens of historic interest remaining in South Norfolk, but at least 26 have been lost since the 1880s.

Similarly, there are many areas of significant archaeological interest within the district, and many more which are as yet undiscovered. It is important that every effort is made to preserve these remains or at least record their value to the history of the area. The protection offered to the Roman-era hedgerow pattern in Dickleburgh and the use of conditions relating to archaeological surveys, protection, and recording on planning permissions is successful examples of this.

Climate Change and Pollution

There is an increasing need to ensure that our lifestyles make minimal contribution to climate change or pollution levels, which can in part be influenced by the planning process. Encouraging and facilitating the use of public transport and renewable energy will improve both local air quality and reduce output of greenhouse gases. Significant, dramatic progress towards this objective can also be achieved through improving the energy efficiency of homes and workplaces, which could involve new design standards, considered material use and resource 'capture' such as grey-water harvesting, solar gain, ground source heat pumps etc. Aspiring to standards such as BREEAM and Eco-Homes ratings, for example, are successful means of integrating environmental awareness into construction.

Reducing the Risks from Flooding

Climate change is also increasing the occurrence of flooding and exceptional weather events. Spatial planning must consider the threats posed to development and plan for the District's growth accordingly. Avoiding inappropriate development in areas at risk of flooding is one aspect of this, as required by PPS1. Draft versions of the PPS25 'Development and Flood Risk' suggest that a Strategic Flood Risk Assessment (SFRA) should be used to identify constraints to development in certain areas. South Norfolk Council will undertake a SFRA that establishes sensitive areas for development based on flood plains for tidal surges and fluvial flooding, and suggests mitigation measures for some areas presently at risk. Further studies could also look at where the geology of the District would enable some Sustainable Urban Drainage Systems to be established. The Environment Agency is also developing Catchment Flood Management Plans and Abstraction Management Strategies, both of which will inform and influence the way that consideration for flood and groundwater levels is taken into account at the development plan level, for making allocations and preparing for water shortages. Only by 'building-in' all these constraints and evidence bases can we allocate and design land use proposals with greater sustainability.

APPENDIX 3: Revised Sustainability Appraisal Objectives (Figure 6)

Environmental		
SEA Theme	Sustainability Appraisal Objective	
Biodiversity, Fauna & Flora	ENV1	To maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation
Climatic Factors	ENV2	To limit or reduce vulnerability to climate change, including minimising the risks from flooding
	ENV3	To maximise the use of renewable energy solutions and reduce contributions to climate change
Air, Cultural Heritage and Landscape	ENV4	To reduce the effect of traffic on the environment
	ENV5	To improve air quality and minimise noise, vibration and light pollution
	ENV6	To maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment
Material Assets and Water	ENV7	To minimise the loss of undeveloped land and conserve and improve the quality of soil resources
	ENV8	To improve water qualities and provide for sustainable sources of supply and sustainable use
	ENV9	To minimise the production of waste and increase recycling

Social		
SEA Theme	Sustainability Appraisal Objective	
Population & Human Health	S1	To provide everybody with the opportunity to live in a decent, suitable and affordable home
	S2	To reduce poverty, inequality and social exclusion
	S3	To offer opportunities for all sections of the population to have rewarding and satisfying employment
	S4	To improve accessibility to essential services, facilities and the workplace, particularly for those most in need
	S5	To improve the education and skills of the population overall
	S6	To improve the health of the population overall
	S7	To encourage local community identity, and foster mixed communities with co-operative attitudes, helping to reduce anti-social activity
Material Assets	S8	To improve the quality of where people live

Economic		
SEA Theme	Sustainability Appraisal Objective	
Material Assets	EC1	To encourage sustained economic growth
	EC2	To encourage and accommodate both indigenous and inward investment promoting a positive image of the District
	EC3	To encourage efficient patterns of movement in support of economic growth
	EC4	To improve the social and environmental performance of the economy
	EC5	To improve economic performance in rural areas

Appendix 4: Considering the cumulative effects of development plan policies against the Sustainability Appraisal Objectives (Template)

Sustainability Appraisal Objectives	Individual policies effects summaries					Cumulative effects of Policies 1-5, with recommendations
	Option 1	Option 2	Option 3	Option 4	Option 5	
Environmental						
ENV1: To maintain and enhance biodiversity, geodiversity, species and habitat quality, and avoid habitat fragmentation						
ENV2: To limit or reduce vulnerability to climate change, including minimising the risks from flooding						
ENV3: To maximise the use of renewable energy solutions and reduce contributions to climate change						
ENV4: To reduce the effect of traffic on the environment						
ENV5: To improve air quality and minimise noise, vibration and light pollution						
ENV6: To maintain and enhance the distinctiveness and quality of landscapes, townscapes and the historic environment						
ENV7: To minimise the loss of undeveloped land and conserve and improve the quality of soil resources						
ENV8: To improve water qualities and provide for sustainable sources of supply and sustainable use						
ENV9: To minimise the production of waste and increase recycling						
Summary of Cumulative Effects against Environmental Objectives						

Appendix 5: Comparison of Options (Template)

Comparison of Options								
Sustainability Objectives	OPTION 1:				OPTION 2:			
	Short Term	Medium Term	Long Term	Comments / Explanation	Short Term	Medium Term	Long Term	Comments / Explanation
ENV1: To maintain...								
ENV2: To limit or...								
ENV3: To maximise...								
ENV4: To reduce...								
ENV5: To improve...								
ENV6: To maintain...								
ENV7: To minimise...								
ENV8: To improve...								
ENV9: To minimise...								
Summary vs. Environmental Objs								
S1: To provide...								
S2: To reduce...								
S3: To offer...								
S4: To improve...								
S5: To improve...								
S6: To improve...								
S7: To encourage...								
S8: To improve...								
Summary vs. Social Objectives								
Summary vs. Economic Objs								
Summary Appraisal: Conclusions								